

WASHINGTON DEPARTMENT OF FISH AND WILDLIFE REPORT ON CATCH SHARES
5-YEAR REVIEW, RANGE OF ALTERNATIVES FOR FOLLOW-ON ACTIONS

The Washington Department of Fish and Wildlife (WDFW) would like to provide the following comments and recommendations on the catch shares five-year review and range of alternatives (ROA) for follow-on actions, in an effort to stimulate discussion by the Council advisory bodies and facilitate public input on the proposed schedule.

Timeline

In September 2016, the Council adopted an accelerated timeline for the five-year review and follow-on actions. Within this proposal, the Council is expected to take the following series of actions (from [Agenda Item F.2., Attachment 1, June 2017](#)):

Council Meeting	Development of Follow-On Action
September 2017	Reviews Purpose and Need Statements and Initial ROA
November 2017	Adopts ROA for Full Analysis (Including Prioritization)
March 2018	Select Preliminary Preferred Alternative (PPA)
April 2018	Select Final Preferred Alternative (FPA)

The schedule notes that PPAs will only be selected in March for those items for which winter provides sufficient time for analysis. However, we are skeptical that there will be enough time for some of the items the Council identified in June as priorities (e.g., gear switching/sablefish issue, at-sea whiting bycatch set asides, and accumulation limits). Our preference would be to take the time needed to produce thorough analyses, review and digest the results, and discuss the trade-offs associated with the different alternatives. These issues are complex; therefore, a slower timeline for consideration would help promote a common understanding and, hopefully, achieve strong consensus with the proposed actions.

Additionally, WDFW has reservations about the workload and timing associated with the analyses, and questions whether there is any benefit in attempting to select an FPA in April given the other groundfish priority items already scheduled. Concurrently over this time frame, the National Marine Fisheries Service, the Council, and its advisory bodies will be working on the 2019-2020 Harvest Specifications and Management Measures, final action on Rockfish Conservation Areas (RCAs) and Essential Fish Habitat (EFH), and developing potential mitigation measures for the Salmon Biological Opinion. Specifically, the overlapping items raise a concern about the Council's ability to give adequate attention to the catch share issues, and given the timing, we question whether the catch share regulations could be implemented in a timely manner after final action.

To address these concerns, WDFW recommends the following:

1. For those items that could be included as new management measures within the 2019-2020 biennium, the Council should signal these items to the Groundfish Management Team (GMT) and Groundfish Advisory Subpanel (GAP) for consideration under Agenda Item E.9 at this meeting.

2. For all other follow-on actions, the Council should prioritize and consider these items within the broader groundfish workload (i.e. omnibus) process. Therefore, we propose delaying both the omnibus prioritization (currently scheduled for June 2018) and PPA selection of follow-on actions items until September 2018 (see proposed revised schedule below). With the workload required to make the January 1, 2019 deadline for the groundfish regulations, WDFW feels that resources may be too limited to take on follow-on actions and the omnibus in June.

Council Meeting	Development of Follow-On Action
September 2017	Reviews Purpose and Need Statements and Initial ROA
November 2017	Adopts Preliminary ROA for Analysis
March 2018	Adopts ROA for Full Analysis (Including Prioritization)
September 2018	Select PPA
November 2018	Select FPA

Priorities

Overall, WDFW is supportive of prioritizing follow-on actions related to gear switching, accumulation limits, and addressing the at-sea bycatch needs. We look forward to hearing from the advisory bodies, including the Community Advisory Board, on potential actions to address these items and any concerns on the proposed timeline presented above.