

GROUND FISH ADVISORY SUBPANEL REPORT ON HALIBUT 2018 AND BEYOND
CATCH SHARING PLAN AND ANNUAL REGULATION CHANGES

The Groundfish Advisory Subpanel (GAP) met with Ms. Robin Ehlke, Pacific Fishery Management Council (PFMC) staff; Mr. Steve Keith and Ms. Jamie Goen, International Pacific Halibut Commission (IPHC); Ms. Heather Reed, Washington Department of Fish and Wildlife (WDFW); Ms. Lynn Mattes, Oregon Department of Fish and Wildlife (ODFW); and Ms. Marci Yaremko, California Department of Fish and Wildlife (CDFW), and offers the following comments.

The GAP refers to the [Situation Summary for this agenda item](#) and addresses the four points listed there.

- A. Alternatives for the Washington recreational sector as described in the September 2017 WDFW report:** The GAP endorses both WDFW reports under this agenda item, and supports the WDFW alternatives be put forward for public review. However, the GAP does not support the proposed change in sablefish and halibut north of Point Chehalis as described in [Supplemental WDFW Report 2, Section 2](#).

The GAP recommends consideration of the following: lower the halibut allocation for retention in the primary sablefish fishery north of Point Chehalis, to not exceed 50,000 pounds when the 2A allocation is 1.25 million pounds. If or when the 2A allocation reaches 1.5 million pounds, the incidental sablefish allocation of halibut would be set at 70,000 pounds.

The GAP notes the Coastal Treaty Tribes also are requesting additional analyses of the WDFW alternatives and remain concerned with any reallocation of halibut in the catch sharing plan (CSP) and reallocation of incidental halibut in the sablefish fishery. The tribal representative on the GAP indicated the [tribes have a separate statement](#) under this agenda item.

- B. Alternatives for a combined commercial and recreational allocation for California as described in the June 2017 CDFW report:** The GAP does not support any change in allocations and recommends deferring any discussions about changes until the new survey information from 2017 is completed and analyzed.
- C. Increase the California recreational subarea allocation from 4 to 6 percent by equally reducing the Washington and Oregon recreational subarea allocations as outlined in the June 2017 GAP report:** The GAP does not support any allocation change until a complete review of current surveys is conducted.

- D. Alternatives for moving away from area 2A 10-hour derby openings, as outlined by the [June 2017 IPHC letter](#):** The GAP does not support changing the status quo for 2018, but appreciates the range of ideas collected and developed by the IPHC and state agencies.

The GAP understands eliminating the derby fishery is desired and that some fishermen and agencies would like to see a change for 2018. However, the GAP suggests 2019 would be a better target date for implementation. More time will allow for better analysis and vetting of all options.

Further, the GAP suggests the IPHC consider a one- or two-year trial period for any changes to the derby fishery and understands many of these ideas have not been discussed with the full Commission.

Other considerations

GAP members also discussed other options not outlined in the Situation Summary under this agenda item.

First, we suggest moving the seaward RCA line from 100 fathoms to 75 fathoms during the directed halibut season in California and Oregon or doing away with the RCA altogether for the directed halibut fishery during the halibut season. We will also bring this up under the 2019-20 groundfish biennial harvest specifications and management measures agenda item.

The GAP also supports the [ODFW Report 1](#) under this agenda item, specifically forwarding ODFW alternatives 1a-1c, along with status quo, for additional public comment. This information is on Page 7 of the ODFW report.

Minority Report

The halibut CSP has been a source of concern for California fishermen for a number of years and efforts have been made since 2011 to adjust the sub-area distribution of the 2A allocation to a more equitable sharing of the resource.

The [GAP statement of June 2017](#) supported for analysis the California request that the sub-area allocation be increased from 4 percent to 6 percent of the non-tribal. This proposed 1 percent be shifted from the Washington recreation and 1 percent from the Oregon recreation sub-allocations. In actuality, the Washington state allocation would be derived from the unused portion of incidental sablefish allocation that if unused, shifts back to cover the overage from the Puget Sound area. The Washington charter and recreational anglers are not affected by the shift of 1 percent. Oregon recreation would have a reduction of the 1 percent to permit this shift.

Justification for this change: California past surveys and IPHC estimates of biomass in the California sub-area area are about 11 percent. California is permitted to harvest only 4 percent of this amount, with the remaining 7 percent being shifted north of the 42° N. latitude line to be

harvested by others. In reality, this is subsumed by the Puget Sound fishery that has overfished its allocation consistently for the past decade.

While we understand that the days of opportunity are limited in the northern areas, the Washington state reports included in the June PFMC meeting demonstrated fishing effort of more than 6,000 recreational anglers per day. We all are faced with the concern of increased fishing effort with a limited resource. California just experienced a complete closure in the Klamath Management Zone (KMZ) area for salmon due to projected impacts and limited resource. We understand that concern, but limited days of opportunity doesn't justify the shift of biomass from one state to another.

Section 301 Title III (4) of the National Standards of the Fishery Conservation and Management Act state: "Conservation and management measures shall not discriminate between residents of different States. If it becomes necessary to allocate or assign fishing privilege among various U.S. fishermen, such allocation shall be (A) fair and equitable to all such fisheries; (B) reasonably calculated to promote conservation; (C) carried out in such manner that no particular individual, corporation, or other entity acquire an excessive share of such privilege."

California representatives on the GAP are requesting the Council consider for analysis a 2 percent shift of allocation on the basis of fairness using the "best science available" at this time. Clearly, California is only being allocated about 36 percent of the biomass as estimated by the IPHC. We feel this is inherently unfair and needs to be addressed.

PFMC
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