

GROUND FISH MANAGEMENT TEAM REPORT ON OMNIBUS REGULATION CHANGES - PART I

The Groundfish Management Team (GMT) reviewed and discussed the materials provided under this Agenda Item and provides the following comments.

Trawl Individual Fishing Quota Program Adaptive Management Program (AMP) Pass-Through

The GMT only spent a small amount of time discussing the alternatives for AMP in the trawl individual fishing quota (IFQ) program, but sees value in Action Alternative 1, Sub-Option B ([Agenda Item F.3.a Attachment 1](#)) that would consider AMP quota pound (QP) allocation procedures as part of the five-year review and specifically, after the implementation of regulations resulting from the five-year review. Issues may rise to the surface during the review that will provide further direction on how best to handle the distribution of non-whiting quota shares and Pacific halibut individual bycatch quota pounds currently reserved for the AMP. The GMT notes that additional work will be needed on AMP if the Council selects Alternative 1B, which could be added to Section B, Immediate and Long-Term Commitments, on the list of management measures identified as “on the horizon” ([Agenda Item F.3.a Attachment 2](#)).

New Rule Clarifications for Trawl Trailing Actions

At the time of the GMT discussion, we understand that the National Marine Fisheries Service (NMFS) had not identified any issues with implementation of the chafing gear rule and the observer/catch monitoring rule.

Omnibus Regulation Changes

The GMT reviewed and discussed the initial compilation of management measures for Council consideration ([Agenda Item F.3.a, Attachment 2](#)) and the summary of documents intended to help the Council in the prioritization exercise ([Agenda Item F.3.a, Attachment 3](#)). While the list of near complete, near and long-term commitments, along with new management measures provided in Attachment 2 may seem overwhelming, the GMT appreciates that listing them all in one place presents the opportunity to evaluate groundfish management measures in a holistic manner that provides a process for establishing Council priorities and addressing workload issues.

The GMT often provides comments during the Future Council Meeting Agenda and Workload Planning agenda items to highlight the expected workload associated with analyzing groundfish issues under Council consideration. This has become more important as the level of analysis and documentation has changed and now requires much more time and effort. In addition, the GMT’s role in stock assessment review (STAR) panels (item B-21) has increased with members of the GMT often responsible for providing detailed summaries of regulations and working with stock assessment authors in advance to ensure that correct data are used; all of this requires additional

time, not just for the GMT but for all advisory bodies (e.g., the GAP and Scientific and Statistical Committee, SSC). As science advancements provide the opportunity for a greater number of assessments (e.g., increase in data moderate assessments), it has become clear that sufficient time is necessary to develop corresponding management measures (items B-28 and B-29). It has become increasingly difficult to have the necessary discussions, conduct analysis, and complete reports within the time frames we have traditionally used. Therefore, we see this prioritization exercise as an opportunity to be more strategic and consider new ways for packaging multiple management measures in ways that provide the biggest efficiencies.

The GMT discussed that the current list of management measures is dominated by those focused on the trawl sector; however, we recognize that a lot of the trawl items address issues that arose following the implementation of the trawl IFQ program and are needed for regulatory streamlining. While there was some discussion about whether future measures should be more evenly distributed by sector, the GMT acknowledged that items should be considered based on need rather than an attempt to set an arbitrary standard of even representation. Alternatively, we do not want to see items being repeatedly delayed or postponed, such as the recreational midwater fishery item which first appeared on a “year-at-a-glance” calendar in November of 2012 ([Agenda Item F.4.a, Supplemental Attachment 3](#), November 2012), for discussion in June 2013, but has yet to occur.

Next, the GMT discussed alternative ways of creating packages of regulatory bundles that might be easier to analyze and more efficient to implement. These regulatory packages could be bundled in a variety of ways, we provide a couple of examples below:

- Items that would be relatively easy versus those that would be more complicated, in terms of both the analysis needed and implementation
- Enforcement issues
- Groundfish management areas for all groundfish (commercial and recreational) sectors

The GMT provides some initial thoughts on the items within the sections (A, B, and C of Attachment 2) with the understanding that more information will be available from NMFS and Council staff in September to further inform prioritization.

Section A: Items Which Action Has Been Completed Which Still Entail Some Workload

At this time, the GMT has no additions to the items in Section A.

Section B: Immediate and Long-Term Commitments

The GMT recommends that discard mortality rates currently used in the nearshore bycatch model and by the West Coast Groundfish Observer Program (WCGOP) in the annual groundfish mortality reports be added to the list in Section B, Immediate and Long-Term Commitments. There is little documentation for applying the discard mortality rates (100 percent) for some rockfish in the deeper depth strata (e.g., deeper than 20 fathoms). This rate is higher than that used in the recreational fisheries and the GMT would like to ensure it's accurate. This would require GMT time as well as the appropriate review by the SSC, if changes to the rates are needed.

Section C: Candidate Items for Prioritization in September

The GMT also identified management measures that we recommend be included in Section C, Candidate Items for Prioritization in September (the order below is not prioritized).

- Further consideration for ecosystem component (EC) species, for example developing management measures for EC species that would prevent future fisheries from starting up.
- Evaluate groundfish management performance and the need to adjustment management measures by comparing the multi-year average catch against an average annual catch limit (ACL). National Standard 1 Guidelines (see [74 FR 3178](#)) references such an approach which could provide stability for industry and reduce workload for the Council and NMFS.
- Consider mortality rates reflecting the use of descending devices in the rod-and-reel component of the commercial nearshore fishery.
- Continuation of model reviews and refinement

If the Council provides guidance on the criteria for prioritization the GMT could further evaluate the management measures as well as the Public Comment submitted under this agenda item. To further assist the Council in prioritizing these items, the GMT could provide information on what work has been done, how complex the discussions about the items may be, as well as the anticipated workload, for each management measure in Section C of the list in Attachment 2 under Agenda Item F.9 at this meeting.

GMT Recommendations:

1. The GMT recommends that discard mortality rates currently used in the nearshore bycatch model and by the West Coast Groundfish Observer Program (WCGOP) in the annual groundfish mortality reports be added to the list in Section B, Immediate and Long-Term Commitments.
2. The GMT recommends including the items listed above under Section C, Candidate Items for Prioritization in September be added to the list.

PFMC
06/21/14