Pacific Halibut
The Amendment 21: Intersector Allocation environmental assessment identified the following objectives relative to the individual halibut bycatch quota (IBQ) for the west coast shoreside groundfish fishery.

1. Account for total mortalities of all halibut bycatch in the trawl fishery.
2. Prosecute a successful Trawl Rationalization Program that is not overly restricted by halibut bycatch limits.
3. Hold individual harvesters accountable for halibut bycatch.
4. Provide incentives to minimize halibut bycatch and halibut bycatch mortality.

It appears that all alternatives, including no action, meet objectives 3 and 4. The Groundfish Management Team (GMT) notes that Alternatives 1 and 2 expand the total constant exploitation yield (TCEY) to include legal and sublegal size halibut, therefore meeting objective 1. Alternatives 1 and 2 also provide the Council an opportunity to adjust the halibut allocation to ensure that the trawl fishery is not overly restricted by halibut bycatch limits, which meets objective 2.

The GMT recommends the Council adopt Alternative 1 as the preliminary preferred alternative (PPA). Alternative 1 not only expands the TCEY to include legal and sublegal sized halibut, but it also reduces work load requirements compared to Alternative 2. Alternative 1 provides the flexibility for the Council to recommend altering the allocation (percent of the TCEY), but it does not require the Council to specify new levels. Alternative 2, on the other hand, requires that the Council explicitly specify an allocation (in pounds) for the 2012 fishery and requires that the Council evaluate and specify allocations each biennial period thereafter.

Set-asides
Beginning with the 2011–2012 biennial specifications process and prior to the setting of fishery allocations, the annual catch limit (or annual catch target when specified) is reduced by the Pacific Coast treaty Indian tribal harvest (allocations, set-asides, and estimated harvest under regulations at §660.50); projected scientific research catch of all groundfish species, estimates of fishing mortality in non-groundfish fisheries and, as necessary, set-asides for EFPs. The remaining amount after these deductions is the fishery harvest guideline or quota. The GMT referred to this process in the 2011-2012 biennial cycles as “deductions from the ACL or ACT” or, sometimes, set asides.

The GMT notes that there are two descriptions for set asides as found in 660.55 (j) and (k):

(j) Fishery set-asides. Annual set-asides are not formal allocations but they are amounts which are not available to the other fisheries during the fishing year. For the catcher/processor and mothership sectors of the at-sea Pacific whiting fishery, set-asides will be deducted from the limited entry trawl fishery allocation. Set-aside amounts will be
specified in Tables 1a through 2d of this subpart and may be adjusted through the biennial harvest specifications and management measures process.

(k) Exempted fishing permit set-asides. Annual set-asides for EFPs described at §660.60(f), will be deducted from the OY. Set-aside amounts will be adjusted through the biennial harvest specifications and management measures process.

It is the GMT’s understanding that the need for flexibility, as described in Agenda Item H.5.a, Supplemental Attachment 2, March 2011, is specifically described for the off the top deductions (i.e., research estimates, tribal, incidental open access, and EFPs) and does not address fishery set-asides as specified in paragraph (j). The GMT recommends that, if flexibility in the off the top deductions and fishery set-asides is desired, that should be so stated, and notes that this may increase the scope to a level outside of that described in Agenda Item H.5.a, Supplemental Attachment 2, March 2011.

Hardwiring the off the top deductions, which occurred as a result of the Amendment 21 framework, makes it more complicated to revise the estimates once we get new and perhaps better estimates during the biennium. The GMT recommends that the Council include flexibility in off the top deductions, specifically the research estimates, tribal, groundfish catch in non-groundfish fisheries (incidental open access), and EFPs, in their preliminary preferred alternative.

PFMC
03/09/11