

GROUND FISH MANAGEMENT TEAM REPORT ON  
FMP AMENDMENT 21 – INTERSECTOR ALLOCATION

The Groundfish Management Team (GMT) reviewed the preliminary Draft Environmental Impact Statement (DEIS) and heard a presentation by Council Staff on Amendment 21, Intersector Allocation and offers the following thoughts and comments for consideration.

**Accounting for Uncertainty**

The GMT would like to point out that in all cases the Council should consider the amount of harvest that will be needed to prevent exceeding specified harvest levels. There are potentially several avenues to accomplish accounting for this management uncertainty. It could be done by reserving some amount for each species in the intersector allocation process. For example a sector with more uncertainty in catch estimates or greater delays in availability of data may need an allocation that is sufficiently large to account for that uncertainty. Another alternative would be to provide some overall residual amount to prevent exceeding harvest levels. This could be accomplished either by setting aside a buffer that is not allocated to any sector, or it could be accomplished in the specification of the harvest level itself. This latter option would require the Council understanding all of the tools available to account for management uncertainty under revised National Standard 1 guidelines.

**Step 1. Allocation Between Trawl and Non-Trawl**

The first step in deciding intersector allocations is determining allocations between the trawl sector and the combined non-trawl sectors. The GMT notes that data from 2003-2005 contains total mortality estimates for commercial sectors as well as improved estimates of recreational catch relative to estimates from 1995-2005. The longer time series relies on the use of landings-only data for commercial fisheries as well as on Marine Recreational Fishery Statistical Survey data which is less robust than estimates from the current state recreational sampling programs. It was also reflective of management that was less constrained by overfished species. The GMT notes use of data from 1995-2005 results in considerably higher trawl percentages for the following species: lingcod, sablefish S of 36°, widow rockfish, yellowtail N of 40° 10', shortspine thornyhead S of 34° 27', and minor slope rockfish coastwide (Table 1).

Table 1. Percent allocation to all trawl sectors by alternative. Taken from the DEIS, March 2009. Final column numbers (shaded) were calculated from the 2007 Observer Discard Report (Table 17) and are shown for comparison only.

Species	Alt. 1 03-'05	Alt 2 03-'05	Alt 3 95-'05	Alt 4 03-'05	GAC 03-'05	Observer Prog 2007
Lingcod	19.8	19.8	<b>39.5</b>	<u>11.8</u>	<b>45.0</b>	31.9
PCOD	98.2	98.2	99.1	98.0	95.0	54.5
Sable N.	50.3	50.3		<u>45.3</u>	52.5	52.3
Sable S	41.9	41.9	<b>47.7</b>	<u>36.1</u>	42.0	No split
POP	99.5	99.5	99.4	99.5	95.0	83.9
Widow	91.4	91.4	<b>98.0</b>	90.6	91.0	96.1
Chilipepper	94.0	94.0	<u>79.5</u>	93.4	<u>80.0</u>	90.8
Splitnose	99.8	99.8	97.2	99.8	<u>95.0</u>	100.0
YT N	88.4	88.4	<b>96.3</b>	87.3	88.0	91.6
SST N	98.4	98.4	97.9	98.3	95.0	85.5
SST S	58.0	58.0	<b>78.8</b>	53.8	58.0	No split
LST N	99.4	99.4	98.9	99.4	<u>95.0</u>	97.4
LST S	0.0	0.0	0.3	0.0	<b>5.0</b>	No split
Darkblotched	98.7	98.7	99.0	98.7	95.0	95.9
Minor Slope RF N	81.0	81.0	<b>87.5</b>	79.1	81.0	84.3
Minor Slope RF S	63.3	63.3	<b>69.9</b>	59.6	63.0	81.8
Dover Sole	99.9	99.9	100.0	99.9	<u>95.0</u>	99.9
English	100.0	100.0	100.0	100.0	<u>95.0</u>	100.0
Petrале	100.0	100.0	99.9	100.0	<u>95.0</u>	99.9
ATF	99.2	99.2	99.9	99.2	95.0	97.3
Starry Fl	87.5	87.5	<u>48.9</u>	86.2	87.0	84.0
Other FF	97.7	97.7	97.3	97.7	95.0	98.6

**bold** > 5% increase relative to Alt. 1  
underline > 5% decrease relative to Alt. 1

*Allocation of Poundage vs. Percentage*

In some instances where species are primarily taken by trawl gear, the Council may want to consider allocating set amounts of fish to the non-trawl sectors with the remainder going to the trawl fishery as opposed to allocating a percentage of the optimum yield (OY) to the non-trawl sectors. This would prevent stranding large amounts of available harvest in instances where the OY increased such that the absolute value of the non-trawl percentage were many times larger than amounts that those sectors were capable of harvesting. Similarly, the amount allocated to the non-trawl sectors should be sufficiently large that there would be little possibility of exceeding harvest specifications from higher than expected landings. The GMT recommends this approach initially for darkblotched rockfish, Dover sole, English sole, and arrowtooth flounder. However, the GMT cautions that in setting the amount for arrowtooth that would be appropriate for non-trawl sectors recent observer data indicates that interactions with longline gear may be higher than previously thought.

## **Step 2. Allocation Between Trawl Sectors**

### Allocation between Shoreside and At-Sea Trawl Sectors

For allocations of overfished species between shoreside and at-sea sectors the Council may wish to consider adopting allocations and/or set asides through the biennial process rather than the Amendment 21 process. While the Council would still want to make these allocations between trawl and non-trawl, hardwiring the initial allocations between the trawl sectors could be especially disruptive with large changes in overfished species' OYs. This is described further in the final section of this statement.

### Allocation Between Shorebased Trawl Sectors

The Council decided under Amendment 20 to manage the shorebased fisheries as a single sector; however, it is important to note that all species need to be allocated as if there are two shorebased sectors initially. The whiting and non-whiting shorebased trawl fisheries' allocations are based on different years and methodologies, so this initial allocation between them provides amounts that can be converted to relative percentages to recombine them into a single sector. This is described in detail in Section 2.2.2, page 24 of the preliminary DEIS.

More specifically, the GMT notes that the implications for initial allocation between shorebased trawl sectors are very different for widow rockfish depending on whether it is overfished or rebuilt (see Table 2-11 in the preliminary DEIS). Currently the majority of widow impacts are from bycatch in the whiting fishery. Once widow is rebuilt, targeting on widow and yellowtail would be expected to increase substantially resulting in very different needs relative to each sector. As such the GMT recommends adoption of two different initial allocations of widow between the shorebased sectors – one for use if widow remains overfished and another that would be implemented should widow be rebuilt.

### Allocations Between At-Sea Sectors

There appears to be some confusion over the Council's November 2008 decision on pro rata distribution overfished species with bycatch caps (darkblotched, widow, Pacific Ocean perch, and canary) to the catcher-processor (CP) and mothership (MS) sector. If the Council's intent was to establish CP and MS sector allocations on a pro-rata basis, the GMT suggests that this clarification be made under this Amendment 21 agenda item. If not then two options exist, which are a) to make a long term allocation between the two sectors now, or b) make the CP and MS allocation decision through subsequent biennial specification and management measure setting processes.

## **Process for Allocation Changes**

The GMT recognizes that as new information becomes available there may be a need to reconsider allocations between trawl and non-trawl. These might include such things as new assessments where the estimated biomass is drastically different than what was envisioned during the initial allocation decision, results from exempted fishing permit (EFP) fisheries that demonstrate an ability to realize a new gear for targeting a species, or increased landings from a developing fishery that the Council may want to accommodate. It will be considerably easier to account for this new information and reassess allocations if the Council adopts a frameworking approach to setting the intersector allocations rather than hardwiring them in the FMP. The latter would require a new FMP amendment in order to change allocations between the trawl and non-trawl sectors. The GMT also notes that the Council should retain the option of suspending allocations for any species that is declared overfished.

**GMT Recommendations:**

1. Determine method(s) for accounting for uncertainty in catch estimates that might result in exceeding an OY.
2. Allocate amounts (poundage) rather than a percentage of the OY for darkblotched rockfish, Dover sole, English sole, and arrowtooth flounder.
3. Consider allocating overfished species within trawl sectors through the biennial specifications and management measures cycle.
4. Clarify the November action relative to sector specific splits between the at-sea sectors.
5. Consider frameworking allocations rather than specifying them in the FMP.
6. Retain the option of suspending allocations for species under rebuilding.

PFMC

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