

SPECIFICATIONS PROCESS FOR 2017-2018 MANAGEMENT

At the June 2015 meeting under agenda item D.5 the Council discussed the process and schedule for the upcoming 2017-2018 groundfish harvest specifications and management measures. Part of the discussion involved the workload and process for a post-January 1, 2017 implementation date. This report provides the NMFS workload and process for that schedule.

NMFSs preference is to implement the harvest specifications and management measures on January 1, 2017. A January 1 implementation date ensures that the harvest specifications and management measures for the entire year are based on the best available science and meet the needs of the fishery.

1. What happens if the 2017-2018 harvest specifications and management measures are delayed past January 1, 2017?
 - Similar to previous years when the harvest specifications have been delayed, no rulemaking is required for fisheries to start on January 1. The harvest specifications and management measures that are currently in regulation (i.e. the previous year's) would remain in place in the interim between January 1 and the implementation of the full 2017-2018 harvest specifications and management measures.
2. What happens if there is a delay **and** there is a conservation concern with leaving the previous year's harvest specifications and management measures in place? For example, if the Council is considering lowering the ACL for a particular stock, NMFS may determine that trip limits for that stock should be lowered to ensure that catch remains below the ACL.
 - Modifications to management measures would be necessary through a notice and comment rulemaking. It is possible that additional NEPA analysis would be required.
 - This would add significant workload for NMFS staff and may delay the 2017-2018 harvest specifications and management measures even further since the staff working on any additional actions would likely be working on both actions.
3. How is IFQ issued if the 2017-2018 harvest specifications and management measures are delayed?
 - As in previous years when a delay occurred, and consistent with the provisions at § 660.140(d)(1)(ii)(A)(2), NMFS would issue QP in two parts. The first issuance would be based on the lower end of the range of possible harvest specifications for that year, and the second issuance would be the remainder up to the full allocation once the 2017-2018 harvest specifications and management measures were in place.

- Allocations and Pacific whiting and Pacific halibut would continue to be issued consistent with provisions at § 660.140(d)(1)(ii)(B)(2) and (C)(2).
- Splitting the QP issuance into two parts would add significant workload for NMFS staff since two rounds of memos, QP calculations, and testing would be required (instead of one round).
- In 2015, NMFS received several complaints that the fishermen who only fish in the early part of the year were constrained by the low interim allocations and could not achieve their normal landings levels, even when they bought QP from other fishermen.