

GROUND FISH ADVISORY SUBPANEL REPORT ON NATIONAL MARINE FISHERIES SERVICE REPORT

In the week prior to the Pacific Fishery Management Council (Council) meeting, information was circulated from state agencies and Council staff regarding a potential revision to sablefish apportionment of 2017 and 2018 annual catch limits (ACLs). The Groundfish Advisory Panel (GAP) has reviewed [Agenda Item F.1, Supplemental Attachment 1](#) and received information from Ms. Jessi Doerpinghaus, Washington Department of Fish and Wildlife; and Mr. John DeVore and Ms. Kelly Ames, Council staff.

Having reviewed the matter, the GAP concludes this computational error should be corrected as soon as possible. The estimated relative biomass north and south of Point Conception (34° 27' N. lat.) in the 2015 sablefish update assessment was misapplied in the 2017-2018 specifications and resulted in an unintended reallocation. That is, the biomass apportionment in the assessment update uses Point Conception as the geographic north/south split rather than the 36° N. lat. demarcation used in previous specifications, which, when applied to the 2017-2018 specifications, resulted in an unintended reallocation of sablefish from the south to the north. The GAP recommends the Council use 36° N. lat. as the north/south split and the apportionment percentages used in previous specifications (that is, 26.2 percent south and 73.8 percent north). Because people have made business plans based on the current harvest specifications proposed for 2017-18, correcting this error may result in a significant disruption to the northern tribal, trawl and fixed gear fisheries with potential economic shifts in those fisheries in the millions of dollars.

Therefore, we suggest the following:

1. Recalculate the apportionment as described in Supplemental Attachment 1. This would result in a recalculation of the relative sablefish biomass north and south of 36° N. lat., according to the status quo methodology of 26.2 percent south and 73.8 percent in the north. Absent Council action, the unintended apportionment results in 15.1 percent in the south and 84.9 percent in the north.

Further, we request the Council and National Marine Fisheries Service (NMFS) do this as expeditiously as possible so as not to interrupt business plans already in process for the upcoming fishing seasons. The fishery management plan (FMP) language regarding inseason adjustments (Section 5.5.1) says: "Beyond this process, OFLs, ABCs, ACLs, OYs, ACTs, HGs, and quotas may only be modified in cases where a harvest specification announced at the beginning of the biennial fishing period is found to have resulted from incorrect data or from computational errors. If the Council finds that such an error has occurred, it may recommend the Secretary publish a notice in the Federal Register revising the incorrect harvest specification at the earliest possible date."

2. The Council is scheduled to address Agenda Item F.3, inseason action, shortly after Agenda Item F.1. The GAP recommends continuing the inseason item later in the week. We suggest the Council request the Groundfish Management Team subsequently provide some

quick calculations of economic impacts to the affected fisheries so the Council and advisory bodies are cognizant of the ramifications of this inseason action.

3. Changes to trawl catch shares fishery and sablefish tier fishery: The GAP also suggests that if the Council does intend to move forward with correcting the recalculation, NMFS set the “interim” ACL in the north based on the corrected apportionment (i.e., the lower ACL) and set the “interim” ACL in the south based on the 15 percent apportionment in the proposed rule – again, the lower ACL. Once final rulemaking incorporates the recalculation, the ACL can be increased in the south or north during inseason action, depending on which apportionment is eventually chosen. The intent is to start with the lowest ACL and add quota or increase trip limits later in the year as necessary.

PFMC
11/17/16