

## GROUND FISH ADVISORY SUBPANEL REPORT ON MID-BIENNIUM HARVEST SPECIFICATION ADJUSTMENT POLICIES

The Groundfish Advisory Subpanel (GAP) received a presentation from Mr. John DeVore that included background information, anticipated Council action, and the Council staff document (Agenda Item F.7, Attachment 1). Ms. Lynn Mattes (Oregon Department of Fish and Wildlife, ODFW) discussed with the GAP information and recommendations provided in Agenda Item F.7.a, Supplemental ODFW Report – ODFW Report on the “Green Light” Framework.

The staff document (i.e., Attachment 1) provides meaningful background information about the purpose and need for mid-biennium adjustments. However, it is generally focused on several species that will be assessed in 2017 and potential adjustment procedures for 2018 Annual Catch Limits (ACLs) for these species. Based on discussions with Mr. DeVore, the GAP understands that it is unlikely the green light policy will be implemented in time for 2018 ACL adjustments. In contrast, the ODFW Report proposes development of a framework process that could be incorporated into the groundfish fishery management plan (FMP) for use in future specification cycles. Therefore, the GAP recommendations herein focus on the ODFW Report.

As stated previously, the GAP strongly advocates for developing and including in the FMP a green light policy that would allow increases to harvest levels mid-biennium in response to new stock assessment information. The GAP greatly appreciates the insightful report provided by ODFW and supports Council adoption of the purpose, need, and range of alternatives presented in the ODFW report. The GAP recommends their adoption with the inclusion of a new alternative that would allow use of the green light policy for any species scheduled for assessment. In the GAP’s opinion, if new stock assessment information supports increasing an ACL mid-biennium, then the use of the green light policy should not be limited to overfished or “constraining” species. Addition of the GAP alternative would require minor adjustment to the ODFW purpose statement such that it applies to all stocks with new assessments. Accordingly, the GAP recommends adding an alternative 3 and expanding the purpose statement to include any species scheduled for assessment:

GAP Alternative 3: Any species scheduled for assessment. This alternative would allow consideration of mid-biennium ACL increases for any stock of fish when new information resulting from a stock assessment indicates a substantial increase in stock status or scale.

In addition to adding a green light policy framework to the FMP, the GAP recommends the Council also consider including in the specifications process steps that would facilitate use of the green light policy. For example, the 2019-2020 specifications that will be finalized in 2018 could include a set of prospective harvest levels for species scheduled for assessment in 2019. These prospective harvest levels could be analyzed in advance in the 2019-2020 specifications such that if new assessment information in 2019 supports increasing an ACL in 2020, then that higher ACL would

already have been analyzed. This type of front-loading process would facilitate more timely implementation. In a similar vein, the stock assessment terms of reference might also be revised to instruct assessment authors to include a range of prospective harvest levels in assessment decision tables to help inform the pre-planning process included in the specifications.

Finally, while the GAP strongly supports development of a green light policy and its inclusion in the groundfish FMP, the GAP cautions that it is important to manage expectations. As noted in the ODFW report, there could be “costs [in the form of] potential negative socioeconomic outcomes related to reprioritization and/or delay of decisions and rulemaking on other items if the Council chooses to implement a green light policy.” This ODFW comment resonates with the GAP because of current delays in moving Council actions through the federal rulemaking process. If this bottleneck persists into the future, then the GAP is concerned that any gains that could be realized by use of a green light policy would be lost to the regulatory mire. However, the GAP is hopeful that by 2020, which is the earliest a green light policy could be employed, the West Coast Region will be fully staffed and regain its ability to carry out Council actions in an effective and timely fashion.

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