

GROUND FISH MANAGEMENT TEAM REPORT ON TRAWL CATCH SHARES AND INTERSECTOR ALLOCATION PROGRESS REPORTS AND COST RECOVERY REPORT

The Groundfish Management Team (GMT) received an overview from Mr. Jim Seger and Mr. John DeVore from the Council staff, and Mr. Chris Biegel from the National Marine Fisheries Service (NMFS) West Coast Region (WCR), reviewed the documents in the briefing book, and offer the following thoughts.

Catch share review report

The GMT discussed the project update and supports the review team continuing on the accelerated schedule, and intends to evaluate the catch-share review reports in detail for the June Council meeting.

Intersector allocation review

The GMT believes the intersector allocation review document addresses many of the requirements under NMFS policy directive 01-119-02¹, either directly, or by reference to other Council documents. Table 1 (at the end of the document) provides the GMT's view on how the [Agenda Item F.4, Attachment 2, April 2017](#) addresses the factors to be considered at this current review stage of intersector allocations. The GMT believes that some of the factors identified in the NMFS policy are more appropriate for changes to allocation decisions, rather than for the review of allocations currently taking place.

Factors not sufficiently addressed (Table 1) in the current report include: economic efficiency improvements, detailed species-level community dependence/engagement and catch/landings, and a description of the quality of information available for each sector. A complete review of economic efficiency would require consideration of costs to harvest, however, such an analysis would be more appropriate with the consideration of new allocations, or potential changes to existing allocations, rather than in the current review stage. Council staff did indicate that a qualitative assessment of information quality for each sector or group would be included in the next draft which will be presented in June.

It is the GMT's understanding that constraints at the permit or vessel level for species with relatively high attainment will be examined in the five-year catch share review, but will not in permit level examination will not be done for the non-trawl sectors. Some qualitative discussion of individual and community level constraints in non-trawl sectors would be helpful, including more information on recreational fisheries. Additionally, while the current focus of the review seems to be primarily species that constrain the trawl sector with unused yield in the non-trawl sector, **the GMT recommends that this review also consider species with low attainment in the trawl sector that may be constraining to the non-trawl sectors.**

¹ <http://www.nmfs.noaa.gov/op/pds/documents/01/01-119.pdf>

The Amendment 21 At-Sea Sector Set-Asides for darkblotched rockfish and Pacific ocean perch that were adopted by the Council in September 2016 were intended to be an interim solution until the completion of the review and a permanent solution could be put in place. As described by the Washington Department of Fish and Wildlife in June 2016 ([Agenda Item G.2.a, WDFW Report, June 2016](#)) and September 2016 ([Agenda Item F.7.a., WDFW Report, September 2016](#)), “The purpose and need of that action was intended to be an interim solution to address the immediate needs of the at-sea sectors.” In addition, it was noted that “During the upcoming five year review of the trawl rationalization program, it is the intention to review these allocations (among the other IFQ species) and determine what more appropriate (i.e., fair and equitable) allocations are for each of the sectors as well as consider other long-term solutions.” The Council’s motion did not specify that date at which this provision would expire because the end date of the five year review was uncertain. Therefore, examination of the allocations and the set-aside approach should be included in this review.

The GMT discussed, but does not recommend further exploration of, specific management options at this juncture in the review. If the Council decides to address any allocation changes, scoping of management alternatives would then occur, and would provide a range of alternatives that are likely broader than those currently presented in [Agenda Item F.4., Attachment 2](#). In addition, **the GMT recommends delaying consideration of intersector trading until the completion of the intersector allocation review and the catch share program review, at which time the Council could consider prioritizing that action with other resulting actions**². The GMT and others might benefit from guidance on how the Council intends to pursue intersector allocation management options, something similar to the omnibus summary ([Agenda Item G.6, Attachment 2, June 2016](#)) might be beneficial for future considerations. As we have stated previously ([Agenda Item F.4.a, Supplemental GMT Report, September, 2016](#)), the Council may want to first identify all allocation matters they would like to address, and then develop a range of alternatives that best address the needs of the fisheries, as a whole.

If the Council elects to continue the intersector allocation review (including consideration of potential changes to intersector allocations), the GMT requests that the Council develop a calendar similar to that provided for the Catch Share Program review in [Agenda Item F.4, Attachment 1](#). The GMT understands that review of intersector allocation was included with the trawl review in an attempt to gain efficiencies in public outreach and meetings, with additional resources needing to be identified when moving forward for the analysis of the action alternatives. At this time, the GMT is unclear whether those additional resources have been identified and secured, as such that may influence the timing with which the Council moves forward with the analysis. The GMT does not see many opportunities to be involved given upcoming involvement in stock assessments and work on the 2019-2020 biennial harvest specification and management measures process. The Council may also wish to consider scheduling any intersector allocation changes such that final action occurs either prior to a biennial analysis (as was done with blackgill rockfish), or be available to be implemented mid-biennium. This would better facilitate GMT participation in the analysis and streamline the implementation process.

² Trawl sector quota pound trading range of alternatives is currently scheduled (shaded) on the proposed June agenda ([Agenda Item C.4., Attachment 2](#)).

Table 1. NMFS Considerations for Evaluating Performance of Intersector Allocations

Factors to Consider when Reviewing/Making Allocation Decisions	Adequately satisfies requirement in current document? (Y/N)	If not, what analyses need to be done?	Citation, if not directly addressed
Ecological Factors			
What are expected ecological impacts on target species?	Y		Amendment 21, Final Environmental Impact Statement
What are the expected ecological impacts on other fisheries? What is the status of non-target species? What are the expected impacts on bycatch and bycatch mortality of both non-target species and protected species?	Y		Atlantis model for Amendment. 24
What are the impacts on the marine ecosystem? What are the impacts on habitat? What are the impacts on the ecological community (e.g., relevant predator, prey, or competitive dynamics)?	Y		Atlantis model for Amendment. 24
Economic Factors			
Can economic efficiency be improved?	N/A	Needs consideration of costs to harvest	
What are the economic impacts of potential changes in allocation?	Y		Amendment 21 FEIS
Social Factors			
Is an allocation fair and equitable?	Y		Amendment 21 FEIS

Are there disproportionate adverse effects on low income and/or minority groups?	Y		Amendment 21 FEIS
What is the importance of fishery resources to fishing communities?	N	Detailed breakout of landings and revenue out at species, sector, community level for species for species with relatively high attainment levels in at least one sector	
i. What is the individual, local, and regional dependence and engagement in each sector?	N	Detailed breakout of landings and revenue out at species, sector, community level for species for species with relatively high attainment levels in at least one sector	
ii. What is the community's vulnerability and adaptive capacity?	Y		2017-2018 Groundfish Harvest Specifications
iii. Are there other social impacts?	Y		
Indicators of Performance and Change			
What are the trends in catch/landings?	N	Detailed breakout of landings and revenue out at species, sector, community level for species for species with relatively high attainment levels in at least one sector	

What is the status of fishery resources?	Y		Groundfish SAFE
Has the distribution of the species changed?	Y		Groundfish SAFE
What is the quality of information available for each sector or group?	N	Qualitative description of data available for analyzing each sector	

*Either directly or incorporated by reference.

N/A = Primarily applicable to new allocation decisions, addressed in Harvest Specifications EIS (but not at species level)