GROUNDFISH ADVISORY SUBPANEL REPORT ON TRAWL CATCH SHARE REVIEW-FINAL REPORT ADOPTION AND PRELIMINARY RANGE OF ALTERNATIVES FOR FOLLOW-ON ACTIONS

The Groundfish Advisory Subpanel (GAP) received an update on the Trawl Catch Share Review from Dr. Jim Seger, and an overview of the National Marine Fisheries Service (NMFS) report and recommendations from Ms. Abigail Harley. The GAP offers the following comments.

In general, the GAP supports the Community Advisory Board (CAB) statement (Agenda Item F.2.a, Supplemental CAB Report, https://www.pcouncil.org/wpcontent/uploads/2017/11/F2a_Sup_CAB_Rpt1_NOV2017BB.pdf). To reiterate past GAP and CAB statements on this issue, we again wish to highlight the importance of completing actions currently underway in the Council forum or awaiting implementation by NMFS. And, as an overarching consideration, the GAP believes that the initial list of potential issues should focus on program modifications that offer the best potential to yield significant program benefits in the short term.

The GAP has no comments on the catch share review report and believes it is ready for finalization.

With respect to the preliminary ranges of alternatives for priority follow-on actions, the GAP believes the ranges identified in the CAB report are adequate and generally provide appropriate "book-ends" for analysis. The GAP also understands that this is not final action on this topic, and that we'll have another chance to review and comment on ranges of alternatives.

With respect to gear switching and possible removal of the 36° line for sablefish, the GAP concurs with the CAB recommendation for an additional CAB meeting to focus on that issue. We think it would be helpful to clarify that the "book-ends" for the gear switching range of alternatives should be no action/status quo, and complete cessation of gear switching. The GAP supports the CAB alternatives on gear switching and the 36° line for sablefish. Where alternatives include qualifying criteria with specific numbers (e.g. a certain number of pounds landed over a certain term), the GAP notes that those should be considered as examples only and should not be considered as specific recommendations of the GAP.

Regarding the NMFS Report, the GAP offers the following comment. Under the current program rules, a quota share (QS) permit owner who does not submit their QS permit renewal by the annual deadline (November 30th) would lose access to any quota pound (QP) allocation for the following year, and would only be able to trade their quota shares if a late renewal package was submitted. NMFS would redistribute that QS permit owner's QP to all other eligible QS permit owners who had renewed. The GAP notes that under the new NMFS proposal, NMFS would hold back their QP instead of redistributing it, in anticipation of the QS permit owner renewing. But if that permit owner never renews, those pounds would be stranded and unavailable for fishing. We recommend keeping the current rules in place as an incentive to renew by the deadline, especially since no permit owner has ever failed to renew their QS permit; or setting a deadline for late renewals (i.e. March 31, to match up with late limited entry permit renewal rules) to prevent stranding, and make all fish available to the individual fishing quota sector. If a permit owner had not renewed by March

31st, their QP would be redistributed to all other QS permit owners in proportion to their QS holdings.

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