

GROUNDFISH MANAGEMENT TEAM REPORT ON ALLOCATION REVIEW
PROCEDURES- PRELIMINARY

The Groundfish Management Team (GMT) received an overview on this item from Dr. Jim Seger, Pacific Fishery Management Council (Council) staff, on our April 3 webinar and offers the following comments.

Overall, the majority of allocations contained within the groundfish fishery management plan already have periodic triggers in place as shown in [Agenda Item D.4.a, Attachment 4](#), April 2019, Table 1. The only groundfish allocations that are not scheduled to be reviewed at this time are the limited entry/open access allocations for groundfish species from Amendment 6 that were not included in Amendment 21: minor nearshore and shelf rockfish complexes north and south of 40° 10' N. lat.¹ There has not been a need to examine changes to these limits while the non-trawl Rockfish Conservation Area (RCA) in place. However, as the Council considers changes to the non-trawl RCA in upcoming years, the GMT suggests that it may be necessary to re-examine these limits.

The GMT discussed whether the salmon take thresholds from the 2017 Incidental Take Statement should be included in the Council Operating Procedures (COP) 27 as an “allocation.” The GMT does not believe that the salmon take thresholds should be considered allocations, as these thresholds are specific amounts of salmon that are anticipated to be “taken” by the groundfish fisheries. These amounts are not governed by the Magnuson-Stevens Act and instead are set forth under the Endangered Species Act. They are also not meant to provide “opportunity to participate” in the fishery, but rather are levels of take that will not result in jeopardy to the stocks.

The GMT recommends the Council adopt the criteria outlined in draft COP 27, with the exception of the salmon thresholds from the 2017 Biological Opinion, as the preliminary criteria for triggering an allocation review. The GMT believes that there are sufficient time-based triggers for review of the groundfish allocations. Additionally, through the Council process, the public and advisory bodies can always raise concerns with allocation issues to potentially be addressed via the groundfish workload prioritization process or the biennial harvest specifications and management measures process.

PFMC
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¹ https://www.pcouncil.org/wp-content/uploads/1112GF_SpexFEIS_100806-FINAL_feb21_.pdf, section 2.2.2, beginning on page 76