

GROUND FISH MANAGEMENT TEAM REPORT ON PHASED-IN APPROACH TO CHANGING HARVEST LIMITS - SCOPING

The Groundfish Management Team (GMT) reviewed the materials in the briefing book, received an overview from Mr. John DeVore of Pacific Fishery Management Council (Council) staff, and offer the following thoughts for consideration.

Raise the P* and 3-year-phased-in allowable biological catch

The GMT suggested consideration of raising the P* and/or phasing in the allowable biological catch (ABC) over three years to provide management flexibility in response to decreases in ABCs that could be attributed to the new sigmas or other declines associated with new assessments. At the June 2019 Council meeting, the National Marine Fisheries Service (NMFS) provided a detailed report that gave an overview of potential options for higher ABCs that included: (1) “case-by-case” ABCs which could depart from the default sigma and P* harvest control rules (as long as below the overfishing limit [OFL]); (2) raising the P*; and (3) 3-year-phased-in ABCs ([Agenda Item D.5.a NMFS Report 1, June 2019](#)).

Case-by-case ABCs are currently available for use in the groundfish fishery management plan (FMP). Raising the P* above the current maximum value and 3-year-phased-in ABCs are not available for use based on the revised National Standard 1 guidelines ([Agenda Item H.7, Attachment 1](#)) and would require an FMP amendment. At the time of implementation, case-by-case ABCs will also require input from the Scientific and Statistical Sub-committee (SSC) ([Agenda Item D.5.a, NMFS Report 1, June 2019](#)). The SSC was briefed on this item and determined that their involvement would consist of running 10-year projections using the case-by-case ABC to inform biological impacts to spawning biomass and relative stock status.

The GMT does not recommend this agenda item be further developed or considered at this time, because case-by-case ABCs can accomplish the same objectives as a higher P* and 3-year-phased-in ABCs without additional work to amend the FMP. This point is illustrated below using Oregon black rockfish as a case study.

The No Action 2021-22 ABCs for Oregon black rockfish (479 mt and 474 mt, respectively) are based on using the maximum P* of 0.45 and new time-varying sigmas that account for the age of the assessment. The Oregon Department of Fish and Wildlife (ODFW) is requesting a case-by-case ABC that is set equal to 512 mt, based on the 2020 ABC which uses the sigma value of 0.72. This would be equivalent to using a P* of 0.465 with the new time-varying sigmas, but avoids the additional workload of developing new tools. Therefore, case-by-case ABCs that depart from using the sigma and P* approach will result in the same outcome as the application of a higher P*. In either case, the ABC must remain below the OFL.

Using the case-by-case ABC over a limited time frame could provide the same flexibility to the Council as a 3-year-phased-ABC. While most examples of 3-year phased-in-ABCs use linear declines each year, NMFS specified that constant ABCs could also be used, which ODFW specified they intended to do for Oregon black rockfish.

Case-by-case ABCs also differ from either raising the P* or using a 3-year-phased-in-ABC in that the latter are harvest control rules that require all the conditions be set ahead of time, while considering ABCs on a case-by-case basis is inherently more responsive to conditions and less prescriptive. To ensure the standardization of these tools, the Council could establish guidelines for case-by-case ABC consideration (APPENDIX 1). These guidelines would be consulted before requesting the SSC to run 10-year projections for case-by-case ABC candidate stocks.

Carryover of ACLs

The working draft of National Standard 1 presents two options for carrying over ACLs, both of which could be considered on an annual basis rather than on our current biennial cycle.

Approach 1 would allow carryover of unused ACL in year 1, as long as the total of that carryover and the year-2 ACL does not exceed the year-2 ABC. In short, this means that Approach 1 would only be applicable to stocks where the ACL is less than the ABC. Approach 1 would therefore not be applicable to most groundfish stocks, as the ACL is typically set equal to the ABC. The main stocks that could be eligible for Approach 1 are those that are overfished or in the precautionary zone, as their ACLs are set below the ABC; the GMT presumes the Council would not be interested in ACL carryover for these stocks given potential conservation concerns.

Approach 2 would, however, be applicable for stocks where the ACL is set equal to the ABC. To carry over unused ACL for these stocks, a new stock assessment projection would have to be conducted to recalculate the OFL and ABC based on actual attainments, which are often less than the full ACL. This is the same as conducting a catch-only projection, which are already available as a tool during the two-year assessment cycle process to increase harvest specifications when catch has been less than the ACL.

Although both of the new ACL carryover approaches could be done on an annual basis, the GMT believes that the increase in workload for assessors and managers outweighs the benefit of the items. The Council and advisory bodies have been opposed to returning to annual harvest specifications for these reasons.

In conclusion, Approach 1 would rarely be used in the groundfish FMP and the tools of Approach 2 are already available for use. Further, the Council has made it clear that annual harvest specifications are not desired. **For these reasons, the GMT does not recommend these new ACL carryover approaches be forwarded at this time for further consideration.**

PFMC
09/16/19

APPENDIX: PREVIOUSLY PROPOSED CRITERIA FOR ABCS THAT DEPART FROM SIGMA AND P* HARVEST CONTROL RULE

ODFW proposed criteria for selecting groupings appropriate for phased-in harvest specifications:
([Agenda Item D.5.a, Supplemental ODFW Report 1, June 2019](#))

- Highly utilized (>75% annual catch limit (ACL) attainment)
- Facing a significant ABC reduction (>10%)
- Not overfished or subject to overfishing
- Not in the precautionary zone (i.e., biomass above the management target)

Council motion describing proposed criteria for phased-in harvest specifications:
([Agenda Item D.5., Council motion, June 2019](#))

1. Consider using criteria to determine which groundfish stocks are eligible for deviation from the default ABC control rule. Suggested criteria could include:
 - a. Stock status (depletion) – consider whether to have different approaches for healthy stocks (e.g., stocks with depletion levels \geq B40), precautionary zone (e.g., rockfish stocks between B25 and B40), and overfished, and/or for stocks with a status trend that has continually declined over time
 - b. Stock category – consider whether to have different eligibility for Category 1 and Category 2 stocks
 - c. Stock complexes – consider whether and how to apply alternative approaches to stocks managed as part of a complex
 - d. Attainment – consider whether to have a minimum average level of attainment of annual catch limits
2. Consider placing a limit on the frequency of using alternative approaches, such as:
 - Deviation from the default ABC control rule cannot apply to a specific stock for two consecutive biennial cycles (i.e., full application of the default ABC control rule would occur in year 3)