

OVIERVIEW: REVIEW PURPOSE AND NEED AND RANGE OF ALTERNATIVES

At its November 2019 meeting, the Council discussed the scope of the Sablefish Area Management and Trawl Allocation Attainment Committee's (Committee) work and agreed that the expectation for the next Committee report is that it would include recommendations related to a suite of alternatives pertaining to gear switching for northern sablefish and some discussion of the southern sablefish issue, including possible need to modify the purpose and need statement.

Under this agenda item, the Committee should review the purpose and need and current range of alternatives to determine the need for any further modifications. In particular, the current purpose and need covers the underattainment of southern sablefish while the alternatives included in the current package only include alternatives pertaining to attainment of allocations in northern areas. Either the purpose and need or range of alternatives need modification.

At its May 2019 meeting, the Committee tabled for future consideration two alternatives that might have helped with both underattainment of southern sablefish allocations and attainment of northern allocations of other species. Under the tabled alternatives, these ends would have been achieved by annually shifting some of the trawl southern sablefish harvest opportunity from south to north. The possibility of management actions that might encourage harvest of southern sablefish within the southern area were discussed but no such alternatives were identified. At that time, it was decided that after the alternatives dealing directly with underattainment in the north were fully developed, the need for the tabled alternatives would be reconsidered. The current alternatives all address the northern attainment issue through limitations on gear switching.

Purpose and Need

This action is needed because the Shorebased Individual Fishing Quota (IFQ) Program has underattained most of its allocations since the inception of the program in 2011. The underattainment for some northern stocks may be due to the allowance to use fixed gear to harvest shorebased IFQ, declining trawl vessel participation, and the lack of market and infrastructure. Specifically, participants engaging in gear-switching are using northern sablefish quota that may otherwise be used by trawl gears; this may lead to uncertainty in trawl access to sablefish, thereby affecting the development of markets and infrastructure. Working within the guidance and authority provided by the MSA (§303A(c))¹ and the Pacific Coast Groundfish Fishery Management Plan (FMP) goals and objectives, the purpose of this action would be to keep northern sablefish gear switching from impeding the attainment of northern IFQ allocations with trawl gear, while considering impacts on current operations and investments.

This action is also needed because the Shorebased IFQ Program has underattained

¹ Section 303(A)(c) of the MSA sets forth elements defining the creation of limited access privilege programs, including the promotion of fishing safety; fishery conservation and management; and social and economic benefits.

several of its southern allocations, specifically sablefish south of 36° N. latitude. Sablefish is managed under a coastwide overfishing limit (OFL) and acceptable biological catch (ABC) but the annual catch limit (ACL) is split into two management areas, north and south of 36° N. The Shorebased IFQ allocation and ACL for sablefish south of 36° N. latitude are underattained due to declining gear switching vessel participation in this area since rationalization,² limited DTS trawling in this area,³ and lack of market and infrastructure.⁴ The purpose of this action would include encouraging utilization of sablefish south of 36° N. latitude within the current management area and exploring mechanisms that would allow a portion of that allocation to be caught in areas north of 36° N. lat.

These separate underattainment issues result in the Shoreside IFQ Program being unable to meet Management Goals 2 and 3 of the FMP which respectively seek to maximize the value of the groundfish resource as a whole and to achieve the maximum biological yield of the overall groundfish fishery. Additionally, this action would seek to improve the program towards the goal of Amendment 20 to the FMP, which created the Shorebased IFQ Program, of providing for full utilization of the trawl sector allocation.

Current Alternatives

The alternatives are fully described in SaMTAAC Agenda Item B, Attachment 1.

Alternative 1: Gear Specific Quota Pounds (QP) (Trawl-only and unrestricted gear northern sablefish QP)

Alternative 2: Gear Switching Endorsements (larger annual gear-switching limits for permits with gear-switching endorsements as compared to permits without such endorsements)

Alternative 3: Active Trawler Requirement and Exemptions (one percent annual gear switch limits for vessels that meet an active trawler requirement and different limits for historic gear switchers that receive an exemption from the active trawler requirement).

Tabled Alternatives

The following are summaries of the tabled alternatives. The [full text of the alternatives](#) is available on the Council webpage for the [SaMTAAC's May 2019 meeting](#). At that time, what are labeled here as Alternatives A and B were Action Alternatives 1 and 2, respectively.

² See page 163 of the Trawl Rationalization Program 5-Year Review (PFMC/NMFS 2017).

³ See page 151 of the Trawl Rationalization Program 5-Year Review and Table 68 (PFMC/NMFS 2017).

⁴ See page 249 of the Trawl Rationalization Program 5-Year Review (PFMC/NMFS 2017).

Tabled Alternative A: Temporarily Shift a Portion of the Trawl Allocation from South to North (Reapportionment)

Each year, a percentage of the sablefish south trawl allocation may be reapportioned. The reapportioned amount will be issued as northern sablefish QP. The amount reapportioned will be determined based on the amount of southern QP that is used/unused over time. The overall proportion of the southern sablefish reapportioned in any one year will be a combination of the percent reapportioned in the previous year (the base reapportionment percentage) and an additional incremental percentage increase or decrease, depending on the amount of southern QP that was used in the previous year. The reapportionments provided in this alternative are not reallocations: they will not change the underlying sablefish north/south or sector allocations formulas. At least 10 percent of the southern sablefish trawl allocation will remain in the south.

Tabled Alternative B: Allow Some Southern QP to Be Harvested as Far North as 42° N. Latitude

Each year, a portion of the southern sablefish QP will be designated as eligible for use up to 42° N. lat., but only with trawl gear. The proportion of southern sablefish QP eligible to be used in the north will be half of whatever portion of the original southern allocation that was not harvested in the south in the previous year (either because it was not harvested anywhere or it was harvested in the north). That proportion is then applied to the current year southern sablefish trawl quota to determine the pounds eligible for use in the north.