

GROUND FISH ADVISORY SUBPANEL REPORT ON
PACIFIC HALIBUT TRANSITION OF AREA 2A FISHERY MANAGEMENT

The Groundfish Advisory Subpanel (GAP) received an overview of the Transition of Area 2 Fishery Management for Pacific halibut fisheries from Ms. Robin Ehlke, Pacific Fishery Management Council staff, and offers the following comments and suggestions.

The GAP reviewed the [Updated Range of Alternatives for the Proposed Transfer of Management](#) under this agenda item and suggests the Council adopt the following alternatives as the preliminary preferred alternatives (PPAs):

1. (4.1) Fishery Management Process: The GAP supports **Alternative 2**, consider the directed fishery framework during the catch sharing plan (CSP) process in September and November, including any guidance for vessel limits and inseason changes for National Marine Fisheries Service (NMFS) implementation. The GAP understands that vessel limits would not be available prior to the International Pacific Halibut Commission (IPHC) annual meeting in January, but perhaps percentages could be used instead, and those percentages could be converted to pounds/metric tons after the IPHC meeting.
2. (4.2.1) Permitting Process/Permits to Issue: **Alternative 2**, issue permits for all Area 2A halibut fisheries, including commercial directed, incidental salmon roll, incidental sablefish, and recreational charter boat fisheries. The GAP supports this alternative because it mirrors what the IPHC already does and would likely provide the least disruption to the affected fisheries.
3. (4.2.2) Permitting Process/Application Deadlines: **Alternative 2**, allow NMFS to determine the appropriate application deadlines for all commercial halibut applications, set to coincide with Council meetings and NMFS processing time.
4. (4.2.5) Permitting Process/Proof of Permit: **Alternative 1**, status quo; require a paper copy of proof of permit to be onboard the fishing vessel. As noted in the report, the GAP has supported this option in the past. However, if the Council and NMFS were to allow an electronic copy of the permit to be used as proof, the GAP recognizes the onus would be on the permit owner/vessel captain to produce that proof – whether paper or electronic – and *not* the enforcement official. Furthermore, it would require the permit owners or vessel captains to have this electronic proof available, even if cell phone service or other electronic access was unavailable.

The GAP considered the proposed timeline and agrees that Council/NMFS planning and timeline is workable. However, we also recognize selecting a final preferred alternative for this issue is shaded as a “candidate item” on the Council’s proposed [November 2020 meeting agenda](#). The GAP requests this be moved to the November agenda so the proposed timeline and implementation dates can be met.