

Updated Range of Alternatives for the Proposed Transfer of Management Responsibilities for Area 2A Pacific Halibut Fisheries with Focus on the Non-Tribal Directed Commercial Fishery

Preliminary Preferred Alternatives Highlighted in **Bold**

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List of Acronyms and Abbreviations

CDFW	California Department of Fish and Wildlife
COP	Council Operating Procedure
CSP	Catch Sharing Plan
Council	Pacific Fishery Management Council
FCEY	Fishery Constant Exploitation Yield
FPA	Final Preferred Alternatives
IPHC	International Pacific Halibut Commission
NEPA	National Environmental Policy Act
NMFS	National Marine Fisheries Service
NOAA	National Oceanic and Atmospheric Administration
ODFW	Oregon Department of Fish and Wildlife
PFMC	See 'Council'
PPA	Preliminary Preferred Alternatives
TCEY	Total Constant Exploitable Yield
WCR	NMFS West Coast Region
WDFW	Washington Department of Fish and Wildlife

Introduction

At its March 2020 meeting, the Pacific Fishery Management Council (Council, or PFMC) considered a [report](#) developed by staff from the Council and NMFS WCR (Project Team) describing how the Council might proceed with the transfer of management responsibilities of the non-Indian directed halibut fishery (directed fishery) from the International Pacific Halibut Commission (IPHC) to the Council and the National Marine Fisheries Service (NMFS). The report included a purpose and need statement, scope of action, and a potential range of alternatives. The Council adopted the major tenets of the report, with the expectation to address the topic again in September 2020 to consider adopting preliminary preferred alternatives for public review, and in November 2020 to adopt final preferred alternatives for recommendation to NMFS. An outline of past Council discussions on the transition topic is provided in Table 1.

1.0 Purpose and Need

The proposed action is to transition the permitting and management of the non-Indian Pacific halibut (halibut) fisheries within IPHC regulatory Area 2A from the IPHC to the Council and NMFS, with a focus on the directed fishery. Area 2A (waters off the coast of Washington, Oregon, and California) is the only area where halibut fisheries are still managed directly by the IPHC. IPHC currently issues licenses¹ for all Area 2A fisheries, and solely manages the non-Indian directed commercial fishery. The purpose of the action is to provide the Council and stakeholders with opportunities to consult on the transitions of regulations and permitting responsibilities from IPHC to NMFS, and for the Council to develop a process for its future consideration of regulations affecting the Area 2A non-Indian directed commercial fishery.

This action is needed because IPHC requested that management of the non-Indian directed commercial fishery be transferred to Area 2A managers as soon as possible. In a [letter](#) addressed to the Council on October 17, 2019, the IPHC stated their "...desire for the IPHC to move full management of the [IPHC Regulatory Area 2A Non-Indian Directed Commercial] fishery from the IPHC (an international fisheries management body) to the relevant domestic agencies."

2.0 Proposed Scope of Action

Currently, the directed fishery opening date(s), duration, and vessel trip limits are determined by the IPHC with fishing periods implemented in IPHC regulations and published by NMFS each March. The IPHC requested transfer of management for only the non-Indian directed commercial fishery; however, when scoping this request, it seemed prudent to consider management aspects for all Area 2A Pacific halibut fisheries, especially when considering the licensing strategy (See [Workgroup Report, June 2019](#)). Therefore, the proposed action as noted under the Purpose and Need section is broad in scope so that the Council could consider transferring the licensing responsibilities for all Area 2A Pacific halibut fisheries. Note that this action does not include the treaty Indian fisheries.

The proposed scope of action is intended to:

- (1) Develop a permitting process and mechanism administered by NMFS to issue permits for Area 2A Pacific halibut fisheries. This scope would include all licenses currently issued by IPHC: non-Indian directed commercial, commercial incidental salmon troll, commercial incidental sablefish, and recreational charter.

¹ The term 'permitted' is synonymous with 'licensed' and 'registered'. IPHC documents generally use 'license' and NMFS/Council use 'permit.'

(2) Transfer management of the non-Indian directed commercial fishery from IPHC to the Council and NMFS. This scope includes development of a schedule, process, and regulatory language to determine the season structure (start date, open periods, duration, vessel limits, etc.) within the overall season established by IPHC. This scope includes both preseason and inseason protocols to ensure access to available harvest and timely notification of such changes.

(3) Identify lead entities and management responsibilities for preseason, inseason, and post season activities.

3.0 Council Process to Transfer Management and Associated Tasks

Assuming responsibility for managing the directed fishery will require developing protocols for a new permitting process, a preseason process, protocols for inseason management, amending the CSP and Council Operating Procedure [\(COP\) #9](#), and identifying management entities and staff responsible for such tasks. The Council's public process provides an opportunity to solicit stakeholder input on the issues associated with these proposed actions.

The focus of this action is specific to the transfer of management and involves mainly administrative and logistical topics, therefore the Project Team believes the Council should continue utilizing the current Project Team to complete the management transfer work. To help inform the Council on halibut-related topics associated with halibut fishery management of the directed fishery, or other halibut fisheries, the Council could establish either an ad-hoc or permanent advisory body to assist in management of the fishery once it is under Council authority. At the March 2020 meeting it was also suggested that the Council could establish a joint halibut subcommittee made up of three Groundfish Advisory Subpanel (GAP) members, three Salmon Advisory Subpanel (SAS) members, and one processor from either body to deal with transition issues or, if the Council preferred, it could meet as necessary to also deal with halibut fishery topics as they arise.

4.0 Range of Alternatives

The range of alternatives presented to the Council in March 2020 were separated into two major categories: fishery management and the permitting process. From a logistical standpoint, the decisions on when to consider the fishery management aspects of the directed fishery would fall mainly to the Council, and NMFS would lead the permitting process. Although there is cross-over between the two categories, the Project Team focused the Alternatives on Council-related tasks (fishery management) and less on the permitting process.

4.1 Fishery Management Process

If the Council decides to transfer management of the directed fishery, then the Council will need to 1) establish a framework for a preseason process (mainly season structure and vessel limits), 2) establish protocols necessary for inseason management, and 3) decide when these decisions will be made. Identifying a fishery start date, interval, duration of each opener, and fishery objective, plus protocol for establishing vessel limits (using the existing vessel classes) could all be part of the preseason process. In addition, the preseason process could include criteria for inseason management, which would guide any needed adjustments so NMFS could implement the fishery seamlessly and efficiently.

In the future, after the transfer of management is complete, the Council could consider changes to the overall structure of the fishery if its desired (i.e., limited entry, development of individual fishing quotas, changes to allocations, etc.). These items would need to be developed under a separate process and are not being considered as part of this action.

The Council has an established CSP process that occurs at the September and November Council meetings, which includes consideration of the seasonal framework mainly for recreational fisheries for the upcoming year. The CSP process is complete before the subquota for the recreational fisheries is available in late January, but because the preseason framework describes how to distribute the subquota and make inseason adjustments, this approach is successful. This same method could be used for the directed fishery, with clear guidance in place for any necessary inseason adjustments. Other options would be to wait until the spring Council meetings (March or April) to finalize the framework for the directed fishery, or choose to finalize the fishery framework through the CSP process (September/November), but wait until March or April to determine the vessel limits and inseason adjustments.

For the directed fishery, vessel limits will need to be set before the season begins, and potentially adjusted inseason. In order to set vessel limits, the subquota and the number of licenses issued for the fishery need to be known. This data is not available until late January (subquota) and late March (number of licenses issued). Vessel limits will be set using the range of vessel classes currently employed, and could be set by NMFS at least initially. The subquota will be distributed to each vessel class to provide as much meaningful opportunity as possible. Vessel limits will be implemented by NMFS throughout the season.

The directed fishery historically has required inseason management, and any needed changes are currently decided and implemented solely by IPHC. IPHC can collect and analyze the inseason data, decide on needed changes, implement the regulations, and announce the change all within the two-week interval of the scheduled fishing periods. Once the Council and NMFS gain management of the fishery, if inseason action is anticipated, then the structure of the fishery – mainly the interval between open dates – may need to be up to 30 days apart in order to compile and analyze the data and implement change. The reaction from the industry regarding possible longer intervals between open fishing periods (greater than two weeks) is anticipated to be negative. To remedy this potential increased interval, the Council could consider including guidance for conditional responses in the preseason planning process to address any inseason action needed. For example, a table describing how vessel limits are distributed initially, and adjusted after the initial period based the balance of subquota may help for timelier implementation of inseason fishery changes by NMFS. Inseason changes to the directed fishery are typically a reduction in vessel limits to remain within the subquota but could also include a reduction in duration if the openers are longer than the 10-hour fishing periods used prior to 2020.

For Council consideration, alternatives for the schedule and process for setting seasons and initial vessel limits:

- 4.1.1 Alternative 1: No action. No management transfer; maintain existing IPHC process.
- **4.1.2 Alternative 2: Consider the directed fishery framework during the CSP process in September and November; including any guidance for vessel limits and inseason changes for NMFS implementation.**
- 4.1.3 Alternative 3: Consider the directed fishery framework during the CSP process in September and November; finalize guidance for vessel limits and inseason changes at the following March or April Council meeting.

Under Alternative 4.1.2, the September/November Council meetings would continue to be used for the current suite of changes to the CSP. Consistent with the CSP process, public input for changes to the seasonal management aspects of the directed fishery would help shape the Council's preliminary recommendations for the upcoming season. Proposed changes would go out for public review after September, and final consideration would occur at the November Council meeting. This process could

include establishing a range of initial vessel limits, and criteria for any inseason adjustments to be implemented by NMFS. This process would not require changes the current NMFS rulemaking schedule. The Workgroup believes this may be the best approach in for considering the annual fishery structure.

Under Alternative 4.1.3, the same process described in Alternative 4.1.2 would be used, except the final Council decision on guidance for vessel limits and inseason changes would be made at the March or April Council meeting. This gives the benefit of knowing the 2A allocation which is announced at the IPHC annual meeting in January; however, like the season setting process for the recreational fisheries, this information is not essential when developing the framework for the directed fishery.

The Council could also choose to modify Alternative 4.1.3 to adopt preliminary alternatives at the September meeting and wait until March or April (not November) to make final decisions on both the fishery framework, initial vessel limits, and any inseason protocols for implementing change.

Alternative 4.1.3 would require changes the current NMFS rulemaking schedule, and final rulemaking on these recommendations would be scheduled to conclude in May. This will require NMFS to have two halibut rulemakings each year: one for the usual catch sharing plan changes, and another for the commercial directed fishery. This scenario increases the workload and reduces the amount of time to process the rulemaking, which could potentially delay the start of the fishery if the federal rulemaking process is not finalized in time.

To help the Council make informed management decisions, under both action alternatives, NMFS would provide an annual report on the performance of the directed fishery (e.g. start date, number of openers and participants, quota attainment, etc.), which would be submitted in time for Council's September advanced Briefing Book.

4.2 Permitting Process

With regards to permitting, the Project Team believes that all the details of the permit system could be left to NMFS Permit Program to decide. However, the Project Team believes that NMFS should require vessels to carry paper permits on-board and take into consideration Council discussion on deadlines for permits.

IPHC currently issues four types of annual halibut vessel licenses (permits) for IPHC regulatory area 2A (West Coast) for the following fisheries: 1) directed commercial, 2) incidental commercial during longline sablefish north of Point Chehalis, 3) incidental commercial during salmon troll, and 4) recreational charter. IPHC does not issue licenses for any other regulatory areas. License applications must be submitted using an online form to IPHC by specified deadlines: March 15 for the incidental fisheries and April 30 for the directed commercial fishery.

The Project Team suggests the Council and NMFS maintain IPHC's current rules for which halibut permits can be held in tandem, at least initially to streamline the transition process of assuming management responsibilities. However, consideration would need to be given to the timing of Council meeting dates and current deadlines for applications.

Considerations for developing a permitting process:

1. Which Area 2A halibut fisheries would be issued permits;
2. Development of application process;
3. Application deadlines;
4. Notification for issuance of permit;
5. Proof of permit.

4.2.1 Which Area 2A Halibut Fishery Permits to Issue

Since it is the desire of IPHC to discontinue its fishery management tasks for halibut fishing in Area 2A, the Project Team believes NMFS should include all Area 2A halibut fisheries in the new permitting system. Having two independent permitting systems (IPHC and NMFS) would require substantial coordination between the two entities and cause additional burden to stakeholders wishing to participate in multiple Area 2A halibut fisheries.

- 4.2.1 Alternative 1 – Issue permits only for the Area 2A non-Indian directed commercial halibut fishery.
- **4.2.1 Alternative 2 – Issue permits for all Area 2A halibut fisheries**
 - **commercial directed, incidental salmon troll, incidental sablefish, and recreational charter halibut fisheries.**

4.2.2 Application Deadlines

The current IPHC application deadline for the directed fishery is April 30, and March 15 for the incidental fisheries. Given the timing of the Council’s annual meetings and typical start date (late June) of the directed fishery, the Project Team believes the deadline for the directed fishery should be moved to an earlier date so management decisions can better align with the Council’s annual meeting schedule, and coincide with the schedule and process for preseason planning. The number of permits, and the vessel class assigned to each permit, is information needed to determine the vessel limits. NMFS will process the permits and report the details after the application deadline has passed. Having the same deadline for all commercial halibut applications seems to be the most efficient and consistent approach for the stakeholders and NMFS.

When determining the application deadline, the preseason schedule (section 4.1) should be part of the deliberations. The Project Team believes since NMFS will be responsible for processing and issuing the permits, NMFS should also determine the appropriate application deadline for the permits, as long as the deadlines are well enough in advance so that the data is available for Council meetings as necessary.

- 4.2.2 Alternative 1 – Status quo: Maintain the IPHC application deadline for the directed fishery of April 30.
- **4.2.2 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.**

4.2.3 Development of an Application Process

Currently, NMFS does not have a system in place to accept applications and issue permits specifically for halibut fisheries. The transfer of management responsibilities will require a new system to be identified and a process developed. In their report submitted in November 2019, NMFS provided three options for a new platform or system that would allow participants to submit applications to obtain permits for the directed fishery.

The Project Team believes NMFS is best suited to determine and implement the most efficient and appropriate application platform.

4.2.4 Notification for Issuance of Permit

Once the participant submits the permit application and the required information is verified, NMFS would issue a response to the applicant to signal issuance of a permit. A master log of permitted participants will continue to be maintained by NMFS and shared with enforcement personnel and state agencies as needed.

The Project Team believes NMFS should determine the most appropriate and efficient means of notification of issuance of permit.

4.2.5 Proof of Permit

Currently, participants are required to carry a paper copy of the permit onboard the vessel and made available to show as proof of permit upon request. Given the strong response in support of this topic from stakeholders, the Council's Enforcement Consultants, and Groundfish Advisory Subpanel, the Project Team agrees this protocol (status-quo) should be maintained.

For Council consideration, alternatives for proof of permit onboard:

- **4.2.5 Alternative 1 – Status quo (revised). Require ~~paper copy of~~ proof of permit to be onboard fishing vessel and made readily available upon request regardless of the type of permit (e.g., paper, or electronic). NMFS to provide access to permit in a printable format or send paper copy directly to participant.**
- 4.2.5 Alternative 2 – No requirement for paper proof of permit to be onboard fishing vessel. NMFS work with enforcement to develop acceptable format of required proof of permit.

4.3 Roles and responsibilities

The Council will need to identify which management entity(s) will be responsible for any tasks related to management of the directed fishery during the transition and after assuming management responsibilities. This includes preseason, inseason and postseason tasks. These roles and responsibilities could change once the management of the fishery is complete but having clear expectations in place initially will help identify where changes may need to occur in the future. Some of the tasks naturally fall into NMFS purview-issuing permits and implementing regulations; while others fall naturally to the Council; setting seasons and developing regulations for NMFS consideration. Table 2 is an organizational chart that identifies (current) lead staff and roles. Table 3 describes potential changes to current roles and responsibilities by management entity.

The Project Team believes that Table 3 in this document provides the most appropriate and efficient means of identifying roles and responsibilities of pertinent tasks related to directed fishery management, and supports its use as NMFS and the Council undertake management of the fishery.

5.0 Workload and Timeline

Generally, it requires at least three Council meetings to adopt major changes to a fishery to accommodate an open transparent process that encourages public input; these meetings need not be consecutive. NMFS provided a detailed timeline with principal achievements outlined in the November report ([Agenda Item F.3.a NMFS Report 1, November 2019](#)) which the Council agreed was a reasonable path forward.

5.1 Council Workload Planning

- March 2020
 - Maintain the current Project Team to continue the transition work, or if necessary, establish an advisory body.
 - Approve scope of action and purpose and need statement for transition process.
 - Review range of alternatives for transition of management of directed fishery.
 - Consider other alternatives suggested through the Council process
 - Provide guidance for additional or modified alternatives as necessary
 - Consider adopting range of alternatives for public review

- Approve schedule to complete project.
- September 2020
 - Project Team identifies preliminary preferred alternatives (PPAs)
 - Council adopts for public review preliminary preferred alternatives
 - Project Team develops any necessary analytical documents
- November 2020
 - Project Team presents updated preliminary alternatives (PPAs)
 - Council adopts final preferred alternatives (FPAs).
 - Council transmits recommendation to NMFS.
- Spring/summer 2021
 - Project team works to develop potential vessel limit framework table
- September 2021 (potential scenario)
 - Council considers directed fishery season structure and vessel limit framework for public review
- November 2021 (potential scenario)
 - Council adopts directed fishery season structure and vessel limit framework for recommendation to IPHC

5.2 Timeline for Approval and Implementation

Timeline hinges on Council transmittal and that the Council takes final action in November 2020:

- March 2020 – range of alternatives provided; preliminary preferred alternatives (PPAs) identified
- May-August 2020 – PPAs refined (Council and NMFS staff)
- September 2020 – Council considers PPAs
- November 2020 – Council adopts FPAs
- November 2020- January: NMFS start PRA process and drafting proposed rule, and other analytical documents
- February 2021: NMFS publishes proposed rule
- February -March 2021: NMFS begins programming for new permitting system
- April 2021: NMFS public comment period ends
- May -August 2021: NMFS reviews comments, drafts final rule
- September 2021: NMFS submits final rule, concludes PRA
- November 2021: NMFS completes programming for new permitting system
- December 2021: NMFS tests new permit system
- January 2022: NMFS initiates new permit process

6.0 Tables

The IPHC Regulatory Area 2A non-tribal commercial directed Pacific halibut fishery structure has been a topic of discussion between the International Pacific Halibut Commission (IPHC) and the Pacific Fishery Management Council (Council) since May 2017, when the Council received a letter from the IPHC recommending the Council consider a change in the management of the fishery. The IPHC did not recommend a particular management structure for the fishery but supported changes that would reduce the concentration of fishing effort. The Council has engaged in discussions regarding this request over several

Council meetings since then. Outlined in Table 1 are some of the major discussion points during Council meetings.

<p>Table 1. PFMC Area 2A Halibut fishery management topics:</p>
<p>November 2018 Council meeting: The IPHC provided a copy of a proposal for longer fishing periods (Agenda Item F.1.a, Supplemental IPHC Report 1). In response, the Council developed a list of issues and concerns, noting that the Council and its management partners could consider the structure of the directed fishery in a holistic way through a workshop.</p>
<p>March 2019 Council meeting: The Council directed Council members and staff to develop the scope of a workshop that could address management of the fishery.</p>
<p>April 2019 Council meeting: The Council reviewed the report (Agenda Item H.2 Supplemental Attachment 1, April 2019) which highlights management considerations that include licensing (i.e., permitting) and inseason management. Further direction by the Council was provided and includes the Council's intent to manage the directed fishery and continue development of a stakeholder workshop (Council Decision Document, April 2019).</p>
<p>June 2019 Council meeting: The Council reviewed the report (Agenda Item H.1 Attachment 1, June 2019) that outlines key questions for consideration and highlights that IPHC would like to discontinue their 2A vessel licensing system at some point in the future, so the timing of IPHC's withdrawal of issuing permits will likely be a key point of the transition plan. Plans for a workshop suspended.</p>
<p>September 2019 Council meeting: The Council submitted a letter to the IPHC stating their intent to manage the fishery as soon as practicable (Agenda Item G.2 Supplemental Attachment 3 September 2019) and noted that a news release was sent to notify stakeholders that the Council will consider the 2020 season structure for the directed fishery for recommendation to IPHC, but does not intend to consider any major changes to the fishery management structure.</p>
<p>November 2019 Council Meeting: The Council received a response from the IPHC that states their willingness to support the Council's efforts and a desire for the transition to conclude in time for the 2021 fishery (Agenda Item F.3.a IPHC Report 1 November 2019). Council adopts the 2020 season structure for recommendation to IPHC.</p> <p>Council assigns NMFS/Council staff to draft document to describe purpose and need, scope of action and range of alternative for Council consideration in March 2020.</p>
<p>March 2020 Council meeting: Council considers Project Teams report (Agenda Item F.3, Attachment 2, March 2020) Council adopts purpose and need, scope of action and range of alternatives for public review. Project Team to provide draft Preliminary Preferred Alternatives in September 2020. Council review and potential adoption of Final Preferred Alternatives scheduled for November 2020.</p>

Table 2. Organizational list of contributors in halibut management (*list incomplete*)

Organization	Name	Responsibility
NMFS WCR Sustainable Fisheries Division	Kathryn Blair [Contractor]	Inseason manager and lead regulation writer and analytical reports.
NMFS WCR Sustainable Fisheries Division	Frank Lockhart	Identify potential policy, regulatory, and administrative issues during development and review. Consultation on Indian interests and interactions between Commissioners, WCR and AKR.
NMFS WCR General Counsel	Caitlin Imaki Maggie Smith	Review and consultation on Indian and Halibut Act and other legal matters.
NMFS WCR Sustainable Fisheries Division	Peggy Mundy	Salmon and incidental halibut inseason manager.
NMFS WCR NEPA	Galeeb Kachra [Contractor]	Review document for completeness in terms of NEPA requirements during development and review.
NMFS WCR Protected Resources Division		Consultation on Protected Species Impact Analyses. Consultation on development of measures and impacts on protected resources (if needed)
NMFS WCR Observer Program	Jon McVeigh	Consultation on bycatch and marine mammal interactions observed in the directed commercial fishery.
PFMC	Robin Ehlke	Pacific Fishery Management Council halibut staff point-of-contact
WDFW	Heather Hall	Lead staff/contact for halibut in state agency
ODFW	Lynn Mattes, Christian Heath	Lead staff/contact for halibut in state agency
CDFW	Caroline McKnight, Melanie Parker	Lead staff/contact for halibut in state agency
IPHC	Lara Erikson, Caroline Robinson	IPHC contact for 2A commercial fishery management

Table 3. List of roles and responsibilities necessary for Pacific halibut fishery management. Shaded areas denote potential change.

Task	Currently performed by:	Post transition potentially performed by
Setting TCEY/FCEY for Area 2A	IPHC	IPHC
Distributing FCEY for various Area 2A fisheries	Council	Council
Licensing		
• Commercial and charter vessel licenses	IPHC	NMFS
• Recreational angler license	States	States
• Tribal license	Tribes	Tribes
Setting vessel/bag limits (preseason and inseason)		
• Directed commercial	IPHC	Council/NMFS
• Incidental	Council	Council
• Recreational	Council	Council
• Tribal	Tribes	Tribes
Setting overall fishing season		
• Directed commercial	IPHC	Council/NMFS
• Incidental	Council	Council
• Recreational	Council	Council
• Tribal restricted and unrestricted seasons	Tribes	Tribes
Setting open and closed fishing areas	NMFS/Council	NMFS/Council
Conducting biological sampling	IPHC/States/Tribes	IPHC/States/Tribes
Development of fishery regulations/changes to fishery regulations		
• Directed	IPHC	Council/NMFS
• Incidental	Council	Council
• Recreational	Council	Council
Publication of fishery regulations (including inseason FRNs)		
• Directed	IPHC/NMFS	NMFS
• Incidental	NMFS	NMFS
• Recreational	NMFS/IPHC/States	NMFS/IPHC/States
Inseason management and monitoring of fisheries		
• Directed	IPHC	NMFS
• Incidental	Council/States/ IPHC	Council/States
• Recreational	States/NMFS	States/NMFS
• Tribal	Tribes	Tribes
Providing observer coverage for directed commercial	NMFS	NMFS
Providing enforcement coverage of fisheries	NMFS/States/Coast Guard	NMFS/States/Coast Guard