

SUPPLEMENTAL GROUND FISH ADVISORY SUBPANEL REPORT ON
FIXED GEAR CATCH SHARE REVIEW – SCOPING

The Groundfish Advisory Subpanel (GAP) received a presentation from Dr. Jim Seger and Ms. Jessi Doerpinghaus regarding the review of the Fixed Gear Limited Entry Tier Stacking program (LEFG). The GAP thanks the staff for the extensive and thorough work done to date and offers the following comments to both staff and the Pacific Fishery Management Council (Council) for further direction.

Regarding this periodic review, the GAP's response to the general threshold questions posed by the analysts are as follows:

1. Is the current draft document adequate, or is more work needed?

Generally speaking, the GAP feels the content of the review seems to be more than sufficient; in fact, in some areas, it may be taking a deeper dive than needed. Specific areas are identified below.

2. If any new measures are suggested for change to the program, should they be developed parallel to the review process, or as 'follow-on' actions after the review process is completed?

If a simple change is proposed such as extending the season from October 31 to December 31st, the GAP recommends it be done parallel to the review process. However, any complex change to the program should not be considered until after the review process is complete.

3. Should there be public hearings as part of the review process, similar to those held in the Trawl Individual Fishing Quota (IFQ) program review?

The GAP recognizes the value of the previous in-person public hearings held regionally up and down the Coast during the trawl catch share review process. The GAP notes if the Council continues to allow public comment via webinar at Council meetings, more LEFG permit owners may actively participate in the review of the tier stacking program. It was also mentioned that there might be a need for public hearings as part of the review or "follow-on" process only if there were significant changes proposed to the program.

Staff also asked the GAP for guidance regarding the review of the program relative to several specific areas of the program itself.

Section 2.2 Allocation.

Regarding allocation within the LEFG sector, between the tier and daily-trip-limit (DTL), the GAP does not recommend any further analysis or potential change regarding the current allocation of the fish. The GAP notes around 93 percent of the tier fish is being caught and about 75 percent of the DTL is being taken.

Section 2.3 Eligibility.

After discussion, the GAP thinks the review does not need to include an analysis of participants that left the fishery.

Section 2.6 Accumulation limits.

The review document does a very good job of addressing accumulation limits on pages 14-15 of the draft, and no additional work needs to be done. Allocation reviews, because the types of analyses described here can be time and resource intensive, it might be appropriate for separate analyses with a summarization in the review document.

Section 2.7 Cost recovery

Regardless of national policy, cost recovery does not seem to be an issue for this fishery. The GAP notes virtually nothing in the LEFG program has changed since the last review, with exception of minor changes such as electronic fish tickets and a rule relating to ownership and control limits. During the 2014 review, the question was raised as to whether it would cost more to recover the related costs than the costs themselves. The GAP asserts this comment is still applicable to today's fishery.

Section 2.8 Data Collection and Monitoring

Regarding the question of how extensive the description of existing data collection, monitoring, and enforcement programs should be set forth in the review document, the GAP thinks current data collections are adequate to support the program evaluation.

The GAP is somewhat concerned that the target of the review, the tier stacking program, could get lost, if topics such as descriptions of state fish ticket systems, details of enforcement regimens, etc. are included. The GAP notes a mention of the pending regulatory efforts since the last program review is appropriate, such as a requiring federal LEFG logbooks, but a detailed description of it in the review is unnecessary. In addition, our understanding is that a regulatory change to report sale prices for tier permits is yet to be prioritized under the groundfish workload priorities document. This effort could provide useful economic information previously unavailable.

Section 2.10 Entry and Exit

Regarding whether additional analysis is needed pertaining to an in-depth analysis of market power, the GAP thinks a further discussion of "market power" is unwarranted. There doesn't appear to be any evidence a vessel owner with a maximum of three permits stacked has any "market power" in the sablefish fishery, and as such, no further research is needed.

PFMC
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