

NMFS REPORT ON BASE PERMIT DESIGNATION

As part of a review of administrative tasks associated with the Primary Sablefish Tier Fishery, NMFS has reviewed the base permit designation in sablefish permit stacks at [§ 660.25\(b\)\(3\)\(iii\)](#), subpart C, and has determined that the requirement to designate a base permit is duplicative and unnecessary. The base permit designation dates back to the development of Amendment 14 to the Pacific Coast Groundfish Fishery Management Plan (see pages 8 and 27 of [Amendment 14 Environmental Assessment, Regulatory Impact Review, and Initial Regulatory Flexibility Analysis](#)). The provision was originally intended to assist in the administration of gear restrictions and length restrictions under consideration; most of which were ultimately not adopted.

The base permit designation was used to determine that at least one permit in a sablefish permit stack had a length endorsement that was long enough for the vessel. However, the length requirement is already covered by a separate regulation within [§ 660.25\(b\)\(3\)\(iii\)](#), subpart C. It is not necessary for a base permit to be designated to enforce the length requirement; NMFS need only ensure that one of the permits in the stack fit the length of the vessel. Given that the designation of the base permit creates an unnecessary administrative burden on fishery participants and NMFS permits staff, NMFS favors the removal of the requirement to designate a base permit in the Primary Sablefish Tier Fishery. NMFS recommends that the Council consider the removal of the requirement to designate a base permit from [§ 660.25\(b\)\(3\)\(iii\)](#), subpart C. The definition of a base permit at § 660.11 may also be removed. This action could be incorporated into a larger action stemming from the Council's program review, or could be included in a future action.