

## SABLEFISH GEAR SWITCHING

Pacific Fishery Management Council (Council) discussions on limiting the use of fixed gear to target sablefish in the trawl individual fishing quota (IFQ) fishery (gear switching) began as part of its review of the trawl catch share program, conducted in 2016 and 2017. As a result of the review, the Council adopted a gear switching control date (September 15, 2017) and subsequently began a process that led to the adoption of a range of alternatives for analysis its September 2021 meeting. That range was then expanded and modified at the June 2022 meeting with the addition of an alternative that would limit gear-switching using gear specific quota pounds (QP) and the split of the alternative that would use gear switching endorsements to achieve the limitation. The following is the current list of alternatives:

- No Action
- Action Alternative 1: Gear-Specific Quota Shares
- Action Alternative 2: Gear-Specific Quota Pounds
- Action Alternative 3: Gear-Switching Endorsement—Permit Qualifier
- Action Alternative 4: Gear-Switching Endorsement—Vessel Qualifier

A description of the alternatives was first provided to the Council as an informational report at its September 2022 meeting and are provided here as Agenda Item H.3.a, Attachment 1. In the process of conducting the analysis, a few issues, mostly related to Alternative 2, were identified which required clarifications to the language of the alternatives. These are highlighted as underlined insertions and strike-outs in Attachment 1. Alternative 2 was developed by staff following the Council's June 2022 guidance to use Alternative 1 as a template to develop an action alternative based on gear specific QP. This is the first time the new Alternative 2 will be presented to the Council as part of an agenda item. The discussion section on Alternative 2 in Attachment 1 explains interpretations that were made in following the Council guidance. Alternative 2 also includes two options for Council consideration that were not part of Alternative 1 but might be appropriate for an alternative based on gear-specific QP. In addition to the changes made to Alternative 2, language was added to Alternatives 3 and 4 to indicate that the size of gear-switching endorsements should not be set above the annual vessel QP limit (currently 4.5 percent). As a companion to Attachment 1, an alternatives and options list is included as Agenda Item H.3, Attachment 2.

An initial analysis of the gear switching alternatives is provided as Agenda Item H.3, Attachment 3. For the November Council meeting, analysts focused on development of the analysis elements that would be most helpful to the Council in selection of a preliminary preferred alternative (PPA). Additional analysis will be completed to support the Council in selection of its final preferred alternative (FPA), currently scheduled for the April 2023 Council meeting. Also, in support of the Council's selection of a PPA, National Marine Fisheries Service (NMFS) has provided a report which provides information and advice on considerations related to the timing, administrative complexity, and cost of implementing the alternatives (Agenda Item H.3.a, NMFS Report 1).

Under this agenda item, several tasks are identified for Council consideration. In reviewing the agenda item materials, as a first step Council members may wish to review the alternatives (Attachment 1). The Council should confirm whether the rendition of Alternative 2 meets its intent, as well as the clarification about the maximum size of the gear switching endorsement limits that could be issued under Alternatives 3 and 4.

Second, the Council should review the analysis of the individual and collective approaches used to apply the qualification criteria. These approaches relate to situations where ownership interest in a group's assets and activities must be evaluated to determine qualification for history-based opportunities to continue gear-switching. At the June Council meeting, after reviewing information on the differences between the approaches, the Council decided to use the individual approach but requested further analysis to evaluate that decision. That analysis is included in Section ES-6.6.1 and Appendix A of the initial analysis (Agenda Item H.3, Attachment 3). If the Council chooses to change to the collective approach, the changes in the results of the current analysis will not be substantial so the Council can proceed with selecting a PPA. However, the language of the alternatives will need to be modified. If this or other changes are made, the Council should have a discussion of its schedule for this action and the most effective way for moving forward.

The third task identified for the Council is to select a PPA. In considering a PPA, it may be most helpful to review the following elements of the analysis.

- Summary of Key Performance Indicators (Section ES-6.6)
  - Analysis of the problem (Section 3.0).
- Impacts of Alternatives (Initial Assessment)
  - Overall Trawl Fishery Harvest, Exvessel Revenue, and Attainment (Sec. 4.4)
- Analysis of Individual Alternatives (Appendix A)
  - Elements of Alternative 1 (Sec. A-2.0)
  - Elements of Alternative 2 (Sec. A-3.0)
  - Elements of Alternative 3 (Sec. A-4.0)
  - Elements of Alternative 4 (Sec. A-5.0)

The fourth task identified is to eliminate any options within the Alternatives the Council finds are not viable based on the initial analysis. This narrowing will reduce the analytical burden, help focus public comment, and reduce the amount of material that the Council needs to review at the next stage of this process.

The final task is to provide any other guidance useful in preparing for the next step of this process.

**Council Action:**

- 1. Review new Alternative 2 and provide guidance, as needed.**
- 2. Review the analysis of individual vs. collective approach and provide guidance, as needed.**
- 3. Select PPA.**
- 4. Eliminate options that are not viable, if possible.**
- 5. Provide other guidance, as needed.**

Reference Materials:

1. Agenda Item H.3, Attachment 1: Range of Gear Switching Alternatives Adopted for Analysis by the Council at Its September 2021 and June 2022 Meetings.
2. Agenda Item H.3, Attachment 2: Gear Switching Alternatives and Options List.
3. Agenda Item H.3, Attachment 3: Initial Analysis of The Gear Switching Alternatives (*Electronic Only*).
4. Agenda Item H.3.a, NMFS Report 1: NMFS Report on Implementation of Gear Switching Alternatives.
5. If received, Public Comments are electronic only ([see e-portal](#)).

Agenda Order:

- H.3 Sablefish Gear Switching Jim Seger/Jessi Doerpinghaus  
*(Part 1 - H.3.a and H.3.b on Saturday, then continue Monday with H.3.c)*
- a. Reports and Comments of Management Entities and Advisory Bodies
  - b. Public Comment
  - c. **Council Action:** Adopt Preliminary Preferred Alternative and Provide Other Guidance, As Needed
- H.3 Sablefish Gear Switching - (Part 2 - *Continued from Sat.*) Jim Seger/Jessi Doerpinghaus
- c. **Council Action:** Adopt Preliminary Preferred Alternative and Provide Other Guidance, As Needed

PFMC  
10/13/22