

GROUND FISH ADVISORY SUBPANEL REPORT ON SABLEFISH GEAR SWITCHING – CHECK-IN AND REFINE THE RANGE OF ALTERNATIVES

The Groundfish Advisory Subpanel (GAP) received presentations and information on this agenda item from Dr. Jim Seger, Pacific Fishery Management Council (Council) staff and Ms. Maggie Sommer, National Marine Fisheries Service (NMFS). Additionally, we reviewed the documents under this agenda item, including the [Supplemental WDFW Report 1](#), [Council Member Report 1](#) and public comment under this agenda item. Considering the presentations, documents, [GAP Report 1](#), [Supplemental GMT Report 1](#), and [Council Member Report 2](#), the GAP had an extensive discussion about the various alternatives and options.

In the interest of refining alternatives, the GAP established consensus surrounding suspending further development of Alternative 3, so long as some of the sub-options were moved to Alternative 2. GAP members believed this would provide the Council with a narrower range of options from which to work and allow Council staff to focus their analysis on the remaining alternatives.

The GAP appreciates Council members' continued work to develop alternatives that would continue to keep the groundfish fishery healthy and productive into the future while also streamlining the alternatives to avoid unnecessary workload for fishery managers. However, as evidenced by the additional suggestions and changes in the briefing book, including some that have not been proposed for GAP consideration yet, the GAP finds it extraordinarily difficult to offer informed comments to the Council, let alone find consensus. We, and the Council, have been trying to narrow the scope of the alternatives at several meetings, only to see new alternatives be added to the mix for consideration. Any alternative could have unanticipated effects on future vessel owners, permit owners, quota shareholders, processors, and communities.

Overarching policies

The GAP discussed the use of quota shares (QS) vs. quota pounds (QP) and potential impacts on flexibility and functionality. At this time, pending further consideration of alternatives and analysis, QP seems to provide more flexibility for management and fishery participants over time.

Members of the GAP will likely not be able to reach consensus on the amount of quota that should be allowed to be used for gear switching. Different sectors have solid rationale for supporting their respective positions. Ultimately, the Council must decide what it determines is best for the future of the fishery and make that decision, whether it's 0 percent, 29 percent, or somewhere in between.

New alternative

The new alternative proposed in [Council Member Report 2](#), uses QP to manage gear-switched quota. The GAP supports including this alternative for analysis. The GAP suggests inclusion of the qualification and expiration options from Alternative 3 that the GAP recommended for Alternative 2 (See Agenda Item G.5.a, [GAP Report 1](#)). The GAP understands with discussions from Council staff that the qualification options could be included without modification, but the

expiration option would need further revisions for the new QP alternative. The main revision is when the legacy-based opportunities expire, the amount of any-gear QP issued would be reduced rather than redistributed among non-legacy participants. With this change, over time the lower bound amount of any-gear QP issued would be the percentage of any-gear QPs issued to non-legacy participants in the year of implementation.

To provide an option with a total phase out of gear switching (similar to the expiration in Alternative 3), rather than issuing a mix of trawl-only and any-gear QP to all non-legacy participants as currently described for the new alternative, those QPs could be issued as 100 percent trawl-only QP.

The Council could make that recommendation at this meeting without substantially changing the process timeline.

GAP discussion

The GAP did discuss the following topics, though the virtual format of our April meeting hindered substantive dialogue:

- The three existing alternatives as outlined in [Agenda Item G.5, Attachment 1](#), Synopsis of Gear Switching Alternatives, Options, Comparisons and Issues;
- The “No action” alternative that will be analyzed by default;
- The potential addition of an alternative that limits gear switching to 29 percent of quota pounds;
- Whether, and if yes, how a cap on gear-switching quota pounds would create a derby fishery within the trawl catch shares program (with limited access privileges). Would it be a stand-alone alternative or incorporated as a sub-option to an existing alternative? and;
- How a potential increase in sablefish biomass and associated harvest levels could affect the trawl and fixed gear fisheries in general and gear switching in particular.

The GAP continues to agree to the content included in Agenda Item G.5.a, [GAP Report 1](#), which focused on issues where consensus was achieved to refine the alternatives. However, we recognize this agenda item is an opportunity to check in on the progress and refinement of alternatives. GAP members could not reach consensus on the items we discussed at this meeting (that is, the bulleted list above) and anticipates the Council will also have a robust discussion on refining the alternatives.

The GAP will come prepared for further refinements to help inform Council action in selecting a preliminary preferred alternative in June 2023. The opportunity to meet in person in Vancouver, WA, should provide the GAP greater ability to consider the Council’s action and offer substantive comments at that time.

PFMC
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