

GROUND FISH ADVISORY SUBPANEL REPORT ON COMMERCIAL FISHERY  
REGULATION CHANGES: VESSEL MONITORING SYSTEMS, SEABIRD AVOIDANCE  
AND CATCH REPORTING – RANGE OF ALTERNATIVES, PRELIMINARY PREFERRED  
ALTERNATIVE

Problem Statement, Range of Alternatives

The Groundfish Advisory Subpanel (GAP) discussed the three proposed actions relative to Agenda Item F.2, which deal with requiring vessel monitoring systems (VMS), seabird avoidance devices and certain catch reporting actions for vessels operating in the directed commercial (DC) Pacific halibut fishery. With regard to Action 3, the GAP does not see a need to include the DC halibut fishery in the scope of the alternative. For the DC halibut fishery, there is no need to count the number of halibut for non-tribal DC halibut landings as it is managed only in pounds. This will only increase the burden for processors (although likely minimal) without any management or enforcement benefit.

The GAP agrees with the modification proposed by the Enforcement Consultants (EC) for the problem statement and overall believes it accurately describes the concerns addressed by the proposed actions.

GAP-supported Preliminary Preferred Alternatives (PPA)

Regarding the Action Items 1 and 2, the GAP supports the following as a PPA (bolded):

1. ACTION 1. Vessel Monitoring System

**Alternative 1:** Require VMS on vessels participating in the DC halibut fishery

• **Component 1.** Applicable waters

A. **EEZ**

B. Convention waters of IPHC Area 2A (0nm–200nm)

• **Component 2.** VMS ping rate requirement

A. **Four times per hour (i.e. once every 15 minutes)**

B. Once per hour

• **Component 3.** VMS status requirement

A. 24 hours a day, 365 days a year

**B. When participating in the DC halibut fishery and fishing during an open period**

2. ACTION 2. Seabird Avoidance Measures

**Alternative 1:** Require vessels participating in the DC halibut fishery using bottom longline gear to deploy streamer lines when setting gear.

• **Component 1,** Applicable waters

A. **EEZ**

B. Convention waters of IPHC Area 2A (0nm-200nm)

The GAP agrees with the EC on the PPA for Actions 1 and 2. This would align regulations for vessels fishing in the non-tribal DC halibut fishery and groundfish vessels. We believe this would eliminate confusion among participants but still address the problem at hand.

The GAP did discuss and acknowledge that approximately seven vessels will be required to purchase VMS equipment and streamer lines in order to participate in the DC halibut fishery should these actions be adopted. While this may be an economic burden to those vessels, the GAP also recognizes the owners of those vessels may be eligible for reimbursement through the Pacific States Marine Fisheries Commission (PSMFC). We understand from the Office of Law Enforcement that PSMFC is evaluating requests based on priority, with requirements being put above elective fishing opportunities, and no requests have been denied to date. Additionally, by using VMS, those vessels will be able to expand their fishing opportunities into groundfish, if they so choose. The GAP also recommends that additional funding for streamer lines be procured as was done for the groundfish fisheries when those measures were implemented.

PFMC  
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