

GROUND FISH ADVISORY SUBPANEL REPORT ON LIMITED ENTRY FIXED GEAR  
ACTIONS; GEAR ENDORSEMENTS, COST RECOVERY AND OTHER  
ADMINISTRATIVE CHANGES – FINAL ACTION

The Groundfish Advisory Panel (GAP) recommends the following for final preferred alternative (FPA):

**Gear Endorsements**

The GAP recommends Alternative 3, including suboption a, allowing limited entry fixed gear (LEFG)-permitted vessels to use any legal non-trawl gear, with the exception of entangling nets. In March 2025, the GAP discussed how Alternative 3 would allow “setnets” – also known as “bottom gillnets” – to be used south of 38° N. lat. by LEFG vessels ([Agenda Item H.7.a, Supplemental GAP Report 1](#)). The GAP does not support the expansion of this gear type or any type of entangling net for the direct harvest of groundfish, and recommends specifically excluding entangling nets (i.e., including suboption a in the FPA).

The biggest benefit to the fishery of this deregulation is the increase in participants' ability to adapt to the many dynamics of fishing (time, place, market, whales, bycatch, etc.) and catch target species with the most effective gear type. Examples of strategies that could be used include: using Portuguese longline for blackgill, bank, and shelf rockfish; rod and reel for shelf and nearshore rockfish; snake gear (Vietnamese longline) for chilipepper rockfish; pots for sablefish; hook-and-line gear for sablefish, etc.

Attachment 1 describes the potential for large shifts from one gear type to another, i.e., longline to pots through three scenarios under the alternatives. Concerns were brought up about the increased risk of whale and sea turtle entanglements given that sablefish pot gear has a higher number of confirmed entanglements. Given the multitude of factors (markets, bycatch, opportunity, economics, ability, etc.) that could affect the decision to use one type of gear vs. another, it is nearly impossible to make a specific estimation of what change in gear types used, if any, may occur. However, the GAP agrees that there will likely be participants who stay with their current types and those that switch to other gears, and that these changes will not only be toward sablefish pots. The GAP appreciates the analysis incorporated our suggestion for a comparison of vertical line hours between pot and bottom longline gear to assist in determining the change in risk of entanglement under the action alternatives. Overall, the GAP concurs with the analysis that while the impacts are uncertain, the impacts of this action are not significant.

**Base permit proposed change**

The GAP supports Alternative 1 as the FPA. This change will help streamline National Marine Fisheries Service administrative reviews with fishing permit changes.

## **Permit Price Reporting**

The GAP recommends no action for this action item. This is a change in the GAP recommendation from March 2025. With additional discussion, it was thought that this information is readily available from current quota brokers, such as Dock Street Brokers. Additionally, as the analysis suggests, permit prices reported may not be accurate. Past sales of LEFG permits, and tiered permits specifically, have not occurred frequently such that the information is so limited it could not be made public. Therefore, Alternative 1 would provide little additional information. The initial request for permit information by the Scientific and Statistical Committee was to be an indicator of expected future profits in the fishery and ease of entry into the fishery. The GAP believes that publicly available data (used in both of the two program reviews) can provide useful information without additional reporting requirements.

## **Season Start Time**

The GAP supports Alternative 1 as the FPA. The reference to noon in the regulations is no longer needed given the use of electronic fish tickets.

## **Cost Recovery**

The GAP recommends that the Pacific Fishery Management Council select Alternative 1, suboption a as its FPA, so that the vessel owner or an authorized representative will pay the cost recovery fee. While the GAP initially proposed having the permit owner be responsible for paying the fee (suboption b), given the number of permit leases in the fishery, the vessel owner (or representative) is the best option.

PFMC  
06/12/25