

HIGHLY MIGRATORY SPECIES MANAGEMENT TEAM REPORT ON HIGHLY MIGRATORY SPECIES ROADMAP DEVELOPMENT

The Highly Migratory Species Management Team (HMSMT) reviewed and discussed the HMS Roadmap, HMS exempted fishing permit (EFP) framework, and future workload and priorities for the Fishery Innovation Workgroup (FIW). The HMSMT recommends the Council:

1. Adopt the FIW Terms of Reference described in [FIW Report 1](#).
2. Enact the near-term EFP streamlining adjustments (one meeting review process; reviews in November and March).
3. Conduct a review of potential performance metrics, including any metrics for economic viability.
4. Adopt the FIW workplan outline described in [Supplemental FIW Report 2](#), but prioritize production of an EFP application template and EFP application guidance document.
5. Finalize the current draft HMS Roadmap as a living document.

Below, we provide more detail and considerations related to each of our recommendations.

FIW terms of reference

The HMSMT discussed the FIW Terms of Reference and is ready to assist the FIW in accomplishing its milestones, especially where subject matter experts on the advisory bodies could provide beneficial input on specific tasks.

EFP review process and timing

The FIW recommendations to make changes in Council Operating Procedure (COP) 20 to optimize the Council EFP review process for potential EFP applicants are appropriate, and the HMSMT endorses the immediate adoption of the first deliverable in the FIW's work plan: "*Surgical, high priority COP 20 proposed revisions.*" Making a recommendation on EFP applications in a single meeting (where appropriate) and reviewing applications in November and March rather than June and September, should streamline the administrative review process and reduce barriers to entry for fishermen wishing to try new HMS gear innovations. The HMSMT also supports allowing applicants to submit at either meeting where EFPs are reviewed (i.e., a new EFP application could be submitted and considered at either the November or March meeting). The HMSMT notes that the timeline for completing all necessary analysis and consultation by NMFS can vary and is longer for new gear configurations and regulatory exemptions being proposed for the first time, relative to applications which simply add a vessel or EFP participant to a gear type where the regulatory process is already completed.

The HMSMT discussed related workload, and recommends the Council consider suggestions by the HMSMT in its November 2024 Report 1 ([HMSMT Report 1 Agenda Item H.4.a](#), - see the 'Modify Council Operating Procedures' section). Applicants are required to submit their EFP applications directly to NMFS and could do so for initial review before submission to the Council. As part of this, NMFS could determine if the application is within the scope of existing documentation (e.g., for NEPA and ESA) and assess the workload related to applications received. Those applications that are identified as being "within scope" could proceed using a one Council

meeting process while those “outside of scope” could continue in the traditional two meeting framework.

EFP performance metrics

There has been extensive discussion on the utility of EFP performance metrics and the HMSMT supports its previous statement on how the Council could consider these topics (see section on EFP Performance Goals, [HMSMT Report 1 Agenda Item H.4.a](#), November 2024). Given the complexity of the topic, the HMSMT recommends the FIW develop a process for reviewing and refining potential EFP performance metrics in consultation with advisory bodies.

FIW draft work plan outline

The HMSMT supports the FIW workplan as outlined in [Supplemental FIW Report 2](#) but questions whether updates to COP 20 are necessary for some of the items (e.g., the third and fourth row of the work plan). The HMSMT suggests that the FIW prioritize clarifying application requirements and desired contents (e.g., producing a template and guidance). The HMSMT recommends completing these deliverables independent of revisions to COP 20. In this way, the work products could be available as a service to applicants, and the Council could avoid unnecessary administrative procedures that could delay these deliverables.

Regarding the EFP application procedures addressed in the third item in the workplan, it is important to solicit and process applications from those who will fish their proposed EFPs, without incentivizing speculative or unserious applications. An EFP application template could reduce existing barriers in the current process and alleviate the need for multiple reviews. This would ensure that the applications provide original information and clarify applicant intentions, without putting the burden on prospective EFP fishermen to try and determine what is required, or incentivizing duplication of previous applications.

If desired, the HMSMT can develop an application template, which could be hosted on the Council’s and/or NMFS’s website for ease of access. Additionally, should the Council adopt standardized review criteria for evaluating future EFP applications based on input from the FIW, these criteria could be informed by the format and fields of the template application.

Draft HMS Roadmap

The HMS Roadmap replaces the Swordfish Management and Monitoring Plan (SMMP), with the stated intent to “*augment the Council’s planning and prioritization of future workload...by offering a holistic view of management considerations for balancing economic viability with conservation objectives in HMS fisheries off the West Coast*” (Appendix A [F.4.a FIW Report 1](#)). Like the SMMP, the Roadmap outlines goals that underpin the Council’s interest in exploratory fishing under EFPs, as well as a suite of actions that connect Council priorities to decision-making frameworks that may inform future updates to the FMP. The HMSMT recommends that the Council finalize the Roadmap as a living document to prioritize its workload on HMS fishery actions. Finalizing the Roadmap as a living document accounts for the exploratory nature of the actions therein and provides flexibility for the Council to incorporate learning as actions progress. For example, the Council might choose to document analyses or decision-making tools—such as performance metrics—within the Roadmap, to maintain course in pursuit of the Roadmap goals.

Alternatively, the Council could decide that such deliverables are better suited to serve as guidance documents, COP revisions, or supporting information for FMP or regulatory amendments.

PFMC

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