GROUNDFISH ADVISORY SUBPANEL REPORT ON HARVEST SPECIFICATIONS AND MANAGEMENT MEASURES FLEXIBILITY

Problem Statement
The Groundfish Advisory Subpanel (GAP) recommends that the Council adopt the problem statement as written.

Range of Alternatives
The GAP recommends that the Council move forward the following range of alternatives (ROA); No Action is not noted, but assumed to be included), summarized below, with an asterisk indicated for the GAP's preliminary preferred alternative (PPA) where applicable:

Carryover

- Alternatives: **Alternative 1*** (ABC carryover) and **Alternative 2*** (ACL carryover)
- Eligibility Criteria: **Options A-C** (A: stock status is known and stock is not overfished; B: stock is not subject to phase-in ABC control rules; C: stock has not exceeded ACL more than once in the past four years) and **add options** (D: stock has not exceeded OFL in past four years; E: ABC carryover for stocks above management target; F: ACL carryover for stocks below management target)
- Process Options: **Option A*** (stock-by-stock)
- Data Options: **Option A*** (final mortality data from year 1 to issue in year 3)
- Buffer Between OFL and ABC: **Option A** (max ABC carryover) and **Option B** (based on category of assessment)
- Specifications & Management Measures:
    - Tribal set-aside: add option for Tribes to indicate species for which carryover would be beneficial, proportional increase
    - Allocations, HGs: **Option C*** (if-then)
    - At-sea set-asides: **Option B*** (change)

Phase-In of ABC Changes

- Alternatives: **Alternative 1*** (Phase-In Framework)
- Eligibility Criteria: **Option A** (stock not selected for ABC carryover in same year)

Mid-Biennium Harvest Specification Change

- Alternatives: **Alternative 1*** (mid-biennium harvest specifications increase)
- Specifications & Management Measures:
    - Tribal set-aside: add option for Tribes to indicate species for which carryover would be beneficial, proportional increase
    - Allocations, HGs: **Option C*** (if-then)
    - At-sea set-asides: **Option B*** (change)

Accounting for Off-the-Top Deductions

- Alternatives: **Alternative 2*** (deduct from ABC, but EFPs from sector-specific allocation)

Harvest Specification Frequency

- Alternatives: **Alternative 2** (biennial cycle with varying specification frequency)
    - Note, No Action is the GAP's PPA.

Carryover

For carryover, the GAP recommends the Council adopt both Alternative 1 (Acceptable Biological Catch [ABC] carryover) and Alternative 2 (Annual Catch Limit [ACL] carryover) as the ROA and recommend both as the PPA, in order to add both tools to the fishery management plan (FMP) framework. These alternatives are not mutually exclusive, and the options we recommend adding below would include utilizing both methods of carryover issuance. While both alternatives are anticipated to be used on a select basis for key stocks, the GAP believes that this provision could provide relief from constraints and provide stability.

The GAP supports all three of the eligibility criteria (Options A-C) for carryover remaining in the range of alternatives, and recommends adding three more criteria:

- Option D: Stock has not exceeded the overfishing limit (OFL) in past four years
- Option E: ABC carryover for stocks above management target (e.g., B40 for rockfish)
- Option F: ACL carryover for stocks below management target

These additional criteria would serve the purpose of adding more precaution and specificity on how carryover would be issued. Under Option C, carryover would not be issued when a stock's ACL was exceeded more than once in the past four years, but the GAP wanted to add another eligibility criteria for analysis that carryover would not be issued if the OFL was exceeded in the past four years. In addition, the GAP recommends that the Council add specificity that ABC carryover would be issued for stocks above the target, and ACL carryover would be issued for stocks below the target, as an extra precaution.

For process options, the GAP's PPA is Option A (stock-by-stock). Species for which carryover would be beneficial would be determined by the Council and its management bodies during the biennial process so that the only the priority species were to have carryover issued for. This would greatly reduce workload for the Scientific and Statistical Committee (SSC) and Groundfish Management Team (GMT) since they would only need to review carryover for the selected stocks, and not every stock. For example, carryover for species such as arrowtooth flounder would not have much utility for most groundfish participants under current harvest specification levels, so would not need to be considered. In addition, species with high attainment or where the ABC or ACL is projected to decrease in the next cycle may not have much, if any, room for carryover and may not need to be analyzed. For the first year of the upcoming biennium, the mortality estimate from year 1 would be available for the upcoming biennium (i.e. year 3- see next paragraph) and therefore the Council would understand potential carryover that could be eligible across the groundfish stocks. While this could create an additional step and work in the specifications process, it would be less overall compared than Option B (default for all stocks). The GAP recommends removing Option B from the range of alternatives.

For data options, the GAP weighed the pros and cons of having carryover issued from year 1 to year 2 (under Option B) versus year 3 (under Option A). We ultimately decided that using the final Groundfish Expanded Mortality Multi-Year (GEMM) report under Option A would significantly reduce workload compared to Option B, which would require attainment projections to be made by the GMT or other entity. In addition, if the attainment projection and resulting carryover issued was wrong, it could result in messy accounting with fish having to be "taken back" later. Final

GEMM data would be much cleaner. The GAP recommends removing Option B from the range of alternatives.

For the buffer between the OFL and ABC, the GAP would like to keep both options in the range of alternatives for further analysis.

For the specifications and management measures considerations, the tribal representative on the GAP indicated that carryover may not be necessary for the tribes in all cases, but there could be situations where receiving carryover would be beneficial. The GAP recommends including a case-by-case tribal issuance of carryover in the analysis using a proportional method. For allocations and harvest guidelines (HGs), the authors did a nice job of thinking through actual carryover scenarios and identifying Option C, which would be fair to all sectors and simplify workload. Under Option C, stocks with a percentage-based trawl/non-trawl allocation would have carryover issued as a proportional increase. For stocks where the allocation or harvest guideline (HG) is set as a metric tonnage for one group with the remainder issued to the other group, a conditional test would apply based on whether or not 50 percent mortality of the baseline allocation or HG was reached. If it was, a proportional carryover would be issued. If it was not, the carryover would be issued to the "remainder" sector. The GAP recommends removing Options A and B from the range of alternatives. For at-sea set-asides, the GAP recommends issuing carryover as a proportional increase. Note that under Agenda Item F.8 (Harvest Specifications and Management Measures for 2027-28 – Part 2) at this meeting, the GAP and GMT are recommending overwinter analysis of an alternative allocation framework that would include performance standards. If the Council chooses to proceed with that analysis, it may be worth addressing under Harvest Specifications Flexibility as well in terms of adding options for carryover issuance.

Phase-In of ABC Changes

The GAP recommends that the Council include the phase-in framework (Alternative 1) within the FMP, as it is already available in the National Standard 1 Guidelines and has been used before in an ad-hoc manner. Under the 2027-2028 harvest specifications and management measures, the Council is considering several alternative harvest control rules that include an ad-hoc ABC phase-in. Formalizing these procedures as a phase-in framework would clean up the FMP and provide more clarity.

For eligibility criteria, the GAP recommends that the Council include Option A (Stock not selected for ABC carryover in same year) in the range of alternatives as this would provide process efficiencies and clarity that a species cannot receive ABC carryover during a phase-in. This aligns with our above recommendation under carryover eligibility.

Mid-Biennium Harvest Specification Change

The GAP recommends that the Council include the mid-biennium harvest specifications increase or "green light" (Alternative 1) within the FMP. A "red light" is already available, and adding the "green light" tool to the toolbox could provide a more responsive tool than currently exists. This tool would have been highly beneficial in this biennium with stocks such as quillback rockfish off California or shortspine thornyhead or in recent history with sablefish. This aligns with the GAP's recommendation for harvest specification frequency below. Regarding the management measures options, the GAP recommends the same options described above for carryover.

Accounting for Off-the-Top Deductions

The GAP sees a lot of promise in Alternative 2, which would move off-the-top deductions from the ABC instead of the ACL, with the exception of any exempted fishing permit EFP deductions which would come off of the sector-specific allocation. Under this alternative, the fisheries/activities which would be accounted for off-the-top would not count against the ACL, which could provide benefits for more closely tracking the ACL because that data is often not available in-season. For stocks where there is already a reduction between the ABC and ACL (such as the canary rockfish example in F.5., Attachment 1), this change would have provided additional yield to the fishery and fishing communities which would have been critical at the time. In addition, if the ABC were no longer equal to the ACL, it could provide benefits for individual fishing quota sector carryover, for which most species are not eligible for carryover now. The GAP discussed any EFP-issued tonnage coming off the sector (trawl/non-trawl) in which the EFP is occurring, and agreed that would be more equitable than off-the-top.

Harvest Specification Frequency

The GAP preferred to remain under the biennial harvest specifications cycle, so No Action is our preferred alternative, but we would like to keep Alternative 2 in the range for analysis as there is potential to create efficiencies in the process. The GAP has concerns about an annual cycle and recommends removing Alternative 1 from the range of alternatives.

PFMC
11/17/25