GROUNDFISH MANAGEMENT TEAM REPORT ON HARVEST SPECIFICATIONS AND MANAGEMENT MEASURES FLEXIBILITY – FINAL ACTION

The Groundfish Management Team (GMT) appreciates the thorough analysis in Agenda Item G.7, Attachment 1, November 2026 and the concise summary of the Range of Alternatives within Agenda Item G.7, Attachment 2, November 2026. The summarized recommendations of the GMT and the Groundfish Advisory Subpanel (GAP) are provided in Table 1 of the Joint GAP/GMT Report 1 under this agenda item.

Table of Contents

Economic and Biological Trade-Offs 2
Carryover 2
Overarching Rationale - Carryover 3
Alternative 1: ABC Carryover Eligibility Options 3
Alternative 1, Eligibility Option A (Stock Status) 4
Alternative 1, Eligibility Option B (Alternative ABC Control Rule) 4
Alternative 1, Eligibility Option C (Catch Exceedance) 5
Alternative 1, Eligibility Option D (New Assessment) 5
Alternative 2: ACL Carryover Eligibility Options 6
Alternative 2, Eligibility Option E (Stock Status) 6
Alternative 2, Eligibility Option F (Catch Exceedance) 6
Options for Both Alternatives 6
Process Option A 6
Data Option A 7
Minimum OFL-to-ABC Buffer Options for ABC Carryover 7
Specifications/Management Measures 7
Tribal Deduction - Option A 7
Allocation – Revised Option 8
At-Sea Set Aside – Revised Option B 8
Phase-In of ABC Changes 8
Alternative 1 8
Eligibility Option A 9
Mid-Biennium Harvest Specifications Change, "Green Light" 9
Alternative 1 9

Specifications/Management Measures 10
Tribal Deduction - Option A 10
Allocation – Revised Option 10
At-Sea Set Aside – Revised Option B 10
Accounting for Off-the-Top Deductions 11
Alternative 1 11
Alternative 2 11
Adjusting Harvest Specifications Frequency 12
Alternative 1 12
Option A 12

Economic and Biological Trade-Offs

The problem statement says the goal of this action is to "promote increased access to, and landings of, groundfish resources off the U.S. West Coast and long-term stability for the groundfish fishery" (Attachment 1, page 18). However, there is little exploration of the trade-offs between increasing landings and increasing stability with relation to each action item (Deroba and Bence 2008, Wetzel and Punt 2017; Attachment 1, page 22). This trade-off is important to highlight because the two goals of this action may, at times, be at odds, yet both have been cited as priorities by industry (Agenda Item E.7.a, Supplemental GAP Report 1, June 2025). It should be acknowledged that measures intended to increase landings could unintentionally lead to less overall fishery stability. The extent to which each proposed action item achieves each goal should be weighed and considered.

The GMT notes that the Council has shown an interest in improving the use of socioeconomic information in decision making processes (Agenda Item G.2, November 2026). This item is a good example of an analysis of potential management measures that could benefit from incorporating existing socioeconomic data streams, such as the data on operational costs collected by the Northwest Fisheries Science Center (NWFSC) Economic Data Collection (EDC) program. For example, the influence of net revenues in driving fishing effort (and therefore, annual mortality) could have been incorporated in the carryover simulations. We highlight this example to help guide future analyses that could incorporate socioeconomic data.

Carryover

Alternative 1 - ABC Carryover: Modify the ABC HCR in the FMP to allow ABCs to be increased from the current ABC value up to but not exceeding the OFL, when there is unharvested Baseline ACL in a recent prior year. The ACL HCR would not be modified.

Alternative 2 - ACL Carryover: Modify the ACL HCR in the FMP to allow ACLs to be increased from the value resulting from the default ACL HCR to up to ABC=ACL, when there is unharvested Baseline ACL in a recent prior year

The GMT recommends the Council adopt both Alternative 1 (Acceptable Biological Catch [ABC] Carryover) and Alternative 2 (Annual Catch Limit [ACL] Carryover) as Final Preferred Alternative (FPA).

Overarching Rationale - Carryover

The extensive quantitative analyses in Attachments 1 and 3 consider multiple Carryover scenarios, including potential for setting Carryover ABCs up to the overfishing limit (OFL) in some years. These analyses demonstrate that there are only minor differences in estimated depletion of stocks between Carryover and No Action scenarios. Cumulative harvests under Carryover are expected to be at or below the cumulative fishery harvest guideline (HG) under No Action, and the Carryover ACLs are set at or below the OFL in any given year. Therefore, the probability of overfishing, as currently defined in the fishery management plan (FMP), for stocks eligible for carryover is expected to be low. Scenarios presented in Attachment 1 provide evidence of how Carryover could increase overall utilization.

A framework that allows unharvested ACL tonnage to be carried forward for harvest in future years (under Carryover Alternatives 1 and 2) is expected to increase variability in year-to-year harvest limits. It also is expected to improve accessibility of these Carryover-increased quotas to all sectors, which in turn could improve utilization of groundfish resources in sectors experiencing constraining conditions for certain stocks. The GMT expects Carryover quotas will improve access to groundfish resources in some portions of the fishery, thus helping improve overall yields. The GMT acknowledges that the distribution of Carryover quotas (within the current allocation structure) is unlikely to be optimal under the framework. However, reallocation of Carryover quota would require time-intensive analysis equivalent to the current biennial harvest specifications and management measures process. Furthermore, reallocation of Carryover quota would likely exclude the Carryover action from being considered a "routine" management measure by National Marine Fisheries Service (NMFS) - decreasing the likelihood that Carryover could be accomplished under an expedited timeline.

The GMT expects Carryover Alternatives 1 and 2 to address the Problem Statement (Attachment 1) in the following ways:

- Carryover allows for increased harvest levels while keeping total mortality within cumulative ACLs through time;
- The framework aims to prevent overfishing while increasing utilization and simultaneously keeping incremental workload increases low;
- Carryover will increase variability in harvest limits from year to year (i.e. less stability in harvest limits) but has the potential to help maintain groundfish markets (i.e. increase market stability) by providing increased quotas to the fishery as a whole to provide benefits to the parts of the fishery experiencing constraints in the current management framework;

Alternative 1: ABC Carryover Eligibility Options

With regards to all Alternative 1 Eligibility Options, the GMT notes that the Scientific and Statistical Committee (SSC) will have exclusive authority for recommending any Carryover ABCs under this framework in the future. Regardless of the eligibility criteria selected for the framework, the SSC will recommend Carryover ABCs based on case-specific information, need for precautionary approaches or adjustments, and balanced application of the flexibilities available for

consideration under this framework. This is fundamental to the GMT's decision to only recommend one Alternative 1 Eligibility criteria. The GMT presumes a wide variety of criteria will be used by the SSC on a case-by-case basis for decision making in the future when recommending any Carryover ABCs.

Alternative 1, Eligibility Option A (Stock Status): The stock's overfished status in the Baseline year for calculating Carryover is known

A1: and the stock has been determined to be above minimum stock size threshold (MSST), or "not overfished" OR

A2: and the stock has been determined to be above the management target (i.e., B40% for rockfish or B25% for flatfish).

The GMT does not recommend Alternative 1, Eligibility Option A (Stock Status) because it limits the utility of this Framework, without taking into account situation-specific trade-offs. The analysis demonstrates that increasing ABCs and ACLs with eligible Carryover could provide greater access to groundfish stocks while mitigating the risks of overfishing by making case-specific precautionary adjustments (including not endorsing a Carryover ABC) to Carryover ABCs and ACLs. For example, a stock managed under a future rebuilding plan, when there is an increased OFL/ABC buffer, would be eligible and may benefit from the expected utilization benefits of ABC Carryover. As long as those Carryovers do not jeopardize the rebuilding timeline, the GMT sees no reason to preclude Carryover for rebuilding stocks. Moreover, we fully expect the SSC to consider the probability of the stock falling below established management targets and thresholds in response to ABC Carryover in its decision about whether to ultimately recommend ABC Carryover.

Alternative 1, Eligibility Option B (Alternative ABC Control Rule): Stock is not subject to an alternative ABC control rule (including a Phase-In ABC harvest control rule [HCR]) during any year in which Carryover quotas would be issued under Alternative 1 (i.e., increasing the ABC). This means the Council cannot ever increase an ABC using both Phase-In (see "Phase-In of ABC Changes") and Carryover or an ad-hoc ABC control rule and Carryover.

The GMT does not recommend Alternative 1, Eligibility Option B (Alternative ABC HCR) for the same reasons stated for Eligibility Option A above; there may be a scenario where the Council wants to consider ABC Carryover based on under-attainment and case-specific rationale for stocks that are subject to an Alternative ABC HCR. We acknowledge Eligibility Option B is also intended to prevent the potential for "double dipping" unharvested yield in both a phased-in stock assessment and ABC Carryover, which is unadvisable. We find a simpler way to address this concern through Eligibility Option D, while maintaining flexibility with other alternative HCRs. There may also be situations where combining an ABC in the last year of Phase-In (or other ad hoc ABC harvest control rule that decreases the OFL-ABC buffer) with ABC Carryover does not appreciably increase the risk of overfishing. The GMT acknowledges the role of the SSC in considering precautionary adjustments to Carryover ABCs that prevent overfishing using the best scientific information available (BSIA).

<u>Alternative 1, Eligibility Option C (Catch Exceedance)</u>: Catch of the stock, based on published final estimates of total mortality has not exceeded:

C1: OFL in the past four years. OR

C2: its ACL more than once in the most recent four-year period.

The GMT does not recommend Alternative 1, Eligibility Option C (Catch Exceedance) because it also limits the utility of this Framework without taking into account situation-specific trade-offs. During the development of the white paper, it seemed prudent to never consider ABC Carryover if an OFL has been exceeded in the past four years. However, there could be a scenario where, for example, catch exceeded an OFL that was based on an old assessment, but a new assessment indicates biomass was higher than indicated by the previous assessment and that overfishing did not, in fact, occur in the year of the nominal OFL overage. In this situation, the Council may want the ability to consider ABC Carryover despite the OFL overage.

<u>Alternative 1, Eligibility Option D (New Assessment)</u>: No ABC Carryover issued for the biennial period (i.e., 2 years) when there is a new assessment.

The GMT recommends the Council adopt Alternative 1, Eligibility Option D (New Assessment) as FPA. This eligibility option renders stocks with new assessments temporarily ineligible for ABC Carryover during the first two years for which the assessment is informing harvest specifications. A new assessment takes into account recent harvest levels and adjusts OFLs and ABCs accordingly. The GMT understands that the implication of doing ABC Carryover in the early years of a new assessment may have an effect of "double dipping" on the underharvests in recent years. The GMT notes that Eligibility Option D is also recommended by the SSC and the GAP.

Figure 1 below depicts a five-year period in which a 2023 stock assessment result yields a Council request to utilize a Phase-In ABC HCR. The figure illustrates that under Eligibility Option D only, the stock would not be eligible for Carryover in 2025 and 2026 but would be eligible in 2027. Under Carryover Eligibility Option B or Phase-In Option A, the stock would also not be eligible for Carryover in 2027.

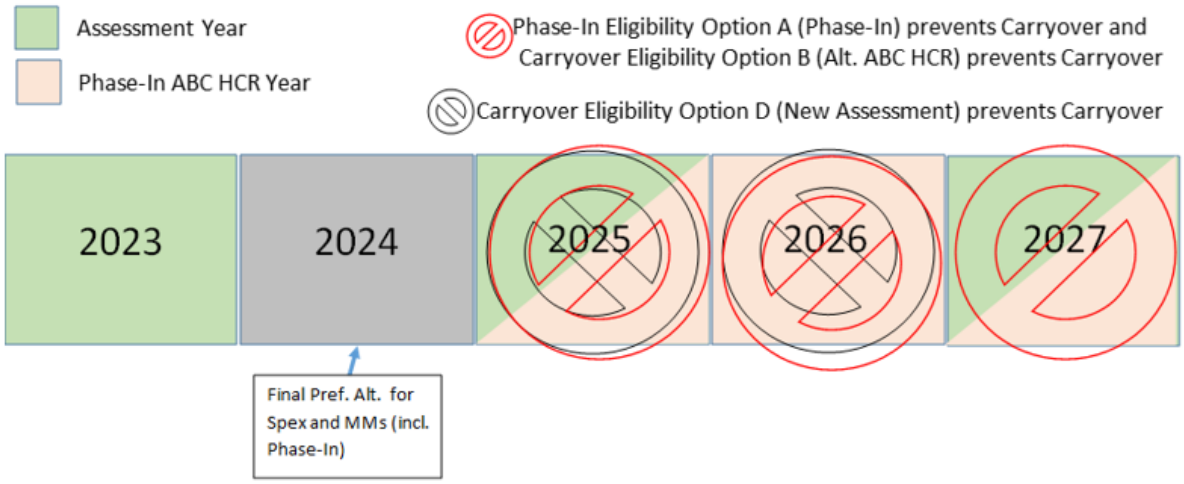


Figure 1: Five-year period of Phase-In and Carryover eligibility overlap for a stock assessed in 2023.

Alternative 2: ACL Carryover Eligibility Options

Alternative 2, Eligibility Option E (Stock Status): The stock's overfished status is known and

E1: If the stock is managed under a rebuilding plan and if rebuilding is on schedule (i.e., NMFS has not determined stock rebuilding progress is inadequate); OR

E2: the stock is either not overfished (i.e., above MSST) or is estimated to be above management target in the year eligible Carryover would be calculated.

As under Alternative 1, Eligibility Option A; the GMT does not recommend Alternative 2, Eligibility Option E (Stock Status) because it limits the utility of this Framework, without considering situation-specific trade-offs. The analysis demonstrates that increasing ACLs with eligible Carryover could provide greater access to groundfish stocks while mitigating the risks of overfishing by making case-specific precautionary adjustments to Carryover ACLs. For example, a stock managed under a future rebuilding plan, when there is unharvested ACL and a larger buffer between the ABC and ACL, would be eligible for the expected utilization benefits of ACL Carryover. These benefits could allow room to refine management measures that keep catch within rebuilding timeframes, while providing for the needs of fishing communities that were expected when the rebuilding plan was developed. The selection of Carryover Alternative 2, Eligibility Option E would preclude the consideration of ACL Carryover in this situation, even in situations where it could pose minimal risk of overfishing. Conversely, the exclusion of this Eligibility Option provides the opportunity for consideration and a more responsive approach to the needs of the fishery (National Standard 8).

Alternative 2, Eligibility Option F (Catch Exceedance): Catch of the stock, based on published final estimates of total mortality, has not exceeded:

F1: its OFL in the past four years. OR

F2: its ACL more than once in the most recent four-year period.

As with Alternative 1, Eligibility Option C, the GMT does not recommend Carryover Alternative 2, Eligibility Option F (Catch Exceedance) because it also limits the utility of this Framework without considering situation-specific trade-offs. During the development of the white paper, it seemed prudent to never consider ACL Carryover if an OFL had been exceeded in the past four years. However, as with Alternative 1, Eligibility Option C, there could be a scenario where, for example, catch exceeded an OFL that was based on an old assessment, but a new assessment indicates biomass was higher than indicated by the previous assessment and that overfishing did not, in fact, occur in the year of the nominal OFL overage. In this situation, the Council may want the ability to consider ACL Carryover as soon as possible and within the 4-year limitation that would be imposed by this criteria.

Options for Both Alternatives

Process Option A: Carryover is recommended by the Council on a stock-by-stock basis.

The GMT recommends the Council adopt Process Option A as FPA. Identifying stocks that should receive Carryover on a stock-by-stock basis will allow for full Council, Advisory Body, and SSC evaluation of each situation.

***Data Option A*: Year 1 Baseline ACL Underage to Year 3 (Maximized Carryover).**

The GMT recommends the Council adopt Data Option A as FPA. The Groundfish Expanded Multiyear Mortality data product (GEMM; part of the annual Groundfish Mortality Report) is BSIA for evaluating total fishing mortality. Due to the timing of GEMM availability and the biennial management cycle, using data from year 1 to determine Carryover in year 3 is the most defensible Option.

Minimum OFL-to-ABC Buffer Options for ABC Carryover

Buffer Option A: Allow for the maximum extent possible of ABC Carryover, which would allow the Carryover ABC to be set at up to 99 percent of the OFL;

Buffer Option B (amended by staff from November 2025): The maximum extent of ABC Carryover is equal to the OFL, reduced by a percentage based on the baseline sigma, P=0.45 amounts (See Table 1), rounded to the nearest whole percentage, and the category of the most recent assessment.*

1. *Category 1 is reduced by 6 percent, Category 2 is reduced by 12 percent, and Category 3 is reduced by 22 percent, OR*
2. *Category 1 and Category 2 are the same as 1 above, and Category 3 stocks would not be eligible for Carryover;*

Buffer Option C (new proposal by staff from November 2025): The maximum extent of ABC Carryover is based on the natural mortality of the stock. Longer lived stocks (with a M<0.15) would have a buffer set at X percent whereas shorter lived stocks (M>0.15) would have a buffer set at Y percent (higher than X percent); OR

Buffer Option D (new proposal by staff from November 2025): The maximum extent of ABC Carryover is equal to 15 percent of Baseline ABC.

The GMT defers to the SSC regarding the minimum OFL to ABC buffer and endorses the SSC Report (Agenda Item G.7.a, SSC Report 2 November 2026) with no recommendation regarding a minimum OFL-ABC buffer. Without a prescribed minimum buffer in the framework, any buffer would be evaluated and recommended on a case-by-case basis. The SSC is ultimately responsible for setting the ABC; therefore, we defer to their preference.

Specifications/Management Measures

***Tribal Deduction - Option A*, Proportional, Upon Request:**

Tribes may indicate species for which Carryover would be beneficial and a proportional increase would be applied based on baseline conditions.

The GMT recommends the Council adopt Tribal Deduction Option A as FPA. As outlined in the Draft Impact Analysis (Agenda Item G.7 Attachment 1), off-the-top deductions for tribal fisheries are intended to account for groundfish mortality in fisheries not directly managed by the Council. In addition, they act as a buffer to reduce the risk of exceeding the ABC/ACL. The Tribes submit requests to the Council during each biennial cycle of harvest specifications and management measures which are projected to accommodate mortality of individual species within

tribal fisheries for the upcoming biennium. While these set-aside requests are made with consideration to the ABC and ACL of a given species, they are not formal allocations (as opposed to the tribal allocation of the sablefish ACL North of 36° N. Lat). This means that, in most cases, it is unlikely that a proportional increase to tribal set-asides under carryover would be necessary to accommodate mortality in Tribal fisheries. Nonetheless, the discussion with tribal representatives did highlight that there may be situations where tribal set-asides are set at levels which constrain tribal fisheries – in response to ABC/ACL levels which are constraining other non-tribal fisheries. In those instances, it would be beneficial and equitable for the Tribes to be able to request a proportional increase at their discretion.

Allocation – Revised Option

The Council's Preliminary Preferred Alternative (PPA), which is Allocation Option C, is currently within Attachment 2 as,

> *"Conditional if/then allocation for flat amount/remainder structures and proportional increases for percentage-based allocations. The percentage for the conditional increase would need to be specified as part of the FPA."*

Most allocations are split by percentage and are simpler to set as a framework distribution of Carryover quota. However, flat allocation/remainder structures would need some method to also receive Carryover quota, and we find this revised Option to be the most structurally efficient. **Therefore, the GMT recommends the Council adopt the Revised Allocation Option as FPA with the following text:**

> ***"Proportional increases for percentage-based allocations, and proportional increases for flat amount/remainder structures upon request."***

At-Sea Set Aside – Revised Option B

The Council's PPA, which is At-Sea Set Aside Option B, is currently within Attachment 1 as,

> "*Proportional increase to both sectors using a ratio of Baseline proportions of the trawl allocation from the year in which carryover is issued.*"

As with the Revised Allocation Option, the GMT agrees that a proportional increase would be most structurally efficient, yet there may be some situations where the at-sea sectors may not necessarily need (or want) an increase to their set-aside. **Therefore, the GMT recommends the Council adopt a slightly modified At-Sea Set-Aside Option B as FPA:**

> ***"Proportional increase upon request."***

Phase-In of ABC Changes

Alternative 1: Specify a framework for the implementation of phase-in HCRs in the Groundfish FMP, which would allow phase-in ABC increases or decreases for a maximum of up to three years, as permitted by the NS1 Guidelines.

The GMT recommends the Council adopt Alternative 1 as FPA. The GMT notes that setting ABC values ultimately falls within the purview of the SSC. While this action would reduce year-to-year variability in fishery HGs when new assessments results are implemented, the effect of this

relief may be limited, depending on the size of the OFL-ABC buffer. That is to say, there will be little room to allow for ABC increases if the buffer is small, since the OFL constrains the ABC and the OFL is not considered for phase-in under this action. Furthermore, higher allowable catches in the first years of the projection period would lead to lower allowable catches in the later years of the projection period**.** This trade-off will need to be considered at the time the decision regarding ABC phase-in is made.

The GMT expects Phase-In Alternative 1 to address the Problem Statement (Attachment 1) in the following ways:

- Describing a Phase-In framework in the FMP will improve efficiency of using ad hoc ABC harvest control rules;
- Maintains harvest specifications policies that prevent overfishing while potentially mitigating the socioeconomic disruptions caused by big changes to harvest specifications.

Eligibility Option A: Stock may not be selected for ABC Carryover during any year in which a phase-in HCR would be implemented.

The GMT does not recommend Eligibility Option A for the reasons laid out above under Carryover Eligibility Option B. We note that, if the Council does not select Eligibility Option D on ABC carry-over, **then the GMT does recommend Eligibility Option A** for ABC phase-in. This would ensure there is no ABC Carryover in the initial years of a new ABC catch stream following a new assessment.

Mid-Biennium Harvest Specifications Change, "Green Light"

Alternative 1: Specify a framework in the Groundfish FMP to allow a mid-biennium harvest specifications increase for previously identified stocks, i.e., "green light."

The GMT recommends the Council adopt Alternative 1, the Mid-Biennium Harvest Specifications Change ("Green Light"), as FPA. The FMP currently allows the Council to reduce specifications in Year 2 of a biennium (the "red light") but offers no comparable path to increase them, short of a NMFS emergency rule. As a result, the benefits of a favorable Year 1 assessment are delayed roughly 1.5 years, with lost opportunity on the assessed stock and continued constraints on co-occurring stocks. Alternative 1 closes this gap without changing stock allocations. The analysis concludes that overfishing risk is unchanged while optimum yield is reached sooner, consistent with National Standards 1 and 2, and positive economic effects for fishing communities are expected. For example, had a Green Light been available in 2025, the Council and NMFS would not have needed an emergency rule to implement new catch-only projections for canary rockfish, shortspine thornyhead, and petrale sole. Additionally, the new limits from the 2025 quillback rockfish assessment would have been able to be implemented sooner. The recent quillback rockfish experience off California further shows the value of having an established path to relief when new science shows a stock is healthier than previously believed.

The GMT expects Green Light Alternative 1 to address the Problem Statement (Attachment 1) in the following ways:

- Providing a framework to improve response time to new, positive stock assessment results, decreasing incremental workload of those actions, and thus, increasing management efficiency.
- Maintaining harvest specification policies that aim to prevent overfishing on an ongoing basis.

Specifications/Management Measures

Tribal Deduction - Option A, Proportional, Upon Request:

> ***Tribes may indicate species for which Carryover would be beneficial and a proportional increase would be applied based on baseline conditions.***

The GMT recommends the Council adopt Tribal Deduction Option A as FPA. As outlined in the Draft Impact Analysis (Agenda Item G.7 Attachment 1), off-the-top deductions for tribal fisheries are intended to account for groundfish mortality in fisheries not directly managed by the Council. In addition, they act as a buffer to reduce the risk of exceeding the ABC/ACL. The Tribes submit requests to the Council during each biennial cycle of harvest specifications and management measures which are projected to accommodate mortality of individual species within tribal fisheries for the upcoming biennium. While these set-aside requests are made with consideration to the ABC and ACL of a given species, they are not formal allocations (as opposed to the tribal allocation of the sablefish ACL North of 36° N. Lat). This means that, in most cases, it is unlikely that a proportional increase to tribal set-asides under Green Light would be necessary to accommodate mortality in tribal fisheries. Nonetheless, the discussion with tribal representatives did highlight that there may be situations where tribal set-asides are set at levels which constrain tribal fisheries – in response to ABC/ACL levels which are constraining other non-tribal fisheries. In those instances, it would be beneficial and equitable for the Tribes to be able to request a proportional increase at their discretion.

Allocation – ***Revised Option***

The PPA, which is Allocation Option C, is currently within Attachment 2 as,

> "Conditional if/then allocation for flat amount/remainder structures and proportional increases for percentage-based allocations. The percentage for the conditional increase would need to be specified as part of the FPA."

Most allocations are split by percentage and are simpler to set as a framework distribution of Carryover quota. However, flat allocation/remainder structures would need some method to also receive Carryover quota, and we find this revised Option to be the most structurally efficient. **Therefore, the GMT recommends the Council adopt the Revised Allocation Option as FPA with the following text:**

> **"Proportional increases for percentage-based allocations, and proportional increases for flat amount/remainder structures upon request."**

At-Sea Set Aside – ***Revised Option B***

The Council's PPA, which is At-Sea Set Aside Option B, is currently within Attachment 1 as,

"Proportional increase to both sectors using a ratio of Baseline proportions of the trawl allocation from the year in which carryover is issued."

As with the Revised Allocation Option, the GMT agrees that a proportional increase would be most structurally efficient, yet there may be some situations where the at-sea sectors may not necessarily need (or want) an increase to their set-aside. **Therefore, the GMT recommends the Council adopt a slightly modified At-Sea Set-Aside Option B as FPA:**

"Proportional increase upon request."

Accounting for Off-the-Top Deductions

Alternative 1: Revise the ACL HCR to change the pre-season off-the-top accounting structure for non-EFP sources outside the recreational and commercial non-tribal groundfish fisheries (i.e., scientific research, non-groundfish fisheries, tribal fisheries) to be deducted from the ABC prior to setting the ACL. Any EFP off-the-top deductions would come off the sector specific allocation (if applicable) rather than off-the-top of the ACL or the ABC. For stocks without allocations, the EFP deductions would be taken off the ABC along with other off-the-top deductions.

Alternative 2: No revisions are made to the ACL HCR and pre-season off-the-top accounting structure for non-EFP sources outside the recreational and commercial non-tribal groundfish fisheries (i.e., scientific research, non-groundfish fisheries, tribal fisheries) would remain the same as No Action. Any EFP off-the-top deductions would come off the sector specific allocation (if applicable) rather than off-the-top of the ACL or the ABC unless the stock or complex is not subject to allocations. If the stock or stock complex is not subject to a trawl/non-trawl allocation, then EFP off-the-top deductions would continue to be taken off the ACL as under No Action.

The GMT does not recommend the Council Alternative 1 as FPA. Alternative 1 would remove Off-the-Top deductions from the ABC instead of the ACL, reducing any existing buffer between the ABC and ACL (Option 1) or maintaining the buffer (Option 2). Alternative 1, Option 2 would result in the same fishery HG as No Action, realizing no practical benefit to the fishery. Alternative 1, Option 1 would increase the fishery HG by reducing the size of the ABC-ACL buffer, which would benefit the fishery only for species where the ABC is not equal to the ACL.

The GMT recommends the Council adopt Alternative 2 as FPA, noting that the Council had previously chosen Alternative 1 as PPA. The GMT supports Alternative 2 over No Action, as this limits the complications found between the interplay of this Action Item with Carryover, Phase-In, or Green-Light while developing a more equitable distribution of exempted fishing permit (EFP) deductions to the sector benefiting from the EFP. The GMT supports Alternative 2 over Alternative 1, as Alternative 1 would complicate accounting and reduce procedural efficiency when combined with other actions under this agenda item, as highlighted in the Cumulative discussion of Risk found in Attachment 1. Furthermore, the size of the ABC-ACL buffer is a Council decision. This means that the Council could choose a smaller ABC/ACL buffer at any point without the need for this action.

The GMT expects Revisions to Off-the-Top Deductions Alternative 2 to address the Problem Statement (Attachment 1) in the following ways:

- Increasing equity in how the Council manages the groundfish fishery;
- Alternative 2 maintains similar efficiencies to No Action when compared to the complicating factors that were described under Alternative 1.

Adjusting Harvest Specifications Frequency

***Alternative 1*: Biennial Cycle with Varying Specification Frequency**

Modify the biennial harvest specifications and management process to allow for setting of harvest specifications for managed groundfish stocks (OFL, ABC, and ACL) for a period up to ten years rather than a two-year period.

***Option A*: Each biennium, adopt long-term specifications (up to ten years) for only newly assessed stocks (SSC suggestion from September 2026).**

The GMT recommends the Council adopt Alternative 1 as FPA with Option A. The team recognizes the efficiency benefits to adopting long-term harvest specifications. Currently, specifications change for stocks that receive new assessments (e.g. benchmarks, updates), or new projections (e.g.. catch-only projections, alternative HCR projections from the SSC or Science Centers). Specification numbers are available for up to ten years. This Option therefore allows setting of specifications once based on the full suite of numbers that are available, rather than revisiting those same numbers in two-year chunks over multiple specification cycles. The GMT interprets this Option to include SSC-recommended projections, such as for stocks with projected OFLs/ABCs/ACLs that have "run out" from the last assessment or updated projection, as was done recently for Oregon kelp greenling (Agenda Item F.3.a, Supplemental SSC Report 1, November 2025, and aurora and rougheye/blackspotted rockfishes (Agenda Item F.3.a, Attachment 2, November 2025). We also interpret this Option to include all the new types of assessments that include projections (e.g. index-based methods) which are currently being developed by the Science Centers.

The GMT also recognizes that this action may result in additional downstream record-keeping workload for Council staff, since this action may result in specifications "running out" in a staggered fashion over time. This will require careful record-keeping to ensure stocks do not inadvertently "run out" of adopted harvest specifications. Additionally, the efficiencies gained of applying specifications for up to ten years will be offset when stocks are reassessed within ten years of a previous assessment.

The GMT expects Harvest Specifications Frequency Alternative 1 to address the Problem Statement (Attachment 1) by reducing workload during some steps of the biennial harvest specifications process, potentially freeing capacity to work on “measures brought forward to holistically improve how the Council manages groundfish fisheries” (Attachment 1).