

## GROUND FISH ADVISORY SUBPANEL REPORT ON COMMERCIAL DIRECTED FISHERY WORKSHOP PLANNING

The Groundfish Advisory Subpanel (GAP) received an overview of this issue from Ms. Robin Ehlke, Pacific Fishery Management Council salmon and halibut staff officer, and reviewed the documents under this agenda item and offers the following comments.

### Area 2A Non-tribal Directed Commercial Fishery Management

Referring to the schedule in [Joint Staff Report \(Attachment 1\)](#) under this agenda item, the Council at this meeting will discuss whether to transfer management of the Area 2A directed commercial fishery from the International Pacific Halibut Commission (IPHC) to the Council. The GAP supports this transfer to Council management.

The IPHC has been managing this fishery for a number of years and is interested in the transfer, due in part to concerns about the safety of the current derby-style fishery. Fishermen have been concerned about safety as well. The recent motion at the IPHC annual meeting and the subsequent IPHC interpretation of that motion – that is, for a two-day fishery consisting of two 10-hour back-to-back days during the first opening this year, as referenced in documents under the March 2019 H.1 Agenda Item – shows a clear misunderstanding about how the directed 2A commercial fishery works. The Council and its component members (states, National Marine Fisheries Service, tribes) and Area 2A stakeholders have a much more comprehensive understanding of the fishery.

### Management Changes/Workshop Timeline

The GAP also discussed the proposed timeline in the Joint Staff Report. We appreciate the aggressive timeline proposed to make a management change for the 2020 season, but remain concerned that it is effectively unreasonable. Even under the simplest management scenario, assessing the input from one stakeholder workshop, analyzing the bycatch concerns, establishing any state management objectives, and adding the burden of additional cost to state and Federal agencies makes this timeline seem too forced at this time.

### Workshop/Workgroup

Any proposed change to the directed commercial fishery will be a huge change for fishermen and processors, especially for the 2020 season. One workshop to discuss issues pertinent to the 2020 season will likely be insufficient, especially if the workshop is held in the summer (late July). This process requires greater outreach to affected stakeholders. In July, many fishermen will be participating in other fisheries such as salmon or tuna, and may not be able to attend the single workshop. Furthermore, attendance at a central location may not be viable for fishermen who live far away. A one- or two-day meeting will end up being three or four days of lost fishing time for these fishermen due to travel time and/or costs.

For these reasons, and those listed in the first section (Management Changes/Workshop Timeline), the GAP recognizes it is very likely the IPHC will continue to manage the directed commercial halibut fishery in Area 2A for 2020.

The GAP suggests this year's workshop could focus on setting up an ad hoc workgroup that would move forward with providing input to the Council on seasons in 2021 and beyond. The July workshop could also provide participants with a range of ideas that have been previously proposed, either to the Council or to the IPHC, and solicit input on those issues.

The Council may want to consider some broader questions and analysis about the Area 2A commercial fishery for the first workshop, such as:

- Should the directed fishery transition to limited entry or open access, as it currently is under IPHC management?
- Should a control date be adopted if the fishery would be limited entry?
- Could the Council phase in management changes over a few years so fishermen and processors could adjust?
- Would halibut management be done annually, or could it be folded into the biennial harvest specifications and management measures?
- Providing background about the stakeholders involved in the Area 2A fishery and related socioeconomic information would be helpful in assessing different management scenarios.

The GAP has suggested season options in our past GAP statements (for details, see: [June 2017](#), [November 2018](#), and [March 2019](#)). These include the following and could help focus the discussions for future management (2021 and beyond):

1. **Extend the season:** Instead of a one-day derby fishery, extend it to a 5-day, 10-day or 20-day season.
2. **Transition to individual quota system:** The IPHC proposed this in the past and some fishermen have suggested this to the IPHC as well.
3. **Incidental catch:** Use the Area 2A quota solely as incidental harvest in salmon and sablefish fisheries.
4. **Hybrid options:** The GAP suggested this in March 2019 and would allow for some of the 2A allocation to go to incidental harvest in other fisheries, while still maintaining a small directed fishery.

In addition, for consideration of long-term management, the GAP suggests holding more than one workshop, perhaps one in each state, similar to the pre-season salmon meetings.

Regarding any proposed ad hoc stakeholder workgroup, the GAP requests, as we did in [November 2018](#), that select members of the GAP be included as full participants in the focused workgroup. The GAP typically sends a representative to Stock Assessment and Review (STAR) panels; the same consideration should be granted for select GAP members. We also suggest including members from the Salmon Advisory Subpanel (SAS). These industry experts – fishermen, processors and conservation representatives – can assist with consideration of the best ways to move forward, how best to communicate with the industry and how proposed changes could affect the fleets and processors.