

GROUND FISH ADVISORY SUBPANEL REPORT ON
LIMITED ENTRY FIXED GEAR ACTIONS: GEAR ENDORSEMENTS, COST
RECOVERY, AND OTHER ADMINISTRATIVE CHANGES

The Groundfish Advisory Panel (GAP) recommends the following amendments to the Limited Entry Fixed Gear (LEFG) program:

Gear Endorsements

The GAP recommends Alternative 3, allowing LEFG permitted vessels to use any legal non-trawl gear. The GAP did discuss how this allowance would permit “setnets” – also known as “bottom gillnets” – to be used south of 38° N. lat. by LEFG vessels. While the GAP does not support the expansion of this gear type, there is a potential that there would be a high barrier to entry if both state and Federal limited entry permits are required to use this gear type. The GAP recommends that Council staff, Office of Law Enforcement, and National Marine Fisheries Service (NMFS) provide additional clarity in June for final action. At that time, depending on the permitting requirements, the Council could consider excluding set nets from the allowable gear types for LEFG permitted vessels.

The biggest benefit to the fishery of this deregulation is the increase in participants' abilities 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 this 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.

The GAP received the analysis from Council staff about the potential for large shifts from one gear type to another, i.e. longline to pots. 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 towards sablefish pots. The analysis was excellent and provided a good range of what could happen. The GAP suggests that a comparison of sablefish pots and longlines on a catch per “downline hour” (time vertical line is soaked) basis might help quantify the conclusions in the analysis that there is limited to no change in the 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 this change. This change will help streamline NMFS administrative reviews with fishing permit changes.

Permit Price Reporting

The GAP supports this requirement. This information will assist the Council and NMFS in tracking the entry cost to this fishery over time. The requirement to industry will be minor. The permit price can easily be put on the permit transfer form when a permit sells.

Season Start Time

The GAP supports this change. The reference to noon in the regulations is no longer needed given the use of electronic fish tickets.

Cost Recovery

The GAP supports collecting any future cost recovery fees at the harvester level and, specifically, suggests that it is collected per delivery similar to current cost recovery in the trawl individual fishing quota program. The GAP has considerable questions about how costs are determined for this fee, but recognizes that cost recovery is mandated by the Magnuson-Stevens Fishery Conservation and Management Act. The GAP and NMFS representatives discussed different ways this fee could be collected and, after exploring various possibilities, the general agreement in the GAP is that collecting any future cost recovery at the fish ticket level is the least impactful to the industry.

The GAP also suggested that if the harvester is responsible for collecting and paying the fee, and doing so at the fish ticket level is not feasible, that instead of paying the fee annually, the fees could be paid monthly or quarterly. A monthly or quarterly responsibility would be easier to manage than an annual fee. Additionally, it would increase the chances of collecting the fees.

PFMC
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