



# NORTH PACIFIC FISHERY MANAGEMENT COUNCIL

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## Action Memo

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**William Tweit, Interim Chair**  
**David Witherell, Executive Director**

**SUBJECT:**

BSAI halibut abundance-based management PSC limits - Preliminary review

**STAFF CONTACT:** Diana Stram and Sam Cunningham (NPFMC)

**ACTION REQUIRED:**

- Review Preliminary analysis
- Refine alternatives for Draft EIS/RIR

**BACKGROUND:**

The Council is in the process of revising alternatives for a draft EIS/RIR of alternatives for abundance-based management (ABM) of BSAI halibut prohibited species catch (PSC) limits. This preliminary analysis provides information on the draft suite of alternatives in order for the Council to refine them for a comprehensive impact analysis in the EIS/RIR.

The Council adopted five alternatives in April 2018, which were developed through iterative discussion papers since 2016. The staff interagency Workgroup for this project added one additional alternative (Alternative 6) for Council consideration in this preliminary analytical document. These six alternatives range from status quo, with fixed halibut PSC limits by sector, to a range of gear-specific PSC limits indexed to BSAI halibut abundance. Once calculated by gear, PSC limits are then allocated to sectors within each gear type.

One objective of Council review at this meeting is to revise the alternatives for the Draft EIS/RIR analysis. As such, some preliminary analysis of alternatives has been done to compare the alternatives across a subset of Elements and Options. This has been done to demonstrate the behavior of certain elements and options and to indicate where clarification from the Council is needed. For example, based on the preliminary analysis, the Workgroup recommends that Alternative 3 be eliminated from the suite of alternatives as it is redundant with, and its intent already covered by, Alternative 4. The Workgroup also recommends moving Element 1 under each alternative, which is intended to dampen interannual variability in PSC limits, to a standalone option that could be applied to any alternative after the PSC limit is calculated.

The preliminary analysis demonstrates how a relative percentage change in the halibut abundance index corresponds to a percentage change in PSC limits, under each alternative. Selecting different Elements and Options within each alternative changes the observed variability between alternatives. The document also responds to several additional requests made to the Workgroup by the Council, explaining how they were addressed or that they will be considered in the Draft EIS/RIR (as applicable).

A narrative description is also included of how the three directly-regulated BSAI groundfish sectors approach their fishing year in the context of the various constraints they face, including but not limited to halibut PSC limits. This section provides the reader with the context necessary to understand interactions between fisheries, and the factors that drive the decisions made during the year by fleet managers and vessel operators in the Amendment 80 sector, the trawl limited access sector, and the hook-and-line catcher-processor sector. The operational decision-drivers in these dynamic, multispecies fisheries define the bounds

within which fishery participants can respond to an emergent constraint such as a reduced annual PSC limit. Those factors are not always obvious, and are not adequately described by the conventional presentation of annual catch and bycatch by species or by target fishery. The description of fisheries presented in this document is a jumping-off point for the social and economic impact analysis to be completed in the RIR chapter of the Draft EIS/RIR. Ultimately, that analysis will convey whether and how a marginal annual change in PSC limits resulting from halibut abundance indices and other selected elements is likely to affect business planning, in-season decisions, and socioeconomic outcomes. Those effects are likely not straight-forward in the sense of a lower halibut PSC limit triggering a fishery closure earlier in the calendar year. Indirectly affected fisheries such as the halibut IFQ fishery are not described in this document but will be considered in the Draft EIS/RIR.

#### Requests of Council at this meeting

At this meeting, the Council will review the preliminary analysis of the Council's April 2018 alternatives, and refine alternatives as needed for analysis in the draft EIS/RIR (scheduled for October 2019). The Workgroup offers the following suggestions to the Council (**attached** table).