## C1 Halibut ABM

- The SSC thanks the workgroup for their work to produce the draft DEIS.
- The SSC does not support release of the DSEIS for public review at this time and wishes to review an updated version
- The report provides a scientific basis for designing ABM alternatives that strike a balance between the benefits of PSC and directed fishing, but highlights two limitations of the current alternatives in achieving the Council's goals:
  - Any differences in age/size between PSC and directed fishery catch do not result in appreciable differences in halibut SSB when halibut mortality is shifted from PSC to the directed fishery
  - The groundfish fleet's ability to avoid halibut is poorly related to indices of abundance

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- The simulation model is an appropriate tool to evaluate trade-offs associated with allocating different portions of the total simulated mortality between PSC and the directed fishery
- The SSC recommends the following improvements to the model:
  - Implement a simple version of the "30:20 control rule" to further reduce TCEY at very low levels of stock abundance as it better approximates the current IPHC management approach
  - Incorporate inter-season variability in halibut encounters and corresponding PSC utilization rates, because the assumption that PSC usage is a constant proportion of PSC limits is unrealistic.

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- Improvements (cont'd):
  - Consider a wider range of recruitment variability, specifically a low recruitment scenario to evaluate performance of the rules at low abundances
  - The SSC recommended other technical improvements but no major changes to the current simulation model
- The SSC recommends including an alternative, for comparison purposes, that allows regulatory flexibility for in-season adjustments /transfers between sectors, after seasonal halibut PSC encounter rates are observed