August 18, 2001

Mr. Jim Lone  
Chairman  
Pacific Fishery Management Council  
7700 NE Ambassador Place  
Portland, Oregon 97220-1384

Dear Jim:

Several times, our Council and others have been criticized for not doing enough to address harvest levels of species that have been designated as "overfished" and for not being precautionary. Conversely, the Groundfish Advisory Subpanel (GAP) has pointed out on more than one occasion that existing management measures adopted by the Council have effectively reduced catches and that we should analyze what we have done so far before changing the management system.

At the request of one of our members, we looked at allowable harvest levels and landed catches for major species of groundfish from 1996 to 2000. The attached table and accompanying graphs show the results. Over all, for the major species of concern, the Council has reduced allowable catch by 37% and landed catch by 50%. For individual species, the Council has reduced landed catch by as much as 95.8%. For most species in most years, landed catch has been well below the allowable catch level. Since allowable catch levels are established using conservative principles (such as the Council’s “40-10” policy), we believe this helps demonstrate that the Council is already taking a cautious approach and that it is succeeding.

As the Council prepares to discuss 2002 management measures, we hope that this information is both illuminating and helpful.

Sincerely,

Rod Moore  
Executive Director
The attached report tracks the allowable harvest and actual commercial landings of major species of Pacific groundfish between 1996 and 2000.

1996 was chosen as a starting point for several reasons:

- it was the first year that two-month cumulative limits were established for most species;
- it was the last year before significant fisheries policy changes were made by Congress;
- it was the first year of large tribal groundfish allocations.

Data used were obtained from the Stock Assessment and Fishery Evaluation reports produced annually by the Pacific Fishery Management Council and the Pacific States Marine Fisheries Commission PacFIN database. While we have tried to be consistent in use of data, the frequent changes in management direction made it difficult. For example, in 1996 and 1997, Allowable Biological Catch (ABC) figures were generally used; from 1998 to 2000, total catch harvest guidelines (later optimum yields or "OY") were used. For simplicity, all of these figures are noted as "OY" in the report.

In general, the OY figure shows total allowable catch (recreational and commercial combined) prior to subtracting assumed discard amounts. Tribal allocations have been removed.

The final page lists major management milestones that occurred in the years covered. We have included only those that have a significant influence (in our judgement) on how allowable catch has been determined and on how the fishery operates.

The report does not track calculated stock abundance, nor should OY figures be assumed to track trends in abundance. In two cases (sablefish and yellowtail), back-to-back stock assessments resulted in significant decreases in OY followed by increases the next year. Since this is a near impossibility given the life histories of the species involved, the OY figures obviously do not give a snapshot of actual stock abundance, nor even necessarily trends. The OY figures merely demonstrate the amount of fish which - for a variety of reasons - was available for harvest. Similarly, care should be taken in comparing the commercial landed catch with the OY in a given year, since the OY reflects amounts available to both commercial and recreational fishermen and does not deduct for assumed discards.
SIGNIFICANT MANAGEMENT ACTIONS

1996

- Two month cumulative trip limit periods for limited entry groundfish were established, with no more than 60% of the limit available for harvest in the first month.
- Dover sole, shortspines, and sablefish were managed as a complex, with separate sub-limits for the various species. Differential limits were established north and south of Cape Mendocino.

1997

- A new (and highly controversial) stock assessment for yellowtail rockfish substantially reduced the ABC.

1998

- New stock assessments were completed for Dover sole, sablefish, the thornyhead species, and widow rockfish, resulting in decreased ABCs for these species.
- A revised stock assessment for yellowtail rockfish raised the ABC.
- The lingcod ABC was revised downward and harvest restrictions were placed on both commercial and recreational harvests.
- Cumulative limits for deep water species (Dover sole, thornyheads and sablefish) were established coast-wide rather than being separated at Cape Mendocino.
  A "platoon" system was established so that some vessels began fishing later during cumulative periods, in order to spread out landings.

1999

- The Council adopted a precautionary "40-10" policy which automatically reduced OY for species below 40% of unfished biomass.
- The Council adopted an MSY proxy of F40% for rockfish species.
- Chilipepper rockfish and splitnose rockfish had separate OYs calculated; chilipepper harvest was managed so as not to exceed 2000 mt in landings in order to avoid interaction with bocaccio rockfish.
- Cumulative limits were adjusted to allow harvest at higher levels during times that bycatch could be avoided, including a three-month cumulative period at the beginning of the year.

2000

- Rebuilding plans were put in effect for lingcod and bocaccio rockfish.
- Major rockfish species were separated from the Sebastes assemblage and the remaining species were aggregated in groups based on occurrence at depth: slope, shelf, and near-shore. Resulting cumulative limits allocated a major portion of the near-shore assemblage to the recreational fishery.
  New sorting requirements accompanied this change.
  Fixed gear harvest of lingcod was prohibited for 6 months.
  Differential fishing opportunities based on trawl footrope size were established to avoid targeting of sensitive species. This in turn led to establishment of bycatch allowances for some species that are inevitably taken along with other target species.
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**Species and Reduction Levels:**
- **Longspine Thornyhead**
- **Shortspine Thornyhead**
- **Dover Sole**
- **Sablefish**
- **Chilean Hake**
- **Bocaccio**
- **Yellowtail**
- **Canary Rockfish**
- **Misc. Rockfish**
- **Window Rockfish**
- **Pacific Ocean Perch**
- **Lingcod**