The Groundfish Advisory Subpanel (GAP) met with Mr. John DeVore to discuss blackgill rockfish and slope rockfish reallocation for these species south of 40° 10’ N lat. The GAP offers the following recommendations and comments on blackgill and slope rockfish reallocation.

The southern California fixed gear fleet has been severely impacted by the reduced blackgill rockfish trip limits implemented in 2013. The limits were reduced to the point that only enough fish were made available to accommodate incidental bycatch in the other directed groundfish fisheries that traditionally occur below Point Conception, such as the shortspine thornyhead, sablefish, and slope rockfish fisheries.

Fishermen have complained that the current blackgill trip limits are restricting their access to all of the traditional fixed gear fisheries, in particular the shortspine thornyhead and slope rockfish fisheries. Having reviewed the latest PacFIN data, it appears the data are confirming that claim. The limited entry (LE) fixed gear fleet has averaged roughly 230 mt annually of shortspine thornyhead including 226 mt in 2012, the last year of unrestricted blackgill trip limits. In 2013 the landings plummeted to 176 mt and last year the catch came in at 139 mt, a catch that is the lowest on record in the Conception management region! One would have to assume this huge reduction in catch is correlated with the reduced blackgill rockfish trip limits in 2013. The 2013 shortspine thornyhead stock assessment estimated the stock is healthy, so it is assumed fishing strategies have been impacted by the restricted blackgill limits.

Fishermen that have traditionally targeted slope rockfish have found it nearly impossible to target those species with the restrictive blackgill limits, and that fishery has virtually shut down. One GAP fixed gear representative has attempted several slope rockfish fishing trips only to end those trips early as the entire catch is blackgill and would exhaust the entire bimonthly trip limit allowance in one trip.

The Conception area fixed gear fleet is looking for relief in the blackgill trip limits. The thinking has been that the only avenue to accomplish that would be to correct the trawl/non-trawl blackgill allocations. It is plainly clear that the current allocations are nowhere close to historical catch as provided in Table 2-1 in Agenda item E.7, Attachment 1. The current 63 percent trawl and 37 percent non-trawl allocation is clearly incorrect. All of the strawman action alternatives illustrate that the blackgill allocation should be closer to 60 percent non-trawl and 40 percent trawl.

There is little doubt that correcting the allocation scheme for blackgill would create issues for the trawl individual fishing quota (IFQ) sector in the quota pounds allocations. It was suggested that lower trawl allocations of blackgill rockfish would constrain or even eliminate some IFQ participants from participating in some groundfish fisheries. The fixed gear sector is sympathetic to that premise but the Council must realize that the fixed gear sector, in particular in southern California, is fighting for its existence.
Referencing Table 2-1 in Agenda item E.7, Attachment 1 the GAP recommends the following allocation alternatives be moved forward for further detailed analysis:

**Sector Allocation Alternatives**

The GAP recommends analyzing the No Action alternative, Alternative 1 based on sector total catch percentages during 2003-2013, Alternative 2 based on sector total catch percentages during 2011-2013, and a new alternative that would allocate 50 percent of the blackgill rockfish fishery harvest guideline to both the LE trawl and non-trawl sectors. The GAP recommends eliminating the other strawman allocation alternatives from detailed analysis since there would be little or no contrast in results relative to the sector allocation alternatives recommended above for analysis. This recommendation provides a wider contrast of sector allocations with the lowest trawl allocation of blackgill presented in Attachment 1 (35.6 percent under Alternative 2) and a higher trawl allocation of blackgill than those presented in Attachment 1 under the new proposed alternative (50 percent). Under this new proposed alternative, the GAP recommends using the 2003-2013 sector catch histories to allocate the remaining species in the Slope Rockfish S complex after blackgill is removed.

**LE Trawl Permit Allocation Alternatives**

The GAP recommends analyzing the allocation of blackgill to LE trawl permits based on catch histories during the 1994-2003 period (the Amendment 20 allocation scheme) as presented in Attachment 1 as well as a permit allocation based on more recent catch histories during the 2003-2014 period.

The GAP recommends analyzing the first two sub-options for allocating quota share (QS) of blackgill attributed to permits removed from the fishery through the buyback program (equal sharing of 100 percent of that QS under sub-option 1 and equal sharing of 50 percent of that QS under sub-option 2). The GAP recommends eliminating sub-option 3, which contemplates no equal sharing of buyback QS since that would negatively impact those LE trawl permit holders with no catch history of blackgill.

Finally, the GAP recommends the Council schedule the decision on a final preferred alternative for the September meeting in Sacramento since more of the affected fishermen in California can more easily travel to that meeting. The November Council meeting is also in California; however, many of the affected fishermen will be fishing Dungeness crab then and will be less likely to attend that meeting.

PFMC
04/15/15