

**GROUND FISH MANAGEMENT TEAM REPORT ON THE BLACKGILL-SLOPE
 ROCKFISH INTERSECTOR ALLOCATION AND ACCULULATION LIMIT
 ADJUSTMENTS**

The Pacific Fishery Management Council (Council) is considering a process to remove blackgill rockfish from the southern Slope Rockfish (SSRF) complex south of 40° 10' N. latitude. The Groundfish Management Team (GMT) extends its thanks to Mr. John DeVore for providing additional information to guide the GMT's considerations and thoughts regarding this issue.

Alternatives

Table 1 summarizes the alternatives presented in the draft Environmental Assessment (EA) document. The GMT notes that a major difference in the structure of the alternatives is that Alternative 1 keeps blackgill rockfish in the SSRF complex, but proposes a modified allocation ratio for the trawl and non-trawl sectors compared to the No Action Alternative. The other three action alternatives separate blackgill rockfish from the SSRF complex with resultant different allocation ratios.

Table 1 . Allocation ratios for blackgill rockfish and the southern Slope Rockfish complex for the trawl and non-trawl fishery sectors, based upon the alternatives from the Preliminary Draft Environmental Assessment ([Agenda Item H.7, Attachment 1, September 2015](#)).

Alternative	Blackgill Removed from Complex?	Allocation Basis	Slope Rockfish S		Blackgill Rockfish	
			LE Trawl Alloc. %	Non-trawl Alloc. %	LE Trawl Alloc. %	Non-trawl Alloc. %
No Action	N	A21 - 2003-2005 Total Catch	63.0%	37.0%	NA	NA
Alt. 1	N	2011-2013 Total Catch	50.0%	50.0%	NA	NA
Alt. 2	Y	2003-2013 Total Catch	91.0%	9.0%	41.0%	59.0%
Alt. 3	Y	2011-2013 Total Catch	86.5%	13.5%	35.6%	64.4%
Alt. 4	Y	Equal Allocation	NA	NA	50.0%	50.0%

Conservation Concern

The GMT notes that the first question the Council will address is whether there is a conservation concern that warrants the removal of blackgill rockfish from the SSRF complex. Thus far, the blackgill rockfish contribution overfishing level (OFL) and harvest guideline (HG) have not been exceeded (Figure 1). However, per Figure 4-1 in the EA, the annual catch limit (ACL) contribution to the SSRF complex ACL, was exceeded four out of the five years between 2009 and 2013, and the excess was particularly high in 2012.

Table 4-2. Total catch (in mt) of blackgill rockfish south of 40°10' N lat. relative to the ACL/OY (annual total catch limit in mt; OY prior to 2011 and ACL thereafter) and ABC/OFL (annual overfishing limit in mt; ABC prior to 2011 and OFL thereafter) contributions of blackgill to the Slope Rockfish South complex, 2003-2013.

	Total Catch	ACL/OY (Annual Total Catch Limit)	ABC/OFL (Overfishing Limit)	% of ACL/OY	% of ABC/OFL
2003	192.3	306	343	62.8%	56.0%
2004	152.8	306	343	49.9%	44.5%
2005	88.4	306	343	28.9%	25.8%
2006	95.1	306	343	31.1%	27.7%
2007	48.3	292	292	16.5%	16.5%
2008	74.4	292	292	25.5%	25.5%
2009	136.0	282	282	48.2%	48.2%
2010	152.1	282	282	53.9%	53.9%
2011	151.1	267	279	56.6%	54.2%
2012	195.5	263	275	74.3%	71.1%
2013	71.6	106	119	67.6%	60.2%

Figure 1. The above table graphic from the EA document that shows the total catch (mt) of blackgill rockfish relative to the ACL/OY and ACL amounts, 2003-2013.

Catch of blackgill rockfish in the individual fishing quota (IFQ) fishery rose sharply after the implementation of IFQs (2011), and was a targeted stock for the non-IFQ fisheries. Catch of blackgill in the IFQ fisheries has since declined, and in 2013 restrictive trip limits for blackgill rockfish were implemented in the limited entry and open access fixed gear fisheries to discourage targeting, and those remain in place.

The GMT notes that without a thorough understanding of the environmental or market factors that led to the sharp increase in blackgill rockfish harvest in the IFQ fishery (from 2009 to 2012), it is difficult to ascertain whether harvest will accelerate once again, particularly given that IFQ can be harvested by non-trawl gear under the Shorebased IFQ Program’s gear switching provisions. If the harvest by the trawl sector does accelerate again, as seen in Table 4-1 of the EA, and blackgill rockfish remains in the SSRF complex, there are limited tools available to reduce harvest in the IFQ sector (e.g. area/depth or season closures). Broad reaching measures to reduce harvest of blackgill rockfish in the IFQ fishery (such as a rockfish conservation area expansion) could diminish the harvest of the other slope rockfish species as well as other valuable co-occurring species like sablefish.

Given that the most recent assessment of blackgill rockfish indicated that the stock was in the precautionary zone (30 percent depletion), the uncertainty of the future behavior of IFQ participating vessels, the potential negative effects of current management tools affecting the harvest by the trawl sector, and the restrictive measures necessary in the limited entry and open access fixed gear sectors, all of which speak against the No Action Alternative. **Therefore, the GMT recommends removal of blackgill rockfish from the SSRF complex and managing it with species-specific quota in the IFQ fishery with an adjusted allocation ratio for the trawl and non-trawl sectors.**

Analysis in the EA and Evaluation of Alternatives

The EA document states that much of the anticipated impacts of the proposed action are largely socioeconomic, as the remedy for the conservation concern (removing blackgill rockfish from the complex and managing it with species-specific IFQ, and issuing IFQ for group of species remaining in the SSRF complex) which gives rise to an allocation issue. As such, any decision between alternatives must consider National Standard 4 guidelines for a fair and equitable balance between fishery sectors, Groundfish Fishery Management Plan (FMP) management goal 2 to maximize the value of groundfish resources, and Groundfish FMP management goal 3 of achieving the maximum biological yield of the overall groundfish fishery. The analysis of the alternatives should also compare and contrast the extent to which they meet the socio-economic framework (section 6.2.3, Pacific Coast Groundfish FMP) and the Allocation framework (section 6.3.1, FMP) laid out in the FMP. With these objectives in mind, the GMT makes the following observations of the different alternatives.

The discussion of the impacts of the alternatives in the EA should be expanded to include a detailed narrative of the projected landings and why we think the change in landings that is illustrated in the current version of the EA make sense. Without this information, the GMT was unable to ground-truth the results of the existing analysis, inhibiting our ability to comment as to why the Council might choose one alternative over the other.

When evaluating fairness and equity of alternatives where a change in allocation is considered, the Council should take into careful consideration changes in the fishery and patterns of landings that may have changed recent landings from historical levels. For example, if the Council wishes to provide a blackgill targeting opportunity for the limited entry fixed gear and open access fleets, they would need to consider catch data prior to 2013, as it would be more representative of typical fleet harvest amounts before very restrictive trip limits were implemented.

Regarding accumulation limits, the GMT came to the conclusion that there doesn't appear to be enough information provided in the EA document for the GMT to consider and comment upon. As such, the GMT requests that additional information be included in the upcoming analysis to better advise the Council in its selection of a final preferred alternative.

Drop Alternative 1: The GMT recommends this alternative be “considered but rejected” and removed from further analysis, as it does not achieve the conservation objectives laid out in the purpose and need. This alternative leaves blackgill rockfish in the SSRF complex and increases the allocation of the remaining other species in the SSRF complex to the non-trawl sector. Leaving blackgill rockfish in the SSRF complex means that it is plausible that a high proportion of the SSRF quota harvested could be comprised of blackgill rockfish. In 2012, 68 percent of SSFR complex was blackgill rockfish. Additionally, Alternative 1 does not include discussion of new or existing management measures that could be used to curtail catch of blackgill rockfish if harvest of the species again shows an increasing trend, and would therefore be the same as No Action.

This alternative also may not meet the first objective of the socioeconomic framework, to “Enable a quota, HG, or allocation to be achieved” (FMP Section 6.2.3). Historically, the non-trawl sector harvest of the SSRF complex has been nearly exclusively comprised of blackgill rockfish. Table 4-1 in the EA indicates 89 percent of the SSRF complex harvest from 2003 to

2013 was comprised of blackgill rockfish. Increasing the non-trawl allocation of other species within the complex will likely result in an increase in unharvested fish. However, the GMT notes that this hypothesis is confounded by the projected landings, which increase from No Action, under this alternative. If this Alternative is moved forward, additional documentation will be merited on this topic.

Alternatives 2 and 3: The GMT recommends that these alternatives remain an option for further consideration. Both alternatives address the conservation objectives outlined in the purpose and need because both alternatives remove blackgill rockfish from the SSRF complex. To address the objectives set forth in the socioeconomic and allocation framework in the FMP, both alternatives allocate a higher share of the remaining SSRF complex species to the trawl sector where, based upon historical landings (Table 1), they are more likely to be utilized. Considering the total magnitude of economic impacts and the spatial distribution of economic impacts among different port areas, the two scenarios are very similar.

Table 2 . Commercial trawl landings (mt) of the SSRF with and without blackgill rockfish from 2003-2013.

		Year and Landings (mt)										
Trawl	Sector	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013
	SSRF	191.0	246.8	124.2	163.5	92.4	148.1	137.6	82.0	52.1	122.7	117.3
	Blackgill	54.8	80.4	52.1	36.2	25.7	37.7	54	61.3	14.3	73.1	38.4
	SSRF (no blackgill)	136.2	166.4	72.1	127.3	66.7	110.4	83.6	20.7	37.8	49.6	78.9

Drop Alternative 4: The GMT recommends this alternative be “considered but rejected” and removed from further analysis. This alternative also does not meet the first objective of the socioeconomic framework, to “Enable a quota, HG, or allocation to be achieved” (FMP Section 6.2.3). While it does remove blackgill rockfish from the SSRF complex, and hence likely achieves the conservation objective, it gives a large portion of the remaining SSRF complex allocation to the non-trawl sector, effectively stranding the allocation where it will not likely be utilized.

GMT recommendations:

- 1. Remove Alternatives 1 and 4 from further consideration.**
- 2. Support further analysis of Alternative 2 and Alternative 3 under the Socioeconomic and Allocation frameworks in the FMP, such that they can be considered at the November 2015 Council meeting, where the Council may select the final preferred alternative.**
- 3. Request that additional information be provided regarding accumulation limits.**

References:

Allocation of Harvest Opportunity Between Sectors of the Pacific Coast Groundfish Fishery of Blackgill Rockfish and Other Species Managed in the Slope Rockfish Complex South of 40° 10' N. Latitude - Preliminary Draft Environmental Assessment, ([Agenda Item H.7, Attachment 1, September 2015](#)).