

GROUND FISH ADVISORY SUBPANEL REPORT ON THE NATIONAL MARINE FISHERIES SERVICE REPORT

The Groundfish Advisory Subpanel (GAP) reviewed the National Marine Fisheries Service (NMFS) report and the 2016 rulemaking plan for groundfish (Agenda Item F.1.a, NMFS Report 2), and offers the following comments.

The GAP is greatly concerned that final rulemaking for the trawl gear modification package is proposed to be delayed until summer 2017. That package, and in particular removing the requirement to use selective flatfish trawl when fishing shoreward of the Rockfish Conservation Area (RCA), could provide access to a major rockfish fishery for the first time in nearly two decades, and inject a desperately needed increase in revenue for the non-whiting fleet and non-whiting processing sector. For context, at today's prices, catching 75 percent of the available rockfish quota next year would double the ex-vessel value of the non-whiting shoreside fishery. Further, the rebuilding of canary rockfish, which is the key to unlock that rockfish, will also improve access to lingcod and other valuable shelf species. Unfortunately, unless the selective flatfish trawl requirement is removed, the opportunity will be squandered because fishermen will be forced to try to catch rockfish and other shelf species using a net with a cutback headrope designed to avoid rockfish.

There are three unified public comment letters from representatives of the harvesting and processing sectors that speak to the urgency of getting this package implemented on January 1. The GAP endorses all three letters. In addition, the GAP offers three additional ideas that could facilitate access to abundant rockfish quotas next year. First, if it would allow for timely implementation of final rulemaking, the GAP would recommend pursuing a "gear package light" that prioritizes removal of the selective flatfish gear requirement but not address the other gear changes from the March 2016 package. If NMFS pursues that approach, the GAP reiterates the importance of completing the remainder of the package in a timely way. Second, the GAP recommends that NMFS consider an exempted fishing permit (EFP) to allow non-whiting midwater fishing on January 1. Under current rules, non-whiting midwater fishing cannot begin until the whiting season start date on May 15th. Allowing non-whiting midwater fishing would facilitate access to the most abundant rockfish quotas next year (yellowtail and widow). If NMFS pursues this approach, the GAP notes that this is not a substitute for completing the gear modification package, but merely a short term solution to allow access to a rebuilt rockfish fishery. Finally, the GAP recommends considering delay of other rules, like vessel movement monitoring, that could potentially free up staff and resources to focus on this package.

The West Coast trawl fishery is already a conservation success story. After more than a decade of the hard work and sacrifice associated with rebuilding, stocks are healthy and quotas are growing. 2017 should be the year that the fishery completes its recovery by becoming an economic success story as well. That will not happen unless NMFS completes the Council's good work by removing archaic regulations or providing another means, like an EFP, of accessing abundant rockfish populations as quickly as possible.