

GROUND FISH MANAGEMENT TEAM REPORT ON FISHERIES IN 2015-2016 AND BEYOND: ADOPT BIENNIAL SPECIFICATIONS FINAL PREFERRED ALTERNATIVES

The Groundfish Management Team (GMT) discussed many of the materials provided under Agenda Item C.4 and offers the following comments. Comments are grouped into four sections:

- Section 1: Harvest Specifications for Non-Overfished Species
- Section 2: Overfished Species Rebuilding Plans and Harvest Specifications
- Section 3: Considerations for Amendment 24 to the Fishery Management Plan (FMP)
- Section 4: Recommendations and Requests for Council Guidance on Management Measures for 2015-2016 (Agenda Item C.9)

Section 1: Harvest Specifications for Non-Overfished Species

The Council action under Agenda Item C.4 is to decide a final preferred alternative for 2015 and 2016 harvest specifications for groundfish stocks and stock complexes.

Other Fish Complex and Reconsideration and Modification of the Shallow Water Complex

In November 2013, the Council recommended restructuring the Other Fish complex by removing spiny dogfish from the Other Fish complex and implementing stock-specific harvest specifications. The Council also designate the following species as Ecosystem Component (EC) species: finescale codling (aka Pacific flatnose), soupfin shark, spotted ratfish, all endemic skates, and all endemic grenadiers. The GMT notes that longnose skate have been managed with stock specific harvest specifications since 2009 and are currently analyzed in the draft Environmental Impact Statement (DEIS) with stock specific harvest specifications – i.e., not as an EC species ([Agenda Item C.4.a, Attachment 3, April 2014](#)). This is consistent with the GMT analysis and recommendations. The Council also assigned further analysis of two options for managing kelp greenling and the Washington stock of cabezon. Option 1 contemplated stock-specific harvest specifications for kelp greenling (WA, OR, CA), cabezon (WA), and leopard shark (coastwide) if overfishing levels (OFLs) could be determined ([Agenda Item C.4.a, Attachment 6, April 2014](#)). Option 2 would manage these stocks together in a newly created Shallow Water complex.

A report was provided by Oregon Department of Fish and Wildlife (ODFW; [Agenda Item C.4.b, ODFW Report, April 2014](#)) that raised issues with the assessment results which compelled discussion in the Scientific and Statistical Committee (SSC) relative to the preferred kelp greenling OFL in Oregon (see Table 2, Agenda Item C.4.a, Supplemental REVISED Attachment 2, April 2014). Numerous public comments were also received that demonstrate impacts that the OFL and resulting management measures may have on the nearshore commercial and recreational fisheries (Agenda Item C.4.c, Public Comment, April 2014; Agenda Item C.4.c, Public Comment 2, April 2014; Agenda Item C.4.c, Supplemental Public Comment 3, April 2014). The GMT understands the SSC indicated that the Council-adopted kelp greenling OFLs for both Oregon and Washington may not be the best available science for use in management this cycle (Agenda Item C.4.a, Supplemental **REVISED** Attachment 2, April 2014). The GMT further understands that the SSC proposes providing the Council with new OFLs for kelp greenling in Oregon and Washington at the June 2014 Council meeting.

The delays in receiving final OFLs will delay the GMT's analysis of management measures and impacts to the nearshore and recreational fisheries. Time is needed for the states to meet with industry to discuss and develop management measures in response to the OFL. The GMT subsequently needs time to run models and evaluate the impacts of those management measures, which cannot be accomplished without final OFLs. Results from the GMT model-runs are needed by Council staff, Dr. Ed Waters, and the Northwest Fisheries Science Center to evaluate economic impacts of the various alternatives to the recreational and nearshore fisheries and communities. The schedule for implementing the 2015-2016 and beyond specifications, adopted in June 2013 ([Agenda Item C.4.a, Attachment 8](#)), anticipated final OFLs in September, and final ABCs and PPA ACLs in November. The adopted process is similar to that used in previous cycles to increase the likelihood of a January 1 implementation. The GMT notes that the harvest specifications for some species have been significantly delayed (~5 months after the recommended schedule).

In order to increase the likelihood of implementing regulations on January 1, 2015, **the GMT recommends that the Council consider adopting a modified version of Option 2 ([Agenda Item C.4.a, Attachment 6, April 2014](#)), which would create a new Shallow Roundfish Complex comprised of kelp greenling (coastwide) and cabezon (WA) and implement stock-specific harvest specifications for leopard shark.**

Based on the National Standard 1 Guidelines on stock complexes and the GMT's method for applying them ([Agenda Item F.8.b, GMT Report, June 2013](#) and [Agenda Item F.8.b, Supplemental GMT Report 2, June 2013](#)), leopard shark should not be included in the newly created Shallow Roundfish complex. Leopard shark are primarily found in California waters over soft bottom habitat and therefore does not likely co-occur to a great extent with kelp greenling and cabezon, which are primarily found over rocky reef habitats. In addition, the life history for leopard shark is much different from that of kelp greenling and cabezon. On the other hand, kelp greenling and cabezon strongly co-occur throughout their range and exhibit more similar life history characteristics.

Recent combined catches of kelp greenling (coastwide) and cabezon (WA) have remained well below the OFL and ABC contributions by kelp greenling (CA) and cabezon (WA) to the proposed Shallow Roundfish complex (Figure 1 and [Agenda Item C.4.a, Supplemental **REVISED** Attachment 2](#)). Catches of leopard shark have also remained well below the proposed OFL and ABC ([Agenda Item F.8.b, Supplemental GMT Report 2, June 2013](#) and [Agenda Item C.4.a, Supplemental **REVISED** Attachment 2](#))

The GMT feels that creating this new Shallow Roundfish complex would be least disruptive to the fishery and makes most sense regarding co-occurrence and life histories. This action would demonstrate progress addressing the mismatch in co-occurrence and life history characteristics between leopard shark and kelp greenling and cabezon. If in future biennial cycles, harvest specifications are available for kelp greenling in Washington and Oregon, the Council could request further analysis of this complex, including Option 1.

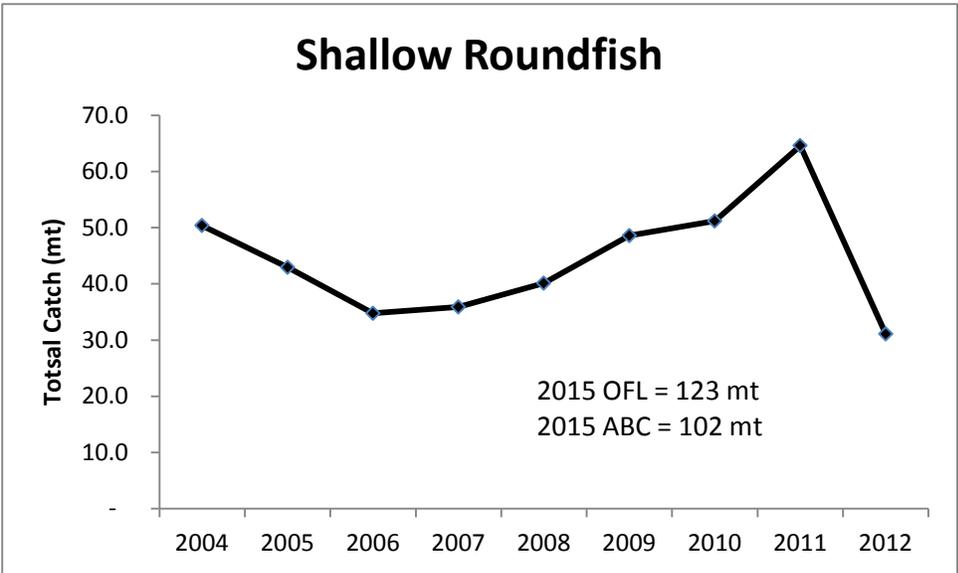


Figure 1. Estimated total catch of the GMT-proposed Shallow Roundfish complex (comprised of kelp greenling and Washington cabezon but excluding leopard shark).

Nearshore Rockfish and China Rockfish North of 40°10 N. Latitude

The Council requested analysis of a Nearshore Rockfish harvest guideline (HG) north of 40°10 N. latitude for California (between 40°10 and 42° N. lat.). The Council also requested a range of China rockfish HGs north of 40°10 N. latitude be analyzed. Further, the Council requested consideration of the harvest specifications associated with the China rockfish stock assessment stratified at 42° N. latitude. The broad range of allocation options listed below and associated management measures analysis represents a daunting task for the GMT. **The GMT requests the Council consider narrowing the scope of alternatives to ensure the GMT is able to complete the analysis in time for final Council action in June.** The GMT also notes that analysis for these alternatives under Agenda Item C.9 may be limited due to time constraints.

China Rockfish Alternatives: All alternatives start with the preliminary preferred OFL from the assessment stratified at 40°10' N. latitude.

1. Historical catch (1916-2012)
 - a. Allocation based on the proportion of commercial and recreational catch
 - b. Allocation based on the proportion of highest commercial catch
 - c. Allocation based on the proportion of highest recreational catch

Nearshore Rockfish Alternatives:

1. North of 40°10' N. latitude for California (between 40°10' and 42° N. lat.) based on stock assessment information and/or historical catch
2. Historical catch (1916-2012)
 - a. Allocation based on the proportion of commercial and recreational catch
 - b. Allocation based on the proportion of highest commercial catch
 - c. Allocation based on the proportion of highest recreational catch
3. Allocation based on miles of coastline in each state north of 40°10' N. Latitude
4. 10 mt allocated to the Washington recreational fishery with the remainder allocated between Oregon and California
5. Accommodate the highest recent mortality for component stocks in the Washington Recreational Fishery from 2004-2013 with the remainder allocated between Oregon and California

The GMT provides the following considerations for the Council with the intent of facilitating selection of a narrower range for analyses. Realizing that there are real world implications of these decisions for the commercial nearshore and recreational sectors in each state, that make this a contentious issue, there are scientific principles that can help inform sound decisions in the selection of OFLs and allocations resulting in harvest guidelines, some examples of which we provide below.

Nearshore Management at a Species Level vs. Complex Level

None of the assessed nearshore stocks have been found to be in an overfished status requiring removal from the complex to facilitate rebuilding. Currently, OFL contributions are summed to provide a complex level annual catch limit (ACL). Recognizing the overharvest of China rockfish resulting in a downward trend in the index of abundance in the northern assessment and the precautionary status, concern has been raised that action is needed to prevent further decline of the stock toward the minimum stock size threshold. Given the constraints posed on the fisheries from management at the species level and the availability of data to allow a full stock assessment to confirm trends identified in the data-moderate assessment, keeping China rockfish within the Nearshore Rockfish complex until a better understanding of the status of the stock and an appropriate species specific ACL may be prudent. Should the Council see the need to take interim management measures to reduce impacts, implementing a China rockfish HG while keeping it within the Nearshore Rockfish complex may be sufficient to take steps to curtail mortality until a full stock assessment is completed. Alternatively, the Council may consider postponing changes to management of nearshore stocks until fully vetting a framework for consistent management of complexes. This would allow for the development of consistent criteria for the management of component species under various categories of assessments and resulting stock status. Under the mixed stock exception, continued mortality exceeding FMSY is permissible in the interim if the appropriate conditions are met as stated in the National Standard Guidelines (e.g., the stock is not overfished).

Considerations Regarding Alternate China Rockfish Assessments

There are questions about the applicability of the China rockfish assessment stratified at 40°10' N. latitude to the area north 40°10' N. latitude in California. The GMT highlighted these issues, including using the indices of abundance primarily from ODFW commercial passenger fishing vessel fishery and the different management approach taken by the three states, in June 2013 ([Agenda Item F.5.b., Supplemental GMT Report, June 2013](#)).

SSC Statements and Advice Provided Regarding Selection of OFLs

Initially, the SSC stated that the OFL stratification should be consistent with the management and assessment lines ([Agenda Item H.6.b, Supplemental SSC Report, November 2013](#)). The SSC has since provided further clarification that the “OFLs and ABCs are set for entire management areas; therefore it is important that these quantities reflect the status of the stock in the entire area ([Agenda Item D.5.b., Supplemental SSC Report, March 2014](#)).”

Considerations Regarding Allocations

Table 1 contains the average landings (mt) in the commercial fishery from PacFIN and recreational mortality (mt) of Nearshore Rockfish stocks north of 40°10' N. Latitude from 2004-2012

The SSC advised that “historical catches of nearshore species by state may not reflect biomass by state because of major differences in the management among states ([Agenda Item D.5.b., Supplemental SSC Report, March 2014](#)).” In previous statements, the SSC indicated that ideally an index multiplying catch-per-unit effort by habitat area for each state or region would inform an allocation in proportion to relative abundance, though these data are not currently available. In the absence of these data, two proxy methods of allocating have been discussed; historical catch from 1916-2012 and the miles of coastline within the assessed area. Allocation using historical catch assumes that catch is proportional to abundance, which may not be the case due to differences in management between states. In addition, data is unavailable from some states or sectors prior to 1980, states differed in the degree of development of their nearshore commercial fisheries between 1980 and 2000 and overfished species constraints limited harvest to varying degrees between states from 2000 to 2012. A more recent time period with more consistent regulations and effort may be more representative, though no period is ideal. Allocation of China rockfish using miles of coastline within each assessed area avoid potential over-allocation to over-harvested areas that can result when historical catch is used.

Allocation by miles of coastline assumes the relative abundance is consistent along the coast, which may not be the case for species that decline in abundance toward the ends of their range, or if habitat is not proportional to coastline distance or if stocks have been overharvested in a given sub-region. China rockfish is relatively common throughout the assessed range and there is no indication that this assumption is violated, though the distribution of habitat is unlikely to be perfectly uniform between states. While this method may still over-allocate to areas by assuming equal relative abundance, the potential for over-allocation is greater than when historical catch is employed, in which states that harvested the most fish would receive the highest allocations, potentially perpetuating overharvest and localized depletion. Future off-year scientific research designed to quantify catch and abundance relative to available habitat would greatly approve allocation methods.

While either method may deviate from the true relative abundance along the coast, which is unknown, consideration of which assumptions are violated for a given species may be helpful in deciding which method is more appropriate. Allocation by historical catch may be preferred in instances where a strong natural decline in abundance from the center of a species range occurs, in which case use of miles of coastline alone would cause an over-allocation to areas at the edge of their range where they are less common. This is the case for some of the Nearshore Rockfish species, for which abundance may naturally decline or become non-existent north or south of 40°10' N. Latitude (e.g., gopher, olive, black and yellow, brown, kelp and grass rockfish; Table 1). Miles of coastline may be more appropriate for those species that are more uniformly distributed within the entire region over which allocations are being made (e.g., copper, China,

and quillback rockfishes). Blue rockfish may be allocated according the stratifications of assessments at 42° N. Latitude since two stocks have been identified and are predominantly distributed on either side with further allocation using appropriate methods discussed above depending on the trends in abundance in the region in question.

Allocations based on the historical high catch such as with the alternative that allocates 10 mt to the Washington recreational fishery may not reflect the relative abundance of the species. The GMT recommends that the Council use methods that best approximate the relative abundance of component species given the assumptions implicit in their application to provide a scientific basis for allocation beyond the needs of the fishery.

Table 2. Average landings (mt) in the commercial fishery from PacFIN and recreational mortality (mt) of Nearshore Rockfish stocks north of 40°10' N. Latitude from 2004-2012.

Species	CA Comm. N. 40°10	CA Rec. N. 40°10	OR Comm.	OR Rec.	WA Rec.	Total
Blue RF	8.32	5.33	4.82	20.98	2.02	41.46
Copper RF	1.33	1.90	0.90	4.07	2.05	10.26
China RF	0.86	1.03	6.54	2.74	3.14	14.31
Quillback RF	2.67	1.97	1.40	4.65	3.01	13.71
<i>Total Common</i>	<i>13.18</i>	<i>10.23</i>	<i>13.66</i>	<i>32.44</i>	<i>10.23</i>	<i>79.74</i>
Brown RF	0.39	0.53	0.01	0.07	0.00	1.00
Grass RF	0.24	0.28	0.47	0.02	0.00	1.01
Black and Yellow RF	0.08	0.03	0.03	0.00	0.00	0.14
Gopher RF	0.03	0.09	0.05	0.00	0.00	0.16
Kelp RF	0.00	0.00	0.00	0.00	0.00	0.00
Olive RF	0.12	0.20	0.00	0.01	0.00	0.33
Treefish	0.00	0.00	0.00	0.00	0.00	0.00
<i>Total Uncommon</i>	<i>0.86</i>	<i>1.13</i>	<i>0.55</i>	<i>0.10</i>	<i>0.00</i>	<i>2.65</i>
Total	14.05	11.36	14.21	32.54	10.23	82.39

Analysis of Options in Light of Considerations

A table of the alternatives proposed in motions by the Council and state reports are provided below along with some initial thoughts on pros and cons reflecting the considerations regarding allocation provided above (Table 3). The GMT did not have sufficient time to fully discuss the pros and cons and there may be additional pros and cons that are not represented here.

Table 3. A draft comparison of the pros and cons of each allocation option.

Allocation Option	Pro	Con
China Rockfish		
Proportion of Commercial and Recreational Catch	Reflects the historical pattern of commercial and recreational fisheries.	Potential for over-allocation to areas that are more depleted. Doesn't address areas where commercial fisheries have been prohibited.
Proportion of Commercial Catch	Reflects the historical pattern of the commercial fisheries.	Potential for over-allocation to areas that are more depleted. Does not reflect the pertinent recreational contribution. Doesn't address areas where commercial fisheries are prohibited.
Proportion of Recreational Catch	Reflects the historical pattern of the recreational fisheries.	Potential for over-allocation to areas that are more depleted. Does not reflect the pertinent commercial contribution.
Minor Nearshore Rockfish Complex		
Proportion of Commercial and Recreational Catch	Reflects the historical pattern of commercial and recreational fisheries.	Potential for over-allocation to areas that are more depleted. Doesn't address areas where commercial fisheries are prohibited.
Proportion of Commercial Catch	Reflects the historical pattern of the commercial fisheries.	Potential for over-allocation to areas that are more depleted. Does not reflect the pertinent recreational contribution. Doesn't address areas where commercial fisheries are prohibited.
Proportion of Recreational Catch	Reflects the historical pattern of the recreational fisheries.	Potential for over-allocation to areas that are more depleted. Does not reflect the pertinent commercial contribution.
Allocation based on miles of coastline in each	Less potential for over allocation to depleted areas than historical	Some species are far less common to the north at the

Allocation Option	Pro	Con
state north of 40°10' N. latitude	catch	edge of their range and would be over allocated to the north since the method assumes abundance is proportional to miles of coastline.
Allocated 10 mt to the Washington recreational fishery with the remainder allocated between other states according to the preferences of the other states.	Accommodates the needs of the Washington recreational fishery.	Does not rely on a scientific basis for allocation between states. May strand allocation if catch is below the 10 year average but would result in a deficit based on 10 year high catch.
Accommodate the highest recent mortality for component stocks in the Washington Recreational Fishery from 2004-2013 with the remainder allocated between other states according to the preferences of the other states	Accommodates the needs of the Washington recreational fishery.	Does not rely on a scientific basis for allocation between states. Potential to strand allocation if catch is below the highest years catch.

ACL Decisions for Non-Overfished Species

The PPA ACL decision was to set the ACL equal to the ABC for all non-overfished species except maintain a constant catch for black rockfish (OR/CA) of 1,000 mt and constant catch for longnose skate (2,000 mt). The GMT has no additional considerations to add.

The Council also recommended a range ACLs for Dover sole (25,000 to 50,000 mt) and widow rockfish (1,500 to 3,000 mt) be analyzed. The GMT has heard that industry is interested in exploring ACL levels for these two species higher than the current range, but still below the ABC. The GMT intends to discuss and comment on this later in the week under Agenda Item C.9. **The GMT recommends that the Council consider postponing final decisions on ACLs for widow rockfish and Dover sole until Agenda Item C.9.**

Section 2. Overfished Species Rebuilding Plans and Harvest Specifications

The GMT reviewed the cowcod rebuilding plan parameters and preferred ACLs provided in [Agenda Item C.4.a Supplemental REVISED Attachment 2](#). The GMT reviewed the harvest specifications, which are summarized below in Table 2, and offers the following comments.

Comments on Stock Status

The OFLs for the stock of cowcod south of 40°10' N. Latitude are based on estimates from the 2013 assessment, which covered the area from 34°27' N. Latitude south to the U.S.-Mexico border, and an OFL estimate based on the XDB-SRA analysis for the area from 34°27' north to 40°10' N. Latitude. These OFL estimates and associated acceptable biological catches (ABCs) associated with overfishing probabilities (P*s) of 0.45 and 0.25 are provided in Table 4 ([Agenda Item D.5.a Attachment 1, March 2014](#)).

The SSC recommended the ACL contribution for cowcod in the Monterey area should consider the method of employing DB-SRA using depletion prior based on the Conception area depletion estimate from the assessment. While this results in an ACL of 10 mt, which is lower than initially anticipated, the preliminary preferred annual catch target (ACT) is only 4 mt with the remainder between the ACT and ACL being used for research. The 4 mt ACT is designed to take into account the needs of the fishery.

The GMT thinks the cowcod rebuilding approach is reasonable and will allow the prosecution of fisheries and accommodate new research.

Table 4. 2015 and 2016 Harvest Specifications (in mt) for Cowcod South of 40°10' N. Latitude.

Stock	Cat.	2014 OFL	2015 OFL	2015 ABC	2015 ABC	2016 OFL	2016 ABC	2016 ABC
				P*= 0.45	P* = 0.25		P* = 0.45	P* = 0.25
COWCOD S. of 40°10' N. Latitude			66.6	59.9	38.2	66.1	59.4	37.8
COWCOD (Conception)	2	7	55.0	50.2	33.8	54.1	49.4	33.3
COWCOD (Monterey)	3	5	11.6	9.7	4.4	12.0	10.0	4.5

Section 3. Considerations for Amendment 24

Under Agenda Item C.4, the Council is scheduled to adopt a final preferred alternative for Amendment 24, if possible, and provide guidance on the FMP language necessary for Amendment 24.

Default Harvest Control Rules

The GMT continues to support Alternative 3 as being most reflective of how the Council has operated and will most likely continue to operate in upcoming cycles. On that note, we discussed briefly whether the Council could or would wish to choose a final preferred alternative without having the full long-term analysis in hand. As we understand it, the Council staff position is that the “and beyond” analysis is more appropriately placed within the harvest specifications. This is very similar to the position of the GMT over the course of Amendment 24 (e.g., [Agenda Item H.4.b, Supplemental GMT Report, March 2013](#)). In brief, the FMP Amendment has no environmental impact in and of itself. The Amendment language has a clarifying benefit but, as we understand it, the “and beyond” analysis could have been conducted without it. The environmental impact comes when the Council actually sets harvest

specifications each cycle. That the “and beyond” analysis are simply a broad look at the range of possible outcomes over the 10-year analysis timeframe. When new science and information is received each cycle, the broad analysis should reduce the amount of additional National Environmental Policy Act analysis needed to implement harvest specifications. We continue to strongly support the approach. **The GMT thinks that the Council could take final action on the Amendment 24 alternatives in June without impacting the ongoing analysis.**

Updating Key Rebuilding Parameters

The proposed changes to Section 4.6.3.4 of the Groundfish FMP ([Agenda Item C.4.a Attachment 4](#)) are meant to clarify whether changes in the probability of rebuilding require changing a rebuilding plan. It is the GMT's understanding that the intent of this clarification is to make sure that the FMP does not require us to spend valuable time and resources, or cause undue restrictions on fisheries, by chasing noise.

While understanding that this proposed change to the FMP language is meant to clarify existing language, some on the GMT think it would be better to wait until the Management Strategy Evaluation (MSE) on rebuilding revision rules are completed and fuller discussions can be had before altering the FMP language. As a reminder, this MSE is currently under development at the Council's request and its very purpose is to explore how to respond to changed assessments and rebuilding forecasts during rebuilding. The MSE and rebuilding revision rules were contemplated as part of Amendment 24 but were put off for workload savings. In addition to the many initiatives being analyzed this cycle, cowcod is the only rebuilding species being considered for changes this cycle. The MSE should be ready to inform broader consideration of how to react to changed rebuilding estimates before the next harvest specifications cycle. The GMT notes that there may be additional changes to the FMP once the MSE process is complete.

Ecosystem Component Species in the FMP

The GMT notes that the final rule implementing the National Standard 1 Guidelines states, “As a default, all stocks in an FMP are considered to be ‘in the fishery,’ unless they are identified as EC species (see § 600.310(d)(5)) through an FMP amendment process.” **If the Council takes final action to designate EC species, the GMT recommends the appropriate draft FMP language be brought forward for June 2014 Council meeting.**

Section 4. Recommendations and Requests for Council Guidance on Management Measures (Agenda Item C.9)

Achieving January 1, 2015 Implementation of the 2015-2016 Harvest Specifications and Management Measures

In March, the Council was informed that the EIS analysis was behind schedule due to delays in receiving harvest specifications. During discussions under Agenda Item D.5, the Council expressed the desire to explore ways to get back on track and ensure a January 1, 2015 implementation. Further, the National Marine Fisheries Service requested that the Council consider tasking the GMT with categorizing management measures with the potential outcome of narrowing the range included in the 2015-2016 EIS ([Agenda Item C.4.b, Supplemental NMFS Report, April 2014](#)).

In November, the Council adopted modifications to Council Operating Procedure (COP) 9 ([Agenda Item I.5.a, Supplemental Attachment 3, November 2013](#)) that stated the criteria by

which the Council select management measures for inclusion in the biennial process. The COP states that in November the Council will:

“...provide initial fishery management guidance, including a preliminary range of management measures necessary to keep catch within or attain a specification or to address a habitat or protected resources concern for analysis and implementation in Years 3 and 4.”

In addition to COP 9, the Council also considers guidance in the FMP about the types of management measures that are appropriate for consideration under the biennial harvest specifications and management measures process. For example, Sections 6.8.4 and 6.8.5 describe how long-term bycatch mitigation in closed areas, such as Cowcod Conservation Areas, and habitat closed areas are usually not modified through biennial management actions.

The GMT believes that all management measures adopted in November 2013 fit the criteria adopted by the Council under COP 9. Despite this, we understand the workload concerns and desire to achieve the January 1, 2015 implementation date. As we noted during discussions on COP 9, the trade-off with broadening the criteria for eligible management measures is increased discussion of workload capacity and priorities. We do not have a good sense of how much can be done, how much NMFS would be comfortable reviewing, and how much time is available for analysis authors to consider revisions.

On the request to review the proposed list against the criteria in NMFS letter, some of us would reiterate our discomfort with the “necessary” and “conservation concern” criteria because they are difficult to apply and involve more gray than black and white.

In the event the Council wishes to narrow the range of management measures included in the 2015-2016 and beyond EIS, we would recommend looking to additional criteria for setting priorities this cycle. The circumstances have been somewhat extraordinary this cycle given delays in harvest specifications and the Amendment 24 efforts. Some measures could be moved to the June 2014 Omnibus Management Measures package. Possible factors to consider in prioritizing would be the complexity and completeness of the current analysis and of what could be completed by June, and taking into account whether some analyses may need further vetting of assumptions. The GMT can identify those measures that need additional dialogue and or analysis; however the GMT notes that ultimately NMFS must determine whether the analysis adequately supports Council decision-making.

Another approach might be to postpone those measures that can be effectively implemented after January 1, 2015 (or conversely, where it is not necessary to have them in place by January 1). **Given appropriate guidance from the Council under this agenda item, the GMT can provide feedback on prioritizing management measures under Agenda Item C.9.**

Apportionment of Sablefish North/South of 36° N. Latitude

The GMT was consulted by members of the GAP about apportionment of coastwide sablefish harvest specifications to north and south of 36° N. latitude. Dr. Jim Hastie was able to provide a preliminary indication of the Northwest Fisheries Science Center (NWFSC) shelf/slope trawl survey swept area biomass estimates for the years 2003-2013. The survey results indicate that

the coastwide biomass available to the survey has been relatively stable since 2008. Although the estimates for individual areas are noisier, there is no clear trend in any stratum. The 2011 sablefish stock assessment estimated the proportions of available biomass based on the years 2003-2010. Estimates of the proportions from recent years are relatively close to the estimates from the 2003-2010 period. The GMT notes that the trawl survey does not have the same selectivity as commercial fishing gear, especially fixed gear, and that the 2011 sablefish assessment described the use of trawl survey biomass for apportionment as a “rough approximation of the sablefish stock.”

GMT Recommendations:

1. The GMT recommends that the Council consider adopting a modified version of Option 2 (Agenda Item C.4.a, Attachment 6, April 2014), which would create a new Shallow Roundfish Complex comprised of kelp greenling (coastwide) and cabezon (WA) and implement stock-specific harvest specifications for leopard shark.
2. The GMT requests the Council consider narrowing the scope of Nearshore Rockfish and China rockfish allocation alternatives to ensure the GMT is able to complete the analysis in time for final Council action in June.
3. The GMT recommends that the Council consider postponing final decisions on ACLs for widow rockfish and Dover sole until Agenda Item C.9.
4. The GMT thinks that the Council could take final action on the Amendment 24 alternatives in June without impacting the ongoing analysis.
5. If the Council takes final action to designate EC species, the GMT recommends the appropriate draft FMP language be brought forward for June 2014 Council meeting.
6. Given appropriate guidance from the Council under this agenda item, the GMT can provide feedback on prioritizing management measures under Agenda Item C.9.

PFMC
04/06/14