

GROUND FISH ADVISORY SUBPANEL REPORT ON STOCK COMPLEX RESTRUCTURING

Introduction

The Groundfish Advisory Subpanel (GAP) heard presentations from Council staff and National Marine Fisheries Service (NMFS) staff about stock complex restructuring. The issues at hand appear to be – is there a compelling conservation risk that requires restructuring of the slope complex, and, if yes, what management tools should be considered. As stated in previous GAP reports, the GAP does not think the sum of the scientific evidence available to the Council demonstrates a compelling need to restructure the minor slope rockfish complex. Moreover, Council discussion about this issue has motivated the industry to consider proactive, voluntary measures to reduce impacts on rougheye rockfish. Therefore, the GAP recommends that the Council (1) adopt a Preliminary Preferred Alternative (PPA) to retain rougheye rockfish in the minor slope complex and (2) continue to engage with the affected fleets to use voluntary measures to reduce their catches of rougheye rockfish. The GAP rationale is elaborated below.

Legal Requirements

The GAP reiterates that the legal requirement to determine whether overfishing is occurring is not when a contribution overfishing limit (OFL) value for a component stock is exceeded, but when a complex OFL is exceeded. Managing to an OFL on individual species within a complex is a policy decision that the Council can make, but is not required. Determining OFLs for individual species within a complex and managing to those levels can result in no fishing activity whatsoever without any particular savings to overall complexes. The National Standard 1 Guidelines envisioned the use of complexes; the Council has used complexes to effectively manage the groundfish fishery. While it might be valid to express concerns that future activity may lead to fishing levels that exceed an OFL, overfishing of the minor slope complex has not and is not occurring. The GAP cautions against retrospectively declaring that overfishing occurred in the past.

Rougheye Rockfish Stock Status

The Council began discussing potential management changes for rougheye rockfish after the Productivity and Susceptibility Analysis (PSA). The PSA indicated that OFL levels for rougheye rockfish were about 70 metric tons. When compared to current fishing levels, the PSA analysis was cause for concern. In 2013, a full assessment of rougheye rockfish was conducted, reviewed by a Stock Assessment Review (STAR) panel, approved by the Scientific and Statistical Committee (SSC), and adopted by the Council. The stock assessment concluded that the stock was at 47.32 percent of unfished biomass in 2013. The 2013 stock assessment indicated that annual catch levels in the range of 188 to 209 metric tons would result in improved stock status over the next ten years, up to 52 percent of unfished biomass (see below, figure d and table g from the 2013 stock assessment). The GAP notes that 188 metric tons (the low end of the range) is much higher than the 70 metric tons projected by the PSA. The GAP cautions against letting PSA ghosts haunt current consideration. The best available science indicates that rougheye rockfish is a healthy species and can accommodate catch levels in line with the catch projections in table g (below).

Figure d. Estimated relative depletion with approximate 95% asymptotic confidence intervals (dashed lines) for the base case assessment model.

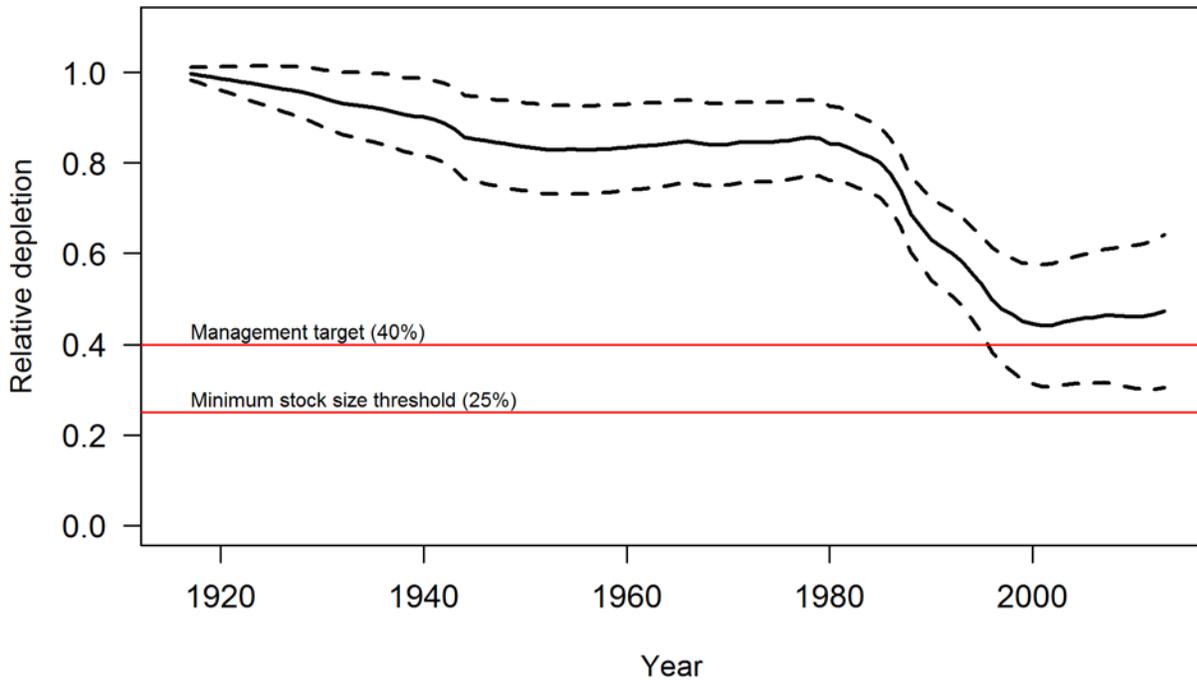


Table g. Projection of potential OFL, landings, and catch, summary biomass (age-10 and older), spawning biomass, and depletion for the base case model projected with total catch equal to the recent 5-year average in 2013 and 2014, and equal to the predicted ABC (adjusted by the 40:10 control rule and 0.9135 to reflect the P^* buffer) afterwards. The predicted OFL is the calculated total catch determined by $F_{SPR=50\%}$.

Year	Predicted OFL (mt)	ABC Catch (mt)	Landings (mt)	Age 10+ biomass (mt)	Spawning Biomass (mt)	Depletion (%)
2013			184	8,176	2,552	47.3%
2014			184	8,220	2,600	48.2%
2015	206	188	183	8,227	2,653	49.2%
2016	210	192	187	8,219	2,706	50.2%
2017	215	197	191	8,225	2,755	51.1%
2018	219	201	195	8,217	2,797	51.8%
2019	222	204	198	8,188	2,829	52.4%
2020	224	206	201	8,136	2,851	52.9%
2021	226	208	202	8,113	2,864	53.1%
2022	227	209	203	8,084	2,868	53.2%
2023	226	209	203	8,052	2,865	53.1%
2024	226	208	203	8,019	2,856	53.0%

Impacts of Removing Rougheye from the Minor Slope Complex

Despite the scientific evidence, NMFS persists in requesting the Council consider removing rougheye from the minor slope N complex. The GAP reiterates our March 2014 comments:

“The issue presented to the GAP was how best to approach the removal of rougheye and shortraker rockfish from the minor slope rockfish category north of 40°10’. The need to make this change is a result of an earlier decision to set a separate OFL for rougheye based upon the recent stock assessment.

The GAP notes that removing rougheye rockfish from the complex will cause tremendous disruption to the commercial groundfish fleets. Rougheye rockfish is caught incidentally in the longline, whiting, and bottom trawl fisheries. Therefore, it would be necessary to provide an amount of rougheye rockfish to these fishery sectors in a way that is as least disruptive as possible. Unfortunately, there does not appear to be an easy solution to this situation.

“For longline and whiting, area restrictions may reduce impacts, but would come at a very high cost of loss of fishing opportunity in those areas. For the trawl IFQ fishery, the amount that potentially could be allocated would likely be so low that rougheye rockfish would become a new constraining species in the fishery and cause a significant amount of harm, much like yelloweye and canary rockfish already have. For example, quota share allocations to individual fishermen would be too small to accommodate fishing opportunity.

“These impacts are cumulative on the entire industry.

“Moreover, constraining species in the traditional trawl fishery have largely already pushed trawlers off of the shelf to the slope. With rougheye becoming a new constraining species -- this time on the slope -- the only area left to fish will be in very deep water.”

Retain Rougheye Rockfish in the Minor Slope Complex

As noted above, the GAP believes there is no compelling conservation risk that requires the Council to remove rougheye rockfish from the minor slope complex. Species-specific OFL, acceptable biological catch (ABC), and annual catch limit (ACL) values for the stock will be established under status quo, stock complex management. These numbers do not change if the species is pulled out of the complex. Moreover, there are no additional tools available to managers to keep catches below the OFL if the stock is removed from the complex – that is, the same tools are available regardless of whether the stock is contained in the complex or not. In short, removing the species from the complex would be highly disruptive to the industry, and likely delay implementation of 2015/2016 specifications, without providing any additional benefit to management.

The GAP agrees that it is critical to ensure overfishing of rougheye rockfish does not occur. In the GAP’s opinion this can be accomplished without removing rougheye rockfish from the minor slope complex. NMFS requested the Council consider further the question of whether rougheye rockfish can be maintained within the minor slope complex. This has been done. The

comprehensive analysis developed and considered by the Council over the past year demonstrates this.

Mitigating Concerns about Status Quo

The GAP stresses that, in its opinion, the best available science demonstrates that there is no conservation concern relative to roughey rockfish. However, the GAP believes the industry has the ability to rise to the call to better understand and to minimize their impacts on roughey rockfish. The GAP will provide greater detail about these measures under Agenda Item C.9. For consideration in the interim, the GAP suggests that a harvest guideline and sorting requirement would improve information about roughey catches to help industry refine voluntary measures to reduce catches.

Potential Management Tools

The GAP and industry have discussed use of voluntary measures to avoid areas of higher roughey rockfish catch occurrence. Voluntary avoidance of these areas would require assistance from the shoreside sampling program to ensure that catch data is transmitted to vessels on an expedited basis so that they can avoid returning to areas where large catches of roughey rockfish may have been encountered. The whiting fleet continues to explore the use of Sea State to track areas of roughey rockfish bycatch and provide that information to the whiting fleet in near real time. Establishment of a sorting requirement would enhance the ability of processors and the fleet to identify larger catches of roughey rockfish. The GAP will also explore, under Agenda Item C.9, Management Measures, identification of areas where higher catches of roughey rockfish could affect projected annual catch, which could trigger a temporary closure to reduce roughey rockfish catch rates. This may involve new management lines or other spatial management tools that can be used. The GAP also suggests examining slope rockfish trip limits for the fixed-gear sector to determine whether they will affect fishermen's behavior and reduce targeting on roughey rockfish. These items will be further discussed by the GAP in preparing our remarks under Agenda Item C.9; the GAP is not recommending action on these items under Agenda Item C.8.

Category 1 or Category 2

Finally, the GAP repeats our recommendation from Agenda Item C.4. The GAP recommends the Council task the SSC with reviewing the SSC decision to reclassify the roughey rockfish stock assessment from category 1 to category 2. It is critical that this question be addressed. There is a direct link between the OFL and ABC values for 2015/2016 and the stock assessment category designation. In general, adopting lower harvest levels without adequate rationale, especially when there is no compelling conservation risk to the stock, is inappropriate. In specific, given the significant ramifications of the roughey/blackspotted ABC to all commercial fisheries, it is critical we get it right.

PFMC
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