

**GROUND FISH ADVISORY SUBPANEL REPORT ON
 BIENNIAL HARVEST SPECIFICATIONS FOR 2015-16 AND BEYOND**

The Groundfish Advisory Subpanel (GAP) met with the Groundfish Management Team (GMT) to consider management measures for the 2015-16 cycle and offers the following comments.

First, the GAP reiterates the comments we made under [Agenda Item C.4, Supplemental GAP Report](#), regarding appropriate annual catch limits (ACLs) for widow rockfish and Dover sole:

Widow rockfish: The GAP recommends an ACL of 3,000 mt, which is higher than the default 1,500 mt ACL specified for 2013 and 2014.

Dover sole: The Council chose for analysis two ACL alternatives for Dover sole – a 25,000 mt and 50,000 mt ACL; the GAP prefers the higher ACL of 50,000 mt. We want to make clear that our support for this ACL does not imply that Dover sole should be managed under anything other than a normal healthy stock strategy using a $P^*=0.45$ and an $ACL=ABC$.

Second, we also recap our comments from C.4 regarding Amendment 24. To summarize, the GAP believes the draft Alternative 3 language most closely follows the GAP recommendation from March 2013 and allows sufficient flexibility with regard to setting biennial harvest specifications and management measures.

Third, in this statement, the GAP addresses numbers 9 through 30 of the checklist found at [Agenda Item C.4.a, Attachment 1, Action Item](#). Numbers 1 through 7 were addressed under Agenda Item C.4, biennial harvest specifications; number 8 was addressed under Agenda Item C.8, stock complexes restructuring.

Preliminary Preferred Allocations and Harvest Guidelines (HG)

9. Fishery HG: Confirm or modify amounts set-aside for groundfish mortality in Tribal, non-groundfish fisheries and research

Reference document(s)	Page(s), section, table or chart
Agenda Item C.4.a Supplemental REVISED Attachment 2	Table 10

→ The GAP agrees with the set-aside figures in Table 10 for research, but notes there may be some tribal adjustments requested in June for English sole, Pacific cod, widow rockfish and yellowtail rockfish.

10. HG: Confirm or modify HG for species managed within a complex

- Blue rockfish in California within the nearshore rockfish complexes north and south of 40°10'

Reference document(s)	Page(s), section, table or chart
Agenda Item C.4.a Supplemental REVISED Attachment 2	Table 8

→ The GAP agrees with this alternative of 194 mt in 2015 and 198 mt in 2016 for all California fisheries. This is consistent with how the stock has been managed in the past.

- Blackgill rockfish within the slope rockfish complex south of 40°10'

Reference document(s)	Page(s), section, table or chart
Agenda Item C.4.a Supplemental REVISED Attachment 2	Table 9

→ While this appears to be a status quo option, the GAP is concerned about some IFQ targeting of blackgill in the south. We request the issue of Amendment 21 slope rockfish allocations south of 40°10' N. latitude be re-evaluated to better reflect actual catch history of blackgill rockfish.

The GAP also intends to bring this up under the June omnibus package.

- Rougheye rockfish?

Reference document(s)	Page(s), section, table or chart
Agenda Item C.4.a Attachment 3	Pages 31-36

→ GAP members spent considerable time discussing management options for rougheye rockfish. The GAP emphasizes the rougheye stock assessment shows it to be well above a level that would trigger precautionary management and the reason we are considering special management measures for this stock is due to the decisions made on how to categorize the stock assessment. Regardless, we recognize that under the law we need to respond so we make the following suggestions:

- Implement a scientific sorting requirement – as noted in our statement under [Agenda Item C.8](#) and public testimony, the commercial and tribal fisheries are committed to voluntary avoidance of rougheye rockfish. In order to accomplish this successfully, we need to provide real-time data to skippers on their rougheye catch. Mandatory sorting will help accomplish this objective. The GAP notes that cooperation from the Northwest Fisheries Science Center (NWFSC) and Pacific States Marine Fisheries Commission (PSMFC) by providing timely observer and shore monitor data quickly, will also be essential to dissemination rougheye catch data to industry participants.
- Analyze the use of discrete conservation areas that can be implemented as temporary closures in the event rougheye catch approaches the ACL, using whatever fishery data is available. The GAP believes such closures are a measure of last resort as they could have significant impacts on fisheries. The GAP urges the Council to task the GMT with using a more collaborative approach to this analysis. Insights from industry will be invaluable to the analysis.

- As noted in our discussion of other management measures, the GAP is recommending a reduction in fixed gear trip limits for slope rockfish north of 40°10’.

11. Allocations (trawl/non-trawl): confirm or modify 2-year trawl and non-trawl allocations for:

- Overfished species: bocaccio, canary, cowcod, petrale and yelloweye

Reference document(s)	Page(s), section, table or chart
Agenda Item C.4.a Supplemental REVISED Attachment 2	Table 16

→ The GAP recommends the allocations for these species as listed in Table 16.

- Longnose skate: trawl (90%) and non-trawl (10%) allocation

Reference document(s)	Page(s), section, table or chart
Agenda Item C.4.a Supplemental REVISED Attachment 2	Tables 11, 12

→ The GAP recommends the allocations for longnose skate as listed above (and in Tables 11 and 12).

- Shelf rockfish north trawl (60.2%) and non-trawl (39.8%) allocation

Reference document(s)	Page(s), section, table or chart
Agenda Item C.4.a Supplemental REVISED Attachment 2	Tables 11, 12

→ The GAP agrees with the suggested biennial allocations.

- Shelf rockfish south trawl (12.2%) and non-trawl (87.8%) allocation

Reference document(s)	Page(s), section, table or chart
Agenda Item C.4.a Supplemental REVISED Attachment 2	Tables 11, 12

→ The GAP agrees with the suggested biennial allocations.

- Rougheye rockfish?

Reference document(s)	Page(s), section, table or chart
Agenda Item C.4.a Supplemental REVISED Attachment 2	Tables 1, 11

→ The GAP believes no formal allocation is necessary at this time and requests no action be taken on this item.

- Spiny dogfish?

Reference document(s)	Page(s), section, table or chart
Agenda Item C.4.a Supplemental REVISED Attachment 2	Table 4 (revised after P* change from 0.35 to 0.4 under Agenda Item C.4)

→ The GAP understands spiny dogfish will have a 2,101 mt ACL in 2015 and a 2,085 mt ACL in 2016. Initial analysis shows there is no compelling reason for a harvest guideline or allocation. Once the set-asides are subtracted from the ACL, adequate fish is available for all fleets. There is no risk of exceeding the

ABC or OFL and any assumed risk is lessened because of the higher P* of 0.40 adopted under Agenda Item C.4.

12. Set-aside: Confirm or modify the at-sea whiting set-asides adopted in November; Consider establishing set-asides from the trawl allocation to account for at-sea whiting bycatch of:

- Spiny dogfish

Reference document(s)	Page(s), section, table or chart
Agenda Item C.4.a Supplemental REVISED Attachment 2	Table 15

→ In line with our remarks under item 11 (above), the GAP thinks it is probably unnecessary to establish an at-sea set aside for spiny dogfish shark because coastwide management of the dogfish HG will likely accommodate current coastwide dogfish impacts. Furthermore, as noted under item 11, the GAP sees no reason for a trawl/non-trawl allocation, which would necessitate an at-sea set-aside.

However, if the Council does establish an at-sea set aside, the GAP recommends 520 metric tons. This is the same amount as the current at-sea “Other Fish” set aside, which is primarily specified to account for dogfish bycatch.

- Rougheye rockfish?

Reference document(s)	Page(s), section, table or chart
Agenda Item C.4.a Attachment 3	Pages 31-36

→ The GAP suggests this is unnecessary, as we recommended retaining rougheye in the slope rockfish complex.

13. HG: Confirm or modify 2-year within non-trawl HG or shares for:

- Overfished species including bocaccio, canary, cowcod and yelloweye

Reference document(s)	Page(s), section, table or chart
Agenda Item C.4.a Supplemental REVISED Attachment 2	Table 16

→ The GAP recommends the harvest guidelines for these species.

- Black rockfish: 58% OR, 42% CA

Reference document(s)	Page(s), section, table or chart
Agenda Item C.4.a Attachment 6	Table 4-34

→ The GAP recommends these percentages will work for Oregon and California; they are the same percentages that have been used in the past.

- Blue rockfish 40-10 adjustment for CA

Reference document(s)	Page(s), section, table or chart
Agenda Item C.4.a Attachment 6 Agenda Item C.4.a Supplemental REVISED Attachment 2	Table 8

→ The GAP agrees with this; this management measure has been in place since the 2007-08 biennial specifications.

- Blackgill south of 40°10': 40-10 adjustment; 60% limited entry and 40% open access fixed gears

Reference document(s)	Page(s), section, table or chart
Agenda Item C.4.a Supplemental REVISED Attachment 2	Table 9

→ The GAP agrees; these percentages have been in place since the 2013-14 biennial specifications.

- Sablefish south of 36°: 55% limited entry and 45% open access fixed gears

Reference document(s)	Page(s), section, table or chart
Agenda Item C.4.a Attachment 6	Section 4.2.1.8; page 158

→ The GAP agrees; this is status quo as listed in the draft Environmental Impact Statement (DEIS).

- Nearshore rockfish HG north of 40°10' for California (between 40°10' and 42° N. lat.)

Reference document(s)	Page(s), section, table or chart
GMT statement, this agenda item	Option 3, hybrid table

→ The GAP recommends using Option 3, the hybrid option, from the GMT statement under this agenda item (below).

Option 3 Hybrid

Species	Contribution	WA%	OR%	CA%	WA mt	OR mt	CA mt
<i>Black and yellow</i>	0.01	0.00	0.21	0.79	0.00	0.00	0.01
<i>Blue (CA)</i>	17.00	NA	NA	1.00	0.00	0.00	17.00
<i>Blue (OR & WA)</i>	26.94	0.07	0.93	NA	1.96	24.98	0.00
<i>Brown</i>	1.75	0.00	0.08	0.92	0.00	0.14	1.61
<i>Calico</i>	0.00	NA	NA	NA	0.00	0.00	0.00
<i>China</i>	6.20	0.26	0.49	0.25	1.60	3.06	1.54
<i>Copper</i>	9.71	0.26	0.49	0.25	2.51	4.79	2.41
<i>Gopher</i>	0.00	0.00	0.29	0.71	0.00	0.00	0.00
<i>Grass</i>	0.55	0.00	0.49	0.51	0.00	0.27	0.28
<i>Kelp</i>	0.01	NA	NA	NA	0.00	0.00	0.00
<i>Olive</i>	0.26	0.00	0.03	0.97	0.00	0.01	0.25
<i>Quillback</i>	6.15	0.26	0.49	0.25	1.59	3.04	1.52
<i>Treefish</i>	0.18	0.00	0.00	1.00	0.00	0.00	0.18
Sum Total					7.66	36.29	24.80

68.75

- China rockfish HG north of 40°10' by state or by CA and OR/WA combined

Reference document(s)	Page(s), section, table or chart
Agenda Item C.4.a Attachment 3	Pages 30-31

→ The GAP understands any proposed HG for China rockfish is negated by the Council’s action under C.4 at this meeting, which retained China in the nearshore complex. Furthermore, the GAP sees no reason for establishing an HG that could constrain this fishery until a future assessment is performed to better inform fisheries management concerns.

Adopt Preliminary Preferred Season Structures

14. Treaty Fisheries: management measures

Reference document(s)	Page(s), section, table or chart
Agenda Item C.4.a Attachment 6	

→ The treaty tribes’ representative on the GAP has no requests for changes to current management measures at this time.

15. Shorebased IFQ: Trawl RCA, non-IFQ trip limits

Reference document(s)	Page(s), section, table or chart
September 2013 PFMC minutes and decision document	Page 4

→ The GAP has requested the RCA changes go into effect in period 6 of 2013 and all of 2014, but they have not yet been implemented, despite the Council adopting those changes in September 2013. Ideally, the GAP would like to see those modifications – a seaward boundary of 150 fathoms and a shoreward boundary of 100 fathoms, for all periods – roll over into both 2015 and 2016.

From the [September 2013 PFMC decision document](#):

***“Consideration of Trawl Rockfish Conservation Area (RCA)
Boundary Modifications***

“The Council reaffirmed their April action to establish a trawl RCA configuration between 40°10' and 48°10' N. latitude with a 100 fm shoreward boundary and 150 fm seaward boundary beginning in Period 6 in 2013 through 2014.”

By shrinking the RCA, fishermen will be able to access more areas and species other than slope rockfish. This would aid in reducing effort on roughey rockfish. Moreover, the trawl fleet is a rationalized fishery and has IFQ for species of concern.

16. Non-nearshore: Non-trawl RCA seaward configuration, trip limits (including sablefish)

Reference document(s)	Page(s), section, table or chart
Agenda Item C.4.a Attachment 6	Tables 4-105, 4-109

→ The GAP recommends the sablefish trip limits under Alternative 3 in the DEIS, which is the Preliminary Preferred Alternative (PPA):

Table 4-105. Alternative 3. Sablefish trip limits north of 36° N. latitude for limited entry and open access fixed gears for 2015-2016.

Year	Fishery	Jan-Feb	Mar-Apr	May-Jun	July-Aug	Sept-Oct	Nov-Dec
2015	Limited Entry	1,025 lb/week, not to exceed 3,075 lb/ 2 months					
	Open Access	300 lb/ day, or 1 landing per week of up to 900 lb, not to exceed 1,800 lb/ 2 months					
2016	Limited Entry	1,275 lb/week, not to exceed 3,375 lb/ 2 months					
	Open Access	300 lb/ day, or 1 landing per week of up to 1,000 lb, not to exceed 2,000 lb/ 2 months					

Table 4-109. Alternative 3. Sablefish trip limits south of 36° N. latitude for limited entry and open access fixed gears for 2015-2016.

Year	Fishery	Jan-Feb	Mar-Apr	May-Jun	July-Aug	Sept-Oct	Nov-Dec
2015	Limited Entry	2,100 lb/week					
	Open Access	315 lb/ day, or 1 landing per week of up to 1,575 lb, not to exceed 3,200 lb/ 2 months					
2016	Limited Entry	2,175 lb/week					
	Open Access	325 lb/ day, or 1 landing per week of up to 1,625 lb, not to exceed 3,250 lb/ 2 months					

The GAP further notes that it may be necessary in the future to reduce slope rockfish trip limits for fixed gear north of 40°10'.

17. Nearshore: Non-trawl RCA shoreward configuration, trip limits

Reference document(s)	Page(s), section, table or chart
Agenda Item C.4.a Attachment 6 Pending GMT statement	Table 4-25

→ The GAP makes no recommendation here until the GMT statement under this agenda item is available. We understand that once an HG is set, routine management measures (trip limits, RCA boundaries) may be set that could be modified during inseason action later. At this time, the GAP recommends no change to the shoreward RCA boundary

18. WA recreational: Season dates, bag limits, area closures

Reference document(s)	Page(s), section, table or chart
Agenda Item C.4.a Attachment 6	Section 4.2.2.2.6; Pages 202-206 and Section 4.2.4.2.6, Page 247

→ The GAP agrees with Alternative 3, the Preliminary Preferred Alternative.

19. OR recreational: Season dates, bag limits, area closures

Reference document(s)	Page(s), section, table or chart
Agenda Item C.4.a Attachment 6	Section 4.2.2.2.7; Pages 207-211
Agenda Item C.4.b, REVISED GMT report Appendix B	Section B.14

→ Under all the alternatives in the DEIS, yelloweye impacts – the issue that is the primary driver of the recreational fishery in Oregon – are the same. The GAP approves of all alternatives and understands the expansion of the Stonewall Bank Yelloweye Rockfish Conservation Area (YRCA) is being analyzed for future use but expansion is not an option at this time. Also, a preliminary analysis has been done on a 50-fathom management line, but Oregon anglers understand more analysis is necessary.

20. CA recreational: Season dates, bag limits, area closures

Reference document(s)	Page(s), section, table or chart
Agenda Item C.4.a Attachment 6	Section 4.2.2.2.8; Pages 211-214; Table 4-76

→ The GAP prefers Option 1 or 2 as listed in the DEIS; Option 3 is too restrictive. Obviously, Option 1 is the most liberal in terms of impacts to overfished and target species, but the difference for each species between Option 1 and Option 2 is negligible, with the exception of the black rockfish ACL. Option 1 also is more liberal in terms of seasons but somewhat more restrictive regarding depth allowances than Option 2, but either provide greater opportunity than status quo. Given the potential to exceed the black rockfish ACL in Option 1, Option 2 is preferred at this time. We also support the lingcod bag limit increase from two to three.

The GAP also requests analysis of the following RCA lines (these would apply to both the sport and commercial fisheries): Changes to the 60-fathom line to more closely approximate the depth contour in the southern California Bight.

Del Mar waypoints, North to South

32° 56' 72"
117° 19' 80"

32° 56' 50"
117° 19' 72"

32° 56' 36"

117° 19' 06"

32° 56' 24"

117° 19' 04"

32° 56' 00"

117° 19' 16"

32° 55' 64"

117° 18' 46"

The following options pertain to a reef in the Southern California Bight. With existing lines, it is difficult to fish the reef in a prevailing current. There is some room to the south and west of the reef that would fix this problem if either of the two options below were implemented. The GAP requests the GMT analyze these options.

Option A: Extend the 60 Fathom line # 206 to:

32° 45' 88"

117° 21' 78"

OR

Option B: Add a new waypoint between #206 and #207 at:

32° 45' 80"

117° 21' 66"

With regard to the 50-fathom RCA line near the Channel Islands, the GAP also requests GMT analysis of the following waypoints (the waypoints are numbered 1-29; we have concerns for waypoints between 2 and 5 and also between 20 and 26):

WPT 2 stay the same

WPT 3 move to 34° 08' 770" and 120° 25' 740"

WPT 4 stay the same

Then add between 4 and 5

1. 34° 05' 73" and 120° 05' 93"

2. 34° 06' 140" and 120° 04' 860"

3. 34° 05' 700" and 120° 03' 170"

4. 34° 05' 670" and 119° 58' 980"

5. 34° 06' 340" and 119° 56' 780"

WPT 5 stay the same.

WPT 20 stay the same

Then add between 20 and 21

33° 50' 250" and 120° 00' 000"

- 21 stay the same
- 22 move to 33° 51' 060" and 120° 03' 730"
- 23 stay the same
- 24 move to 33° 58' 900" and 120° 20' 150"
- 25 stay the same
- Then add between 25 and 26
- 34° 02' 200" and 120° 30' 370"
- 26 stay the same

Adjustments to Existing or Routine Measures

21. RCA boundary adjustments to better approximate depth

Reference document(s)	Page(s), section, table or chart
Agenda Item C.4.b, REVISED GMT report Appendix B	Section B.1, Table B-1, Figure B.1

→ The GAP agrees these changes should be made to be conform to depth contours.

22. Using underutilized set-asides in the projections for the shorebased IFQ carryover

Reference document(s)	Page(s), section, table or chart
No analysis yet	

→ The GAP notes that we have commented on IFQ carryover in the past and generally support any reasonable measure that addresses the carryover issue.

23. Trip limit adjustments for lingcod N. of 40°10' N lat., slope rockfish N. of 40°10' N lat., shortspine thornyhead N. of 34°27' N lat., bocaccio S. of 34°27' N. lat., and shelf rockfish S. of 34°27' N. lat.

Reference document(s)	Page(s), section, table or chart
Agenda Item C.4.b, REVISED GMT report Appendix B	Section B.6, Table B-25

→ The GAP believes a full range of options should be available, if routine in-season adjustments need to be made. To that end, we request the following be analyzed for June:

- Bocaccio limited entry: 1,000 lbs/2 months; and
- Bocaccio open access: 500 lbs/2 months

Bocaccio are nearly rebuilt – if not already rebuilt – and fishermen are encountering more bocaccio in the directed fixed gear nearshore fishery. An increased trip limit of bocaccio would reduce discards and turn them into landed fish.

The GMT already has analyzed a full range of options to make them available during inseason actions.

The GAP also wants to make the Council, advisory bodies and the public aware that inseason requests for slope rockfish trip limits north of 40°10' may be necessary to reduce effort on roughey rockfish in 2015 and 2016.

24. Modifications to groundfish retention regulations in the Pacific halibut fisheries?

Reference document(s)	Page(s), section, table or chart
Agenda Item C.4.b, REVISED GMT report Appendix B	Section B.13

→ The GAP understands there is no precise decision point here but agrees with the GMT that this should be analyzed so it can be used during the International Pacific Halibut Commission (IPHC) catch-sharing plan process.

New Management Measures

25. Establish rougheye rockfish Groundfish Conservation Area closures

Reference document(s)	Page(s), section, table or chart
Agenda Item C.8.a Supplemental REVISED Attachment 3	Pages 1-5
Agenda Item C.4.b REVISED 2 GMT Report	Section B.2

→ As noted above, the GAP supports analysis of discrete spatial blocks that can be implemented as temporary closures in the event that rougheye catch approaches the ACL, using whatever fishery data is available. The GAP believes such closures are a measure of last resort as they could have significant impacts on fisheries.

The GAP urges the Council to task the GMT with using a more collaborative approach to this analysis. Insights from industry will be invaluable to the process.

26. Establish spiny dogfish Groundfish Conservation Area Closures

Reference document(s)	Page(s), section, table or chart
Agenda Item C.4.b, REVISED GMT report Appendix B	Section B.2

→ The GAP does not recommend any Groundfish Conservation Area (GCA) closures for spiny dogfish, as they are impractical. The risk of exceeding the spiny dogfish ACL/ABC/OFL is extremely low, given the reasons we've mentioned earlier in this statement. Ideally, if closures are necessary, rolling closures would be the preferable way to go, though enforcement may be problematic.

The trawl industry already uses voluntary measures to avoid spiny dogfish and has been successful. To that end, the fleet is applying some of those voluntary measures already used in spiny dogfish to rougheye rockfish avoidance.

27. Require rockfish excluders for the at-sea and shoreside Pacific whiting fisheries

Reference document(s)	Page(s), section, table or chart
Agenda Item C.8.a Supplemental REVISED Attachment 3	Pages 6-21
Agenda Item C.4.b, REVISED GMT report Appendix B	Section B.10

→ The GAP does not support mandatory use of rockfish excluders at this time. As the analysis indicates, during initial trials the Pacific States Marine Fisheries Commission (PSMFC) excluder has had some success at excluding smaller rockfish such as widow, canary and yellowtail rockfish at lower volumes of whiting but there are still significant issues with excluder clogging when the volumes of whiting are higher. Clogged excluders almost always result in abandonment of the haul, which leads to potentially large unnecessary discards of fish, and damage of retained catch that gets clogged in the excluder.

Defining, regulating and enforcing a mandatory rougheye excluder is both difficult and unreasonable at this time. The GAP envisions significant challenges with regulating and enforcing the use of an excluder. First, excluders are not one size fits all, because all nets are not the same. Second, each vessel is different and, operationally, excluder use is different on each vessel. If you are already carrying a salmon excluder and a small fish excluder, adding a rockfish excluder can result in a line of excluders that is longer than the actual net.

There is a financial consideration as well. Early indications are that a rougheye rockfish excluder could cost upwards of \$25,000 per excluder. To date, the industry has spent hundreds of thousands of dollars on excluder development. This isn't grant money or government dollars – this is industry money. If the Council and NMFS attempt to implement a mandatory excluder that does not work, it will in all likelihood stop any further development of an excluder that actually *does* work.

The GAP continues to support industry and agency development of a workable excluder and we are confident that development will continue under the voluntary measures that we are advocating for the 2015-16 management period.

28. Provide for lingcod retention in Periods 1, 2 and 6

Reference document(s)	Page(s), section, table or chart
Agenda Item C.4.b, REVISED GMT report Appendix B	Section B.7

→ The GAP understands the GMT is analyzing options that would cover the requests of some fishermen to retain lingcod all year. Specifically, we request analysis of:

LE: 1,600 lbs/2 months during periods 3, 4, 5 and November;
 OA: 800 lbs/month during periods 3, 4, 5 and November;

LE: 200 lbs/2 months during periods 1, 2 and December; and
 OA: 100 lbs/month during periods 1, 2 and December.

This equates to Option 2b under B.6, “Other Trip Limit Adjustments” and Option 2 under B.7, “Analysis of lingcod retention in the nearshore and non-nearshore fixed gear fisheries in periods 1, 2 and December.”

In addition, the GAP requests analysis of the following:

LE: 1,200 lbs/2 months during periods 3, 4, 5 and November;

OA: 600 lbs/month during periods 3, 4, 5 and November;

LE: 500 lbs/2 months during periods 1, 2 and December; and

OA: 250 lbs/month during periods 1, 2 and December.

29. Remove or modify commercial gear restrictions for targeting flatfish in California

Reference document(s)	Page(s), section, table or chart
Agenda Item C.4.b, REVISED GMT report Appendix B	Section B.8

→ The GAP understands the GMT is not going to make a recommendation under this agenda item and also realizes more analysis will be done

However, the GAP encourages analysis of the options that would potentially remove gear restrictions and allow more flexibility for open access fishermen. We note the Enforcement Consultants, in their report under this agenda item, prefer Option 3, as it is clear and enforceable. While we don't have a preference for any option, the GAP expects to make more comment on this in June.

30. Allow canary rockfish retention in the recreational fisheries

Reference document(s)	Page(s), section, table or chart
Agenda Item C.4.b, REVISED GMT report Appendix B	Section B.12

→ In general, the GAP supports the analysis of canary rockfish retention in recreational fisheries. California recreational fishermen are concerned that retention of canary would shorten seasons, although they support the idea for Oregon and Washington fishermen. Oregon and Washington have smaller populations and fewer groundfish anglers; therefore the risk of exceeding the sport HG for canary is much lower than if the California recreational sector were allowed to have even a one-canary bag limit. In short, more people equals more impact. Neither California nor Washington recreational fishermen on the GAP support retention of canary at this time, but the GAP requests this option be left open in the future as canary continues to rebuild.

Alternatively, analyzing this option for all three states could provide more flexibility to the recreational sector as a whole, should it be necessary or desired. States can set more restrictive management measures on federally-managed species; a coastwide option would put the onus on the states to either allow retention (and set corresponding bag limits, seasons and depth restrictions) or prohibit retention.

The GAP understands this has been a frequent request to the GMT and the state of Oregon. The Oregon recreational sector has noted in the past that allowing some canary retention may decrease pressure on nearshore stocks. Furthermore, limited canary retention would discourage targeting and the catch data would help inform future stock assessments.

Items not on the action checklist

- 1) **Moving 0.6 mt of yelloweye:** The GAP understands the GMT is evaluating the impacts of moving 0.6 mt of yelloweye from the non-nearshore fixed gear sector to the nearshore fixed gear sector. The GAP supports this analysis and will provide more comments on this issue in June.

- 2) **Midwater sport fishery:** This has been ongoing since 2008 and this issue, while generating a great deal of interest, never seems to get on any agenda or workload schedule. The GAP believes this is a priority for the sport fishing community and the opportunity should be analyzed. The GAP may also comment on this during the June omnibus package.