

GROUND FISH ADVISORY SUBPANEL REPORT ON
BIENNIAL MANAGEMENT PROCESS FOR 2013-2014 GROUND FISH FISHERIES –
PART 2

The Groundfish Advisory Subpanel (GAP) received a presentation from Mr. John DeVore and Ms. Kelly Ames on proposed groundfish harvest specifications and management measures for the 2013-14 management cycle. The GAP offers the following comments and recommendations on proposed 2013-14 harvest specifications and management measures.

Harvest Specifications

It was the GAP's understanding that preliminary actions under Agenda Item E.4 to decide a range of annual catch limits (ACLs), followed by additional guidance under Agenda Item E.5, would lead to final Council determinations on the range of ACLs for detailed analysis and identification of preliminary preferred ACL alternatives under this agenda item. The GAP reiterates the recommendations and considerations offered under Agenda Item E.4.b, Supplemental GAP Report. The GAP also offers the following recommendations for the range of 2013-14 harvest specifications to better analyze the biological and socioeconomic impacts that concern the GAP.

Canary. With regard to canary rockfish, the GAP suggests that if ACL alternative 5 is chosen for analysis and ultimately adopted, all sectors will benefit from higher ACLs. This is a particularly constraining species for all sectors and is important for the prosecution of all groundfish fisheries coastwide.

Several cumulative management measures, such as reduced trip and bag limits for the recreation sector and gear restrictions in the trawl sector, have been implemented to support canary rockfish rebuilding efforts. As canary is a species that affects all sectors, any increase in the ACL will increase the viability and economic efficiencies of those sectors.

For example, a higher canary ACL would help trawlers design a targeted midwater yellowtail rockfish fishery. According to the November 5, 2011, IFQ report, only 18% of this year's yellowtail trawl allocation has been harvested. This year, the trawl fleet has landed only 64% of what it landed for the same time last year. Forgoing harvest opportunity due to canary impacts at a time when the price per pound of yellowtail has increased is a loss to the fleet, the processors and the communities. Ample yellowtail quota is available north of 40°10' N latitude but remains inaccessible due to canary constraints.

Other sectors would also benefit from an increased canary yield by relaxing constraints to these fisheries. Nearshore commercial fisheries could fish in deeper waters with a higher allocation of canary, whiting fisheries could more efficiently access whiting with a larger bycatch cap, offshore fixed gear fisheries could access more productive areas on the shelf, etc. Relaxing such constraints leads to economic efficiencies and higher value catches and would contribute to safer conditions at sea since vessels would be able to fish closer to port to access target species.

Cowcod. The GAP recommends analysis of a 4 mt ACL alternative for analysis and specification of that alternative as preferred. While the GAP realizes that this alternative was rejected when NMFS disapproved Amendment 16-5, the GAP still believes there is a need for this slightly higher available harvest. Estimated total catch of cowcod in 2007 was slightly higher than the status quo 3 mt ACL with the California recreational and trawl fisheries having the highest impacts. Therefore, a higher yield would reduce the risk of constraining California recreational and trawl fisheries. Part of the reason there is such a low trawl catch and effort on the shelf this year is that trawlers have such a low cowcod quota, few are willing to risk catching any cowcod. Therefore, a 1 mt increase in available cowcod harvest would certainly provide significant economic benefits at the cost of 3 years of additional rebuilding. The GAP believes the “cost” of three years of additional rebuilding in a 60-year rebuilding plan is worth the socioeconomic benefits that California fishing communities would undoubtedly reap from increased recreational effort and higher trawl landings.

Darkblotched Rockfish. The GAP requests analysis of darkblotched ACL alternatives 2, 3 and 6. All of the alternatives offer reasonable tradeoffs for rebuilding and harvest options. That is, they offer higher yields with only a small cost in terms of predicted duration of rebuilding. The resulting ACLs also are higher than the current ACL of 296 mt and all options in the range between alternatives 2 and 6 are predicted to have a 100% probability of rebuilding by the current Ttarget of 2025. The highest ACLs vary in the median time to rebuild by one year (2018 vs. 2017) and the increased yield could leverage significant access to valuable target slope species and thus higher economic returns for fishing communities. Rebuilding by 2018 is still seven years sooner than the current Ttarget.

A higher darkblotched ACL would also increase total catch limits in the whiting fleet, reducing the risk of early closure.

Yelloweye. The GAP reiterates their recommendation for using yelloweye ACL alternative 7 for the ACL (i.e., 21 mt in 2013 and 2104) and an 18 mt ACT, which corresponds to ACL alternative 6. The GAP notes there is some management uncertainty in predicting and managing yelloweye impacts in recreational fisheries and using an ACT would help account for that while providing flexibility in fishing operations for all sectors.

Beyond the clear economic benefits of higher yelloweye yields for most groundfish sectors that have been well articulated by the GAP in past statements, higher available harvest of yelloweye could also restore much needed research surveys such as the extended International Pacific Halibut Commission survey, and allow potentially valuable EFPs that have recently been denied primarily due to yelloweye impacts.

Dover Sole. The GAP recommends analysis of a 40,000 mt ACL alternative for Dover sole. The GAP notes that Dover sole has become the primary target of the trawl fleet since the implementation of the TIQ program and a larger ACL could attract larger volume retail and food service outlets. This type of market development depends on the availability and dependability of high volumes of seafood supply. A higher ACL would result in an increased trawl allocation and a higher vessel use cap in terms of the amount, thereby benefitting those vessels that might be operating at the vessel use cap. The GAP notes that the projected biomass of Dover sole remains healthy even at harvest levels that approach the OFL or ABC.

Sablefish. The GAP recommends reconsideration of the Council's ABC decision for sablefish and the adoption of a range of ACL alternatives for detailed analysis. The GAP believes the ABC should be based on a P* value of 0.45. The sablefish stock assessment is robust with less inter-assessment variability in estimated biomass than most, if not all, west coast groundfish assessments with results informed by relatively rich fishery-independent and fishery-dependent data. These factors lead to the conclusion that scientific uncertainty in estimating OFL in the sablefish assessment is low compared to other assessments. **The GAP also recommends analysis of two ACL alternatives: 1) the preliminary preferred ACL based on a 40-10 adjusted ACL calculated using a P* of 0.4, and 2) a 40-10 adjusted ACL calculated from the ABC recommended by the GAP.** This would allow a better analysis of biological and socioeconomic impacts, which can only be done at the ACL level. Such an analysis is critically important in deciding final sablefish specifications given how important this stock is to the west coast fishing industry and economic analysis.

Longnose Skate. The GAP recommends analysis of a 2,000 mt ACL alternative for longnose skate and specifying this alternative as the preliminary preferred ACL. The decision table in the 2007 assessment projects the stock will maintain a healthy biomass at a level of annual removals higher than 2,000 mt. This level of harvest is less likely to constrain fisheries than the status quo ACL of 1,349 mt, which was slightly exceeded in 2010. Trip limit adjustments, should they be needed, should be sufficient to keep the harvest within the ACL.

Widow Rockfish. The GAP also recommends analysis of a 3,500 mt ACL for widow rockfish and specifying this ACL as the preliminary preferred alternative. The stock is now rebuilt and projected biomass and depletion under the base model in the assessment indicate the stock will remain healthy with this level of removals. This level of available harvest would allow resumption of the target widow/yellowtail fishery, which would greatly benefit fishing communities. The bycatch control afforded by IFQ management alleviates the concern regarding potentially higher bycatch of overfished species, particularly canary, when targeting widow and yellowtail rockfish by trawls.

Other Fish Complex. The GAP is concerned with the new harvest specifications adopted for the Other Fish complex. The GAP notes the SSC statement indicates these specifications are biased low because of the missing OFL contributions of many of the component species. The adopted ACL for this complex is now so low that catch of many of these species is likely to be a significant constraint to many west coast fisheries. Few options are available to react to catches of these species since they are a mixed assemblage of shallow and deep water species.

Vulnerable Species Currently Managed in Stock Complexes. The GAP is aware of the emerging issue of higher vulnerability of some rockfish species currently managed in stock complexes. **The GAP prefers a measured approach for analyzing and mitigating these impacts by developing measures in the 2015-16 biennial management process.** GAP members agree with the GMT recommendation to specify a sorting requirement for the five most vulnerable species in the slope and nearshore rockfish complexes. A sorting requirement would provide better information to track catch inseason. The industry will explore measures to voluntarily avoid these vulnerable species should the need arise based on inseason catch monitoring.

The GAP also recommends analysis of an alternative to remove these species from their respective complexes. This is especially important for the most vulnerable slope rockfish species that are primarily caught in trawl fisheries. The GAP believes the analysis could explore less Draconian management measures than extending the trawl RCA out to 250 fm should the need arise to avoid these species.

Management Measures

Species-Specific Management Measures for All Fleets

Blackgill Rockfish. GAP members agreed that establishing lower trip limits and implementing a sorting requirement for blackgill rockfish would be a better alternative than adjusting the RCA boundaries. The GAP agrees with the GMT that this species can be easily managed, given these management measures. **The GAP also recommends analysis of a blackgill allocation alternative of 60.3% for limited entry and 39.7% for open access, based on the 5- to 10-year average, as shown in Table 3 in Agenda Item E.9.b, GMT Report 2.**

Greenspotted Rockfish. The GAP agrees with the GMT recommendation that the Council continue to manage greenspotted rockfish within the minor shelf complexes, for all the reasons stated by the GMT in Agenda Item E.9.b, GMT Report 2.

Spiny Dogfish. If spiny dogfish catch starts to raise concerns regarding premature attainment of the Other Fish ACL, the GAP offers the following actions to reduce impacts. Reducing trip limits for spiny dogfish will help reduce impacts in any directed fishery that targets spiny dogfish. However, as the GMT stated in Agenda Item E.9.b, GMT Report 2, changing trip limits will have little effect and will only lead to increased discards in fisheries that do not target spiny dogfish but do have an incidental bycatch of the species. Furthermore, decreasing trip limits could put unnecessary constraints on target fisheries. Instead, the GAP suggests fishermen in both trawl and non-trawl fisheries simply avoid the species if they are encountered. In the fixed gear and recreational fisheries, improved avoidance and discard handling techniques such as those listed in Agenda Item E.9.b, GMT Report 2 should be pursued.

Longnose Skate. The GAP agreed that, if there is a longnose skate ACL attainment issue, the trawl fleet can explore use of excluders and other appropriate avoidance and release techniques, such as those recommended for spiny dogfish. Already there has been success with the use of skate excluders in trawl nets and continued refinement of this technology should be pursued.

Preliminary Two-year Allocations for Bocaccio, Canary, Cowcod, Yelloweye, and Petrale Sole

The GAP weighed potential changes in allocations for these five overfished species and decided at this time to use the current sector allocations for analysis in the Draft Environmental Impact Statement (DEIS).

It would be difficult at this meeting to suggest changes to allocations because ACLs and potential ACTs are not yet final and an impact analysis of integrated alternatives is not available. The GAP realizes that, as the ACLs and ACTs are finalized and when we have analyses informing the need for yields of these species to prosecute fisheries by different sectors, we will have the opportunity to provide more detailed perspectives on any changes to allocations.

Limited Entry Trawl Management Measures

General Gear Issues. The GAP reiterates the importance and priorities for addressing the trawl gear issues outlined in Agenda Item E.7.b Supplemental GAP Report. **The GAP recommends the highest priority gear issues be addressed as soon as possible. If analysis and rulemaking necessary to implement recommended gear changes can be accomplished faster in the specifications process, then the GAP recommends inclusion of these analyses in the specifications DEIS. Otherwise, a separate NEPA analysis and rulemaking is recommended.**

Lingcod Management Line Shift. **The GAP recommends shifting the management line used to manage lingcod from the California-Oregon border at 42° N latitude to 40°10' N latitude.** This management line shift should not pose any biological impacts since Cape Mendocino at 40°10' N latitude is a biogeographic break. Further, minimizing the number of management lines will limit fishery disruptions given the crossover provisions that prevent trawlers from fishing in more than one management area on a fishing trip. A management line at the California-Oregon border is especially problematic for trawlers fishing out of the ports of Brookings, Crescent City, and Eureka since they typically tow back and forth across that line.

Vessel Use Caps for Lingcod. **The vessel use caps for lingcod need to be increased when the lingcod ACL is divided into northern and southern components so fishermen won't lose access to fish they otherwise would have been able to use.** Currently, the coastwide vessel use cap for lingcod is 3.8%. When the quota allocation is reduced from a coastwide one to area-specific quotas, then a fisherman who is holding quota pounds at the cap will also be at the cap at the lower sub-area ACL. Trading lingcod quota pounds with someone in the other area will not improve the fisherman's portfolio if he is held to the same vessel use cap implemented when there was a coastwide allocation of quota. Therefore, the caps will need to be adjusted upward to allow fishermen to use an amount equal to what they had held prior to stratifying the coastwide quota to the two areas corresponding to the two areas for which lingcod ACLs are specified.

The GAP proposes the current vessel use cap of 3.8% be adjusted upward to account for the loss of quota pounds within each of the two management areas.

The formula for this is:

$$\text{Old vessel cap} / (\text{sub-area ACL} / (\text{north ACL} + \text{south ACL}))$$

For example:

Northern vessel cap -

$$3.8\% / (840 \text{ mt} / (840 \text{ mt} + 970 \text{ mt})) = 8.2\%$$

Southern vessel cap –

$$3.8\% / (970 \text{ mt} / (840 \text{ mt} + 970 \text{ mt})) = 7.1\%$$

Lingcod Survival Credit and Minimum Size Limit. The GAP strongly recommends implementing a lingcod survival credit that would allow discarded lingcod that survive not to be counted against lingcod quota. Currently all lingcod caught, whether they survive or not, are counted against quota, which is overly punitive and does not provide any incentive to carefully release smaller, unmarketable lingcod. The GAP also recommends analysis of a 20 inch minimum size limit for lingcod coastwide to explore the threshold size where lingcod are no longer marketable. The current lingcod minimum size limit is 24 inches south of 42° N latitude and 22 inches north of 42° N latitude and some of the smaller lingcod that are discarded may have market value. Given that all discarded lingcod count against quota, the higher minimum size limit further reduces the potential value of the catch.

Limited Entry Fixed Gear and Open Access Management Measures

Lingcod Landing Limits. The GAP request the GMT analyze a 50 lb daily trip limit and a 250 lbs/month limit of lingcod during the months of December, January, and February for the limited entry and open access fixed gear fisheries both north and south of 40°10' N latitude.

The current regulations (800 lbs/2 months during May-October and 400 lbs/month in November for limited entry; 400 lbs/month during May-November for open access) result in higher percentages of discards during the winter months. These discards could be turned into landed catch with little or no effect on other fisheries or other species.

Lingcod stocks are healthy and fishermen have noted that even a small landing limit increase would help them stay economically viable in light of the decreased limits for other species. These low landing limits, in place at a time when many fishermen will turn to Dungeness crab fishing, are low enough to discourage targeting of lingcod. Limited landings also will help processors and distributors keep the market channels open during the winter months.

Rockfish Conservation Area Management Line Changes

The GAP agrees with the general philosophy of the Trawl Rationalization Regulatory Evaluation Committee (TRREC) that questions whether Rockfish Conservation Areas (RCAs) are still needed for the trawl fishery given the protections afforded under rationalization. However, the GAP recommends the following trawl RCA adjustments and analyses for the 2013-14 specifications analysis. The GAP also recommends a line adjustment for the non-trawl RCA.

Trawl RCA Line Adjustments. **The GAP recommends adjusting the 150 fm trawl RCA management line to include all the petrale cutouts.** In a few instances, the petrale cutouts extend slightly shoreward of the current 150 fm line, which reduces flexibility to fish the petrale cutouts while maintaining a 150 fm seaward RCA boundary elsewhere. The GAP also recommends analyzing trawl impacts using the 125 fm line to enable inseason RCA adjustments to that line as a routine management measure for trawl management.

150 fm RCA Line Adjustments. **The GAP recommends a couple of minor adjustments to the 150 fm RCA management line to enable access to fish the tips of the Usal and Noyo canyons.** These were important areas to target healthy groundfish stocks in the fixed gear fisheries that were lost when the 150 fm line was first implemented. The GAP coordinated with Enforcement Consultants and these line changes do not seem to cause enforcement problems. The waypoints describing these minor RCA line adjustments are as follows:

Usal Canyon (Figure 1):

1. 39°49.099' N lat., 124°06.028' W long.;
2. 39°48.913' N lat., 124°04.599' W long.;
3. 39°48.599' N lat., 124°04.512' W long.;
4. 39°48.171' N lat., 124°05.355' W long.

Noyo Canyon (Figure 2):

1. 39°32.980' N lat., 123°56.430' W long.;
2. 39°31.918' N lat., 123°56.489' W long.;
3. 39°31.816' N lat., 123°56.762' W long.;
4. 39°32.275' N lat., 123°57.354' W long.;

California Recreational Management Measures

Yelloweye rockfish is a constraining species for all of California, but especially in the Northern California Mendocino area above Pt. Arena. Education and voluntary measures by the private boaters in this region has resulted in an estimated 2011 yelloweye bycatch of only 1.51 mt to date with a 3.1 mt allowance. If this improved performance in managing recreational impacts in this area continues, then the GAP recommends extending the season in this area. The preliminary preferred yelloweye ACL alternative proposed by the Council is 18 mt for 2013-14. With this 1 mt additional yield from increasing the ACL (or ACT) and assuming a 0.3 mt increased allocation to the California recreational fishery, and voluntary avoidance of yelloweye by anglers, the GAP proposes an increase in fishing opportunity for the Mendocino Management Area.

Season Length. The GAP recommends the following analysis of an alternative recreational season for this management area:

A. The GAP proposes a change in the season specified in the Shelter Cove Area (i.e., the Vizcaino Management Control Line to the 40°10' N latitude line) be changed from closing on September 15 to closing on October 15. The additional month of fishing would add 25% more time on the water for this area.

B. Likewise, the GAP proposes that the season in the Fort Bragg area from the Pt. Arena line at 38°57.5' N latitude to the Vizcaino Management line be extended six weeks to close on October 31 rather than August 15. This six-week season extension will provide the same fishing opportunity as now exists in the Northern Area above 40°10' N latitude to the Oregon border.

C. All opening dates for California should be on the Saturday preceding an opener if it is scheduled for mid-week. For example, a May 15 opening date, that may be a Tuesday, would open on the preceding Saturday.

The GAP believes the reduced take of yelloweye in this region justifies consideration of these season extensions.

Control Depth. Currently, regulations for the northern management areas allow groundfish fishing out to a depth of 20 fm. This is a different depth restriction than those implemented in other areas of the state where an offshore line is established with fishing allowed shoreward of a line defined by waypoints and not a depth contour. **The GAP recommends analysis of an offshore line at 25 or 30 fm defined by waypoints that would allow fishing shoreward of the line.** This would remove the ambiguity of boaters knowing whether or not they are within legal fishing areas.

CDFG Management Recommendations. The GAP agrees with all of CDFG recommendations for management measures to be analyzed for 2013-14, including the 40-50 fm proposal for the San Francisco area, a 3 bocaccio and 3-10 greenling sub-bag limit (statewide), and the retention of shelf rockfish species while fishing at open depths (< 20 fm) adjacent to the Cowcod Conservation Areas when fishing for rockfish is open.

PFMC
11/06/11

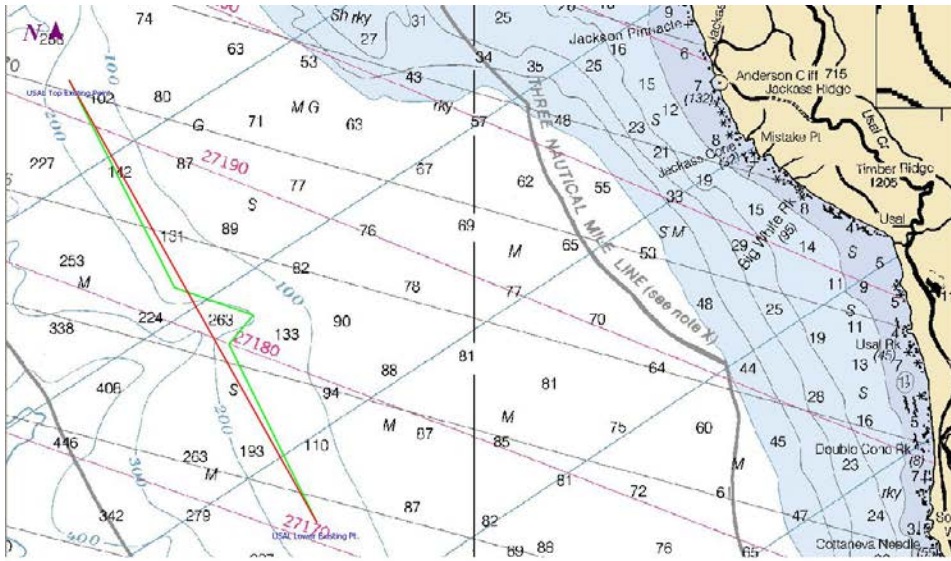


Figure 1. The proposed 150 fm RCA line adjustment at Usal Canyon.

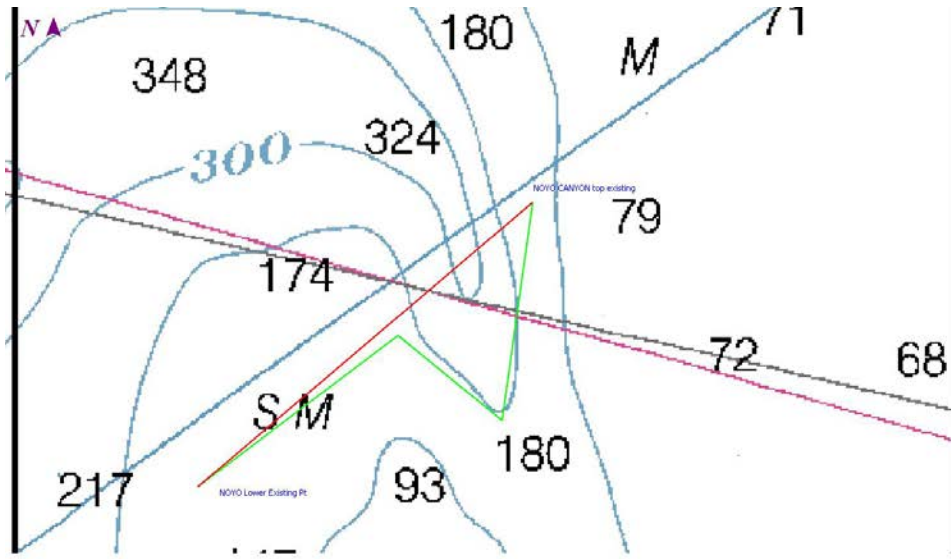


Figure 2. The proposed 150 fm RCA line adjustment at Noyo Canyon.