

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE REPORT ON THE
2015-2016 BIENNIAL HARVEST SPECIFICATIONS AND MANAGEMENT MEASURES

The California Department of Fish and Wildlife (CDFW) offers the following comments for management approaches of nearshore rockfish in 2015 and 2016 and beyond.

CDFW acknowledges the preferred management options in the Washington and Oregon Departments of Fish and Wildlife (WDFW/ODFW) report for management of nearshore stocks (Agenda Item F.7.b, Supplemental WDFW/ODFW Report) and supports individual flexibility in managing nearshore stocks within respective state processes. While all of the states may have different approaches to nearshore fishery management, one commonality is the understanding that a one-size fits all approach may not work for all.

During adoption of the 2013 data moderate stock assessments, many complexities were identified in the application of assessment results to nearshore rockfish management. Since these complexities will require ongoing discussion about how to proceed in the future and will likely take time to resolve, CDFW is supportive of the general management approach outlined by WDFW and ODFW for 2015 and 2016. We believe these interim measures strike a balance between responding to the newest science and minimizing disruptions to the fishery.

CDFW proposes the following approach for managing the nearshore complex from 40°10' N lat. to 42° N lat. which recognizes our differing management needs and ability to respond to inseason actions:

- Establish a harvest guideline for minor nearshore rockfish between 42° N lat. (Oregon/California border) and 40°10' N lat. (Cape Mendocino) which would be specified in federal regulations. This harvest guideline would be specified at 23.7 mt (Table 1; Supplemental WDFW/ODFW Report); a number which represents the No Action alternative in the EIS [i.e., expected commercial landings (Table 4-39) combined with projected recreational mortality (Table 4-50)].
- In accordance with CDFW's policy to provide a stable fishery and minimize inseason disruptions, seasons will continue to be designed and modeled preseason in order to maximize fishing opportunity while expecting to keep harvest within specified harvest guidelines. CDFW employs the use of multi-month closures early in the year as part of the overall design to ensure that limits are not exceeded. While we are committed to our inseason tracking process and taking actions as needed in response to the latest information, season structures are designed with an expectation that we will not need to take inseason action.

- CDFW will continue to monitor harvest levels of nearshore fisheries inseason and to share catch tracking information with the other states.
- CDFW will continue to employ the same approach used for monitoring of other species with an established state harvest guideline (e.g. blue, canary, and yelloweye rockfish). Harvest levels will be monitored inseason and if projected catches are expected to exceed harvest limits we would take appropriate action in coordination with the National Marine Fisheries Service.

The 2013 data moderate stock assessment and review process was less than optimal and many lessons were learned on how to better improve the process for the future. CDFW is encouraged to see that those comments are being considered during planning and prioritization for groundfish stock assessments in 2015 (Agenda Item F.8.b, NWFSC Report).

To prevent future confusion or delays in management and regulatory development, CDFW believes a broader discussion on nearshore species assessments and management needs to occur outside the stock assessment cycle before engaging in additional full or data moderate nearshore rockfish assessments. Addressing these complex issues during a stock assessment review or on the Council floor is not optimal. If this does not occur, the issues experienced during the 2013 assessment cycle (i.e., boundary issues) are likely to be repeated again especially as the Council is currently considering the use of data moderate assessments for nearshore stocks that have been previously assessed at state boundaries (e.g. blue and gopher rockfish). CDFW also believes that these discussions should be holistic and address the complex as a whole instead of focusing solely on a few individual species as is currently being done now.

CDFW also notes that there is disconnect between management of overfished species and nearshore stocks. Overfished species are allocated to the states according to state boundaries for some sectors, but target stocks are not necessarily aligned with those same boundaries. This reduces the flexibility of the states to effectively manage their recreational and commercial nearshore fisheries. Establishing individual state harvest guidelines in federal regulations instead of sector specific limits would provide needed flexibility for state management and allow states to work out sector allocations within the respective state delegations. CDFW hopes that issues such as this would also be included in a broader scale discussion of nearshore rockfish management moving forward.