

GROUNDFISH ADVISORY SUBPANEL REPORT ON FISHERIES IN 2015-2016 AND
BEYOND: HARVEST SPECIFICATIONS, MANAGEMENT MEASURES, AND
AMENDMENT 24

The Groundfish Advisory Subpanel (GAP) met with members of the Groundfish Management Team (GMT), Mr. John DeVore, and Ms. Kelly Ames to consider management measures for the 2015-16 cycle, and offers the following comments.

In this statement, the GAP uses the checklist found at [Agenda Item F.7.a, Attachment 1, Action Item](#).

Recognizing that the Council is behind on its agenda, the GAP has identified the following items as ones that: 1) the GAP has identified as departing from the preliminary preferred alternative (PPA) or final preferred alternative (FPA); 2) the GAP specifically supports and adds clarification or details; or 3) is a change from our recommendations in April. However, our comments on all of the items on the checklist will at least be in the Council record.

The important ones to the GAP are:

- No. 6. Confirm EC species' designations
- No. 8. Decide FPA for Slope Rockfish complexes
- No. 9. Confirm or modify amounts deducted from the ACL
- No. 11. Trawl/non-trawl: Confirm or modify 2-year trawl and non-trawl allocations for:
Overfished species: bocaccio, canary, cowcod, petrale and yelloweye
- No. 13. Non-trawl: Confirm or modify 2-year within-non-trawl HGs or within non-trawl shares
for: Overfished species including bocaccio, canary, cowcod and yelloweye
- No. 13. Non-trawl: Confirm or modify 2-year within-non-trawl HGs or within non-trawl shares
for: Nearshore rockfish HG north of 40° 10'
- No. 15. Shorebased IFQ: Trawl RCA, non-IFQ trip limits
- No. 16. Non-nearshore: Non-trawl RCA seaward configuration, trip limits (including sablefish)
- No. 17. Non-Trawl RCA shoreward configuration, trip limits
- No. 18. WA recreational
- No. 19. OR recreational
- No. 20. CA recreational
- No. 21. Trawl: RCA boundary adjustments to better approximate depth
- No. 22. Trawl: Using underutilized set-asides
- No. 23. Non-trawl: Trip limit adjustments
- No. 25. Trawl: Establish new trawl RCA coordinates for 300 and 350 fm boundaries
- No. 26. Non-trawl: Provide for lingcod retention in Periods, 1, 2 and 6
- No. 27. Non-trawl recreational: One-fish canary sub-bag limit

2015-2016 Harvest Specifications

1. Confirm SSC-recommended OFLs including a revised 2016 cowcod OFL

Reference document(s)	Page(s), section, table or chart
F.7.a, Att. 2, Preferred 2015 and 2016 Harvest Specifications	Table 1

→ The GAP confirms the SSC recommendations, including the revised cowcod 2016 OFL of 68 tons.

2. Confirm P* and ABCs. Adopt revised 2016 cowcod ABC

Reference document(s)	Page(s), section, table or chart
F.7.a, Att. 2, Preferred 2015 and 2016 Harvest Specifications	Table 1

→ The GAP confirms the SSC recommendations, including the revised cowcod 2016 ABC of 62 tons.

3. Confirm FPA ACLs

Reference document(s)	Page(s), section, table or chart
F.7.a, Att. 2, Preferred 2015 and 2016 Harvest Specifications	Table 1

→ The GAP agrees with the Final Preferred Alternative ACLs as listed in Table 1 of Attachment 2.

4. Confirm 4 mt ACT for cowcod

Reference document(s)	Page(s), section, table or chart
F.7.a, Att. 2, Preferred 2015 and 2016 Harvest Specifications	Table 1

→ The GAP agrees with the Final Preferred Alternative ACTs of 4 mt in 2015 and 2016, as listed in Attachment 2, Table 2.

5. Confirm rebuilding plan parameters including a new T_{TARGET} for COWCOD ABC

Reference document(s)	Page(s), section, table or chart
F.7.a, Att. 2, Preferred 2015 and 2016 Harvest Specifications	Table 2
F.7.a, Att. 4, Draft Environmental Impact Statement	Page 127, section 4.1.1.3

→ The GAP agrees with the Final Preferred Alternative T_{TARGET} of 2020 for cowcod as listed in Table 2 and corresponding to the preferred ACT.

2015-2016 Stock Complexes

6. Confirm EC species' designations and associated FMP language to be implemented under Amendment 24

Reference document(s)	Page(s), section, table or chart
F.7.a, Att. 8, Proposed Groundfish FMP Amendment Language	Table 3-2

→ The GAP agrees with the species listed in Table 3-2 in Attachment 8 as ecosystem component (EC) species. GAP members discussed Pacific grenadier (*Coryphaenoides acrolepis*) at length in April 2013 and determined it would fit well as an EC species.

Further, we understand National Marine Fisheries Service (NMFS) has concerns about removing Pacific grenadier from the fishery management plan (FMP). To that end, we reiterate our comments from April 2013, [D.3.b, GAP Report on Stock Assemblages](#):

“The GAP recommends an alternative for analysis that removes Pacific grenadier from the FMP. Pacific grenadier, as well as the other endemic grenadier species, are caught incidentally in West Coast fisheries and are not targeted. Furthermore, since these are deepwater species, catch of grenadiers are restricted since the prohibition on trawling deeper than 700 fm went into effect in 2006 with the final rule implementing Amendment 19. Since 2006, the average annual landings of grenadiers is 127.7 mt. Finally, the GAP notes the core distribution of grenadiers is much deeper than the 700 fm limit for West Coast trawl fisheries. Therefore, if harvest were to increase from the recent year average, there would be no biological effect of any significance since the fishery cannot access the core population.”

7. Confirm FPA to manage kelp greenling coastwide, WA cabezon, and leopard shark in the Other Fish complex ABC

Reference document(s)	Page(s), section, table or chart
F.7.a, Att. 4, Draft Environmental Impact Statement	Table 4-16

→ The GAP agrees with this management change.

8. Decide FPA for Slope Rockfish complexes

Reference document(s)	Page(s), section, table or chart
F.7.a, Att. 4, Draft Environmental Impact Statement	Page 8, Table 2-1, preferred option

→ The GAP recommends the Council adopt its preliminary preferred alternative as the final preferred option, which would maintain the status quo slope rockfish complex and establish a new scientific sorting requirement for roughey, shortraker, and blackspotted rockfish. This sorting requirement will better inform management decisions in the future by better tracking catches while not creating an unbearable burden for the industry (See related item, No. 25, in this document).

2015-2016 Allocations and Harvest Guidelines (HG)

9. Confirm or modify amounts deducted from the ACL to account for groundfish mortality in Tribal, non-groundfish fisheries, EFPs and research

Reference document(s)	Page(s), section, table or chart
F.7.a, Att. 4, Draft Environmental Impact Statement F.7.b, Supplemental Tribal Report	Pages 1-2

→ The GAP agrees with the changes recommended in the supplemental Tribal report. Increasing the Tribal set-asides will help account for increasing encounters of some species as those stocks continue to rebuild.

10. Confirm or modify HGs 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
F.7.a, Att. 2, Preferred 2015 and 2016 Harvest Specifications	Table 6

→ The GAP agrees with these, as also confirmed in our April 2014 GAP report.

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

Reference document(s)	Page(s), section, table or chart
F.7.a, Att. 2, Preferred 2015 and 2016 Harvest Specifications	Table 7

→ The GAP agrees with these, as also confirmed in our April 2014 GAP report.

11. 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
F.7.a, Att. 4, Draft Environmental Impact Statement	Page 223, Table 4-52

→ The GAP recommends the allocations for these species as listed in Table 4-52 of the DEIS (the preferred alternative), including allocating 35 mt of petrale to the non-trawl sector. An excerpt of the table is below.

Table 4-52. Preferred Alternative. Stock specific fishery harvest guidelines (HG) or annual catch targets (ACT) and allocations for 2015 (in mt).

Stock	Area	Fishery HG or ACT	Allocation Type	Trawl		Non-trawl	
				%	Mt	%	Mt
BOCACCIO	S of 40°10' N. lat.	340.7	Biennial	N/A	81.9	N/A	258.8
CANARY	Coastwide	106.8	Biennial	N/A	56.9	N/A	49.9
COWCOD a/	S of 40°10' N. lat.	4.0	Biennial	N/A	1.4	N/A	2.6
DARKBLOTCHED	Coastwide	317.2	Amendment 21	95%	301.3	5%	15.9
POP	N of 40°10' N. lat.	143.0	Amendment 21	95%	135.9	5%	7.2
PETRALE SOLE	Coastwide	2,579.4	Biennial	N/A	2,544.4	N/A	35.0
YELLOWEYE	Coastwide	12.2	Biennial	N/A	1.0	N/A	11.2

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

Reference document(s)	Page(s), section, table or chart
F.7.a, Att. 4, Draft Environmental Impact Statement	Page 223, Table 4-52

→ The GAP recommends the allocations for longnose skate as listed above (preferred alternative), as we also supported in our April 2014 GAP report.

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

Reference document(s)	Page(s), section, table or chart
F.7.a, Att. 4, Draft Environmental Impact Statement	Page 223, Table 4-52

→ The GAP recommends the allocations for shelf rockfish as listed above (preferred alternative), as we also supported in our April 2014 GAP

report.

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

Reference document(s)	Page(s), section, table or chart
F.7.a, Att. 4, Draft Environmental Impact Statement	Page 223, Table 4-52

→ The GAP recommends the allocations for shelf rockfish as listed above (preferred alternative), as we also supported in our April 2014 GAP report.

12. Within trawl/at-sea: Confirm or modify the at-sea whiting set-asides adopted in April

Reference document(s)	Page(s), section, table or chart
F.7.a, Att. 4, Draft Environmental Impact Statement	Page 235, Table 4-60

→ The GAP agrees with the set-asides listed in the table referenced above.

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

- Overfished species including bocaccio, canary, cowcod, and yelloweye

Reference document(s)	Page(s), section, table or chart
F.7.a, Att. 4, Draft Environmental Impact Statement	Page 227, Table 4-56
F.7.a, Att. 6, Excerpted Portions of Appendix B	Table B-37

→ The GAP discussed the need for a buffer in both the nearshore and non-nearshore sectors in the event some yelloweye was transferred between sectors.

Under the current preferred alternatives, yelloweye impacts to nearshore fishery are 1.2 mt out of 1.2 mt share. The non-nearshore impacts are 0.5 mt out of 1.1 mt. Thus, the proposal is to move 0.6 mt from non-nearshore to nearshore to assist with potential yelloweye impacts due to increased lingcod trip limits and a year-round fishery north of 40° 10' (See also Nos. 23 and 26, below).

However, the GAP was concerned that the only adjustment available for the non-nearshore sector is to move the RCA line deeper, from 100 to 150 fathoms, which would prevent the attainment of targeted fisheries.

At the same time, the risk of exceeding the yelloweye ACL is low, according to GMT analysis.

Therefore, the GAP suggests transferring 0.4 mt (instead of 0.6) from the non-nearshore sector to the nearshore sector.

- Black rockfish: 58% OR, 42% CA

Reference document(s)	Page(s), section, table or chart
F.7.a, Att. 4, Draft Environmental Impact Statement	Page 220, Section 4.22

→ 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
F.7.a, Att. 2, Preferred 2015 and 2016 Harvest Specifications	Table 7

→ 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; 60% limited entry and 40% open access fixed gears

Reference document(s)	Page(s), section, table or chart
F.7.a, Att. 2, Preferred 2015 and 2016 Harvest Specifications	Table 7

→ 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
F.7.a, Att. 4, Draft Environmental Impact Statement	Section 4.2.2

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

- Nearshore rockfish HG north of 40°10'

Reference document(s)	Page(s), section, table or chart
F.7.a, Att. 4, Draft Environmental Impact Statement F.7.b Supplemental WDFW/ODFW report F.7.b, Supplemental CDFW report	

→ The GAP struggled with this issue. At the April meeting, the GAP agreed to the hybrid option, as we wrote in our statement. That was the assumption going into this meeting.

However, subsequent reports from the states (joint WDFW/ODFW and CDFW) prompted the GAP to discuss various options for management of nearshore rockfish.

Recognizing the necessity of remaining below 69 mt coastwide, the GAP reconsidered the hybrid option. At the same time, we considered the ability of the states to manage nearshore rockfish through an inseason process. California has noted its process takes longer and the ability to manage inseason is more difficult. Washington and Oregon can respond to inseason action much more quickly.

We also appreciate that all three states have a good reputation for working together.

Therefore, California has proposed a Federal 23.7 mt harvest guideline. Washington and Oregon have proposed joint management of the nearshore sector (45.3 mt). The consensus of the GAP is that this situation will work (we note that California’s proposal of 23.7 mt is below what it would have received in the hybrid option) and the states will be accountable for staying below 69 mt total coastwide.

2015-2016 Season Structures

14. Treaty fisheries: Management measures

Reference document(s)	Page(s), section, table or chart
F.7.a, Att. 4, Draft Environmental Impact Statement	

→ The treaty tribes’ representative on the GAP said only one change is being implemented: a slight modification in how the bi-monthly trip limits will be managed inseason to stay within the overall harvest targets as well as estimated impacts to overfished species.

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

Reference document(s)	Page(s), section, table or chart
F.7.a, Att. 4, Draft Environmental Impact Statement	Section 4.4.2
F.7.a, Att. 3, Executive Summary and PPA	Page 10, 11

→ The GAP remains frustrated with the reasons for Council-recommended modifications of the trawl Rockfish Conservation Area (RCA) adjustments being disapproved by NMFS. In April, the GAP commented on its desire to move forward with the action the Council made regarding the RCA in September 2013:

From our April statement:

“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. lat. 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.”

At this point, the GAP reiterates its desire for the preliminary preferred alternative of 100 fm shoreward and 150 fm seaward RCA lines for the area 40°10’ to 48°10’ N. lat., year-round.

If that is not possible, the 200-fm-modified RCA line between 40°10’ to 46° N. lat., year-round, would be preferred.

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

Reference document(s)	Page(s), section, table or chart
Pending GMT analysis	

- The GAP understands part of this relates to analysis of non-trawl impacts relative to moving the seaward non-trawl 200 fm and 250 fm RCA management lines. The GAP generally supports this as an option, particularly if needed to protect species of concern or in the case of roughey. However, the GAP recommends that if the Council uses these management lines, it should do so discriminately and not encompass the whole area north of 40° 10’ N. lat.
- For sablefish, 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/ 2onths					

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

Industry south of 36° N. Latitude: *request no action*

Year	Fishery	Jan-Feb	Mar-Apr	May-Jun	July-Aug	Sept-Oct	Nov-Dec
2015	Limited Entry	2,000 lb/week					
	Open Access	320 lb/ day, or 1 landing per week of up to 1,600 lb, not to exceed 3,200 lb/ 2 months					
2016	Limited Entry	2,000 lb/week					
	Open Access	320 lb/ day, or 1 landing per week of up to 1,600 lb, not to exceed 3,200 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
F.7.a, Att. 4, Draft Environmental Impact Statement	Sect. 4.2

→ The GAP prefers the Council’s April preliminary preferred alternative. To accommodate the potential increase in lingcod trip limits and a year-round fishery, the GAP would prefer to keep the RCA lines the same, if needed.

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

Reference document(s)	Page(s), section, table or chart
F.7.a, Att. 4, Draft Environmental Impact Statement	Sect. 4.2
F.7.a, Att. 3, Executive Summary and PPA	Page 24+, Tables 4-21, 4-22

→ The GAP agrees with all of the recreation management measures in the preferred alternative as listed in Att. 3 (beginning on Page 24) for Washington as outlined in the DEIS.

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

Reference document(s)	Page(s), section, table or chart
F.7.a, Att. 4, Draft Environmental Impact Statement	Sect. 4.2
F.7.a, Att. 3, Executive Summary and PPA	Page 29+, Tables 4-24 and 4-26, figure 4-2

→ The GAP agrees with all of the recreation management measures in the preferred alternative as listed in Att. 3 (beginning on Page 29) for Oregon as outlined in the DEIS.

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

Reference document(s)	Page(s), section, table or chart
F.7.b, Supplemental Revised CDFW report 2	

→ The GAP supports the recreational recommendations as presented in Agenda Item [F.7.b, REVISED Supplemental CDFW Report No. 2](#) for season structures and RCA configurations.

Regarding the lingcod bag limit, we recommend a split bag limit within the state for lingcod: three lingcod for the Mendocino and North Coast areas (north of 38.57.5 N. lat.) and two lingcod south of that latitude line. Justification is due to the concern of the Commercial Passenger Fishing Vessel (CPFV) fleet in the Central and San Francisco zones with possible impacts to several species of concern that would require inseason action resulting of loss of time on the water.

The GAP has no objection to increasing the bag limit on lingcod to three below Point Conception at 34° N. latitude, since the species of concern mentioned above are quite rare in that area.

Further, we support the recreational recommendations as stated in Agenda Item F.7.b. Supplemental CDFW Report No. 1 regarding a California harvest guideline of 23.7 mt for the nearshore complex and other described management measures.

2015-2016 Adjustments to Existing or Routine Measures

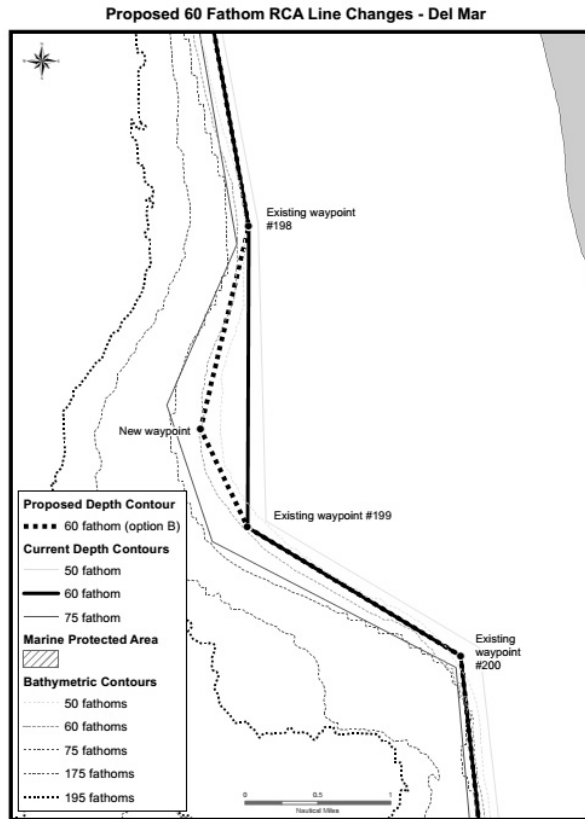
21. Trawl: RCA boundary adjustments to better approximate depth, including the 200 fm modified line in Oregon and a 60 fm line in California

Reference document(s)	Page(s), section, table or chart
F.7.a, Att. 6, Excerpted Portions of Appendix B	Section B.1

→ The GAP agrees these 200-fm changes should be made to conform to depth contours (the preferred option, Option 1).

Del Mar 60 Fathom RCA Changes

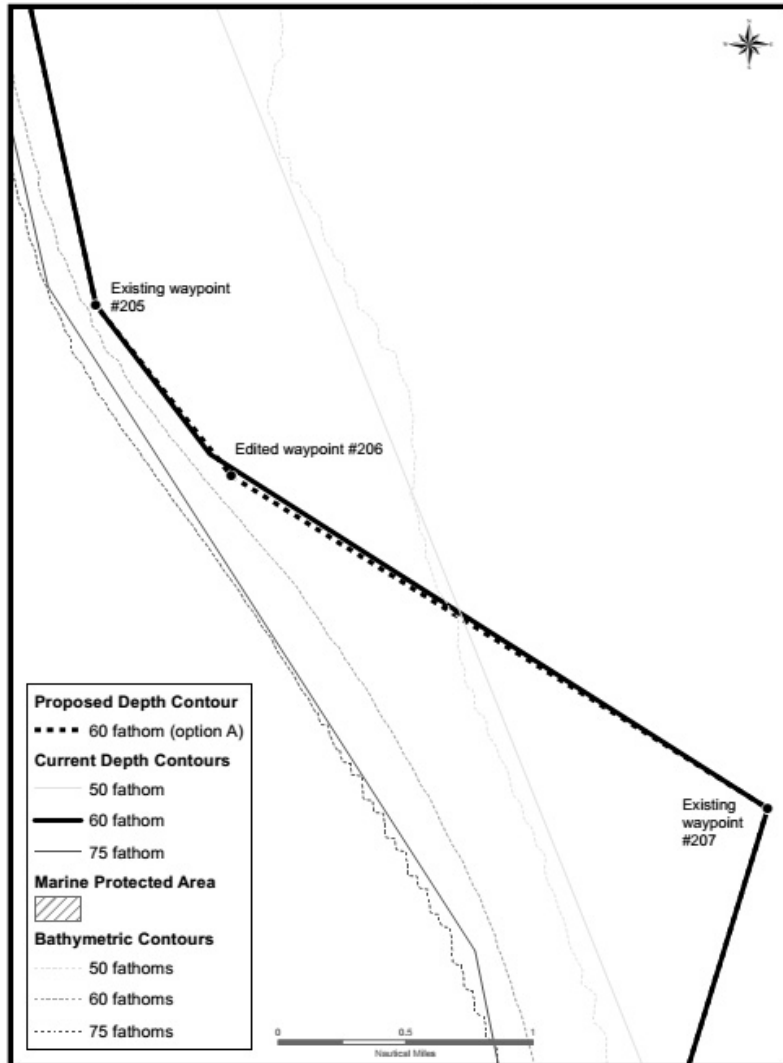
While industry favors its recommended correction submitted in April, the GAP realizes that absent the appropriate fine-scale cartography that shows the less-than-60 fathom ridge, the Council would be unable to grant this request. Thus the GAP favors the GMT-recommended 60 fathom line changes as shown below for Del Mar.



South of Del Mar RCA Changes

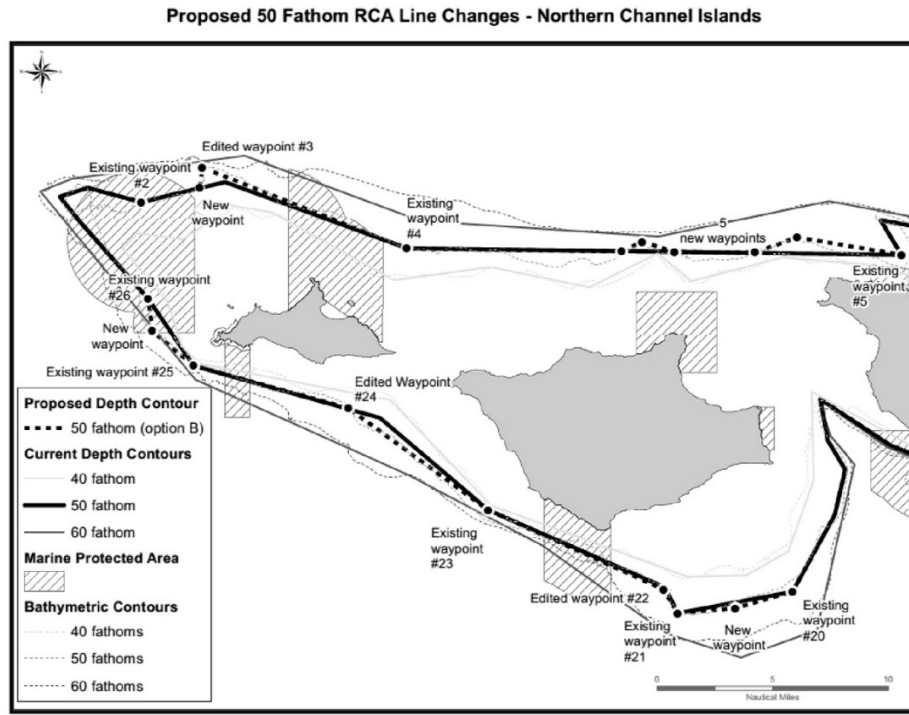
Both of the 60 fathom changes for south of Del Mar would be acceptable to the GAP (see below). However, existing waypoint #207 may be misprinted in the Code of Federal Regulations as it appears to be well inside the 50 fathom line. This was confirmed by Mr. Bob Leos of the GMT.

Proposed 60 Fathom RCA Line Changes - South of Del Mar



Channel Islands 50 Fathom RCA Line Changes

For the 50 fathom line in the Channel Islands, the GAP favors and greatly appreciates the following GMT option.



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

Reference document(s)	Page(s), section, table or chart
Pending analysis	

→ No analysis had been done by the time the GAP considered this, but using underutilized set-asides for shorebased IFQ carryover is just common sense. In that regard, the GAP agrees with this concept. Simply, this is a reliable way to allow for carryover without taking up a lot of Council staff or NMFS time.

23. Non-trawl: Trip limit adjustments for lingcod N. of 40° 10' N. lat. (increase), slope rockfish N. of 40° 10' N. lat. (decrease), bocaccio S. of 34° 27' N. lat. (increase), and shelf rockfish S. of 34° 27' N. lat. (increase)

Reference document(s)	Page(s), section, table or chart
Appendix B F.7.b, Supplemental Revised CDFW report 2 F.7.a, Supplemental Analyses for Appendix B	Page 104; Page 113

→ The GAP considered trip limit adjustments for lingcod N. of 40° 10' N. lat. and agrees with increasing the limits. However, more discussion about that and the options for a year-round lingcod fishery are discussed in this document, No. 26.

Regarding slope rockfish, the GAP has no comment, as the analysis has not been completed yet.

With regard to bocaccio, the GAP agrees with Option 2A, which equates to 750 lbs. bimonthly for limited entry and 250 lbs. bimonthly for open access.

For shelf rockfish, the GAP agrees that Option 2A would be best. It equates to 4,000 lbs. bimonthly for limited entry when the season is open for non-trawl and 1,500 lbs. bimonthly when open for open access. This would be sufficient to address the uncertainty in overfished species (OFS) impacts.

24. Non-trawl recreational: Modifications to groundfish retention regulations in the Pacific halibut fisheries

Reference document(s)	Page(s), section, table or chart

→ The GAP understands this would allow the Council more flexibility in the halibut catch-sharing plan and supports these changes.

New Management Measures for Implementation in 2015-2016

25. Trawl: Establish new trawl RCA coordinates for 300 and 350 fm boundaries

Reference document(s)	Page(s), section, table or chart
Pending GMT analysis/statement	

→ The GAP reviewed the draft GMT analysis and had several questions:

Since this is in the 2015-16 annual harvest specifications and management measures process, does the Council intend to use them during this cycle? Many on the GAP were under the impression that voluntary reductions and mandatory sorting requirements would be used in 2015-16, to help inform the Council as to whether any management measures would be required in 2017-18. The GAP believes this approach is prudent and meets the needs of both the agency and the fleet.

If the Council chooses this as the preferred management option, how does the Council intend to implement this tool? How do we accurately measure all the sectors catch and is there a threshold for each sector that would need to be met in order to implement additional management measures?

Furthermore, data reports that show rougheye catch are on different timelines for different sectors. For example, the whiting fleets have a 24-hour turnaround time thanks to industry-funded tracking (both area-specific and catch estimates), so they know each day where the rougheye hotspots are for their vessels. However, data for open access fleets, for example, have at a minimum a two-month lag time. The GAP questions the ability of the Council/NMFS to use inseason measures effectively based on incomplete catch information.

One of the reasons there was so much industry buy-in for voluntary reduction measures was due to the belief that the Council and NMFS supported use of these measures for the 2015-2016 season. The threat of establishing these types of measures being utilized in the 2015-2016 management period is draconian and

undermines the voluntary efforts of the industry to work together. At best these measures create skepticism and distrust of the process. At worst, it pits sectors of the industry against each other, which is what we were trying to avoid.

This whole discussion is frustrating to the GAP because it appears the rougheye issue is a manufactured crisis that we are constantly revisiting. This is especially troubling, given that the recent stock assessment acknowledges the stock is healthy at 7 percent above target and continuing to grow.

The Council discussion at the time of this request was basically: Do what you can in the time given. Clearly, the GMT analysis is not done. Can the Council even take, let alone consider, final action on an incomplete analysis? The GAP cannot comment on an incomplete analysis nor does the GMT or Council have time to address any concerns raised by GAP members.

The maximum depth distribution of rougheye is in the 250-fathom range. That would seem to indicate the analysis of these lines really is for comparison only – and not intended to be established – as it seems clear they would not be necessary or appropriate.

One portion of the GMT analysis considered the use of Bycatch Reduction Areas (BRAs). However, the regulations state “Bycatch Reduction Areas may be implemented in the Pacific whiting fishery: as an automatic action for species with a sector-specific allocation.” Therefore, it follows that since there are no sector-specific allocations of rougheye, then these proposed reduction areas are not available tools in the whiting fishery.

To recap: 1) a full assessment has been done (which shows the rougheye stock is healthy); 2) industry reacted immediately to institute *voluntary* inseason reductions in 2014 and begin sorting shoreside ([see F.7.c, Public Comment, pages 7-15](#)); and 3) a mandatory scientific sorting requirement – at the suggestion of fishermen and processors – will be implemented in 2015 and beyond.

It is clear that industry’s actions demonstrate we are taking this issue seriously and making progress on rougheye/blackspotted reductions but need more time to consider the effect of these changes before looking at, let alone implementing, management measures such as draconian RCA line changes.

26. Non-trawl: Provide for lingcod retention in Periods 1, 2, and 6

Reference document(s)	Page(s), section, table or chart
F.7.b, Supplemental CDFW Revised Report No. 2	

The GAP prefers the option listed in the [CDFW Supplemental Revised Report No. 2](#). A 600 lb./200 lb. option in period 6 for limited entry vessels north of 40° 10’ N. lat. would be a better option – and more representative of fishing behavior -- with the correlating limits during the summer months. Corresponding trip limits for LE and OA south of 40° 10’ N. lat. also are preferred by the GAP. The alternative choice is similar, but with lower limits in the summer, and can be found in [Table B-43 on Page 93 of Excerpts from Appendix B](#). The most important issue to fixed gear and open access fishermen is to have a year-round lingcod fishery.

From [CDFW Supplemental Revised Report No. 2:](#)

Table 1. Preferred trip limits for limited entry and open access lingcod north of 40° 10' N latitude.

	Jan/Feb	Mar/Apr	May/June	Jul/Aug	Sept/Oct	Nov/Dec
Limited Entry	200	200	1,200	1,200	1,200	600/200
Open Access	100	100	600	600	600	600/100

Table 2. Preferred trip limits for limited entry and open access lingcod south of 40° 10' N latitude.

	Jan/Feb	Mar/Apr	May/June	Jul/Aug	Sept/Oct	Nov/Dec
Limited Entry	200	CLOSED	800	800	800	400/200
Open Access	100	CLOSED	400	400	400	400/100

27. Non-trawl recreational: Implement a one fish canary rockfish sub-bag limit for the Oregon recreational fisheries

Reference document(s)	Page(s), section, table or chart
Agenda Item F7a, Att6, Excerpted portions of Appendix B	Option 1, page 124

→ The GAP recommends Option 1, retention of one canary rockfish per day, as a sub-bag limit of miscellaneous groundfish daily bag limit of 10.

This has been a popular request from Oregon anglers. As the canary stock rebuilds, canary rockfish are hard to avoid. Landing some also would provide some biological data via dockside sampling to help inform future assessments and management. Furthermore, canary retention may also reduce impacts to other nearshore species such as black rockfish.

Amendment 24 – Default Harvest Control Rules

28. Select a final preferred alternative for default harvest control rules that would be used in future bienniums, unless modified by the Council, to establish future harvest specifications

Reference document(s)	Page(s), section, table or chart
F.7.a, Att. 8, Proposed Groundfish FMP Amendment Language	Page 5

→ The GAP recommends Alternative 3, Use the harvest control rules (HCRs) in place in the previous period (biennium) as defaults.

29. Provide guidance on FMP language to implement Amendment 24

Reference document(s)	Page(s), section, table or chart
F.7.a, Att. 8, Proposed Groundfish FMP Amendment Language	Page 5+

→ The GAP understands there will be some slight wording change but agrees conceptually with the changes.