The Groundfish Advisory Subpanel (GAP) considered management recommendations for 2011-12 harvest specifications and agree with the Groundfish Management Team's range of 2011 annual catch limits (ACLs) alternatives for most of the species listed on G.6.a, Attachment 1, “Table 2-1a. GMT-recommended alternatives.

However, the GAP is concerned that for some species, consideration of broader ranges that incorporate higher ACLs are justified. The GAP also notes that some of the species caught primarily in the trawl fishery could, in the future, have higher ACLs since total catch monitoring will be in place in a rationalized fishery.

Referencing G.6.a, Attachment 1, the GAP started at the top and worked its way down the list. The following list is only of species for which the GAP believes some other considerations are necessary.

- **Pacific whiting:** The GAP recommends a broader range of numbers be analyzed by including a higher ACL of 404,318 mt. Rationale: this would encompass the range of OYs analyzed in the Final Environmental Impact Statement for 2009 and 2010 specifications and management measures, which included a low optimum yield (OY) of 134,773 mt and a high OY of 404,318 mt (this range represented 50 percent to 150 percent of the 2008 U.S. OY of 269,545 mt). This broader range in Pacific whiting harvest levels should be analyzed to assess the potential range of assessment-derived ACL values and the economic effects to coastal communities.

- **Sablefish, south of 36° north latitude:** The GAP requests a higher option that be considered is the ACL without the 50 percent reduction in the south.

- **Yelloweye:** This species has been and still is a prime candidate for a mixed-stock exception and the GAP requests the mixed-stock exception be considered.

- **Longspine thornyhead north of 34° 27' north latitude:** The GAP requests an increase of 25 percent for a high-end ACL analysis. Under a rationalized fishery (TIQ), there may be more opportunity to achieve higher ACLs for this species. The 25-percent adjustment for assessment uncertainty that was subtracted should be included so the GAP and the council can consider a range of possibilities.

- **Black rockfish (OR-CA):** A high-end ACL of 1,200 mt should be analyzed. Like yelloweye, this is an important species for most all sectors of the groundfish fishery and the Central California recreational sector already is bumping up against the nearshore OY.

- **Dover sole:** The GAP requests an ACL equal to the acceptable biological catch be considered and analyzed. Dover is solely a trawl-caught species and more opportunity to
harvest Dover may exist in the future. As the trawl individual quota (TIQ) program continues, future ACLs should be able to be closer to the ABC since the catch and bycatch is fully monitored. In short, this is a fully assessed species and monitoring would remove the need for as much precaution.

- **Petrale sole:** The GAP request the Council consider using ACLs at the highest end of the range. The high end of the range for 2011 is 1,170; for 2012, it's 1,369. Petrale is one case in which the high end of the range is at a level the GAP believes the fishery can maintain minimum operations in light of historic landings and established fishing practices.

- **Longnose skate:** This is becoming a critical species for the trawl fleet as it moves into rationalization and vessels look to fishing more on the shelf. It also could constrain the fixed-gear fleet if limits are constrained. The GAP suggests analysis of a higher ACL of 1,564 mt, or 50 percent of the 2011 overfishing limit.

For 2012, the GAP suggests making similar adjustments in ACLs based on the rationales used for the species above.

PFMC
11/04/09