

GROUND FISH ADVISORY SUBPANEL STATEMENT ON
PROPOSED MANAGEMENT MEASURES FOR 2001

The Groundfish Advisory Subpanel (GAP) had an extensive discussion on proposed groundfish management measures for 2001, including those proposed by the Council's Ad Hoc Allocation Committee and options developed by the GAP.

Since the Allocation Committee options primarily involved reductions in fishing time, the GAP first reviewed this general issue. The GAP - as it has in the past - strongly opposes "time off the water" options.

The GAP recommends the Council adopt the following season structure options for public review:

1. Status quo.
2. Divide the season into two cumulative limit periods.
3. Treat the entire year as one cumulative limit period.
4. As a sub-option to status quo for trawl limited entry vessels, require vessels to declare which cumulative limit choices they will make, based on fishing strategy. The GAP intends to recommend differential limit choices which reflect the diversity of the fishery.

Members of the GAP note the management structure used in 2000 involving gear, species, and area restrictions have already accomplished removing vessels from the water during extensive periods of the year. Several GAP members related their own experiences and those of others regarding an observed reduction in fishing effort coast wide and among all gear types.

An analysis of 2000 effort, including logbooks, landings, and other data, will be important prior to making major changes in the management structure. Moving to a formal "time off the water" system will result in several problems that will only exacerbate the economic difficulties faced by the industry. The ability to employ crews both on vessels and in processing plants will be significantly reduced. Vessels will be unable to access those species which are not subject to trip limits, and which comprise an important economic component of the fishery. At the same time, the data available suggests a formal "time off the water" system will result in only slightly increased trip limits.

The GAP is concerned the Council seems eager to once again change the management system without looking at the disruptions that will occur to vessels, processing plants, and long-term business planning. No analysis has yet been conducted of the 2000 management system to see if it is working, which the GAP believes it is. For these reasons, the GAP strongly recommends maintaining the current system as the preferred option.

The GAP is aware Washington and Oregon will propose options for the 2001 recreational lingcod and rockfish fisheries. The GAP recommends the Council adopt the options for public review.

Finally, the GAP reiterates its support for individual quotas as a preferred management option at such time as the Council is able to establish a quota system for all sectors.

CALIFORNIA MANAGEMENT PROPOSALS

The GAP used Exhibit G.10.b - Supplemental CDFG Report as the basis for its comments.

1. Movement of the southern rockfish/lingcod management line - The GAP opposes moving the line from Lopez Point to Point Conception. Location of the line has no biological impact, but will affect recreational effort and create an economic impact on recreational fishing operations.
2. Rockfish and lingcod closure periods - The GAP suggests the proposed November - February closure in the southern management zone be changed to a December - March closure. This will allow recreational charter operations to take advantage of the Thanksgiving holiday period.

3. Rockfish bag limit - The GAP suggests establishing a combined rockfish and lingcod bag limit of 10 fish, not to exceed the legal limits for individual species.
4. Prohibition on fishing for and retention of certain species - The GAP has no objections to this proposal if sanddabs are not included. The GAP notes the language describing “commercial and recreational fisheries” should be re-worded to be track proposal number 2.
5. Reduction of bocaccio bag limit - The GAP supports reducing the bag limit for bocaccio to two fish.
6. Reduction of number of hooks used in angling - The GAP supports reducing the number of hooks used to two.
7. Season closure for lingcod, cabezon, and greenling - The GAP believes this proposal needs significant clarification before it is considered. For example, does the closure apply to all trawl gear or only exempted trawl gear? How does this closure relate to the proposed closure in option #2, which applies only to fixed gear? How would a prohibition on “fishing” for three particular species be defined and enforced? The GAP recommends the language on “commercial” be modified to track the language in proposal number 2; it is the GAP’s understanding this is the intent of the proposal.
8. Lingcod bag limit - The GAP supports maintaining the two-fish bag limit, but achieving conservation through an increase in the minimum size to 28 inches.
9. Increase in cabezon size limit - The GAP supports increasing the minimum size of cabezon to 16 inches.
10. Transport provisions - The GAP believes transportation allowances through restricted areas should be made available for both recreational and commercial vessels.
11. Prohibition of cowcod retention - The GAP suggests allowing one cowcod to be retained per boat, unless a zero retention option provides sufficient conservation savings to avoid the need for the closures proposed in option 12.
12. Area closures - The GAP recognizes the proposed closures support the conservation of species other than cowcod. However, the GAP has concerns about the enforceability of this proposal, especially sub-option 2. Further, some members of the GAP note this proposal creates a de facto marine reserve without the benefit of public discussion and analysis envisioned by the Council - and supported by the GAP - under the Council’s marine reserve policy.

PFMC
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