

GROUND FISH ADVISORY SUBPANEL COMMENTS ON  
REBUILDING PLANS FOR CANARY ROCKFISH AND COWCOD

The Groundfish Advisory Subpanel (GAP) reviewed proposed rebuilding programs for canary rockfish and cowcod.

In regard to both rebuilding plans, the GAP continues to express strong concerns over the intent and ability to monitor rebuilding. Although the law requires rebuilding plans be monitored every two years, it is unclear how this is going to be done. Management regulations to accomplish rebuilding will further disrupt the flow of data required to rigorously examine rebuilding progress, a problem we are already facing. This is especially true for those species that rely heavily on fisheries dependent data. There is no clear determination of who will pay the cost of monitoring or where the money will come from. There seems to be no way of determining when we have done enough. These are serious questions the Council will need to address.

In regard to cowcod, the GAP believes adjustments need to be made to the text on page 4 regarding area closures. It is the GAP's understanding the specific closures identified are not those proposed to accomplish rebuilding. The plan needs to be modified to reflect Council action.

In regard to canary rockfish, a majority of the GAP believes modifications can be made which will accomplish rebuilding while still allowing a carefully-managed fishery to be prosecuted. The GAP notes the uncertainty associated with the canary stock assessments, including a decision to discount the results of the 1998 triennial survey. Further, the assumptions used to judge recruitment ignore the higher level of recruitment identified in recent years. Given that the acceptable biological catch (ABC) suggests 228 tons of canary could be caught while maintaining stock status quo, a decision to reduce harvest to 60 metric tons seems extreme, especially given the economic impact. If the Council chose to accept a recruitment level between the low recruitment assumed and the higher recruitment noted, and added a reasonable level of catch to reflect what seem to be healthier southern stocks, the GAP believes a conservative harvest of between 120 and 150 metric tons coastwide could be allowed. The GAP recommends the Council adopt a more moderate assumption on recruitment strength, so a modest fishery can continue for both recreational and commercial sectors. The results of the 2001 triennial survey will provide better data in time for the 2002 stock assessment (which coincides with the 2-year monitoring requirement). This more moderate approach makes sense in light of the questions surrounding the assessments, available data, and recent recruitment strength.

A minority of the GAP believes the rebuilding plan should be adopted as presented, using the 60 metric ton harvest amount.

The GAP spent a considerable amount of time discussing the allocation issues that arise from the presumed apportionment of canary rockfish impacts among the various fisheries. Similar issues were raised in regard to the apportionment of minor nearshore rockfish both north and south of the Mendocino line.

The GAP is extremely concerned the presumed apportionments constitute an allocation among fishery sectors. The GAP notes the Groundfish fishery management plan and implementing regulations are very clear on what constitutes an allocation and how allocations are to be accomplished by the Council. The Council has established an allocation process, which the GAP has supported. The GAP believes the Council should - and in fact is required by law to - adhere to this process. Simply deciding that one sector or another should be allowed a larger share of a diminished harvest undermines confidence in the management process. If allocation is to be accomplished, the GAP believes the established process must be followed.

Looking further at proposals for apportioning canary rockfish harvest, a majority of the GAP recommends reductions made in 2001 be proportional to the harvest levels that were allocated under emergency regulations for the 2000 fishery. This will provide the equitable treatment of fishing sectors required by

law.

A minority of the GAP agrees reductions must be made, but disagreed with establishing a particular proportional target, because only vigorous efforts by all sectors to avoid canary harvest will meet harvest goals. All GAP members agreed reductions can only be accomplished if efforts are made to avoid harvesting canary rockfish and noted both state and anecdotal data indicating many fishermen - both recreational and commercial - are already making efforts to avoid harvesting canary rockfish. Because many people are unaware of the serious problem with canary rockfish, better public education and changes in fishing techniques can significantly reduce canary catch, as demonstrated in the Washington recreational fishery this year.

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