

GROUND FISH MANAGEMENT TEAM STATEMENT ON
2001 MANAGEMENT MEASURES

The GMT continues to remind the Council that lacking a comprehensive observer program, or a verified full retention program, our estimates of total fishing mortality remain highly uncertain. Absent a tool to measure changes in fishing mortality that result from management changes, the GMT has no recourse other than the review of trawl logbooks (which contain no discard information) and then make "guesstimates" as to what extent measures such as gear modification or changes in fishing behavior have altered observed logbook bycatch rates. Moreover, for the nontrawl sector, the GMT has no logbook program or other information to gauge the bycatch consequences of the Council's management measures. The GMT strongly supports the rapid development of an observer program that will provide information on total mortality in the groundfish fisheries.

In addition to the attached tables recommending cumulative trip limits, the GMT discussed the following issues for GAP and Council consideration.

1. GAP recommendations on differential landings limits for the trawl DTS complex (Dover sole, thornyheads, sablefish) north and south of Cape Blanco raise enforcement concerns similar to those currently associated with rockfish limits north and south of Cape Mendocino. Current management measures include "crossover" provisions to deal with trip limits that are differential by area. In general, a vessel that fishes for the same species or species group in areas with different trip limits during the same cumulative limit period, that vessel is subject to the more restrictive limit for that species or species group. Enforcement of trip limits that are differential by area is usually done on a port-of-landing basis, although some at-sea enforcement of the restrictions on "taking, retaining, possessing, or landing" also occurs.

"Operating in areas with different trip limits. Trip limits for a species or species group may differ in different areas along the coast. The following "crossover" provisions apply to vessels operating in different geographical areas that have different cumulative or "per trip" limits for the same species or species group....

(a) Going from a more restrictive to a more liberal area. If a vessel takes and retains any groundfish species or species group in an area where a more restrictive trip limit applies, before fishing in an area where a more liberal trip limit (or no trip limit) applies, then that vessel is subject to the more restrictive trip limit for the entire period to which that trip limit applies, no matter where the fish are taken and retained, possessed, or landed.

(b) Going from a more liberal to a more restrictive area. If a vessel takes and retains a groundfish species or species group in an area where a higher trip limit or no trip limit applies, and takes and retains, possesses or lands the same species or species group in an area where a more restrictive trip limit applies, then that vessel is subject to the more restrictive trip limit for that trip limit period."

2. The GAP has recommended summer flatfish limits that are relatively liberal when compared against 2000, particularly for Dover sole south of Cape Blanco. While the GMT is willing to support these limits at this time, it is with the understanding that the GMT will be spending time this winter looking at 1999 and 2000 logbook data on catch composition and tow location for the summer months, and may recommend more restrictive inseason changes early next year to canary rockfish from bycatch effects.
3. The GMT notes that the California delegation will be proposing a change in a southern management line for some recreational and commercial fisheries from 36°00' in 2000 to Point Conception (34°27') in 2001. While this management line differs from the standard Monterey/Conception areas border, the GMT does not see this line shift as posing resource management concerns.

4. The GMT concurs with the GAP recommendation for removing the 22" size limit for sablefish now in effect for the limited entry trawl fishery and fixed gear primary season, and expects that this change should result in lower sablefish discards for small-size sablefish.
5. For widow rockfish, the GMT supports higher limits during the winter months, when widow rockfish are more aggregated, rather than a constant limit throughout the year. The GMT also recognizes the necessity of providing some widow rockfish allowance for incidental retention during mid-water yellowtail rockfish fisheries.
6. The GMT concurs with the recommendations of the Oregon delegation for Pacific City, Oregon, which are:
 - a. An April-September season for nearshore rockfish, with a 2,200 lb per month limit, of which no more than 700 lb may be rockfish other than black or blue rockfish.
 - b. Outside of that season, in January-March and October-December, a 200 lb per month limit for black or blue rockfish.
 - c. If nearshore rockfish limits are increased inseason for vessels outside of Pacific City, the Pacific City nearshore rockfish limits will be increased proportionately during the months of April-September.
7. There are several open access exempted trawl fisheries (pink shrimp, spot and ridgeback prawns, California halibut, sea cucumber) that take incidental groundfish. With the exception of pink shrimp, these exempted trawl fisheries were managed in 2000 under standard Open Access landings limits, with no more than 300 lb of groundfish per trip. Additionally, the amount of groundfish landed per trip in these fisheries could not exceed the amount of target species landed, except that the amount of spiny dogfish landed could exceed the amount of target species landed. In April 2000, the Council set differential cumulative limits for exempted trawl vessels participating in the pink shrimp fishery. In general, the groundfish species-specific limits (canary rockfish, lingcod, sablefish) for this fishery were higher than the open access limits. The pink shrimp fishery also had a per trip limit of 500 lb of groundfish per day, multiplied by the number of days in the fishing trip, but not to exceed 2,000 lb of groundfish per trip. Similar to other exempted trawl fisheries, the amount of groundfish landed could not exceed the amount of targeted pink shrimp landed.

Although the GMT would support continuing the pink shrimp exempted trawl limit for sablefish at 2,000 lb per month starting April 1 and for lingcod at 400 lb per month starting May 1, we have some reservations about allowing a canary rockfish limit any higher than the standard open access canary rockfish limit. For canary rockfish, the GMT recommends a cumulative limit of 50 lb per month (same as open access) in April, and 200 lb per month in May through October. The overall groundfish limit would be 500 lb per day, no more than 1,500 lb per trip. The GMT recommends the use of finfish excluders or other canary-avoidance management (avoiding areas of high canary rockfish interaction, fleet education on canary rockfish avoidance) to ensure that the shrimp fishery does not exceed its expected canary rockfish mortality level. Limited entry permitted vessels participating in the pink shrimp fishery may be affected by DTS limits that are differential by area, as described above.