

*Presented by Tom Barnes*

*@ 4:41 pm 11-2-2000*

Exhibit C.9.c.  
Supplemental GMT Report 2  
November 2000

GROUND FISH MANAGEMENT TEAM COMMENTS ON  
COWCOD MANAGEMENT MEASURES FOR 2001

The Groundfish Management Team (GMT) discussed the proposed cowcod groundfish area closure, and concluded that prohibition of federal groundfish within the proposed boundaries will achieve the rebuilding yields for the Southern California Bight. As originally proposed, the closure would eliminate groundfish fishing in a large geographic area, resulting in a 55% reduction in total cowcod mortality. The closure is primarily located far offshore where cowcod catches and catch rates remain high, but where total groundfish effort has been comparatively lower than for fishing grounds closer to the mainland. Therefore, the area closure is likely to be less disruptive to southern California fisheries than alternative measures applied across the board to all shelf fishing grounds.

Some of the proposed area closure alternatives raise concern that efforts to allow fishing for selected groundfish species within the proposed area closure would result in enforcement difficulties and cowcod bycatch. These concerns must be addressed and resolved to maintain an expectation that rebuilding yields will not be exceeded. Total allowable 2001 fishing mortality under the base case in the rebuilding plan is 2.4 mt (55% probability of success within 98 years), which is about one half of the current take, and far less than average annual catches during the 1990's (25.9 mt/yr). Rebuilding analyses suggest that for the base case scenario, recovery will be jeopardized if rebuilding yields are exceeded by any significant amount.

In order for the proposed closure to be effective, it is necessary that all fishing opportunities for shelf groundfish be eliminated within the proposed closure boundaries. The proposed boundaries (all 3 options) encompass virtually all offshore fishing grounds that still exhibit high catch rates for cowcod. There are at least three logically plausible alternatives for eliminating cowcod catches within the proposed area boundaries:

- 1) Complete prohibition of groundfish fishing and prawn trawling, as specified in the original proposal.
- 2) Prohibit fishing for and retention of shelf groundfish and prawn trawling, with allowance for nearshore and slope fishing within the closure.
- 3) Redefine the area boundaries to exclude nearshore and/or slope fishing grounds from the closure. This option may require provision for transport of prohibited groundfish through closed areas.

Although all options raise significant enforcement concerns, those other than Option 1 (above), present increased problems. If fishing for nearshore or slope species is permitted within the proposed boundaries, bycatch of shelf species has the potential to result in cowcod mortality if those fishing activities are not precisely constrained to shallow nearshore (<20fm) or slope (>175fm) fishing grounds. Enforcement of depth-specific regulations is problematic for large geographic areas located far offshore. Alternate area boundaries have been proposed to allow some slope fishing grounds to remain open, resulting in an irregular shaped closure that will be more difficult to enforce than the rectangular-shaped alternatives. The GMT expects that it would also be difficult to identify, define and enforce shallow-water boundaries to provide access to nearshore (<20fm) fishing grounds within the proposed closure boundaries. Also, any new proposal to redraw area boundaries to allow some productive offshore shelf habitat to remain open may result in effort shift that has the potential to result in cowcod catches in excess of rebuilding yields. The same concerns that have been identified for cowcod also apply to expected savings for bocaccio from the various closure options.

Input from Enforcement Consultants will be essential in consideration of all options, especially those that allow nearshore and slope fishing within the proposed boundaries. In order to meet rebuilding yields based on area closures, the measures under consideration must be enforceable, and not result in additional cowcod fishing mortality.

The GMT recommends that retention of cowcod in recreational and commercial fisheries be prohibited. It is important that the angling public and commercial fishers understand the importance of avoiding the take of cowcod, and this measure would achieve that purpose. The status of cowcod as a highly prized trophy species in the recreational fishery raises the possibility of targeting, even under a one-fish bag limit. Also, the one fish per landing allowance in the commercial fishery is expected to result in only a few hundred pounds of landings in 2000. The GMT believes the potential for increased discards is more than offset by the benefits of prohibition.