

GROUND FISH ADVISORY SUBPANEL STATEMENT  
ON GROUND FISH MANAGEMENT MEASURES FOR 2004: FINAL ACTION

The Groundfish Advisory Subpanel (GAP) has worked with the Groundfish Management Team (GMT) over the last few days to develop groundfish management measures for 2004. The GAP has reviewed the proposed trip limits and fathom boundaries described by the GMT in their statement and concurs with their recommendations.

In regard to other management measures, the GAP has the following comments and recommendations:

Regulations to prevent “drifting” in the Rockfish Conservation Area (RCA): the GAP is quite concerned the final vessel monitoring system (VMS) regulations not only allegedly (we have not yet seen a copy) prevent trawl vessels from drifting in the RCA, but in addition, an attempt is being made to establish a further prohibition under 2004 groundfish management regulations. The GAP as a whole, and individual GAP members, submitted formal comments to NMFS on the vessel safety reasons that could require a vessel to drift for short periods in the RCA. These comments were evidently ignored. We were told by NMFS, when VMS equipment was first described, of how NMFS is able to track a vessel’s activity through the VMS system. If - as claimed by NMFS - a VMS signature allows NMFS to determine when a vessel is fishing, then there is no reason to prohibit drifting. If VMS units are not able to perform as described, then we suggest the Council has been sold a bill of goods and perhaps we should re-examine the VMS system.

The GAP notes the Ad Hoc VMS Committee will be meeting in October. We expect further VMS regulations are contemplated. If that is the case, then the drifting issue should be handled under the VMS regulations and not under the groundfish specifications.

Maintaining the “B” Platoon: The majority of the GAP believes the “B” platoon system should be maintained. In winter months, platooning offers vessels - especially those fishing nearer shore - an opportunity to achieve their cumulative limits during a time of poor weather. In summer months, platooning offers processors a means to spread out the flow of product, thereby maintaining the efficiency of processing operations and providing a higher quality product to consumers.

Given concerns expressed by the Enforcement Consultants, the GAP is willing to recommend that fathom line changes apply on the date specified to all vessels, regardless of platoon. This will prevent the confusion of having to enforce multiple fathom lines, an issue identified by the Enforcement Consultants. However, the GAP notes that enforcement agencies have been able to deal with differential trip limits for many years, so there should be no increased problem with maintaining the “B” platoon. As the Council examines differential trip limits in conjunction with use of more selective gear, enforcement agencies will still have to handle differences in landed catch. There is no practical difference in dealing with different catch levels resulting from continuing the “B” platoon and dealing with different catch levels from use of selective gear designed to reduce bycatch.

A minority of the GAP believes the “B” platoon opportunity should be eliminated.

Sablefish fixed gear season start date: The GAP disagrees with the recommendation that the season start date be delayed by one month. Planning for next year’s fishery has already begun and markets have been established, based on standard season opening dates. If new discard data is going to be incorporated in-season - a practice opposed by the GAP - then it should be done so. The GAP notes that the fixed gear portion of the sablefish OY was not fully attained in 2003. The same situation is likely to occur in 2004, providing sufficient overhead to accommodate new discard data.

Oregon recreational management: The Oregon recreational members of the GAP recommend that the prohibition on retention of canary rockfish and yelloweye rockfish be removed. The impact of the recreational fishery has already been accounted for in the species scorecard; prohibiting retention would simply convert catch to discards.

Oregon selective flatfish trawl fishery: While the GAP generally concurs with the GMT recommendations, we suggest two changes: first, that the ability to use the selective trawl gear be available to fishermen along the entire coast of Oregon and Washington; and second, that the cap on incidental species include an appropriate cap on shortspine thornyheads.

Widow rockfish in the whiting fishery: The GAP notes that the 2003 fishery, which has not yet been completed, has exhibited substantially lower bycatch of widow rockfish. We expect that at such time as the whiting OY is selected next year, the 2003 bycatch data will be included as part of the average and that widow bycatch will not be a constraint on the whiting fishery.

The GAP also has two recommendations for issues that need to be analyzed in the environmental impact statement for the 2004 groundfish specifications. We request the Council agree to analyze the following:

- \* A 100-fathom line for fixed gear (both limited entry and open access) and midwater trawl gear in periods 2 through 5 in the area south of 38°. The GAP believes that bocaccio impacts will be minimal and can be handled by standard management measures. By analyzing the 100-fathom line, there will be an option for possible in-season adjustments if they are feasible.
- \* The impact of scorpionfish mortality in the area south of Point Conception. The figures currently used for scorpionfish mortality appear to be excessive.