

GROUND FISH ADVISORY SUBPANEL STATEMENT ON
PRESEASON MANAGEMENT SCHEDULE AND PROCESS, ACCEPTABLE BIOLOGICAL
CATCH, PRELIMINARY OPTIMUM YIELD, AND MANAGEMENT MEASURES FOR
2005-2006 FISHERIES

The Groundfish Advisory Subpanel (GAP) reviewed a draft table - which we received after 5 p.m. last night - displaying recommended preliminary acceptable biological catch (ABC) /optimum yield (OY) levels and the Groundfish Management Team (GMT) statement on harvest levels and management measures which we received at 8:15 this morning. Rather than comment on every ABC/OY recommendation, the GAP will confine its comments to certain species.

In regard to sablefish and yellowtail rockfish, the ranges being presented to the Council are based on projections contained in the most recent stock assessments. However, in both cases, assessment projections assume removals due to fishery mortality. For the last two years, fishery mortality for both these species has been less than assumed in the stock assessments. Therefore, rather than decreasing, the ranges proposed for 2005 and 2006 should be increasing. Simply suggesting that “we’ll fix it in the next stock assessment” does no good to those fishermen and processors whose livelihoods have been affected by substantial harvest decreases over a wide range of species. We suggest a higher range be established based on true fisheries mortality and not incorrect assumptions.

Further, we note the high OY level recommended for sablefish is based on an $F_{45\%}$ harvest policy applied to a stock influenced by a regime shift. The medium OY is based on a density-dependent stock. The majority of the GAP doesn’t know what more evidence is needed to show the existence of a regime shift than that which the Council sees all around us.

In regard to chilipepper rockfish, an OY of 2,000 mt continues to be recommended. This OY is an artifact of concern for incidental take of bocaccio rockfish at a time when bocaccio stocks were declining. Not only are we seeing an increase in bocaccio as reflected in the latest stock assessment, but in addition, management measures have been enacted that reduce incidental take of bocaccio. The OY value should be increased to reflect these changed circumstances.

For other flatfish, other fish, and Pacific cod, the OY recommendation reflects a 50% “precautionary” cut applied to unassessed stocks. Not only is the ABC/OY table inconsistent in applying this precautionary reduction, but it makes no sense for these species groups. The 50% precautionary reduction has been applied by the Council to *Sebastes* species based on research done on similar species in Alaska. It reflects the slow growth and long lifespan of this genus. Equating this research to Pacific cod, for example, is absurd. This is a highly fecund, fast growing fish whose population in waters under the jurisdiction of this Council is a fringe of a larger population located primarily off Canada and Alaska. Cod stocks expand and contract based on ocean conditions; when they are available in our area - as they are in great numbers at the moment - they are harvested. Arbitrarily and capriciously halving the OY not only removes a potential source of fish for a fleet that is being pushed hither and yon by the need to avoid more

sensitive species, but it will also simply generate more discards - a situation the Council is supposed to avoid. The same is true for other species where a precautionary reduction of 50% is being recommended.

Arguments have been advanced in regard to Pacific cod that Canada has allegedly reduced its harvest limit, and so we should too. First of all, we have no evidence of if - or why - Canada may have taken such action. Second, if our policy is to follow Canada's lead in regard to transboundary stocks, then the GAP suggests we substantially raise the OY for the several transboundary species we are managing at much lower harvest levels.

Further, actions such as this create the impression in the public mind that fisheries managers are acting deliberately to punish harvesters. It is one thing to argue over stock assessment models; in that case, there is at least some rational reason that can be shown for reducing harvest. However, a so-called precautionary cut simply undermines public support for sound fisheries management.

The GAP recommends that for Pacific cod, other fish, and other flatfish a high OY alternative be included which sets the OY equal to the ABC.

In regard to rebuilding species, the GAP recognizes that OY recommendations reflect rebuilding plans. We believe this is an appropriate approach.

In regard to management direction, the GAP has several suggestions which we will outline below.

First, as was mentioned by the GAP earlier this week, we need to explore the option of area management. There is no consensus in the GAP as to whether this is the correct approach to take, but the recent inseason problem we faced underscores the need for at least a preliminary examination. However, the GAP wants to make absolutely clear that - because this can be a contentious issue involving allocation - GAP support for even a cursory look is contingent on the GAP being a full and equal partner with the GMT on any discussions and recommendations involving area management.

Second, in regard to retention of canary rockfish in the Oregon recreational fishery, it was the GAP's understanding following the September Council meeting that the issue of canary attention was to be re-addressed next year. The GAP believes it is premature to make final recommendations at this meeting.

Third, the GMT recommends that the 2005-2006 trip limits be analyzed at a level equivalent to 200% of the 2004 levels. While we agree that higher trip limits should be analyzed to reflect the effects of buyback, we are not sure there should be an arbitrary boundary set. What if the appropriate number is 210%? We recommend that constraints not be set on the analysis.

Finally, the GAP recommends that three shelf rockfish species - copper, brown, and olive - be removed from the California deeper nearshore complex. Starting in January, keeping them in the complex will prevent California limited entry vessels from harvesting these species, again leading to increased discards.

PFMC
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