

GROUND FISH MANAGEMENT TEAM STATEMENT ON IMPLEMENTATION OF AN EXPANDED VESSEL MONITORING SYSTEM

The Groundfish Management Team (GMT) reviewed the draft Environmental Assessment, *Expanded Coverage of the Program to Monitor Time-Area Closures in the Pacific Coast Groundfish Fishery*, and offers the following comments.

Time-area closures are a keystone piece of groundfish management and are necessary in order to minimize the mortality of rebuilding species while providing access to healthier stocks of target species. Vessel Monitoring Systems (VMS) can help maintain the integrity of Groundfish Conservation Areas (GCAs) – which currently include the Yelloweye Rockfish Conservation Area (RCA), Cowcod Conservation Area, the Farallons depth closure, Cordell bank, and the RCAs – to help ensure the Council’s strategies for rebuilding and bycatch reduction are met. While the GMT believes an expanded VMS system could assist management by providing additional data on spatial behavior, the GMT believes it is more meaningful to require VMS of vessels that are restricted by GCAs than to require VMS of commercial vessels if they are not restricted by GCAs.

The GMT notes that under federal regulations, vessels potentially subject to GCAs are vessels that take, possess, and retain groundfish - meaning that vessels may exclude themselves from open access regulations if they do not take, possess, and retain groundfish. For example, Dungeness crab vessels that retain groundfish would be subject to GCA restrictions, while Dungeness crab vessels that do not retain groundfish would not be subject to GCA restrictions. However, there are exceptions; currently salmon troll vessels only retaining limited amounts of yellowtail, and pink shrimp trawl vessels retaining limited amounts of groundfish may fish within the RCA; while ridgeback prawn trawl, California halibut trawl, and sea cucumber trawl have RCA restrictions, regardless of whether or not they retain groundfish. For reference, a copy of open access regulations listing gear types that do not target groundfish and their corresponding regulations are attached. All other open access gear types are subject to the general open access regulations, which include GCA restrictions.

The GMT notes that Alternatives 6a and 6b include all vessels subject to GCA restrictions. The GMT also notes that Alternative 7 is nearly the same as Alternative 6a, but may exclude those vessels from VMS provisions that are not capable of carrying a VMS system.

The GMT also identified an issue with respect to the VMS requirements being proposed for open access gears employing fishing strategies for non-groundfish species that result in some small incidental take of groundfish species (e.g., highly migratory species fisheries). With the exception of the gears in the attached table, the regulations being proposed would require open access vessels taking groundfish in non-groundfish strategies to either carry a VMS unit or discard any incidental groundfish. This would be the case even if all fishing activity occurred outside of the RCA, and the vessel simply transited the RCA to return to port. The Council may wish to consider examining historical incidental catch rates in these non-groundfish fisheries and

provide for some small amount of groundfish catch relative to target species catch. This could avoid creating undocumented discard resulting from vessels choosing to discard unavoidable groundfish bycatch rather than incur the cost of VMS.

Finally, the GMT would like to reiterate its support for spatially-based data systems – especially systems such as logbooks where catch and effort can be linked. Additional spatial data would help the GMT in developing measures for the various fisheries sectors that minimize impacts on overfished species while providing access to healthier species.

2005-2006 Trip Limits for Open Access Gears North of 40°10' N. Lat.

	JAN-FEB	MAR-APR	MAY-JUN	JUL-AUG	SEP-OCT	NOV-DEC
PINK SHRIMP NON-GROUNDFISH TRAWL <i>(not subject to RCAs)</i>						
North	<p>Effective April 1 - October 31: groundfish 500 lb/day, multiplied by the number of days of the trip, not to exceed 1,500 lb/trip. The following sublimits also apply and are counted toward the overall 500 lb/day and 1,500 lb/trip groundfish limits: lingcod 300 lb/month (minimum 24 inch size limit); sablefish 2,000 lb/month; canary, thornyheads and yelloweye rockfish are PROHIBITED. All other groundfish species taken are managed under the overall 500 lb/day and 1,500 lb/trip groundfish limits. Landings of these species count toward the per day and per trip groundfish limits and do not have species-specific limits. The amount of groundfish landed may not exceed the amount of pink shrimp landed.</p>					
SALMON TROLL						
North	<p>Salmon trollers may retain and land up to 1 lb of yellowtail rockfish for every 2 lbs of salmon landed, with a cumulative limit of 200 lb/month, both within and outside of the RCA. This limit is within the 200 lb per month combined limit for minor shelf rockfish, widow rockfish and yellowtail rockfish, and not in addition to that limit. All groundfish species are subject to the open access limits, seasons and RCA restrictions listed in the table above.</p>					

2005-2006 Trip Limits for Open Access Gears South of 40°10' N. Lat.

	JAN-FEB	MAR-APR	MAY-JUN	JUL-AUG	SEP-OCT	NOV-DEC
PINK SHRIMP NON-GROUNDFISH TRAWL GEAR (not subject to RCAs)						
South	<p>Effective April 1 - October 31: Groundfish 500 lb/day, multiplied by the number of days of the trip, not to exceed 1,500 lb/trip. The following sublimits also apply and are counted toward the overall 500 lb/day and 1,500 lb/trip groundfish limits: lingcod 300 lb/ month (minimum 24 inch size limit); sablefish 2,000 lb/ month; canary, thornyheads and yelloweye rockfish are PROHIBITED. All other groundfish species taken are managed under the overall 500 lb/day and 1,500 lb/trip groundfish limits. Landings of these species count toward the per day and per trip groundfish limits and do not have species-specific limits. The amount of groundfish landed may not exceed the amount of pink shrimp landed.</p>					
RIDGEBACK PRAWN AND, SOUTH OF 38°57.50' N. LAT., CA HALIBUT AND SEA CUCUMBER NON-GROUNDFISH TRAWL						
NON-GROUNDFISH TRAWL Rockfish Conservation Area (RCA) for CA Halibut and Sea Cucumber:						
40°10' - 38° N. lat.	75 fm - modified 200 fm ^{7/}	100 fm - 200 fm			75 fm - modified 200 fm ^{7/}	
38° - 34°27' N. lat.	75 fm - 150 fm	100 fm - 150 fm			75 fm - 150 fm	
South of 34°27' N. lat.	75 fm - 150 fm along the mainland coast; shoreline - 150 fm around islands	100 fm - 150 fm along the mainland coast; shoreline - 150 fm around islands			75 fm - 150 fm along the mainland coast; shoreline - 150 fm around islands	
NON-GROUNDFISH TRAWL Rockfish Conservation Area (RCA) for Ridgeback Prawn:						
40°10' - 38° N. lat.	75 fm - modified 200 fm ^{7/}	100 fm - 200 fm			75 fm - modified 200 fm ^{7/}	
38° - 34°27' N. lat.	75 fm - 150 fm	100 fm - 150 fm			75 fm - 150 fm	
South of 34°27' N. lat.	100 fm - 150 fm along the mainland coast; shoreline - 150 fm around islands					
	<p>Groundfish 300 lb/trip. Trip limits in this table also apply and are counted toward the 300 lb groundfish per trip limit. The amount of groundfish landed may not exceed the amount of the target species landed, except that the amount of spiny dogfish landed may exceed the amount of target species landed. Spiny dogfish are limited by the 300 lb/trip overall groundfish limit. The daily trip limits for sablefish coastwide and thornyheads south of Pt. Conception and the overall groundfish "per trip" limit may not be multiplied by the number of days of the trip. Vessels participating in the California halibut fishery south of 38°57'30" N. lat. are allowed to (1) land up to 100 lb/day of groundfish without the ratio requirement, provided that at least one California halibut is landed and (2) land up to 3,000 lb/month of flatfish, no more than 300 lb of which may be species other than Pacific sanddabs, sand sole, starry flounder, rock sole, curlfin sole, or California scorpionfish (California scorpionfish is also subject to the trip limits and closures in line 31).</p>					

PFMC
04/06/05