WASHINGTON DEPARTMENT FISH AND WILDLIFE
JUSTIFICATION FOR APPLYING THE RAMP-DOWN OY APPROACH TO REBUILDING YELLOWEYE ROCKFISH

As noted in the Draft Environmental Impact Statement (EIS) and the Groundfish Management Team report on Agenda Item F.2, the yelloweye is data poor and highly uncertain. All of the yelloweye assessments have been tuned to a recreational catch-per-unit-of-effort (CPUE) index and lack fishery independent trend information. Standardized fishery independent sampling is designed so that changes in sampled indices reflect changes in the population being measured rather than the method of sampling. Fishery CPUE can be prone to those changes being partially reflective of changes in behavior of the fishery (area, gear, target strategies, etc.) rather than changes in the population. As noted by the Center for Independent Experts reviewer of a previous yelloweye assessment, "CPUE data are of fundamental importance in this assessment because this is the only data type which provides direct evidence of biomass trends. However, there is always doubt as to whether any fishery-derived CPUE series is proportional to abundance." The current assessment authors state, "As in the previous assessments, the sparseness of the size and age composition data and the lack of a relevant fishery-independent survey has limited the model's ability to properly assess the status of the resource."

The baseline model assumed a single coast-wide stock and complete mixing. Given the apparently sedentary nature of this species this may be unrealistic. However, even though the approach may be desirable, current data are too sparse to support area-specific models. This is especially problematic in trying to construct the historical population required to model the population off Washington within the Stock Synthesis 2 software employed in the assessment. Although data are too sparse for a specific model off the Washington coast, previous assessment authors have commented on data that may point to a less depleted yelloweye resource in this area (trawl survey abundance, lower historical exploitation, larger average size). "The WA result is for a much lesser degree of stock decline." (Methot, et al. 2002 Yelloweye Assessment). However, until further data are collected, we will be unable to address this uncertainty. As stated in the assessment, "…due to catch restrictions since 2002, catch-per-unit-effort (CPUE) data no longer reflect the real changes in population abundance, and discard estimates are highly uncertain."

Uncertainty in the data and assessment versus the certainty of the major impacts upon industry need to be a consideration in how we proceed with respect to yelloweye rockfish.

One source of information for stocks off Washington might be to collaborate with Department of Fish and Oceans, Canada to draw upon information on the yelloweye stock and management response immediately to the north in British Columbia. Yelloweye catch quotas for the British Columbia fishery for the current year are 83 mt for the commercial fishery off the west coast of Vancouver Island, and 284 mt coastwide. Recreational catches would be in addition. To provide some perspective, this means, that after rebuilding our yelloweye stock over a 70 to 80 year period, the MSY catch level for the entire US coast will still be less than half the total of the current annual commercial catch off the west coast of Vancouver island (less than the length of the Oregon coast).

Efforts to Collect Additional Data

The Washington Department of Fish and Wildlife (WDFW) is working on several initiatives to collect additional biological data and fishery information, including:

- In 2006, WDFW is partnering with the International Pacific Halibut Commission to enhance their longline halibut survey by setting additional stations in "untrawlable" areas off Washington's north coast. WDFW hopes to continue this effort in 2007 and would also like to expand the enhanced survey with additional stations off Oregon.

- WDFW is working with scientists from Alaska and British Columbia to assemble and review data on yelloweye growth and natural mortality; these data could potentially be used to address the assumption for natural mortality (M) in the next stock assessment.

- Collection of biological and species distribution information from federal and state at-sea observer programs.

- In May, WDFW began a voluntary recreational private angler camera project to collect species identification and length data from recreational fishers.

- In May, WDFW began a voluntary logbook program for charter and private recreational boats; these data could help identify the fishing locations of these fisheries and bycatch information on canary and yelloweye rockfish.

- Also in May, WDFW began a voluntary logbook program for limited entry fixed gear participants to collect much-needed fishery location data.

In addition to these efforts, WDFW is continuing to develop a yelloweye occurrence and habitat GIS database, implement a strong public education program, and work with stakeholders from commercial and recreational fishers to refine yelloweye rockfish conservation areas (YRCAs).

Impacts to Washington Recreational Fisheries

Under the $T_{F=0}$ yelloweye OY, the estimated loss to recreational fisheries is about 1,150,000 angler trips (as noted in Chapter 7 of the draft EIS, section 7.2.10.1.1, p. 49). Washington recreational bottomfish and halibut angler trips are estimated to decline by 30% under the yelloweye OY of 12 mt (Chapter 7, section 7.2.10.1.1, p. 50). These projected reductions in angler trips would cause undue hardship on Washington's coastal communities that are already depressed.

For reference, the status of Washington's coastal communities was described in the 2000 U.S. census. In 2000, the population of Neah Bay was 794, which is a 13.3% decline from 1990. There is a 24% unemployment rate in Neah Bay. The per capita income was $11,338 with a median household income of $21,635; these data indicate that 29.9% of the Neah Bay population is below the poverty level. A lot of the employment in Neah Bay is seasonal in nature, with fisheries employing about 300 people per year.

Also according to the 2000 U.S. census, the population of La Push was 371. There is an unemployment rate of 27.4% in La Push. The per capita income was $9,589 with a median household income of $21,750, which indicates that 34.5% of the population is below the poverty level. In 2000, the population of Westport was 2,137. There was a per capita income of

$17,362, and a median household income of $32,037, which indicates that 14.3% of the population is below the poverty level.

In 2006, Washington's recreational fisheries were further constrained by the implementation of depth restrictions off our North Coast and central areas, where yelloweye are caught. These include a 20-fm depth restriction applied to the fisheries operating out of Neah Bay and La Push from late May through the end of September, and a 30-fm depth restriction from mid-March through mid-June to the recreational fishery out of Westport. Given the location of the continental shelf off Neah Bay, the 20-fm depth restriction is about 0.5 to one mile offshore. These depth restrictions, especially in the North Coast area, have severely impacted recreational bottomfish fisheries targeting healthy lingcod and black rockfish stocks, and have resulted in additional economic loss to the coastal communities.

With regard to Action Alternatives 1 and 2, the results of these alternatives would virtually eliminate the Washington North Coast recreational halibut fishery in Neah Bay and La Push. There are 38,985 angler trips taken out of Neah Bay annually, 26% of which (10,166) are halibut trips. There are an additional 7,984 angler trips originating out of La Push, 17% of which (1,389) are halibut trips. Both Neah Bay and La Push are considered to be vulnerable recreational fishing communities and they both have very low resiliency (as noted in Chapter 7 of the draft EIS, section 7.1.5.2.2 on p. 30). Action Alternative 1 would result in a decrease of 33% in recreational charter trips, and a decrease of 27% of private boat trips in the North Coast, and Alternative 2 would reduce charter trips by 42%, and private boat trips by 32% (Chapter 7, section 7.2.11, p. 53). These reductions are the result of fishery closures and increased depth restrictions, but do not include any projected reductions resulting from the proposed area closures for yelloweye conservation; therefore, the estimated reductions are likely low.

Impacts to Washington Commercial Fisheries

Under the TF=0 yelloweye OY, the estimated loss to commercial fisheries is over $100 million in ex-vessel revenues, which would result from complete closures of the tribal groundfish fisheries and closures of Washington longline and pot fisheries (as noted in Chapter 7 of the draft EIS, section 7.2.10.1.1, p. 49). Commercial ex-vessel revenues could decline by as much as 40% under the yelloweye OY of 12 mt (Chapter 7, section 7.2.10.1.1, p. 50). To ensure this low OY was not exceeded, the non-trawl rockfish conservation area would have to expand from the shoreline to 150 fms offshore, precluding access to prime sablefish and dogfish areas that are the backbone of Washington's longline fishery. The economic impacts resulting from these measures, again, would cause undue hardship on Washington's coastal communities that are already depressed. Areas labeled "most vulnerable" with regard to commercial fishing in Washington include Neah Bay and Ilwaco; other commercial vulnerable areas with low resiliency include La Push, Westport and Bellingham.

For the reasons described above, the Washington Department of Fish and Wildlife believes the ramp-down strategy is justified for setting the OY for yelloweye rockfish.