

## GROUND FISH ADVISORY SUBPANEL REPORT ON PRELIMINARY REVIEW OF EXEMPTED FISHING PERMITS (EFPs) FOR 2008

The Groundfish Advisory Subpanel (GAP) discussed four applications for Exempted Fishing Permits for the 2008 season and has the following recommendations and comments.

### Applications 1, 2, and 4

The GAP recommends forwarding the three EFP applications which seek to test different hook and line configurations to fish both commercially and recreationally for rockfish species off central and northern California. The GAP stresses that there are unknown risk factors involved with each of these EFPs with regards to potential bycatch of depleted species. The GAP recommends that bycatch caps are articulated specifically in order to determine whether the scorecard can accommodate the potential bycatch impacts. The GAP also recommends that the applicants explore the potential costs associated with the EFPs including fuel, observers and other operational costs and whether the potential benefits of the EFP outweigh the cost of implementing the permit. Further, if the bycatch projections could cause disruption to existing fisheries the GAP believes the caps should be amended or the EFPs should not be forwarded for consideration.

### Application 3

The GAP does not support forwarding The Nature Conservancy/Environmental Defense (TNC/ED) EFP application for further consideration. The GAP believes that the hypothesis the applicants seek to test does not require special privileges or an EFP. Regional-based co-ops exist in other areas of the country; this is not a ground-breaking endeavor. If the TNC/ED partnership wishes to explore the potential benefits of a cooperative regional fishery management organization and report their findings on how the co-op works to help inform the individual quota (IQ) process - they can do that with existing limited entry fixed gear vessels in the Morro Bay area under existing limited entry fixed gear limits. While they argue that they want to “pool” the trip limits to share among participants they have also stated that they would like to support several vessels – so in the end the vessels will likely be relegated to similar trip limits to those that are currently in place. The applicants could also test their hypothesis with open access vessels in the area under existing open access limits. The TNC/ED partnership has argued that the low open access trip limits do not provide enough fish to make the co-op successfully operable. However, working within existing trip limits more closely reflect reality versus utilizing an artificial limit.

The GAP believes that the EFP as proposed is a reallocation of fish and the GAP questions where the additional fish requested will come from. We further believe that the EFP as written could harm other fishermen operating under the same sablefish optimum yield (OY) in the area. The TNC seems to believe that they have guaranteed access to landings history associated with 6 trawl permits that were bought in Morro Bay. It is unclear to the GAP what the landings history associated with these permits is. The GAP reminds the Council and the applicants that until there is an individual trawl quota program in place, there is no guaranteed access to any amount of fish and there is no hard allocation. Further, the GAP questions the biological effects of taking a larger amount of a single species from an area where the fishery has traditionally landed

a lesser amount of fish. In other words, we believe there could be issues with localized depletion that have not been fully explored.

If the TNC/ED partnership wishes to explore how regional fishery organizations work and report their findings to inform the IQ process they do not require special privileges or an EFP in order to do that. The experiment will still be ongoing when final preferred options in the trawl IQ process are selected so it is unclear how this experiment would inform the IQ program. The GAP is opposed to forwarding this EFP for consideration.

PFMC  
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