

GROUND FISH ADVISORY SUBPANEL COMMENTS ON PART II MANAGEMENT
MEASURES FOR 2009-2010 FISHERIES

The Groundfish Advisory Subpanel (GAP) heard a presentation from the Groundfish Management Team (GMT) on various management measures to meet high and low optimum yield (OY) values for overfished species. In addition, the GAP considered supplemental reports from Washington Department of Fish and Wildlife (WDFW), Oregon Department of Fish and Wildlife (ODFW), California Department of Fish and Game (CDFG) and the tribes. Lastly the GAP reviewed the WDFW motion as amended during agenda item H.5.c. The GAP comments address all of these areas.

2009-2010 OYs for Overfished Species

GAP Recommendations for Overfished Species

SPECIES	2009	2010
Bocaccio	288 mt	302 mt
Canary	155 mt	155 mt
Cowcod	4 mt	4 mt
Darkblotched rockfish	300 mt	306 mt
Widow Rockfish	522 mt	506 mt
Yelloweye Rockfish	17 mt	14 mt

The GAP refers the Council to Agenda Item H.1.c., Supplemental GAP report where the GAP explained their rationale for the proposed overfished species OYs listed above. We have some additional comments below.

In general the GAP would like to remind the Council that any liberalizing in OYs on overfished species does not present NEW fishing opportunities. We are looking to reinstate significant lost opportunities and provide flexibility for some existing fisheries. In the last two years some of the commercial and recreational participants have been permanently lost. In the last two years shoreside infrastructure and facilities have been lost. In the last two years ice plants have had to be subsidized in some ports and buyers have stopped buying product because the amounts available are too low.

Increases in overfished species OYs also allow increased EFP opportunities. In recent years the GAP has consistently denied creative and forward thinking EFP applications due to the unknown and potential impacts on overfished species. Increases in overfish species OYs allow the possibility that EFP proposals utilizing new and innovate gear could be pursued.

Increases in overfished species OYs presents opportunities for new and innovative cooperative research and also takes some pressure off traditional research opportunities. In recent years the possibility of a large research tow of canary rockfish could have shut down several fisheries. Research is a critical part of the process and a robust research program must be continued. Higher OYs on overfished species allow existing and new cooperative research programs to take place which ultimately inform the stock assessments necessary to make management decisions.

Yelloweye Ramp Down – new alternatives: the GAP believes that new ramp down strategies on yelloweye should not be included in the analysis. While we understand the dire consequences to communities under the current ramp down strategy, we believe that altering the ramp down strategy now to be more liberal is irresponsible. There is a significant cost to analyzing these new ramp down strategies. Diverting resources from analyzing other critical management measures to spend time on an alternative that is likely to be legally indefensible is nonsensical.

Darkblotched Rockfish

Implementing a 300 mt OY is probably the most important decision to make today. Darkblotched rockfish affects virtually every commercial fishery deeper then 100 fathoms. A 300 mt OY represents a 10% reduction from the 2008 OY. If you restrict the deep water opportunities north of 40° 10 you run the risk of an effort shift into more shallow areas where canary and yelloweye impacts would increase. The deeper the RCA boundary the more inefficient your operation becomes. Vessels must travel further using more fuel at an increased cost. Some of the smaller vessels are unable to fish seaward of the RCA and their opportunities are eliminated. Safety concerns also increase the deeper the RCA seaward boundary is set.

Widow Rockfish

The GAP reiterates our recommendation to set the widow rockfish OY at the current SPR harvest rate, which provides a 2009 OY of 522 mt. The health and increasing abundance of the widow stock has been consistently validated over the past several assessment cycles. It is likely the stock will be above B40 before 2009 management measures are implemented. It is clear to the GAP that the widow rockfish resource can easily support the current harvest rate. Given their increasing abundance, it is certain that widow rockfish will be encountered at higher rates in many sectors of the groundfish fishery. Maintaining the current harvest rate will provide flexibility to the Council in balancing widow rockfish impacts in the scorecard. The GMT's analysis indicates that, based on current bycatch rates, the 2009 whiting fishery would be severely curtailed by widow rockfish at an OY of 371 mt. A potential revenue loss of

\$19,000,000 dollars in ex-vessel value and a community impact of \$57,000,000 dollars. Even a 522 mt OY, which is based on the current harvest rate, will potentially limit the whiting fishery to less than 300,000 mt.

Analysis of Management Measures for 2009-2010

Limited Entry Trawl Fishery

The table below demonstrates the loss of average ex-vessel revenue between the low and high OY options:

Species	Average ex-vessel price in 2007	Difference between high and low OY
Sablefish	\$1.48 / pound	\$2,769,370.00
Longspine	\$0.51 / pound	\$96,292.00
Shortspine	\$0.71 / pound	\$403,728.00
Dover	\$0.38 / pound	\$7,006,692.00
Arrowtooth	\$0.10 / pound	\$200,123.00
Petrals	\$1.00 / pound	\$941,108.00
Other flatfish	\$0.35 / pound	\$476,725.00
Slope Rock	\$0.55 / pound	\$67,883.00
Total		\$11,961,921.00

The difference in average ex-vessel revenue for the limited entry trawl fishery between the low OY options and the high OY options is just under \$11,961,921. Using the community impact multiplier of 3 to 1 the loss to west coast communities under a low OY option is \$35,885,763 million dollars.

Fixed Gear Sablefish Fishery

The GAP has concerns over options that would alter the non-trawl RCA creating deeper seaward boundaries from 100 fathoms to 125 or 150 fathoms in order to save yelloweye rockfish. For a small yelloweye savings the following impacts should be considered:

1. The 125 fathom RCA seaward boundary would eliminate the northern fixed gear dogfish fishery.
2. The depth restriction would eliminate significant halibut grounds for the directed halibut fishery off of Oregon currently valued at \$4 - \$5.00 per pound delivered dressed. The resulting fishery will be very limited in area which will exacerbate gear conflicts, which are already a problem with the 100 fathom line boundary.
3. The deeper RCA seaward boundary will reduce or eliminate the incidental halibut take in the sablefish fishery north of Pt. Chehalis. This amounts to approximately 70,000 pounds with an average value of \$315,000.
4. A 125 or 150 fathom RCA boundary will result in the fleet fishing earlier in order to access the sablefish before they move shallower into the RCA. This migration of sablefish tends to take place from winter through summer and is very evident off the Olympic peninsula. This effort shift will have safety ramifications for all vessels but particularly for the DTL fishery which has many small vessels. Fishing sablefish earlier in the season results in fish with less oil and weight at a given length due to spawning. Sablefish traditionally are sold to high end export markets such as Japan that base valuation on oil and prime fish condition. Any departure from present quality standards has the potential to push these buyers away from sablefish. If this happens the effects could devalue the entire west coast sablefish fishery.
5. The deeper depth restriction will reduce other economic values that help make a fishing trip profitable. Currently a vessel can land a 400 pound limit of lingcod per trip, valued at \$2.00 a pound. Lingcod and other species will be eliminated or greatly reduced.

Open Access North of 40°10'

The GAP recommends analyzing status quo options with these additions:

1. Analyze moving to 20 fathoms from 30 fathoms to reduce yelloweye mortality.
2. If option 1 above does not reduce yelloweye mortality adequately, reduce only the minor nearshore component of the bi-monthly limits as much as needed to reduce yelloweye mortality.

The GMT proposal to reduce black rockfish will not reduce yelloweye impacts. Baited hooks on the bottom catch these fish. Boats fishing this gear often use vertical gear to catch black rockfish while “soaking” bait accounting for the yelloweye/black rockfish relationship found in observer data. Reducing black rockfish limits will only cause unnecessary economic harm to the current fishery.

Open Access and Limited Entry Fixed Gear South of 40°10' - 34°27'

The GAP recommends analyzing status quo options with these additions:

1. Shoreward RCA boundary of 20 fathoms
2. Shoreward RCA boundary of 30 fathoms
3. Shoreward RCA boundary of 40 fathoms

A deeper boundary would allow for access to more valuable shelf rockfish species.

Washington Recreational

The Washington recreational options have been crafted not toward an OY of 17 mt or a harvest guideline of 3mt. They have been crafted for the long-term goal of meeting the 2010 harvest guideline and beyond without the possibility of increase and to provide breathing room in case of mistakes. Reduced salmon opportunity alone will cause loss of revenue to community and business. Any allocative removal of bycatch allowance is penalizing Washington management and fishermen for behaving responsibly. Aside of enforcement concerns with small management hot or cold spots, the GAP believes the Washington management alternatives will achieve those goals.

Oregon Recreational

The GAP supports the management measures described in the ODFW report (Agenda Item H.5.b) ODFW Report. The GAP would like to include analysis of two additional options:

1. Retention of 3 lingcod in the daily bag limit for recreational fisheries – currently the bag limit is 2 fish and Oregon is not attaining the harvest guideline on lingcod.

California Recreational

The GAP supports the CDFG management measures (as amended on the Council floor under Agenda Item H.5) described in Agenda Item H.5.b Supplemental CDFG Report with one addition. The GAP recommends analyzing retention of 3 bocaccio in the daily bag limit.

Council Direction to the GMT

In general we support the Council's guidance to the Team on 2009-2010 management measure analysis under agenda Item H.5. provided in Supplemental WDFW Motion in Writing, Agenda Item H.5.e. as amended.

Conclusion

The GAP believes that taking into account the needs of communities continues to be of paramount concern and we believe that current needs are not being met under status quo harvest levels. Clearly this is the case as we realize the loss of whole fleets from particular communities. These fishermen are not coming back. These communities are permanently losing a major part of their history and culture. Families continue to suffer financially and emotionally. Relief is not only needed it is essential if we truly want to preserve communities and prevent future losses.

PFMC

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