

**GROUND FISH MANAGEMENT TEAM REPORT ON FISHERY MANAGEMENT PLAN
 AMENDMENT 20-TRAWL RATIONALIZATION-ACCUMULATION LIMITS**

The Groundfish Management Team (GMT) conducted a very preliminary review of the overfished species accumulation limits, adopted by the Council under Agenda Item G.4. The GMT did not have sufficient time to analyze all of the individual overfished species limits nor did we have sufficient time to fully explore the consequences. However, in the limited time available, the GMT identified several areas of concern and believes that the existing overfished species accumulation limits will likely result in several unintended consequences that conflict with the trawl rationalization objectives (Preliminary Draft Environmental Impact Statement, page 4). Specifically, the limits recommended by the Council may prohibit the development of a viable, profitable, and efficient groundfish fishery. Further, the restrictive vessel limits may dramatically reduce operational flexibility, which conflicts with another objective of the rationalization program.

The effect of the overfished species accumulation limits taken from the spreadsheet in the main motion for accumulation limits adopted under Agenda Item G.4 are shown in the following table. The implications of some of these numbers are also included.

Species	Assumed Trawl Sector Allocation (MT)	Percentage		Metric Tons		Pounds	
		Vessel	Control	Vessel	Control	Vessel	Control
Canary	9.4	0.078	0.052	0.7	0.5	1,616	1,078
Widow	163.0	0.038	0.025	6.2	4.1	13,655	8,984
POP	137.5	0.05	0.033	6.9	4.5	15,156	10,003
Bocaccio	48.0	0.1	0.075	4.8	3.6	10,582	7,937
Cowcod	2.8	0.1	0.1	0.3	0.3	617	617
Darkblotched	257.6	0.03	0.02	7.7	5.2	17,037	11,358
Yelloweye	0.4	0.039	0.026	0.0	0.0	34	23

If the widow rockfish accumulation limits were to apply to an overfished widow rockfish stock, substantial hardship would be placed upon the shoreside whiting fishery. In recent years, for example, several vessels have incidentally caught over 15 mt while operating under bycatch caps – conditions that are similar to the constraints posed by individual fishing quota for those species. If the existing accumulation limits remain in place and the stock is overfished, the tonnage associated with the control limit may be on the order of 4 mt, while the tonnage associated with the vessel limit may be on the order of 5 mt. If past catch data in the shoreside whiting fishery is any indication, these limits will have the effect of highly restricting multiple entities to the extent that some may not be able to substantially participate in the fishery.

In the event that widow rockfish is rebuilt at the start of the rationalization program, the existing accumulation limits do not appear to be conducive to target opportunities. Widow rockfish opportunities may be a relatively specialized type of strategy, and if that is the case, vessel and control limits may need to be set higher to accommodate target opportunities.

Under the yelloweye rockfish accumulation limits, vessels operating off particular areas of the Washington and Oregon coasts may not be able to acquire enough quota to operate in those areas. However, this ultimately depends on the size of the sector allocation. The effect of the control and vessel limits adopted by the Council under potential sector amounts of 0.1 to 0.4 mt are 8 to 34 lbs for the vessel limit, and 5 to 23 lbs for the control limit. Data from the West Coast Groundfish Observer Program (WCGOP) indicates several observed discard events larger than 30 lbs and some as large as 100 lbs. Examining landings data does not provide a very helpful picture due to lack of yelloweye landings events, however, on an annual basis, some vessels have landed in excess of 40 lbs during a year. Given the high degree of importance and potential effect of a yelloweye accumulation limit, it appears difficult to establish a yelloweye limit without knowing the sector allocation.

The existing darkblotched limit would result in an 11,000 lbs and 17,000 lbs control and vessel limit, respectively. While this scale is substantially larger than some other overfished species, the control limit is very similar to the landed catch (not including discard) of vessels in recent years. When discard is taken into account, the existing limits may not be as close to current catch levels, and when fleet consolidation is taken into account, it may be necessary to allow for greater amounts of darkblotched per entity and vessel. However, existing information indicates that darkblotched are not as "patchily" distributed as some other rockfish stocks, meaning the risk of "disaster tows" is somewhat less. This type of species distribution may make it easier to avoid darkblotched and would tend to reduce the risk of a disaster tow, meaning the effect of a lower accumulation limit may not be as pronounced as for some other species. The types of effects listed here should be carefully considered.

The Pacific Ocean perch (POP) limit can be viewed somewhat similarly to darkblotched, but there are some notable differences. POP appear to be distributed over a smaller distribution, meaning that it may be appropriate to have a relatively greater number of entities and vessels for this species compared to darkblotched. The existing POP limit would result in poundage that is also somewhat similar to recent fishery patterns (like darkblotched), but would not be large enough to accommodate some of the higher catches in recent years.

There is insufficient, readily available data to provide much insight into bocaccio and cowcod. However, these stocks are regionally distinct, meaning that it may be reasonable to have a relatively small number of entities and vessels associated with these species.

GMT Recommendation

In conclusion, the GMT has identified some concerns with the adopted overfished species limits. The GMT recommends that the Council submit a range of control and vessel usage limits for analysis, with refinement and final adoption in June 2009.