



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
NATIONAL MARINE FISHERIES SERVICE  
West Coast Region  
7600 Sand Point Way N.E.  
Seattle, Washington 98115

February 26, 2015

Ms. Lowman, Chair  
Pacific Fishery Management Council  
7700 NE Ambassador Place  
Portland, OR 97220

Dear Ms. Lowman:

By this letter, I am approving Amendment 24 to the Pacific Coast Groundfish Fishery Management Plan (PCGFMP). As you know, Amendment 24 consists of three components: 1) default harvest control rules; 2) a suite of minor changes, including clarification of routine management measures and adjustments to those measures, clarification to the harvest specifications decision making schedule, changes to the description of biennial management cycle process, updates to make the PCGFMP consistent with the best available science on the  $F_{MSY}$  proxy for elasmobranchs, and clarifications to definitions; and 3) stock classification updates, including the addition of new stocks and species and designates ecosystem component (EC) species.

With respect to the Council's recommendations for designation of EC species, the National Marine Fisheries Service (NMFS) noted in the final rule implementing the 2015-2016 groundfish harvest specifications that reclassification of Pacific grenadier from a stock "in the fishery" to an EC species is arguably inconsistent with the National Standard (NS) 1 Guidelines, which state that EC species should not be a target stock and should generally not be retained. Recent Pacific grenadier landings average about 130 mt per year, and Pacific grenadier is landed, marketed, and possibly targeted in some regions, mainly in central California. However, despite relatively high amounts of catch when compared to catch of other proposed EC species, only about 10 percent of the estimated Overfishing Fishing Limit (OFL) contribution for Pacific grenadier was caught annually from 2009 to 2011. NMFS believes this level of catch is low enough to not require conservation and management measures. In addition, because the stocks that will be reclassified as EC species were previously managed as part of the Other Fish complex rather than as individual species, the EC classification results in very limited changes from existing management practices. Because of this, NMFS believes that the change to EC status will not result in additional fishing pressure on Pacific grenadier.

Like Pacific grenadier, big skate is also currently in the Groundfish FMP as part of the Other Fish complex, and is designated as an EC species through Amendment 24. The information the Council had at the time of its recommendations indicated that recent average catches of big skate were only 18 percent of the estimated OFL. However, at its February 2-6, 2015, work session, the Council's Groundfish Management Team (GMT) discussed new information about the catch



data that was used to review whether big skate was an appropriate stock for EC species classification. The GMT noted that it was recently discovered that the majority of landings contributing to an “unspecified skate” market category were in fact predominantly big skate and that recent catches of big skate were much closer to the estimated OFL. The Council and its other advisory bodies have not yet reviewed the preliminary information described by the GMT. If the information is accurate, then big skate would likely be in need of conservation and management and, therefore, not an acceptable candidate for EC species classification. Because this new information came to light after the Council submitted Amendment 24 to NMFS for review, and only a few weeks before the statutorily-mandated deadline for NMFS’ decision on the amendment, it was not practical for the new information to be incorporated into Amendment 24. NMFS understands that the Council intends to review this information at its April 2015 meeting. If trip limits in the trawl fishery are needed to prevent overfishing on big skate, then the Council and NMFS have authority under existing regulations to implement those changes via inseason action. If the GMT verifies the preliminary information regarding big skate, then the Council would need to initiate a process to reclassify big skate as a stock in need of conservation and management and “in the fishery,” rather than an EC species.

NMFS published a proposed rule to implement Amendment 24 and the 2015-2016 groundfish harvest specifications and management measures on January 6, 2015 (80 FR 687), and we expect to have the final rule effective at the beginning of March 2015. The final rule implements the Council’s recommendations from its June 2014 meeting on harvest levels and management measures for all groundfish species, as modified by Council recommendations from its November 2014 meeting. I have approved all of the Council’s recommendations on harvest levels and management measures for 2015-2016. Therefore, NMFS is approving the Council’s recommendation to designate Pacific grenadier and big skate as EC species with the understanding that continued monitoring and evaluation of the stocks’ classifications will occur.

Amendment 24 and the 2015-2016 groundfish harvest specifications and management measures were developed over several Council meetings and required the focused attention of the Council, its advisory bodies, and its staff. I am extraordinarily grateful for all of the time and attention the Council family has given to this significant management package. The work of members of the public at Council meetings and in their homeports, and the deliberations by the Council and its advisory bodies, demonstrate an impressive commitment to the principles of the Magnuson-Stevens Fishery Conservation and Management Act. Thank you for your time and care.

Sincerely,



William W. Stelle, Jr.  
Regional Administrator

cc: Donald McIssac, John DeVore (PFMC)