

**GROUND FISH MANAGEMENT TEAM REPORT ON
AMENDMENT 21 AT-SEA SECTOR ALLOCATION REVISIONS**

The Council has utilized a variety of temporary solutions to address recent bycatch constraints in the at-sea whiting sectors, including transfer of residual darkblotched rockfish from the pink shrimp fishery to the mothership (MS) and catcher-processor (CP) sectors in 2015, and used an emergency Council meeting in 2014 to authorize a voluntary transfer of darkblotched rockfish from the CP sector to the MS sector. Seeking a more effective longer term solution to reduce bycatch constraints in the at-sea whiting sectors, the Washington Department of Fish and Wildlife (WDFW) proposed revising the Amendment 21 (A-21) allocations for Pacific ocean perch (POP) and darkblotched rockfish.

Based on the WDFW proposal, the Council adopted a preliminary preferred alternative (PPA) during the April 2016 meeting to (1) change the formal allocations of these two species to the at-sea sectors and (2) consider managing these species via annual sector-specific set-asides. The amounts proposed to be set aside, or re-allocated from the Shorebased individual fishing quota (IFQ) Program, to the at-sea whiting sectors are as follows in Table 1.

Table 1: Proposed Range of Alternatives (ROA) for Changes in Allocation for Darkblotched Rockfish and POP in 2017 and 2018 (as seen in [Agenda Item G.2.a, WDFW Report 1](#))

Sector	Darkblotched (mt)		POP (mt)	
	No Action	PPA	No Action	PPA
Shorebased IFQ	416.7	394.6	121.9 (2017) 126.6 (2018)	104.3 (2017) 109.0 (2018)
Catcher-Processor	13.5	25	10.2	20
Motherships	9.5	20	7.2	15

The first section of this report focuses on (1) the purpose and need statement contained in [Agenda Item G.2.a WDFW Report 1](#); (2) the ROA from the same report; and (3) potential expansion or additional analysis on impacts to affected sectors than what was presented in [Agenda Item G.2.a, Supplemental WDFW Report 2](#).

The second section of this report focuses on responding to [Agenda Item G.2.a., Supplemental NMFS Report](#) and providing initial thoughts on actions that could be taken under Agenda Item G.4., Final Action to Adopt Management Measures for 2017-2018 Fisheries to partially address the purpose and need under the proposed action for this agenda item.

Part 1: Purpose and Need

The GMT reviewed the purpose statement in [Agenda Item G.2.a, WDFW Report 1](#), and believes that it represents the purpose and need of the April 2016 proposed action.

Part 2: Range of Alternatives

The GMT reviewed the range of alternatives (ROA) in [Agenda Item G.2.a, WDFW Report 1](#) (reproduced in Table 1 above) and believes the range of A-21 allocation alternatives is sufficient to address the immediate need and not overly broad. However, we note that there is crossover between this agenda item and the biennial harvest specifications (i.e. ACL decisions under Agenda Item G.4.), that may also partially address the purpose and need without needing to change the A-21 allocations.

With the proposal to revise the A-21 allocations by transferring allocation from IFQ to the at-sea whiting sectors, the Council has to consider the potential trade-offs associated with harvest potential for all three sectors (i.e., IFQ, MS, and CP). The GMT believes the revised A-21 allocations under the PPA appear to be high enough to adequately reduce bycatch constraints for the at-sea whiting sectors, but at the same time are not set too high as to potentially strand fish in the at-sea whiting sectors that could be better utilized in the IFQ fisheries. In conclusion, the GMT believes the ROA provides adequate bookends in regards to the proposed action to revise A-21 allocations. The Council still has the ability to pick an intermediate value from within the range if desired. However, the Council could consider adding additional alternatives, though this would increase the analytical workload.

Part 3: Additional issues to be further analyzed for final action

WDFW has requested input regarding potential issues or analyses that may not have been adequately addressed in [Agenda Item G.2.a, Supplemental WDFW Report 2](#). Time permitting, WDFW would work to address these issues prior to selection of a FPA (which is potentially slated for September).

Considerations of the re-emergence of the IFQ mid-water trawl rockfish fishery

Shoreside processors and IFQ participants mentioned that POP are encountered in the IFQ mid-water trawl fishery for widow and yellowtail rockfish, and requested that analysis be completed to determine if the PPA allocation could hinder their ability to access these target stocks, compared to No Action. The mid-water trawl rockfish fishery has been dormant since the 2000's due to widow rockfish and canary rockfish both being overfished, but the fishery is expected to re-emerge as bycatch constraints have been reduced (i.e., canary rockfish has rebuilt) and the allocations of the targets (i.e., widow and yellowtail rockfish) will greatly rise due to the widow rockfish ACL increasing by nearly six fold for 2017-2018.

Accordingly, the GMT explored a bycatch rate approach to determine if there are differences in future harvest potential for widow and yellowtail rockfishes between No Action and the PPA POP allocations. In short, the bycatch approach shows how well the historical IFQ fisheries could have obtained their higher and more accessible (due to canary rockfish rebuilding) 2017-2018 widow and yellowtail rockfish allocations with their historical unused POP for both allocation alternatives. Since the Shorebased IFQ Program uses approximately 35 to 40 percent of their POP

allocation for their current fisheries (mostly slope bottom trawl), the unused POP was assumed to be what would be available to access the midwater targets.

Based on this hind cast bycatch approach, IFQ participants could potentially access their full allocations of widow and yellowtail rockfish with their unused A-21 allocations of POP under No Action, but not under the PPA (Table 2). The magnitude of difference could vary by year, and is tied to how much POP they take elsewhere (e.g., slope bottom trawling); differences in harvest potential are greater during years when their POP takes elsewhere are greater, as they would have less available POP to apply to the midwater trawl fishery for yellowtail and widow rockfishes. Due to this variation in POP impacts elsewhere, associated impacts with the lesser PPA allocation of POP could range from reduction in a few hundred thousand dollars ex-vessel (e.g., \$366,078 in 2014) when POP encounters are low to a few million dollars ex-vessel (e.g., \$3,735,182 in 2012) when POP encounters are higher.

Table 2: Hind-cast of the harvest potential of widow rockfish (WDOW) and yellowtail rockfish (YTRF) for the IFQ mid-water trawl fishery (non-whiting) for the No Action and PPA POP allocations.

Year	WDOW + YTRF already taken by IFQ (mt)	Unused IFQ WDOW + YTRF IFQ could access with 2017-2018 allocation increasing to 15,836 mt	Amount of unused WDOW + YTRF IFQ could access with their unused POP allocation (mt)		Difference in harvest potential for the POP alternatives (PPA – No Action)		
			No Action	PPA	MT	lbs	\$ ex-vessel
2011	877	14,959	14,959	12,473	-2,486	-5,480,692	-2,466,311
2012	1,150	14,686	14,616	10,851	-3,765	-8,300,404	-3,735,182
2013	1,131	14,705	14,705	11,829	-2,876	-6,340,495	-2,853,223
2014	1,818	14,018	14,018	13,649	-369	-813,506	-366,078
2015	2,265	13,571	13,571	11,648	-1,923	-4,239,489	-1,907,770

In conclusion, while IFQ sector attainments of POP have been relatively low (i.e., 40 percent or less), the lesser IFQ POP allocation associated with the PPA could potentially impede the harvest potential of IFQ to access their future allocations of widow and yellowtail rockfish (which are higher than in years past).

Considerations of removal or reduction of the trawl Rockfish Conservation Area

As part of the Essential Fish Habitat (EFH) review, the Council could consider removing or reducing the scope of the trawl rockfish conservation area (RCA; e.g., opening portions of the RCA that are trawled by the pink shrimp fishery). Since the initial purpose for the adoption of the trawl RCA was to curtail darkblotched rockfish impacts, removal or reduction of the RCA could increase future IFQ attainments of darkblotched rockfish and also POP (which also occur on the inner slope and outer shelf). As such, while recent IFQ attainments have been relatively low for

both species (i.e., less than 40 percent annually), future attainments could increase if the RCA is changed but harvest potential could be reduced under the PPA.

Considerations to harvest potential of Dover sole, thornyheads, and sablefish

The Dover sole, thornyheads, and sablefish (DTS) complex is a mainstay to the portfolios of IFQ bottom trawlers. Since DTS activity occurs on the slope where darkblotched rockfish and POP also reside, it is important to consider potential limitations to DTS harvest potential associated with the PPA alternative. However, it is the understanding of the GMT that the bottom trawl fisheries' access to the DTS complex is primarily constrained by sablefish, and thus harvest potential of DTS may not be as inhibited by reduced POP and darkblotched rockfish allocations (e.g., compared to potential in the mid-water rockfish fishery).

Part 4: NMFS Report and alternative solution to increase ACLs

The National Marine Fisheries Service (NMFS), in the [Supplemental NMFS Report](#), provides thoughts on possible solutions to the issue of the at-sea sectors needing additional darkblotched rockfish and POP in order to efficiently access their Pacific whiting allocation. Based on their assessment of workload and regulatory complexity, the PPA would not be able to be implemented until January 1, 2018. Therefore, another option was explored to increase the ACLs, thereby increasing the allocations to all sectors for the 2017 Pacific whiting season.

Darkblotched Rockfish Annual Catch Limit

The GMT discussed that the Council could increase the annual catch limit (ACL) of darkblotched rockfish for 2017-2018. It has the potential to, at least partially, meet the objectives of the Council's PPA. Increasing the ACL would reduce the level of precaution that the Council used in setting the ACL at 490 mt for 2017-2018; however, management measures could potentially be designed to target a lower amount with a deduction off the top of the ACL for unforeseen mortality. The GMT will further discuss the potential change in the 2017-2018 ACLs under Agenda Item G.4.

Pacific Ocean Perch Annual Catch Limit

In their report, NMFS does not recommend extending the time to rebuild POP in order to increase the ACL, and respective allocations. However, the GMT explored potential options that could be put into place for 2017 (as opposed to the PPA proposed under this agenda item) to alleviate the need of the at-sea sectors.

Initially, the GMT analyzed what the increase to the ACL would have to be in order to switch from allocating 30 mt to the whiting at-sea sectors under A-21 to the 17 percent provision, as well as the ACL that would be required to reach the PPA allocation amounts (approximately) under status quo A-21 regulations. Table 3 below shows the No Action and PPA for 2017 from the WDFW Report, as well as the minimum ACL needed to use the 17 percent rule and the ACL that would allocate the PPA amounts to the at-sea sectors in 2017 and 2018. The FPA set-aside value of 24.4 mt was used across all columns.

Table 3: POP Harvest Specifications Under Alternatives

	No Action	PPA	Minimum ACL for 17% to take effect	ACL needed to meet PPA amounts
ACL	171	171	210.2	388.6
HG	146.6	146.6	185.8	364.2
Trawl Allocation	139.3	139.3	176.5	346.0
IFQ	121.9	104.3	159.1	311.9
CP	10.2	20	10.2	20
MS	7.2	15	7.2	14.1

However, based on the rebuilding plan for POP that is available for Council action for Agenda Item G.4, there is no option to increase the ACL to the needed value to match the PPA at-sea allocations. The GMT will further discuss the potential change in the 2017-2018 POP ACLs under Agenda Item G.4. Under such an approach, management measures could be designed to target an amount lower than the ACL, with a deduction off-the-top of the ACL to accommodate unforeseen mortality.

The Council could also consider further reducing the risk of the at-sea sectors exceeding their bycatch allocation (and being automatically closed) by changing the at-sea allocations to sector specific set asides, as under the PPA with the No Action amounts. This would mean that the at-sea sectors may not be subject to automatic closure if those amounts are reached.

Conclusion

The GMT believes the purpose and need and ROA for revising the A-21 allocations are adequately addressed in [Agenda Item G.2.a, WDFW Report 1](#). In addition, the potential to reduce bycatch constraints for the at-sea Pacific whiting sectors are well described in [Agenda Item G.2.a, Supplemental WDFW Report 2](#), and will be helpful for the Council assessing the risk of MS and CP sectors' inability to obtain their whiting allocations due to POP and darkblotched rockfish constraints under No Action compared to the PPA. Shorebased IFQ activities are also well described for past years as well as some future potential impacts to individual participants. However, further analyses would be helpful to determine potential impacts on future IFQ fisheries (e.g., re-emergence of the mid-water trawl rockfish fishery and removal of the trawl RCA).

Overall, while revising the A-21 allocations appears to be a better longer term solution to addressing bycatch constraints in the at-sea sectors than the temporary actions the Council has taken in the recent past; the Council could consider alternative ACLs for 2017-2018 under Agenda Item G.4. PPMC 06/24/16