

## GROUNDFISH ADVISORY SUBPANEL STATEMENT ON 2017-2018 HARVEST SPECIFICATIONS AND MANAGEMENT MEASURES

The Groundfish Advisory Subpanel (GAP) received a presentation from Mr. John DeVore and Ms. Kelly Ames regarding harvest specifications and management measures for the 2017-18 management cycle, and offers the following comments.

The GAP supports most of the annual catch limits (ACLs) and the preliminary preferred alternatives (PPAs) for the management measures. Rather than include the whole list of actions from the checklist (Agenda Item G.4, Attachment 1), we supply comments here that depart from those of the PPAs due to changes in circumstances or new information.

### 2017-2018 Harvest Specifications

The GAP supports most of the harvest specifications as listed in Agenda Item G.4, Attachment 2. However, due to recent circumstances, we request a change in the Pacific Ocean perch and darkblotched rockfish ACLs.

Consistent with the Council's action in April to amend the Amendment 21 allocations for darkblotched and Pacific Ocean perch (POP) to ensure at-sea sectors have enough bycatch to prosecute their whiting fisheries, the GAP requests an ACL= acceptable biological catch (ABC) for darkblotched and a change in the SPR harvest rate for POP. A recent shoreside lightning strike of POP bycatch demonstrates the need of shoreside fisheries to sustain its access to POP in order to prosecute both shoreside whiting and non-whiting groundfish fisheries. Sufficient bycatch amounts for POP for shoreside becomes more urgent as increases of other rockfish in 2017 and 2018 that allow for a midwater non-whiting fishery pose increased risk of encounters with POP.

For darkblotched, the GAP reiterates what we suggested in our supplemental statement under Agenda Item G.2: that the Council reconsider the ACLs adopted in April 2016 and adopt the ACL=ABC alternative, resulting in 641 mt in 2017 and 663 mt in 2018. This has already been analyzed as part of the harvest specifications process.

For POP, setting a spawning potential ratio of 0.839, according to Table 2 of [Agenda Item I.4, Attachment 7](#) from November 2015, an updated rebuilding analysis using actual catch from 2011-14 (instead of assumed catch), would result in ACLs of 208 mt in 2017 and 212 mt in 2018, an increase of 37 and 36 mt, respectively, more than the current preliminary preferred alternative (PPA). These amounts would provide sufficient quantities of bycatch to keep both shoreside and at-sea fleets on the water. As we noted in Agenda Item G.2, the economic gains from these increased ACLs outweigh the effect on extending the rebuilding timeframe by two years – with little risk to the health of the stock.

### 2017-18 RCA Coordinate Updates, Allocations and Harvest Guidelines

#### #2: *Off-the-top deductions*

The GAP suggests increasing the bocaccio deduction from 3 mt to 10 mt. As more fishermen start

targeting chilipepper in the south, they are likely to encounter more bocaccio in the EFP.

#### *#6: Allocations, within trawl*

The GAP agrees with the preliminary Groundfish Management Team comments to eliminate the canary annual catch target and instead establish the ACL=ABC and use off-the-top deductions as a buffer that could filter down to specific sectors through inseason action if needed.

#### *#10: At-sea sectors, Amendment 21 allocations*

The GAP supports the PPA for everything except what has already been covered in Agenda Item G.2, and refer to that statement for details.

#### *#11: Non-nearshore*

For sablefish north of 36 N. latitude limited entry and open access, the GAP supports Alternative 3. The GAP understands these are different trip limits than the original PPA from April.

### 2017-18 Season Structures

#### *#16: CA recreational*

The GAP supports these options, as they provide additional opportunity for recreational fishermen.

### 2017-18 RCA Coordinate Updates, Allocations, and Harvest Guidelines

#### *# 19: Allow transfer of shorebased IFQ quota pounds for canary, darkblotched, POP, and widow rockfish to the mothership sector*

The GAP does not support this, given prior Council discussions about this issue.

#### *# 21: New inseason process outside of a Council meeting for California fisheries to take action*

The GAP recognizes the new inseason process is imperative to give California Department of Fish and Wildlife the ability to manage yelloweye, black, and canary rockfish so prompt action can be taken outside of Council meetings.

#### *# 23: Nine new overfished species hotspot closures*

The GAP does not support inclusion of the nine “hot spot” closure areas listed under the Proposed Management Measures as described in Agenda Item G.4 Attachment 5, Appendix B.

### Amendment 27 FMP Language

The GAP supports the changes listed under this agenda item, with the exception of the hotspot closures.