

GROUND FISH MANAGEMENT TEAM REPORT ON  
TRAWL CATCH SHARES – GEAR SWITCHING AND TRAWL SABLEFISH AREA  
MANAGEMENT

The Groundfish Management Team (GMT) was briefed by Dr. Jim Seger (Pacific Fishery Management Council [Council] staff), reviewed the documents in the briefing book, and offer the following thoughts for consideration.

Ultimately, the choices of whether to change gear switching or the management line at 36° N. lat. are policy decisions for the Council and the National Marine Fisheries Service (NMFS). Both of the issues described in this agenda item appear to be allocation and resource-access issues. The Council may wish to weigh unintended consequences of palliative solutions to the most “immediate” allocation problems in the fishery against taking no action and risk exacerbating current problems.

### Gear Switching

The GMT notes that there are policy trade-offs associated with gear switching in relation to [Amendment 20](#) and Magnuson-Stevens Fishery Conservation and Management Act (MSA) goals. Gear switching, which was a rollover provision from the limited entry trawl program, was included in the final action implemented through for Amendment 20 for two primary reasons:

1. Protect the environment, specifically to “reduce bycatch and other possible adverse environmental impacts by moving some of the harvest toward non-trawl gears”, and
2. Improve economic outcomes, in particular to support operational flexibility.

The final environmental impact statement to support Amendment 20 described “the need for a flexible system that allows for variations and contingencies, long-term and short-term concerns for communities”. The GMT believes that, in the context of this purpose and need, maintaining the gear switching provision may contribute to achieving many of the goals, objectives, and guiding principles of Amendment 20. Based on the evidence<sup>1</sup>, gear switching continues to support the flexible system envisioned, as well as several of the objectives of the individual fishing quota program, including promoting practices that reduce bycatch and discard mortality, increasing operational flexibility, and providing quality product for the consumer. The GMT believes that eliminating or restricting gear switching could be counter to achieving program objectives, as it could reduce flexibility for participants and result in adverse impacts to vessels that have developed strategies to catch sablefish with fixed gear and their communities.

However, as some trawl vessels report being constrained by sablefish, limiting or eliminating gear switching may provide increased economic opportunity for trawl-focused operations and communities, as it would expand access to the resource and potentially enable them to harvest larger amounts of other trawl dominant species (e.g., Dover sole). Creation of markets for these underutilized species would help to promote additional processing and employment opportunities

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<sup>1</sup> Sources include [Agenda Item H.2., Attachment 1, March 2018](#), [Agenda Item F.2., Attachment 6, November 2017](#), and [Agenda Item F.2., Attachment 3, November 2017](#).

(Objective 6 of Amendment 20), and increase the fleet's ability to achieve optimal yield for more groundfish species (National Standard 1).

The GMT believes there is a significant amount of uncertainty in what the future of the groundfish fishery may look like due to significant actions taken by the Council, or upcoming on the Council's schedule. The Council is scheduled to take final action on modification to the trawl rockfish conservation areas in April. The GMT expects a new sablefish assessment in 2019, which may result in changes to the stock status of sablefish and resulting management measures. Other notable upcoming changes include trawl gear regulatory reforms, increasing participation by community quota funds in southern California ports, and higher annual catch limits (ACLs) for several rebuilding species (including yelloweye rockfish). Combined, these changes make predicting potential impacts from changes to the current gear switching provision impracticable. Therefore, the GMT does not find sufficient evidence from the analyses presented to date of the severity of the problem or of the predicted benefits from suggested solutions to support Council action on gear switching at this time.

### Sablefish Management Line

Attainment of southern (south of 36° N. lat.) sablefish quota has been declining since 2011, averaging 21 percent in the last three years. If this quota were to be more fully attained, it could boost the total ex-vessel revenue of the non-whiting fishery by as much as 19 percent ([Agenda Item F.2.a, Supplemental GMT Report 1, November 2017](#)). The GMT has had extensive discussions on the removal of the 36° N. lat. management line for sablefish over several meetings. Through those discussions, the following themes have emerged:

1. There is no biological rationale for the stratification at 36° N. lat., because the stock is coast-wide.
2. Quota south of the line provides community benefits to California central coast communities and fishers.
3. The basis for apportioning the coastwide sablefish ACL (i.e., trawl survey biomass proportion) may not be reflective of the true sablefish abundance north and south of 36° N. lat., which could contribute to lack of attainment in the south.
4. Industry suggests that the inability to access the sablefish habitat within the Cowcod Conservation Areas may be contributing to the lack of attainment.

Therefore, the GMT sees merit in the Council forwarding this issue for further consideration. There may be additional solutions previously not considered that may provide benefits, while minimizing adverse effects on fishing communities. Alternatives could include allowing southern quota to be fished up to 42° N. lat. or moving a percentage of the southern quota that is likely not to be attained to the north during the biennial harvest specifications cycle. If the Council were to move forward, the GMT would be willing to work with Council and National Marine Fisheries Service staff to further develop the ideas and analysis for consideration.

PFMC  
03/11/18