

**GROUND FISH MANAGEMENT TEAM REPORT ON 2019-2020 HARVEST  
 SPECIFICATIONS FINAL PREFERRED ALTERNATIVE**

The Groundfish Management Team (GMT) received an overview from Mr. John DeVore, Pacific Fishery Management Council (Council) staff, and offers the following comments and recommendations for the 2019-2020 harvest specifications final preferred alternative (FPA).

**Contents**

|   |    |
|---|----|
| Default Harvest Control Rule Species .....                | 1  |
| Lingcod .....   | 1  |
| California scorpionfish south of 34° 27' N. lat. ....     | 2  |
| Yelloweye rockfish .....                                  | 2  |
| Overview of Action .....                                  | 2  |
| Alternatives .....  | 3  |
| MSA Requirements for Revisions to a Rebuilding Plan ..... | 3  |
| History .....   | 3  |
| Consideration of Secretarial Amendment 1 .....            | 3  |
| Fishery Management .....                                  | 4  |
| New Information .....                                     | 5  |
| Stock Assessment Update and Conservation Concern .....    | 5  |
| Needs of Fishing Communities .....                        | 6  |
| Workload Considerations .....                             | 12 |
| Evaluation of ACL Alternatives .....                      | 12 |
| Prioritization .....                                      | 13 |
| Recommendations .....                                     | 13 |

**Default Harvest Control Rule Species**

The GMT recommends that the Council adopt the default harvest control rule (HCR) for all species except for lingcod, California scorpionfish south of 34° 27' N. lat., and yelloweye rockfish as FPA for 2019-2020 as shown in Table 1 of [Agenda Item F.2, Attachment 2, April 2018](#).

**Lingcod**

The GMT recommends that the Council adopt Alternative 1 in Table 2 of [Agenda Item F.2, Attachment 2, April 2018](#) as FPA for lingcod. Alternative 1 would apply a P\* of 0.45 to the lingcod stock south of 42° N. lat. compared to the default HCR of P\* = 0.4.

The GMT does not believe there is a risk of overfishing with a P\* of 0.45, because the 2019-2020 annual catch limits (ACLs) are projected to be under-attained by at least 350 mt. In addition, the favorable long-term forecast for the stock could imply lesser need for precaution ([Agenda Item H.7, Attachment 3](#)). Although the southern stock is projected to stay at somewhat low depletion levels (32 percent or less) for the next three years due to a lack of recruits, forecasts suggest the stock will then quickly rise to 37 percent by 2028, as new recruits enter the spawning population. The stock is likely to reach the 40 percent management goal by 2028, as current projections assume the unlikely event of full ACL removals.

Note that the 2019-2020 ACLs are decreasing from 2017-2018 levels for both alternatives, and selection of Alternative 1 would result in a less severe reduction, which would benefit the non-trawl fisheries off California.

### **California scorpionfish south of 34° 27' N. lat.**

The GMT recommends that the Council adopt Alternative 1 in Table 2 of [Agenda Item F.2, Attachment 2, April 2018](#) as FPA for California scorpionfish south of 34° 27' N. lat. Alternative 1 would manage the stock at a P\* of 0.45 with allowable biological catch (ABC) = ACL as opposed to a 150 mt constant catch ACL. Based on the most recent full [stock assessment](#), California scorpionfish is healthy (54 percent depletion in 2017) and can support higher harvest levels than the No Action alternative of 150 mt that has recently constrained fisheries.

## **Yelloweye rockfish**

### **Overview of Action**

#### **Alternatives**

In 2017, the yelloweye rockfish assessment showed an improved forecast in the time to rebuild relative to the previous estimate from 2011, prompting the Council to consider a range of ACL alternatives for 2019-2020. At this meeting, the National Marine Fisheries Service (NMFS) has recommended that, if the Council were to select an option other than No Action, the Council should select a preferred preliminary alternative (PPA) now and delay selecting an FPA until June. Alternatives 1 and 2 would require revising the yelloweye rockfish rebuilding plan and therefore necessitate the completion of additional analyses prior to the advanced briefing book deadline of May 11 to allow for Council consideration in June (discussed below).

**Table 1. Yelloweye rockfish alternatives.**

| Alternative        | 2019 |     |     | 2020 |     |     | HCR  |
|--------------------|------|-----|-----|------|-----|-----|--|
|                    | OFL  | ABC | ACL | OFL  | ABC | ACL |  |
| T <sub>(F=0)</sub> | 82   | 74  | 0   | 85   | 77  | 0   | ABC (P*=0.4), ACL (SPR=100%);<br>median time to rebuild 2026 |
| No Action          | 82   | 74  | 29  | 84   | 77  | 30  | ABC (P*=0.4), ACL (SPR=76%);<br>median time to rebuild 2027  |
| Alternative 1      | 82   | 74  | 39  | 84   | 77  | 40  | ABC (P*=0.4), ACL (SPR=70%);<br>median time to rebuild 2028  |
| Alternative 2      | 82   | 74  | 48  | 84   | 77  | 49  | ABC (P*=0.4), ACL (SPR=65%);<br>median time to rebuild 2029  |

### **MSA Requirements for Revisions to a Rebuilding Plan**

The Magnuson-Stevens Fisheries Conservation and Management Act (MSA) states that “conservation and management measures shall, consistent with the conservation requirements of this Act (including the prevention of overfishing and rebuilding of overfished stocks), take into account the importance of fishery resources to fishing communities by utilizing economic and social data that meet the requirements of paragraph (2), in order to (A) provide for the sustained participation of such communities, and (B) to the extent practicable, minimize adverse economic impacts on such communities” (National Standard 8 (Section 301(a)(8))). MSA 109-479 outlines provisions for rebuilding in a time period as short as possible while taking into account, among other issues, “the needs of fishing communities”. The Ninth Circuit has indicated this leaves managers “some leeway to avoid disastrous short-term consequences for fishing communities”.

### **History**

#### **Consideration of Secretarial Amendment 1**

Based on the [2009 rebuilding analysis](#), the Council had previously recommended a revised rebuilding plan for yelloweye rockfish in June 2010. This was ultimately disapproved by NMFS, as they concluded the findings from the economic analysis of the needs of the fishing communities were not sufficient to support the Council’s decision on revisions to the rebuilding plan. Secretarial Amendment 1 specified the current rebuilding plan.

Based on the litigation that resulted in Secretarial Amendment 1:

“any changes to the rebuilding plan will need to address why circumstances have changed such that a change to the current default harvest control rule is now warranted. Improved stock status is not sufficient to support a higher harvest rate. Rather, the record must show why the new rebuilding plan selects a target time for rebuilding ( $T_{\text{target}}$ ) that is ‘as short as possible’ while giving consideration to ‘the status and biology of the overfished species and the needs of the fishing communities’” ([Agenda Item H.7.a., Supplemental NMFS Report 2, March 2018](#)).

As described above in the overview of the action, the Council chose three alternatives (Table 1) provided in the [2017 yelloweye rebuilding analysis](#), which progressively adds one year to the projected median time to rebuild, while also providing an additional 9-10 mt to the 2019-2020 ACLs. NMFS has advised the Council that no additional analysis is needed beyond what has already been provided in the draft Environmental Assessment (EA) if they choose the No Action Alternative. However, if the Council chooses to revise the rebuilding plan, additional analysis will be needed to satisfy the requirements of the MSA outlined above. The GMT highlights some of the key points for the Council to consider when evaluating the yelloweye rockfish ACL alternatives against these requirements below.

### **Fishery Management**

Yelloweye rockfish was declared overfished in 2002. Since that time, most groundfish sectors have been managed very conservatively to ensure that the sector-specific harvest guidelines (HGs), allocations, and overall ACL are not exceeded. These low ACLs during the rebuilding timeframe have resulted in considerable negative economic and social impacts to all groundfish fisheries except the at-sea whiting sector.

Even with conservative management measures in place, and the ACLs projected to be under-attained, the Council and state management agencies have had to take inseason actions to further restrict or even close fisheries when sector-specific HGs were reached or exceeded. In the last ten years, attainment of specified optimum yields (OYs)/ACLs for yelloweye rockfish has been on average 57.6 percent and ranged from 47.4 to 82.6 percent. Even with low attainments of the ACL, the Council has taken inseason actions in six out of the last ten years, significantly impacting communities.

**Table 2. Annual yelloweye rockfish overfishing limit (OFL), ABC, ACL, total mortality and inseason actions taken to reduce impacts to yelloweye rockfish to stay within sector-specific HGs.**

| Year | OFL (mt) | ABC (mt) | ACL/OY (mt) | Total Mortality (mt) | Mortality % of ACL | Comments on inseason actions  |
|------|----------|----------|-------------|----------------------|--------------------|---|
| 2007 | N/A      | 26       | 23          | 19                   | 82.6%              | *CA rec north of Pigeon Point closed Oct. 1   |
| 2008 | N/A      | 26       | 20          | 12                   | 60.0%              | *OR rec fishery restricted to inside 20 fm, bag limit reduced July 7-Sept. 7  |
| 2009 | N/A      | 31       | 17          | 11                   | 64.7%              |   |
| 2010 | N/A      | 32       | 14          | 8                    | 57.1%              | *OR rec fishery restricted to inside 20 fm July 24 – Dec. 31  |
| 2011 | 48       | 46       | 17          | 9                    | 52.9%              | *OR rec fishery restricted to inside 20 fm July 21-Sept. 30   |
| 2012 | 48       | 46       | 17          | 12                   | 70.6%              | *WA rec fishery closed in the north coast management area (management areas 3 and 4) after Labor Day due to attainment of WA yelloweye HG.  |
| 2013 | 51       | 43       | 18          | 11                   | 61.1%              |   |
| 2014 | 51       | 43       | 18          | 9                    | 50.0%              |   |
| 2015 | 52       | 43       | 18          | 12                   | 66.7%              |   |
| 2016 | 52       | 43       | 19          | 9                    | 47.4%              | *OR rec fishery restricted to inside of 20 fm July 15-Sept. 30  |
| 2017 | 57       | 47       | 20          | Not yet available    | Not yet available  | *OR rec fishery closed Sept. 17 due to attainment of YE HG, among other species, reopened outside of 40 fm with longleader gear only on Oct 1.<br>*CA rec fishery restricted to shallower depths north of Pt. Conception on Oct. 16 |

The GMT provides information below on several factors, including the 2017 stock assessment results, the needs of fishing communities, and workload trade-offs, for the Council to consider when making their decision.

## **New Information**

### **Stock Assessment Update and Conservation Concern**

Alternative 1 would add one year to the projected median time to rebuild under the No Action alternative, and add 10 mt to the 2019-2020 ACLs; Alternative 2 would add two years to the projected median time to rebuild and add 19 mt to the 2019-2020 ACLs.

These rebuilding times are based on an assumed steepness prior (0.718) that is much more productive than the steepness that had been estimated in the 2011 yelloweye rockfish assessment (0.441). Sensitivity analyses of lower steepness values show that the stock could take decades longer to rebuild than projected under the base case scenario, regardless of the ACL alternative selected. However, yelloweye rockfish will be frequently re-assessed within the next fifty years, so any deviations from the projected rebuilding trajectory are likely to be detected.

Additionally, projected rebuilding times are based on the assumption that the full ACLs are taken every year, while actual rebuilding times will depend upon actual removals. Therefore, the Council could select Alternative 1 or 2 and still meet the faster rebuilding times associated with No Action by developing management measures that catch less than the full ACL. Nonetheless, the GMT notes that the MSA requirements are based on the ACL.

### **Needs of Fishing Communities**

When considering a change to the rebuilding plan, the Council must rebuild in a time period as short as possible, while taking into account the needs of fishing communities. In the seven years since the Secretarial Amendment 1 revision to the rebuilding plan was implemented, the needs of many West Coast communities impacted by access to the yelloweye rockfish resources have changed substantially, as shown in Table 3.

**Table 3. Overview of Area/Fishery Needs for Expanded Access to Yelloweye, and Potential Benefits of the action alternatives.**

| <b>State/Community</b>   | <b>Fishery</b>                          | <b>Need</b>  | <b>Potential Benefits</b>  |
|--------------------------|---|--|--|
| California               | Recreational                            | Recent poor salmon seasons have shifted effort into the groundfish fishery. In addition, low black rockfish ACLs have begun to restrict fishing opportunities in the nearshore.  | Access to additional yelloweye rockfish could allow more liberal depth restrictions, which would take some pressure off of black rockfish and other nearshore species.   |
| Oregon                   | Recreational                            | Recent poor salmon seasons have shifted effort into the groundfish fishery, especially when tuna opportunities are lacking. At the same time, low black rockfish ACLs have begun to restrict fishing opportunities in the nearshore areas that are open.                 | Access to additional yelloweye rockfish could allow more liberal depth restrictions, which would take some pressure off of black rockfish and other nearshore species. It could also allow additional opportunities for underutilized species that live in similar habitats to yelloweye rockfish.       |
| Washington               | Recreational                            | Reduced HGs for black rockfish in 2017 resulted in closure of a portion of the recreational season and put additional pressure on nearshore species. Poor salmon seasons exacerbated pressure on bottomfish fisheries.   | Additional yelloweye rockfish could provide access to mid-water species, such as yellowtail and widow rockfish, and lingcod that would not otherwise be available under lower yelloweye ACLs.  |
| North of 40° 10' N. lat. | Salmon Troll                            | Poor salmon seasons led to low Chinook salmon landing limits when open. Current incidental lingcod limits are based on a ratio to Chinook salmon, so low Chinook salmon limits result in low number of lingcod allowed to be landing.                                    | Additional yelloweye rockfish could allow more liberal lingcod limits on salmon troll trips, which would offset some of the losses from decreased Chinook salmon fishing opportunities.  |
| North of 40° 10' N. lat. | Sardine, pink shrimp, tuna, and halibut | Many of the important West Coast fisheries, such as salmon, sardine, and tuna, have been closed or in sharp decline in recent years. The pink shrimp sector has also recently shown volatility, and the Pacific Halibut fishery will likely seen declines in the future. | Increased yelloweye allocations could provide high enough lingcod limits to make trips profitable and help absorb losses from other West Coast fisheries.<br><br>Underutilized lingcod has the potential to provide up to \$12 million in ex-vessel revenue, \$21 million in income, and 1,450 new jobs. |

| State/Community                | Fishery               | Need   | Potential Benefits  |
|--------------------------------|-----------------------|--|---|
|                                |                       | <p>To offset lost revenue, some fishermen have shown increased interest in Open Access (OA) lingcod fisheries, as one of the few alternative opportunities.</p> <p>However, the current OA lingcod trip limits that are restricted by yelloweye rockfish are too low to cover operational expenses.</p> <p>OA lingcod fishermen typically also participate in state limited entry fisheries, where they catch species unavailable to non-groundfish fishery participants, in order to be profitable.</p> | <p>Alt 1 or 2 would likely not provide enough additional yelloweye rockfish to fully achieve that potential, but the extra 10 or 19 mt could help communities attain a large proportion of prospective increases.</p>   |
| <p>North of 40° 10' N lat.</p> | <p>Shorebased IFQ</p> | <p>There are concerns that gear switching would reduce the amount of sablefish available to the trawl fishery, which in turn hinders the ability to catch healthy co-occurring stocks.</p> <p>Limited Entry Fixed Gear (LEFG) and OA lingcod is of similar value in terms of price and potential total value to sablefish.</p>   | <p>Additional yelloweye could provide higher LEFG and OA trip limits of lingcod that could reduce the incentive for entering the IFQ program with fixed gear. Unlike in the IFQ sector, participants do not pay lease fees for LEFG and OA lingcod.</p> <p>Underutilized lingcod has the potential to provide up to 12 million in ex-vessel revenue, 21 million in income, and 1,440 new jobs.</p> <p>There would likely not be enough yelloweye rockfish with alt 1 to catch all that, but an extra 10 mt could allow for large portion.</p> |

### ***Recreational Fisheries***

Yelloweye rockfish management has led to several closures in recreational sectors since 2007 (**Table 3**), resulting in negative economic impacts on coastal communities in Washington, Oregon, and California. Additionally, as opportunities to fish for salmon have been reduced, communities have increasingly relied on groundfish as a replacement. With more effort in the groundfish fisheries, it would be increasingly beneficial to provide stable recreational opportunities. In public testimony at state hearings and Council meetings, recreationally-focused communities (e.g., Neah Bay, La Push, Garibaldi, Brookings, Winchester Bay, and Coos Bay, as well as California communities north of Pt. Conception) have reported negative economic impacts from closures, with charter operations, bait and tackle shops, marine fuel, and service industry businesses laying off staff and, in some cases, closing prematurely.

As a case study, Winchester Bay, Oregon was particularly devastated when coastwide depth restrictions (shallower than 40 fathoms), that were implemented to limit the catch of yelloweye rockfish, closed off all of their available reef (there is no reef structure shoreward of 40 fathoms). Prior to the depth restriction, there were 12-15 active charter vessels operating out of Winchester Bay. Since 2006, there has not been a charter bottomfish trip out of Winchester Bay. Prior to 2006, in most years there were several hundred private bottomfish trips; since 2006, there have been less than 100 trips annually. Between 2001 and 2006, bottomfish angler trips contributed \$8,000 to \$66,000 of income and 0.4 to 1.2 jobs to Winchester Bay, which has a population less than 400. Since 2007, bottomfish trips have contributed less than \$3,000 of income and 0 jobs to Winchester Bay.

In Washington, management measures considered for recreational fisheries for 2019 - 2020 resulted in increased projected estimates of angler trips. In recent bienniums, yelloweye HGs have increased, but only slightly, and not enough to allow for consideration of liberalizing depth restrictions. Alternative 1 and 2 yelloweye ACLs considered for 2019 and 2020 are sufficient to consider access to midwater species, such as yellowtail and widow rockfish, and lingcod, driving an increase in expected angler trips. The potential increase in Washington recreational effort provided by Alternatives 1 and 2 is driven by access to more yelloweye, which could allow for liberalization of depth restrictions. We assumed that this access would increase angler effort, as interest in deep water lingcod fishing has increased in recent years. Additional angler trips could increase fishing opportunity for Washington stakeholders, as well as provide income to coastal communities that are highly dependent on fishing, such as Neah Bay and La Push. For example, estimated angler trips in the north coast subarea, which includes the ports of Neah Bay and La Push would increase from 7,673 under No Action to 7,858 under Alternative 1 or to 8,659 under Alternative 2.

In Oregon, Alternative 1 would allow for fewer months with depth restrictions and Alternative 2 would allow for year round all depth fishing, additional lingcod opportunities, and/or reduce restrictions on groundfish retention during all-depth halibut trips. This could restore opportunity for Winchester Bay, and other Oregon ports that have been negatively impacted due to seasonal depth restrictions that were put in place to minimize impacts to yelloweye rockfish. One of the greatest benefits come from providing a hedge against closure of the nearshore recreational fisheries, as occurred in 2017. Since the rebuilding plan was last revised, there has been a near doubling of recreational bottomfish angler trips due in large part to spillover from poor and closed salmon seasons and the overall economy rebounding. This recent pulse of growth has caused great

strain to quotas of nearshore species such as black rockfish and cabezon, and resulted in overages in 2017 that led to complete closure of the fishery in September. Higher yelloweye rockfish allocations could allow deeper fishing and alleviate pressure on the more nearshore stock, which may lessen the chances of having to take additional restrictions or cause a complete closure.

In California, proposed management measures range from limited season structures and depths under No Action to a year round fishery at all depths under Alternatives 1 and 2. North of Pt. Conception, where yelloweye is most commonly encountered, estimated angler trips would increase from 759,622 under No Action to 824,701 under Alternatives 1 and 2. Recreational fishery economic impacts north of Pt. Conception are \$40.1 million under No Action and increase to \$50.5 million under Alternatives 1 and 2 (Table 4-14 [Agenda Item F.2., Attachment 1, April 2018](#)).

Coastwide, limited access and closures have diminished the infrastructure supporting recreational fisheries to the point that many have ceased to engage in these fisheries. Charter operators, bait and tackle shops, ice plants, hotels, and restaurants, for example, all depend on a minimum level of business throughout the year to cover operating costs, and a higher level to reinvest in capital improvements and maintenance. Constituents report that many of these types of supporting businesses have shut down with recent fishery closures. Even when the resource opportunity is expanded after rebuilding, closed businesses are unlikely to reopen, as individuals will have found alternative employment opportunities. The additional 10 mt under Alternative 1 is projected to contribute to millions of dollars in additional income to recreational-oriented businesses compared to No Action (Table 4-15 in [Agenda Item F.2, Attachment 1](#)). It does not appear from available analysis that Alternative 2 is projected to provide a significant level of benefits beyond those provided under Alternative 1 for the recreational sector, with the expansion of opportunity largely provided for in Alternative 1 and existence of other constraints on fishery effort. This addition over No Action would likely buoy the sector, as recreational effort shifts away from previously popular salmon trips to lingcod and rockfish targeting substitutes.

### ***Commercial Fisheries***

As noted in Table 3, one of the main economic benefits associated with either ACL alternative could be increased utilization of non-trawl allocations of northern lingcod (north of 40° 10' N. lat.) and midwater rockfishes (e.g., canary, widow, and yellowtail rockfishes). Access to these stocks is currently limited by non-trawl rockfish conservation areas (RCAs) and low trip limits that are designed to keep yelloweye rockfish bycatch within low allocations.

The liberalization of yelloweye rockfish constraints that would allow more access to these stocks has the economic potential to add up to \$20.6 million in ex-vessel revenue, \$35.6 million in income, and 2,203 new jobs (Table 4). To put this in perspective, the potential value of “uncaught non-trawl lingcod and mid-water rockfish” that is constrained by yelloweye rockfish ACL is on par with the entire value of the 2017 coastwide limited entry fixed gear (LEFG) and open access (OA) sablefish fishery, and almost of the same value as the 2017 shoreside whiting fishery (Table 5).

**Table 4. Current value of major non-trawl fisheries constrained by yelloweye rockfish and potential value of the unused allocations.**

| Species or Group   | 2019 projection |                      |            | Unused 2019 allocation (mt) b/ | Value of unused allocation |            |       |
|--------------------|-----------------|----------------------|------------|--------------------------------|----------------------------|------------|-------|
|                    | mt              | \$ Ex-vessel revenue | \$ per lb. |                                | \$ Ex-vessel               | \$ Income  | Jobs  |
| Lingcod north      | 158 a/          | 905,659              | 2.60       | 2,102 b/                       | 12,048,703                 | 21,004,657 | 1,447 |
| Mid-water rockfish | 18              | 88,280               | 2.22       | 1,745 c/                       | 8,532,476                  | 14,639,674 | 756   |
| Total              | 176             | 993,939              |            | 3,847                          | 20,581,180                 | 35,644,332 | 2,203 |

a/ Assuming Council adopts most aggressive Option 3 for LEFG and OA lingcod trip limits

b/ 2,520 non-trawl mt allocation - 260 mt rec. - 158 mt already taken for non-IFQ FG

c/ 2,017 mt allocation - 253 mt recreational - 18 mt already taken with non-IFQ FG

**Table 5. Comparison of the ex-vessel revenue of “uncaught fixed gear lingcod and midwater rockfish” that is constrained by yelloweye rockfish and revenue of other major coastwide non-tribal fisheries.**

| Fishery                                     | Ex-vessel revenue (millions of \$) |
|---|------------------------------------|
| Albacore tuna                               | 34.9                               |
| Sablefish (all gears)                       | 30.5                               |
| Whiting (shoreside)                         | 23.8                               |
| Chinook salmon                              | 23.0                               |
| "Uncaught FG lingcod and midwater rockfish" | 20.6                               |
| Pink shrimp                                 | 17.5                               |
| FG sablefish (non-IFQ)                      | 16.9                               |
| Pacific halibut                             | 6.5                                |
| Nearshore fishery                           | 4.0                                |

It is difficult to determine how much yelloweye rockfish biomass would be needed to fully access these underutilized non-trawl stocks, but an additional 10 mt, beyond what is available in the No Action Alternative, would certainly provide greater opportunity. A rough projection could be an additional 1,650 mt of lingcod with Alternative 1 if all 10 mt of yelloweye rockfish was allocated to the LEFG and OA sectors, which would be most of the potential lingcod value. Full attainment could be possible with Alternative 2. These projections are based on trip limit models that project 66 mt of lingcod per 0.4 mt of additional yelloweye rockfish.

In California, commercially important rockfish species (chilipepper, vermilion, and other shelf and nearshore rockfish species) could provide substantial economic relief to communities that are currently inaccessible due to the RCA depth restrictions in place to protect yelloweye. Additional yelloweye rockfish could allow for liberalization of the RCA, providing a fishing opportunity that historically supported local coastal communities.

In summary, an extra 10 mt of yelloweye rockfish could provide considerable economic benefits and fulfill an urgent need to restore opportunity for participants of non-groundfish fisheries that were closed or greatly reduced since the rebuilding plan was last revised. The additional 19 mt available under Alternative 2 would provide even greater relief.

### ***Communities***

In addition to the community-level impacts of fishery restrictions and closures that occur when a species is declared overfished, decades of rebuilding have undoubtedly impacted fishery-dependent communities. Available recent data from the Five-Year Review Report (which is focused on the trawl program) indicates decreasing engagement ([Table 3-120, pg. 3-258](#)) paired with medium-high and high vulnerability in many of these communities. This is due to the combination of these impacts and demographic trends, particularly in rural and gentrifying coastal communities ([Tables 3-121 and 122, pg. 3-262](#)).

As access to the resource was limited during the yelloweye rockfish rebuilding period (2002-present), supporting community infrastructure and product markets diminished or disappeared. The Five-Year Review Report discussed the challenges for processors in maintaining markets during extended rebuilding periods:

“...global markets influence the demand for groundfish products. The [decades] long rebuilding periods for the overfished species in this fishery may have caused a loss of historical markets... During this time, markets have adjusted through substitution with other species, foreign imports (e.g., tilapia or Canadian rockfish), or even other forms of protein” ([Five Year Review, pg. 3-145](#)).

Public testimony during the Five-Year Review indicated that due to the long lead time needed for developing new commercial markets after a species has rebuilt, benefits to communities do not accrue immediately, and may take years (see many of the [Five-Year Review Community Hearing](#) summaries). Even as markets rebuild, short-term benefits to communities are uncertain in areas most impacted by consolidation, and likely to be delayed, gradual, and uneven across geographic areas.

With both commercial and recreational fisheries struggling under shifting conservation and economic constraints, highly vulnerable and resource-dependent communities may depend on gradual liberalization of management measures prior to full rebuilding to survive in the short-term.

## **Workload Considerations**

### **Evaluation of ACL Alternatives**

As the Council evaluates the ACL alternatives for yelloweye rockfish, it is important to not only consider the conservation risks and needs of fishing communities, but also the workload that would be associated with supporting and reviewing the decision. The GMT has been informed by NMFS staff that if the Council chooses Alternatives 1 or 2, then the analysis supporting a revision to the rebuilding plan will need to be robust and provide a detailed justification to demonstrate the changes (including the current needs of fishing communities) that have occurred since the last revision of the rebuilding analysis. Alternatives 1 and 2 would provide an additional 10-19 mt

above the No Action levels with only an additional one or two years in the median time to rebuild. No Action would provide an additional nine metric tons compared to 2017 ACL levels. This increase could provide some limited liberalizations of management measures in specific sectors without a revision to the rebuilding plan.

### **Prioritization**

The GMT recognizes that the analysis justifying a revision to the yelloweye rebuilding plan is anticipated to be a heavy workload item for some GMT members, NMFS, NMFS General Counsel, and Council staff. This will likely delay progress on some current rulemakings and shift GMT staff time away from the current workload, which may limit the number of new management measures (Agenda Item F.5. at this meeting) that will be able to be completed as part of the 2019-2020 process, while still having a high probability of meeting January 1, 2019. Therefore, the Council should consider the potential implications of workload and trade-offs on which new management measures are able to be included for 2019-2020 or on the possibility of a March 1, 2019 or later implementation date for a larger biennial harvest specifications and management measures package. At the same time, the GMT notes that low allocations of yelloweye rockfish have caused considerable inseason workload issues in the past, for the states and NMFS, that could be alleviated in the future with higher allocations.

### **Recommendations**

The GMT recommends:

1. The Council adopt the default HCR for all species except for lingcod, California scorpionfish south of 34° 27' N. lat., and yelloweye rockfish as FPA for 2019-2020 as shown in Table 1 of [Agenda Item F.2, Attachment 2, April 2018](#).
2. The Council adopt Alternative 1 in Table 2 of [Agenda Item F.2, Attachment 2, April 2018](#) as FPA for lingcod.
3. The Council adopt Alternative 1 in Table 2 of [Agenda Item F.2, Attachment 2, April 2018](#) as FPA for California scorpionfish south of 34° 27' N. lat.

PFMC

04/08/18