

## GROUND FISH MANAGEMENT TEAM REPORT ON 2020 HARVEST SPECIFICATIONS FOR SHORTBELLY ROCKFISH

The Groundfish Management Team (GMT) reviewed the Regulatory Impact Review / Initial Regulatory Flexibility Analysis (RIR/IRFA; [Agenda Item H.6, Attachment 1, September 2019](#)), received an overview from Mr. John DeVore of Pacific Fishery Management Council (Council) staff, reviewed some of the scientific literature on shortbelly rockfish, and provides comments below.

### **Background**

An extensive overview of the shortbelly rockfish issue was provided in the GMT's June 2019 inseason report ([Agenda Item I.7.a, Supplemental GMT Report 1, June 2019](#)). That report describes how the species are primarily caught incidentally in mid-water fisheries, and to a lesser extent in shrimp and groundfish bottom trawl fisheries.

High bycatch of shortbelly rockfish in the whiting sectors in 2018 (508 mt) and 2019 (544 mt as of September 15, 2019) resulted in the fishery exceeding the annual catch limits (ACLs) in both years. In the absence of intermediary mitigation measures, a future shortbelly rockfish overage could result in early closure of the whiting fishery, causing drastic economic consequences for vessels, processors, and communities. This issue has been discussed at length by industry and in analyses for recent actions on several species, such as darkblotched, Pacific ocean perch, and most recently, salmon (see [Agenda Item H.4, Attachment 1](#) Table 3.7 for closure impacts by month). In recent years, industry self-regulation through the co-operative move-along rules and hotspot closures for other species were largely effective at minimizing bycatch for species of concern. These preventative actions increase the variable operating costs for catcher vessels and at-sea processors and can result in trade-offs when multiple species must be avoided. For example, the fishery diligently works to avoid species such as Chinook salmon, sablefish, darkblotched, widow, and roughey rockfish. The current low ACL for shortbelly rockfish adds another spinning plate to this balancing act.

The increased bycatch described above provides anecdotal evidence of an increased abundance of shortbelly rockfish off Oregon and Washington. There is also empirical evidence, as we reported in June 2019, that several atypically high recruitment events occurred between 2009 and 2017 off central California. It is highly likely that members of these large cohorts migrated north and began interacting with the whiting fishery, perhaps due to warming waters in the north. Although shortbelly rockfish stock size has not been formally assessed in many years, the recent high recruitment events suggest that the population is thriving. Therefore, even if shortbelly rockfish bycatch is relatively high, enough individuals will likely remain to form a robust forage base.

An initial goal of setting low ACL for shortbelly rockfish was to discourage potential emergence of a directed fishery on this species. At this time, however, the GMT does not feel that measures to prevent a targeted fishery from developing are necessary. Industry has indicated that shortbelly rockfish is not currently marketable and does not expect it to become so in the near future. The low ex-vessel price of \$0.01-\$0.03 per pound in recent years supports industry reports that the fish

is primarily used as fishmeal or discarded at-sea. The median West Coast limited entry trawl permitted vessel has variable operating costs of \$0.46 per pound, according to the most recent [Economic Data Collection Report](#), and is unlikely to pursue a targeting strategy for such a low value species, as the revenues would be less than typical operating costs.

### **Purpose and need**

The Council must establish a purpose and need, such as proposed in the RIR/IRFA ([Agenda Item H.6, Attachment 1, September 2019](#)). Given the background above, the GMT proposes the following alternate alternative purpose and need:

*The purpose of this action is to re-examine the ACL for shortbelly rockfish given recent high bycatch in groundfish trawl sectors.*

*This action is needed to avoid closures in 2020 for the groundfish trawl fishery, which would result in negative socioeconomic impacts to West Coast groundfish fisheries and fishing communities, while still protecting shortbelly rockfish as an important forage resource for the ecosystem.*

### **ACL alternatives for 2020**

The Council must also select a range of alternatives (ROA), and its preliminary preferred alternative (PPA) for the 2020 harvest specifications for shortbelly rockfish. The GMT will also be discussing options for shortbelly rockfish beyond 2020 under Agenda Item H.8. at this meeting. The selection of a new 2020 shortbelly rockfish harvest specification is ultimately a policy decision, given that the ACLs were intentionally set well below the constant overfishing limit (OFL) and acceptable biological catch (ABC) in order to recognize and protect their value as a forage resource. In selecting a PPA, the Council should consider the impacts to shortbelly rockfish and the larger ecosystem, potential economic consequences, and conflicting industry priorities for avoiding other bycatch species.

Under the No Action Alternative for shortbelly rockfish in 2020, the Council would take no action to address the ACL overages from 2018 and 2019. Instead, the Council would maintain the current 500 mt ACL, an OFL of 6,950 mt, and an ABC of 5,789 mt (P\* of 0.40). Under No Action, the GMT concludes that there would be a high risk of exceeding the 2020 ACL as ~40 percent of simulated bootstrap seasons exceeded 500 mt, with some simulations as high as 1,000 mt ([Agenda Item I.7.a, Supplemental GMT Report 1, June 2019](#)), and ocean conditions are currently relatively warm in the Pacific Northwest. The GMT does not have any updates to these projections from June, as the at-sea whiting sector has been in Alaska since then, and bycatch from the shoreside whiting sector has been accumulating as earlier predicted. No Action would provide the greatest protections to shortbelly rockfish for forage purposes, but would likely be counter to the goal to not constrain fisheries.

Under Alternative 1, the GMT's Sub-option C, a "middle-ground" ACL of a currently undefined X mt or an ACL range could be considered ([Agenda Item H.6, Attachment 1, September 2019](#)) and would have to be specified in this action. Although the size of a middle-ground ACL would be a policy decision best addressed by the Council, the GMT suggests that 1,000 mt be a minimum starting point for discussion, to account for the maximum estimated projection under high bycatch

scenarios. Oceana also proposes a 1,000 mt ACL based on the GMT's high-end projection ([Agenda Item H.6, H.8 Oceana Public Comment, September 2019](#)) (Alternative 1, Sub-option A). Included in the Oceana proposal is a 500 mt annual catch target (ACT) that would trigger mitigation measures (e.g. a groundfish related bycatch reduction area); however, the GMT discussed and believes that managing this ACT would be difficult given that the few mitigation measures available would likely be ineffective due to the broad spatial extent of shortbelly bycatch. Given the tight turnaround on implementation, there is not sufficient time to analyze or implement more targeted mitigation measures for shortbelly rockfish in this action.

It is important to stress that any projections of shortbelly rockfish will be highly speculative, as the high bycatch since 2017 is unprecedented and the contributing factors remain unclear. For that reason, the Groundfish Advisory Sub-panel (GAP) ([Agenda Item H.6.a, Supplemental GAP Report 1](#)) recommends an ACL of 3,000 mt (Alternative 2, Sub-option B) to provide additional cushion to Oceana's proposal of a 1,000 mt ACL (Alternative 1, Sub-option A). Although the whiting co-operatives report being highly watchful since first recognizing this issue in June, both industry and the GMT recognize that avoiding shortbelly rockfish bycatch is difficult as the species occurs throughout the coast in 100-200 fathoms depths, which are regularly fished for whiting ([Agenda Item I.7.a, Supplemental GMT Report 1, June 2019](#)).

Under Alternative 2, the ACL would be set equal to ABC, which is the conservation reference point for the shortbelly rockfish stocks. The original proposal was to set the ACL equal to the 2020 ABC of 5,789 mt (Alternative 2, Sub-option A). However, both the GMT and GAP recommend a second approach where the ACL would equal the proposed 2021-22 ABC of 4,184 mt (Alternative 2, Sub-option B). Since 4,184 mt will likely be the constant ABC for 2021-22 and beyond, this could be considered both a short-term solution for 2020 and a long-term solution for consideration under Agenda Item H.8 and would provide fishery stability. Alternative 2 would meet sustainable fishing mortality objectives for the shortbelly rockfish stock by staying at or under the ABC. However, this alternative could reduce the incentive for mid-water trawlers to voluntarily avoid bycatch, which are not managed with IFQ or at-sea set-asides.

**The GMT recommends the Council select a PPA other than No Action for the 2020 shortbelly rockfish ACL from the alternatives in Table 1.** The increase of the ACL to a minimum of 1,000 mt will help ensure that shortbelly rockfish is protected while providing enough catch to avoid fishery closure based on GMT projections. By all indications, the shortbelly rockfish stock appears to be thriving, and it is biologically unlikely that even relatively high bycatch (e.g., Alternative 2) will either appreciably harm the stock or induce a scarcity of prey to species that forage on shortbelly rockfish. The GMT, however, does not provide a recommendation among Alternatives 1 and 2, as it is a policy decision.

**Table 1. The GMT’s updated range of alternatives for the shortbelly rockfish ACL. For all options, the OFL would be 6,950 mt, and the ABC would be 5,789 mt.**

<b>Alternative</b>	<b>Sub-option</b>	<b>Comment</b>
No Action	500 mt ACL	Status quo ACL for 2019-2020
Alternative 1	(A) 1,000 mt ACL (w/ 500 mt ACT)	Oceana proposal based on 1,000 mt high GMT projection. Lower ACT was proposed to trigger mitigation, but the GMT notes there are not any effective mitigation options currently available
	(B) 3,000 mt ACL	GAP proposal to buffer the GMT high projection
	(C) Council specifies a different ACL of X mt	Must be between 500 mt (No Action) and less than the 2020 ABC (Alternative 2, Sub-option 1)
Alternative 2	(A) 5,789 mt ACL	2020 ABC with the old sigma
	(B) 4,184 mt ACL	GMT and GAP both propose this modification to the reduced 2021-22 ABC as that will be the long-term and constant ABC for 2021 and beyond

PFMC  
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