The Groundfish Advisory Subpanel (GAP) was briefed by Mr. John DeVore on 2020 harvest specifications for cowcod south of 40° 10’ N. lat. and shortbelly rockfish. The GAP recommends the following alternatives.

**Cowcod**

The GAP supports the trawl industry’s request to increase the 2020 annual vessel limit for cowcod south of 40° 10’ N., and recommends the Council select Alternative 1, which would eliminate the 6 mt cowcod annual catch target for 2020 and manage fisheries to stay within the 10 mt annual catch limit (ACL). Alternative 1 would also reduce the research set-aside to 1 mt, and establish a 2020 vessel limit of 1,264 pounds for the shoreside individual fishing quota sector.

**Shortbelly Rockfish**

The GAP recommends the Council select Alternative 1, which would set the 2020 shortbelly ACL at 3,000 mt. Vessel operators are not targeting shortbelly rockfish, and have many incentives to avoid it, as described below, but the GAP finds the status quo alternative of a 500 mt ACL and the Oceana proposal of setting the 2020 ACL to 1,000 mt (Agenda Item H.4.b, Public Comment, November 2019) to be too risky for the 2020 fishery. The GAP heard from members of the Groundfish Management Team and Council staff that the total shortbelly mortality for 2019 is expected to reach between 700-800 mt. The species now appears to be abundant coastwide, and it is unknown whether the shortbelly abundance could increase in 2020. If 2020 bycatch increases even slightly from 2019 levels, GAP members expressed concern about the potential for fishery closures if the ACL is set too low.

Setting the ACL at 3,000 mt under Alternative 1 best meets the purpose and need statement to “review and adjust the ACL for shortbelly rockfish in 2020 to a level that will accommodate incidental bycatch of this stock given recent high bycatch in groundfish trawl fisheries, while continuing to minimize bycatch and discourage development of a targeted fishery for shortbelly rockfish.” The 3,000 mt ACL under the Council’s preliminary preferred alternative would be precautionary, since it is lower than Alternative 2 where the ACL would be set equal to the 2020 acceptable biological catch (4,184mt), and would account for future uncertainty where there could be continued expansion of the shortbelly range and abundance in more northerly areas than were considered in the 2007 stock assessment (Field et al 2007).

Shortbelly is a difficult species for vessel operators to differentiate on their sonar (as described and pictured in June 2019 public comment, Agenda Item 1.7.b, Supplemental REVISED Public Presentation 1, June 2019), and an ACL that is set too low could create adverse impacts for other species of concern, particularly Chinook. For example, if the groundfish fisheries were to approach
the ACL in 2020, shortbelly would become the primary species for vessel operators to avoid, since reaching the ACL would close fisheries. This may create a situation where vessel operators are avoiding shortbelly and fishing in other areas with higher bycatch of species of greater concern. The GAP recommends the Council select an ACL that is higher than expected bycatch so as to not create negative impacts on other species.

An ACL that is set too low would also create adverse impacts for vessel operators and processors in all sectors of groundfish fisheries with shortbelly bycatch. Industry has many incentives to avoid shortbelly rockfish, primarily because there is no market for this species, and it generally results in a loss of income and time to vessel operators and processors. In the shoreside whiting fishery, shortbelly bycatch that is mixed in with whiting in a catcher vessel’s fish hold degrades the quality of the delivered whiting, and takes up space in the fish hold that fishermen would much rather be filled with whiting. At the dock, shoreside processors must unload, sort, and separate the shortbelly into totes that could otherwise be used for marketable product, and truck the shortbelly to fishmeal plants. In the at-sea whiting fishery, shortbelly bycatch must be separated on the sorting line. High bycatch requires the factory to minimize speed on the sorting belt, and send more processors to assist with sorting, which slows down the factory operations.

In response to Oceana’s concerns, the GAP also wishes to point out the forage value of any species modeled by fisheries population growth models is captured within the model itself. It is a major component of "natural mortality" \( M \). This natural mortality parameter is derived empirically, that is, on the basis of data. Thus, any reduction of the shortbelly ACL from the acceptable biological catch simply accrues as an additional buffer for uncertainty, providing predators with additional forage beyond mortality already accounted for in the stock assessment.

In conclusion, the GAP recommends the Council select their identified preferred alternatives with respect to both cowcod and shortbelly rockfish.