SUPPLEMENTAL JOINT INSEASON REPORT FROM THE
OREGON AND CALIFORNIA DEPARTMENTS OF FISH AND WILDLIFE

This inseason report was developed by state representatives from the Groundfish Management Team (GMT), but due to time constraints, had to be provided as a supplemental state report that has not been fully reviewed by the entire GMT.

This report also incorporates unofficial public requests and feedback from the Groundfish Advisory Sub-panel (GAP). Stakeholders were given open public briefings during morning delegation meetings, during a joint session with the GAP this morning, and with earlier briefings with GAP representatives from the non-trawl sectors. Furthermore, it is important that all the trip limits proposals are simply those that were being proposed for implementation in 2021-22, but would be fast tracked into 2019 for more immediate relief. Recall that these trip limit proposals have already been subject to extensive prior analysis that was publicly presented by the GMT to the Council and GAP at this meeting under Agenda Item G.6.; the GAP, GMT, and Council all supported the trip limit proposals as PPA see Action Item #14 and Appendix of Agenda Item G.6.a Supplemental GMT Report 2 April 2020) .

Only a select number of high priority trip limits are being proposed for earlier implementation in 2020 via the inseason process. These proposals were strategically selected to maximize benefits while taking into account workload constraints. In summary, these proposals have already been subject to extensive public review in line with the Council process. Other proposals that have not been subject to as much prior public feedback (e.g., non-trawl RCAs north of 40°10’ N. lat) were given more focus during analysis and joint discussions.

There are four main sections in the report:

(1) LEFG and OA trip limits north of 40°10’ N. lat.
(2) LEFG and OA trip south of 40°10’ N. lat.
(3) Non-trawl RCA minor modifications: 40°10’ - OR/WA border (46°16’)
(4) Non-trawl RCA minor modifications: south of 40°10’ N. lat.

Overarching benefits and goals of all proposals

ODFW and CDFW have received many public requests to adopt some of the trip limit and non-trawl RCA adjustments proposals being proposed for 2021-22 this year as well as additional non-trawl RCA adjustments via inseason (Agenda Item G.8.a Supplemental CDFW Report 1 April 2020). Many of the requests have been by fishermen who participate in other fisheries that are being disrupted by COVID-19. Requests have also been submitted by those who are experiencing a higher than normal demand for locally, sustainably caught fish as the public wants to keep seafood in their diet without going to restaurants. Depending on the geographic location the needs range from needing minor assistance to filling a complete void, or to assist in developing rapidly changing business models that are shifting to home delivery services, such as Community Supported Fishery (CSF) businesses.

The GMT will be submitting a supplemental inseason report at this meeting that describes the COVID-19 impacts in greater detail (Agenda Item G.9.a, Supplemental GMT Report 1, April 2020), but are summarized below. This includes commercial fishermen who are experiencing market loss such as crab and charter businesses that have had to close their party boat operations (i.e., sport fishing and sightseeing) due to not being able to maintain required social distancing standards. Higher OA trip limits could provide an economically viable option for displaced fishermen to switch to commercial fishing given there are costs associated with OA (e.g., VMS, commercial licenses, etc). As a reminder, access to new OA fishermen is mainly limited to federal waters given that more restrictive state limited entry nearshore permits are required which have limited availability for open transfer and can be expensive ($10K-25K).

The analysts note that some of the trip limit proposals may not have much benefit unless minor portions of the Non-trawl Rockfish Conservation Area (RCA) are reopened in 2020. This includes many of the proposals for healthy and under attained mid-water rockfishes (e.g., canary, shelf, yellowtail, and chilipepper rockfishes) that predominantly occur on the shelf in closed waters. As such, the report contains proposals to raise the trip limits for these stocks in conjunction with non-trawl RCA minor reopenings to maximize economic benefits. Making these changes together would provide the greatest benefit to fisheries, with smaller benefits realized if trip limits are increased without access to the non-trawl RCA, and would not cause negative impacts to yelloweye rockfish bycatch or other species of concern (e.g., salmon).

As per 660.600(C)(3)(i) of the Code of Federal Regulation it states:

> *….Depth-based management measures and closed areas may be used for the following economic objectives: To extend the fishing season; for the commercial fisheries, to minimize disruption of traditional fishing and marketing patterns; for the recreational fisheries, to spread the available catch over a large number of anglers; to discourage target fishing while allowing small incidental catches to be landed; and to allow small fisheries to operate outside the normal season.*

If these proposals are postponed to the June Council meeting, implementation of any adopted changes would not become effective until July (at the earliest) and would result in losing several months of needed opportunity. Current LEFG and OA participants would benefit from increases as soon as possible, and any delays would continue to put economic stress on displaced fishermen with limited portfolios (i.e. do not have additional federal or state limited entry permits) that either routinely or intermittently utilized the OA fishery to fulfill financial gaps.

None of the proposals have concerning impacts to target stocks, yelloweye rockfish, other bycatch species (e.g., salmon), and/or habitats. All proposals were designed to meet the regulatory standards for potential inseason adoption if recommended by the Council.

Section 1: LEFG and OA trip limits north of 40°10' N. lat.

The trip limits proposals to the north were strategically prioritized in order to provide the most economic benefits for participants throughout the entire area. The proposals to increase sablefish trip limits apply north of 36° N and benefit many fishermen in California, Oregon, and Washington. The other proposals are mainly about increasing opportunities north of 40°10' N. lat. in Northern California and Oregon. As the Council is aware, there is de minimis catches of non-sablefish slope species to the north of 40°10' N. lat. and Washington does not have a nearshore fishery per state rules.

The Oregon and Northern California nearshore fisheries have done relatively well in March 2020 following the COVID-2019 closures (Figure 1-1). This is further evidence that the new marketing campaigns are working well and that higher trip limits could provide immediate benefits for both current and displaced participants (e.g., charters or crab fishermen).

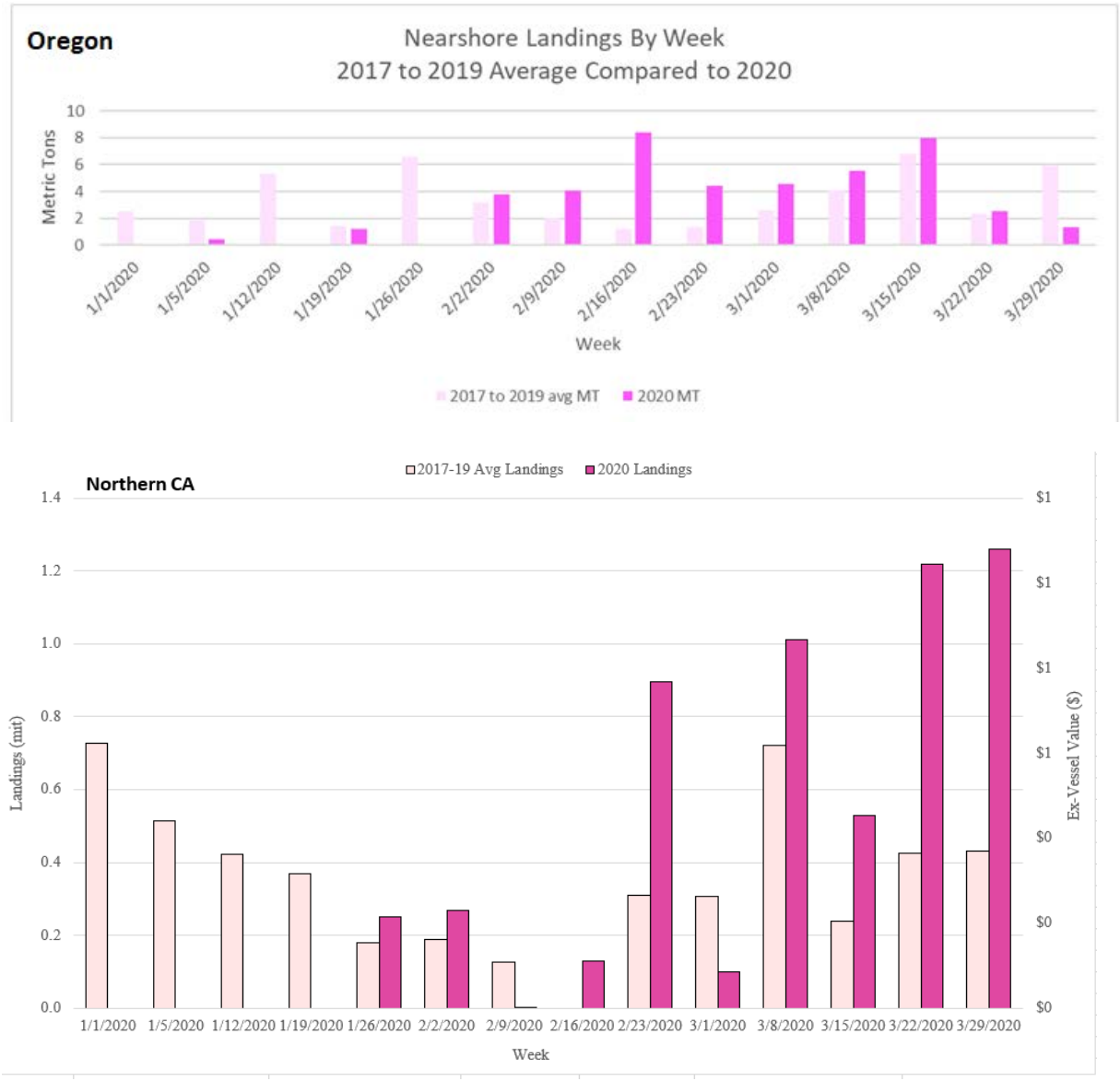

Figure 1-1. Comparisons of nearshore catches for Oregon and Northern California in 2019 and 2020 to evaluate potential impacts related to COVID-2019.

Sablefish daily trip limits - north of 36°

The status quo sablefish trip limits for 2020 were originally set in the 2019-20 biennium to achieve but not exceed the landing targets for both limited entry (LES) and open access (OAS). The same was true for the pre-season 2019 trip limits, but two inseason trip limits were adopted for OAS and one for LES given that landings were tracking 25-40 percent lower than initially projected. In

November 2019, the GMT projected that these inseason adjusted 2019 trip limits (see Table 1 from Agenda Item H.10.a, Supplemental GMT Report 1, November 2019) could cause considerable overages to the 2020 landings target if carried over into 2020: *"If prices increase in 2020, then the GMT projects that OAN could exceed their landings target by 25 percent and LEN by 10 percent under No Action final 2019 trip limits"*.

The Council therefore took action in November 2019 to reduce the 2020 trip limits to more precautionary trip limits that were the same as initially analyzed for the 2019-20 biennium (Option 1; Table 1-3). The project attainments when the 2020 trip limits were set inseason were 67.7-93.1 percent for OAN and 84.1-91.2 percent for LEN.

Members of the GAP are now requesting higher trip limits based on new analyst projections that the 2020 attainments could be 25-40% lower than originally projected when the limits were set. Landings were already tracking low due to lower than anticipated prices during period 1 and have started to track even lower now that there are COVID-2019 market disruptions that started in period 2. The analysts are projecting that ~$275,000 in sablefish allocations could be underutilized if trip limits are not increased in 2020. Raising the trip limits now will allow fishermen to take advantage of higher trip limits during prime summer weather conditions. Although COVID-2019 is expected to negatively impact prices and markets, fishermen are still finding markets and making deliveries even in recent weeks with restaurant closures (Figure 1-2). The analysts stress the projected future 2020 landings (dotted red line) will likely be at least 25-40 percent too high because the model has been continually overestimating even before the COVID-2019 issue.

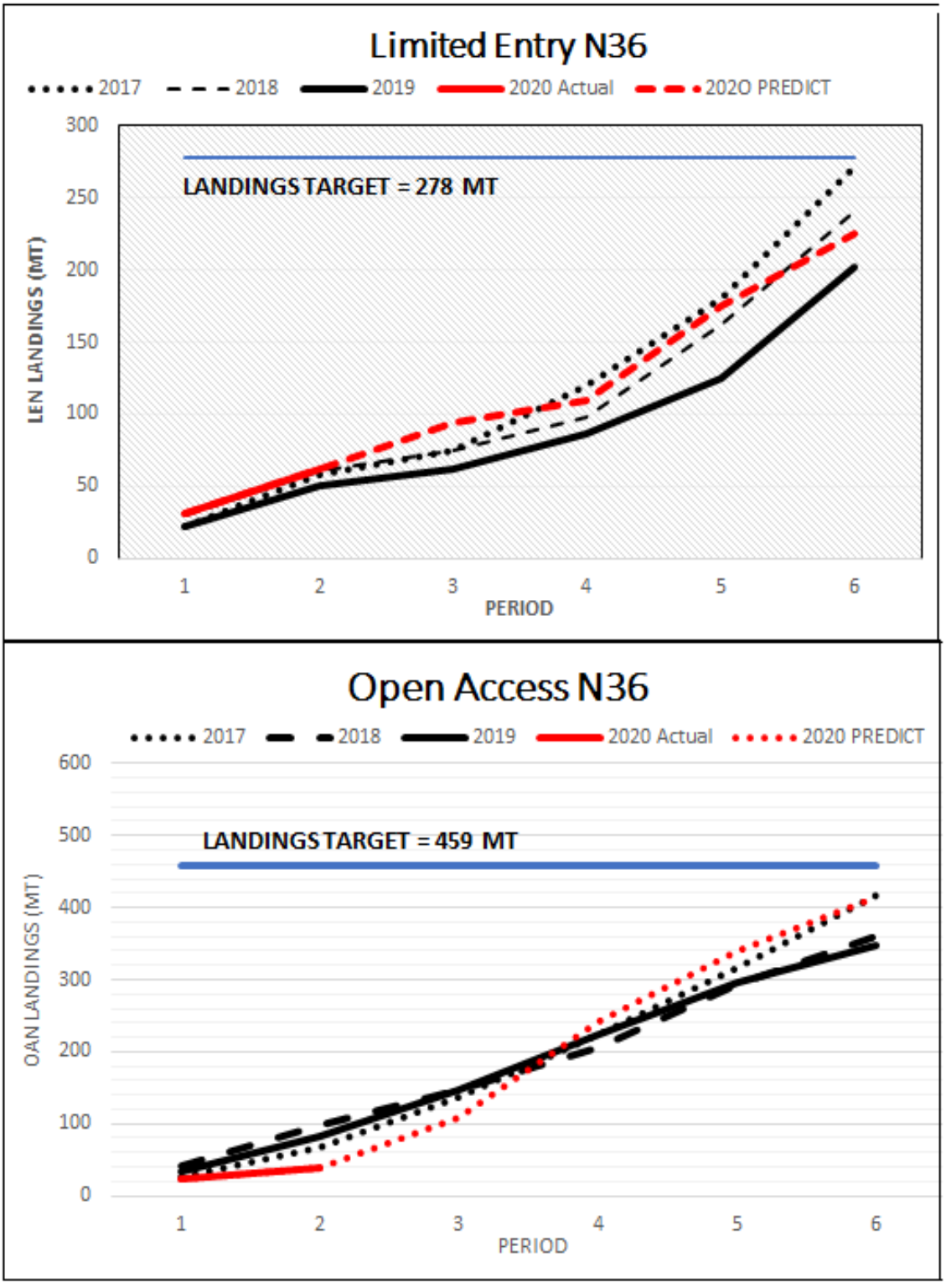

Figure 1-2. Cumulative actual sablefish landings in 2019 for the northern DTL sectors relative to previous years and the model predicted year-end attainment that is likely at least 25-40 percent overestimated.

ODFW and CDFW recommend the Council select Option 2 for northern sablefish DTL trip limits. It is too speculative to attempt to provide precise estimates of 2020 landings given uncertainty in the model, and the unpredictability associated with COVID-2019. The analysts are however fairly certain that the Option 1 (SQ) trip limits would result in low attainments and that the proposed higher Option 2 would not exceed the landings target nor cause risk to the ACL (Table 1-3). The GMT would evaluate risks during future inseason meetings and could recommend lower trip limits if needed. With mandatory e-tickets and a 24 hour reporting requirement for sablefish, real-time data has vastly improved the ability to adaptively manage sablefish trip limits as proposed.

Table 1-3. Proposed sablefish trip limits (round weight lbs) for the northern limited entry (LEN) and open access (OAS) sectors.

Option	Daily limit	Weekly limit	Bimonthly	Projected attainment
LEN 1 (SQ)	---	1,300	3,900	50-70%
LEN 2	---	1,500	4,500	70-90%
OAN 1 (SQ)	300	1,200	2,400	40-60%
OAN 2	300	1,500	3,000	70-90%

Limited Entry and Open Access - Lingcod north of 42° N. Lat.

Raising the lingcod trip limits is one the best ways to provide additional opportunity for current LEFG and OA participants, and can help support fishermen who have lost opportunity in other fisheries. As discussed with the Council in March 2020, lingcod is an easily accessible stock for new OA participants since they can be taken without need for expensive federal limited entry permits or state limited entry nearshore permits.

The Option 1 (SQ) trip limits to the north of 42° are 2,600 lbs bimonthly for limited entry and 1,200 lbs monthly for open access (Table 1-4), which were analyzed and established during the November 2019 inseason process (Agenda Item H.10.a, Supplemental GMT Report 1, November 2019). The projected non-trawl trawl mortality (537.8 mt) of lingcod at that time the 2020 trip limits was set was only 23.0 percent of the 2020 non-trawl allocation (2,345 mt).

The Option 2 trip limits are 4,000 lbs bimonthly for limited entry and 2,000 lbs monthly consistent with the proposal previously analyzed for the 2021-22 harvest specifications and management measures (Table 2-56 of Agenda Item G.6 Attachment 2, April 2020).

Option 2 is expected to increase lingcod mortality for the LEFG and OA sectors north of 42° N. lat. by an additional 18-48 mt depending on how many new participants join OA. The projected economic gain of Option 2 is expected to range from $118,000 - $315,500 in ex-vessel revenue per year. Total non-trawl mortality is only expected to be 578-610 mt compared to the 2,344.7 mt non-trawl allocation. There are no risks to the ACL since lingcod is a low attainment stock in all sectors. Option 2 is only expected to increase commercial non-trawl bycatch of yelloweye rockfish by 0.2 mt, and projected commercial non-trawl ACT attainments would remain at approximately 50 percent.

Table 1-4. Lingcod north of 42° N. lat. proposed LEFG and OA trip limits in regard to the non-trawl allocation north of 40°10 N. lat.

Option	Trip limit	Projected LEFG OA mortality N 42°	Projected non-trawl mortality N 40°10'*	2020 non-trawl allocation N 40°10'
1 (SQ)	LEFG: 2,600 lbs/ 2 months OA: 1,200 lbs / month	135	547	2,344.7
2	LEFG: 4,000 lbs / 2 months OA: 2,000 lbs 2/ months	153 - 183	578 -610 a/	

*Includes 424 mt of projected recreational impacts, 16.3 mt for LEFG and OA 40°10'-42° N lat., and 137.3 mt LEFG and OA north of 40°10' N. lat.

ODFW and CDFW recommend the Council select Option 2 for LEFG and OA trip limits north of 42° N. lat.

Limited Entry and Open Access - Lingcod between 42° and 40°10' N. Lat.

For similar reasons stated above, increases to lingcod trip limits between 40°10' and 42° N. lat. would provide additional opportunity for current LEFG and OA participants, and can help support fishermen who have lost opportunity in other fisheries. Figure 1-3 show the higher than normal weekly landings of lingcod in northern California.

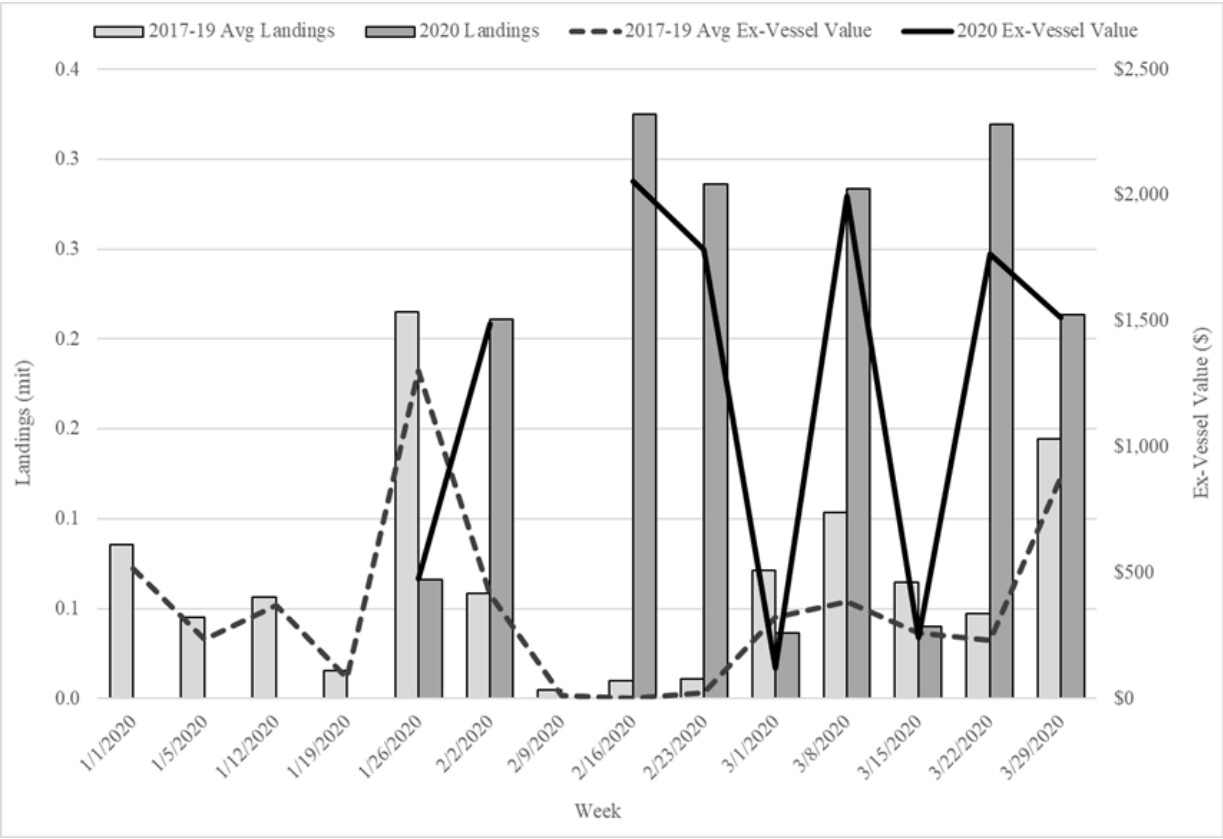

Figure 1-3. Weekly landings up through March 29, 2020 compared to the previous three year average (2017-2019) weekly landings with associated ex-vessel revenue for lingocd rockfish between 42º and 40º10' N. lat.

The Option 1 (SQ) trip limits are 1,400 lbs bimonthly for LEFG and 600 lbs per month for OA. Option 2 would increase the LE trip limits to 2,000 lbs bimonthly and the OA limits to 1,000 lbs per month. The status quo trip limits were set in the 2019-20 biennial harvest specifications and the predicted mortality at that time was similar to the new projections that utilize new 2019 landings data (Table 1-5). The same proposal was analyzed and publically reviewed as part of the (Agenda Item G.6, Supplemental Attachment 4 April 2020), but modifications had to be made to reflect differences in the 2020 non-trawl allocation. Option 2 is projected to increase lingcod landings off northern California by ~8-14 mt depending on the number of OA participants. The projected economic benefits are $53,000 - $92,000 in additional ex-vessel revenue. Projected total mortality is shown in Table 1-5.

ODFW and CDFW recommend the Council select Option 2 for LEFG and OA lingcod trip limits from 40°10' - 42° N. lat. If Option 2 is adopted for lingcod in both areas north of 40°10', the total projected gains in ex-vessel revenue are $171,000 - $537,500 depending on the number of new OA participants. The total impacts of lingcod for Option 2 in both areas are expected to remain low relative to the non-trawl allocation of lingcod north of 40°10' as shown in Table 1-4 and described in the section of lingcod north of 42° N. lat The projected yelloweye rockfish bycatch is also expected to remain low relative to the commercial non-trawl ACTs (~fifty percent) and there is 10 mt of residual ACL projected by the GMT.

Table 1-5. Status quo and proposed trip limits with associated projected mortality for lingcod north of 40°10' N lat in the area between 42° and 40°10' N lat. Projected mortality from non-nearshore and nearshore fisheries are compared to the 2021 non-trawl allocation.

Option	Trip limit (42°- 40°10' only)	Non-nearshore 42° - 40°10' (mt)	Total projected mortality N of 40°10 (mt) a/	Non-trawl alloc. N of 40°10 (mt)
LEFG 1 (SQ)	1,400 lbs / 2 months	3.6	547	2,344.7
OA 1 (SQ)	600 lbs / month	12.8		
Total for Option 1 (SQ)		***16.4***		
LEFG 2	2,000 lbs / 2 months	5.1	578 -610 a/	
OA 2	1,000 lbs / month	20.1		
Total for Option 2		***25.2***		

a/ Includes 424 mt of projected recreational impacts, 16.3 mt for LEFG and OA 40°10'-42° N lat., and 137.3 mt LEFG and OA north of 40°10' N. lat.

Limited Entry and Open Access - Minor Shelf Rockfish, Widow Rockfish, and Shortbelly Rockfish north of 40°10' N. lat.

Similar to the proposal above, raising the trip limits for northern shelf rockfish is expected to provide a high degree of benefits of both current LEFG and OA participants and displaced fishermen. The northern shelf rockfish includes several desirable mid-water rockfish species (e.g.,

vermilion, chilipepper, and bocaccio rockfishes) that are healthy, underutilized and in high demand as they are a lower cost fish that the public can still afford even during these difficult economic times.

The Option 1 (SQ) trip limits are 200 lbs per month of shelf, shortbelly, and widow rockfishes combined for both LEFG and OA. The status quo trip limits were analyzed in the 2019-20 biennium and the projected non-trawl attainment was less than 10 percent for all three stocks, which is consistent with new projections that use new 2019 landings data (see below for more detail).

The Option 2 trip limits would be raised to 800 lbs monthly combined for both. In regard to shortbelly rockfish, the projected impacts are less than 0.1 mt for both options since these species are too small in size to be caught by non-trawl fisheries. For widow rockfish, the projected impacts are less than 10 percent of the 2020 non-trawl allocation (985.6 mt) for both options.

Option 2 is projected to increase LEFG and OA shelf rockfish landings by 11.7 mt, ex-vessel revenue by $51,587, and total mortality by 12.7 mt (Table 1-6). The projected benefits could however be higher if the higher OA limits are utilized. Northern shelf rockfish attainments are projected to remain low and have considerable growth potential to provide economic relief. The GMT does not have any bycatch concerns with this proposal because these stocks would be targeted in the mid-water column and above the bottom where yelloweye rockfish reside. As described in the lingcod sections above, the projected attainments of yelloweye rockfish are also expected to remain low.

ODFW and CDFW recommend the Council consider Option 2 for LEFG and OA trip limits for the northern shelf, shortbelly, and widow rockfish trip limit category.

Table 1-6. Proposed trip limits for minor shelf rockfish, widow rockfish, and shortbelly rockfish north of 40°10' N. lat. and the associated projected shelf rockfish mortality compared to the 2020 non-trawl allocation.

Option	LEFG OA Trip limit	Projected mortality (mt)	Projected non-trawl mortality a/	Non-trawl Allocation (mt)
LEFG 1 (SQ)	200 lbs. / month	11.1	68.8	784.5;
OA 1 (SQ)	200 lbs. / month	23.6		
Total for Option 1		***34.7***		
LEFG 2	800 lbs. / month	15.7	81.5	
OA 2	800 lbs. / month	30.7		
Total for Option 2		***46.4***		

a/ Includes 25.8 mt projection for OR recreational and 8.3 mt for CA recreational.

Limited Entry and Open Access - Yellowtail Rockfish north of 40°10' N. lat.

Yellowtail rockfish are a highly valued stock to commercial fishermen that have low attainments (< 20 percent) in the non-trawl sector. Similar to the other proposals above, increasing the trip limits now could help current LEFG and OA participants and also help displaced fishermen.

Option 1 uses the status quo trip of 1,000 lbs monthly for LEFG and 500 lbs monthly for OA. Option 1 was analyzed during the 2019-20 biennium and the projected attainment was less than 20 percent of the 566.8 mt allocation, which is consistent with new projections that use new 2019 landings data (Table 1-7).

Option 2 would provide 3,000 lbs monthly for LEFG and 1,500 lbs for OA, Option 2 is expected to increase total mortality by 0.4 mt (Table 1-7), landings by 0.38 mt, and ex-vessel revenue by $1,860 from status quo. The projected non-trawl attainment is projected to be low for both trip limits options. However, the analysts stress that yellowtail rockfish has been identified by industry as one of the best stocks for market development and have considerable economic growth potential. The proposals to reopen minor portions of the non-trawl RCA (Section 3) could provide greater access to this shelf stock.

The GMT does not expect any increased yelloweye rockfish bycatch issues with this proposal since they are a mid-water species and can be selectively targeted with minimal impacts to benthic yelloweye rockfish. Additionally, projected attainments of yelloweye rockfish ACTs are expected to be low (see lingcod section above).

Table 1-7. Proposed LEFG and OA trip limits for yellowtail rockfish north of 40°10' N. lat. in relation to the non-trawl allocation.

Option	Trip limit	LEFG OA mortality (mt)	Non-trawl projected mortality (mt) *	Non-trawl Allocation (mt)
LEFG 1 (SQ)	,000 lbs. / month	1	108.6	566.8
OA 1 (SQ)	00 lbs. / month	2.3		
Total for Option 1		***3.3***		
LEFG 2	,000 lbs. / month	1	109	
OA 2	,500 lbs. / month	2.7		
Total for Option 2		***3.7***		

*Projected mortality and allocations are for the entire non-trawl sector including 43 mt for WA, 61 mt for OR, and 1.3 from Ca recreational fisheries.

Limited Entry and Open Access - Canary Rockfish north of 40°10' N. lat.

Canary rockfish are another low attainment mid-water rockfish stock of which higher trip limits could benefit both current LEFG and OA participants, as well as displaced fishermen, as rockfish, in general, are in demand because they are a lower cost fish that the public can still afford even during these difficult economic times. Canary rockfish, like other shelf rockfish, can be utilized without the need of expensive state and federal limited entry permits for new fishermen who would like to fish OA. There are also no yelloweye rockfish bycatch concerns with higher trip limits as described in the sections above.

Option 1 would maintain the status quo 300 lb bimonthly trip limit for both LEFG and OA (Table 1-8). Option 1 was analyzed as part of the 2019-20 biennium and the projected attainments at that time were very similar (+- 4 mt) compared to new projections that incorporate 2019 landings data

(Table 1-8). The Option 1 projected attainments are very low relative to the sector HGs for the different non-trawl fisheries.

Option 2 would increase the trip limits to 3,000 lbs bimonthly for LEFG and 1,000 lbs bimonthly for OA. Option 2 is projected to increase landings by 4.9 mt and ex-vessel revenue by $24,200 from status quo (Table 5). Projected mortality from Option 2 is well within the commercial non-nearshore share (41.2 mt) and the nearshore share (88.7 mt) for 2020. Projected benefits could be higher if the Council reopens portions of the non-trawl RCA (section 3), which is highly constraining for canary rockfish. **ODFW and CDFW recommend the Council consider Option 2 for LEFG and OA trip limits for the canary rockfish north of 40º10' N lat.**

Table 1-8. Proposed LEFG and OA trip limits and projected mortality for canary rockfish north of 40°10' in relation to the coastwide commercial non-nearshore and nearshore shares.

Option	Trip limit	Non-nearshore projected mortality, coastwide (mt)	Non-nearshore share (mt)	Nearshore projected mortality, OR + CA (mt)	Nearshore share (mt)
LEFG 1 (SQ)	300 lbs. / 2 months	1.0	41.2	1.3	88.7
OA 1 (SQ)	300 lbs. / 2 months	9.3		4.4	
Total for Option 1		***10.3***		***5.7***	
LEFG 2	3,000 lbs. / 2 months	5.3		8.9	
OA 2	1,000 lbs. / 2 months	32.5		28.3	
Total for Option 2		***37.8***		***37.2***	

Limited Entry and Open Access - Minor Slope and Darkblotched Rockfish North of 40°10' N. lat.

There is a small but growing CSF market for minor slope and darkblotched rockfish north of 40º 10' N. lat. Providing higher trip limits will not only provide the much needed relief to the fixed gear fleet in the north during this time, but will also help ensure the small markets continue to grow and provide fresh fish to the northern coastal communities.

The status quo (Option 1) LEFG trip limits for slope rockfish north and darkblotched rockfish are 4,000 lbs. bimonthly and 500 lbs. per month for OA (Table 1-9). Option 1 was analyzed during the 2019-20 biennium and the projected attainments for both stocks are similar to the new projections that incorporate new 2019 landings data (Table 1-9 and 1-10).

Option 2 is to increase the bimonthly LEFG trip limits to 8,000 lbs and the monthly limit for OA to 1,000 lbs. The proposed trip limits affect the non-trawl fisheries that have separate non-trawl allocations for the slope rockfish complex north of 40°10' N. lat. and for darkblotched rockfish coastwide. The projected non-trawl attainment is projected to be low for both Options 1 and 2 for

slope rockfish (Table 1-9) and for darkblotched rockfish in Table 1-10. For the slope rockfish complex north of 40°10' N. lat, Option 2 is projected to increase landings and total mortality by 1.2 mt with an associated increase in ex-vessel revenue of $2,910. For darkblotched rockfish coastwide, Option 2 is projected to increase landings and total mortality by 0.2 mt and increase ex-vessel revenue by $439. The projected increases for landings and total mortality are the same because the higher trip limits trades discarded dead fish to landed dead catch. The projected increase in landings and total mortality would be absorbed by the non-trawl allocation which is currently under attained (Table 1-9).

In conclusion, Option 2 is expected to provide immediate economic benefits without causing conservation risk since the projected non-trawl attainments are only 16 percent for darkblotched rockfish and 13 percent for slope rockfish north. **ODFW and CDFW recommend the Council select Option 2 for LEFG and OA trip limits for the slope and darkblotched rockfish trip limit category north of 40º10' N lat.**

Table 1-9. Projected non-trawl attainment of the slope rockfish complex north of 40°10' N. lat. for LEFG and OA trip limit options for slope and darkblotched rockfish north of 40°10' N. lat with the associated projected mortality compared to the 2020 non-trawl allocation.

Option	Trip limit	Projected mortality (mt)	Non-trawl projected mortality* (mt)	Non-trawl allocation (mt)
LEFG 1 (SQ)	4,000 lbs. / 2 months slope and darkblotched	32.4	39.6	Slope rockfish = 313.7
OA 1 (SQ)	500 lbs. / month slope and darkblotched	7.1		
Total for Option 1		39.5		
LEFG 2	8,000 lbs. / 2 months slope and darkblotched	33.6	40.8	
OA 2	1,000 lbs. / month slope and darkblotched	7.1		
Total for Option 2		40.7		

*Projected mortality and allocations are for the entire non-trawl sector including recreational.

Table 1-10. Projected non-trawl attainment of darkblotched rockfish coastwide for LEFG and OA trip limit options for slope and darkblotched rockfish north of 40°10' N. lat. with the associated projected mortality compared to the 2020 non-trawl allocation.

Option	Trip limit	Projected mortality (mt)	Non-trawl projected mortality (mt)	Non-trawl allocation (mt)
LEFG 1 (SQ)	4,000 lbs / 2 months slope and darkblotched	4.5	6.0	39.1
OA 1 (SQ)	500 lbs. / month slope and darkblotched	1.5		
Total for Option 1		6.0		
LEFG 2	8,000 lbs. / 2 months slope and darkblotched	4.7	6.2	
OA 2	1,000 lbs. / month slope and darkblotched	1.5		
Total for Option 2		6.2		

Minor Nearshore Rockfish between 42° and 40°10' N. Lat.

Finding markets for minor nearshore rockfish (MNRF) in northern California is difficult and sometimes requires traveling close to 400 miles to San Francisco to sell product. Recent landings, although spread out, have indicated that there is a higher than normal demand for nearshore rockfish (Figure 1-3) either in the area or in other regional domestic markets. Some of the fish that are shipped to San Francisco are supporting restaurants that offer take-out services or fulfilling the growing demand for Community Supported Fishery (CSF) programs that deliver direct to the consumer.

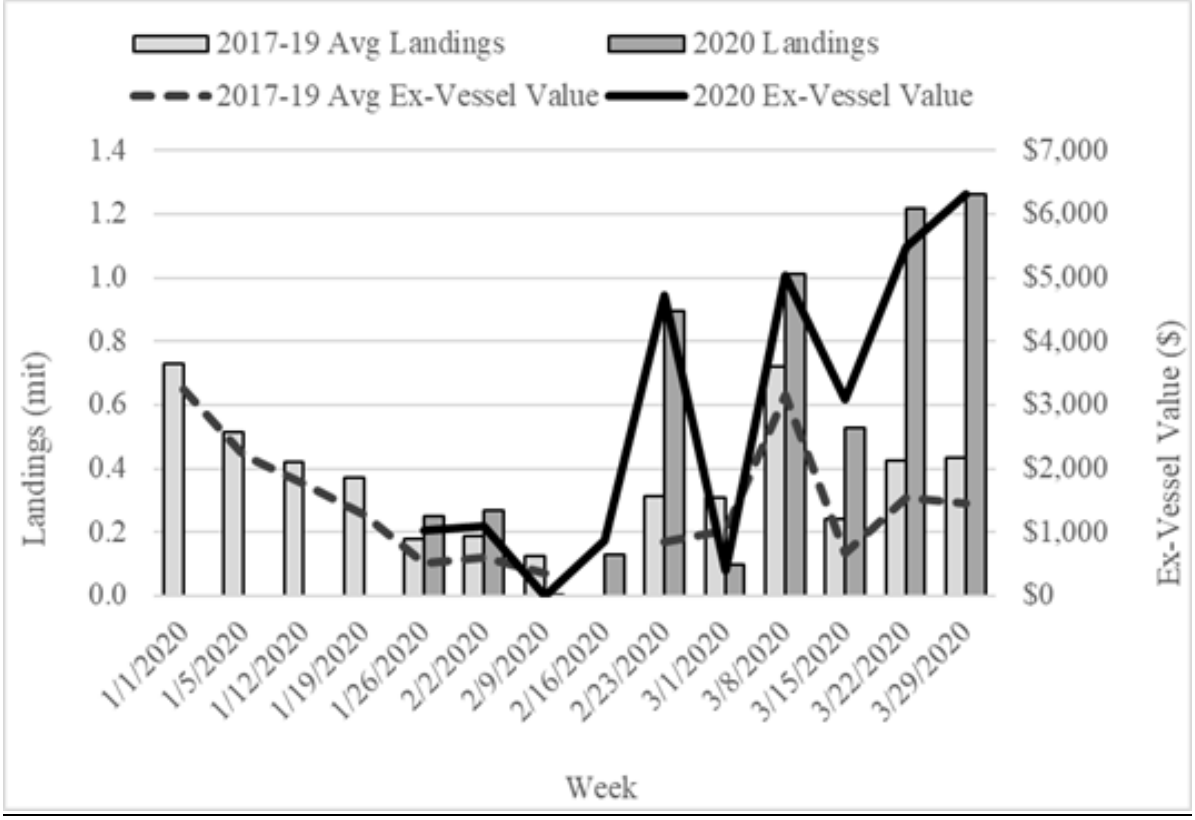

Figure 1-4. Weekly landings up through March 29, 2020 compared to the previous three year average (2017-2019) weekly landings with associated ex-vessel revenue for minor nearshore rockfish between 42º and 40º10' N. lat.

Historically, the MNRF stocks in California are under attained. The stocks are under a restricted access CA nearshore permit which means the impacts are not expected to change significantly. Although Council took inseason action in November 2019 to increase MNRF trip limit (Agenda Item H.10.a. Supplemental GMT Report 1, November 2019), the current high demand for low cost fish warrants further increases in the MNRF trip limits to meet the needs of the community. The projected attainments at the time were ~82 percent of total California share and that remains the best projection (Table 1-11) since it utilized the 2019 last full year of landings data.

Table 1-11 shows the status quo (Option 1) trip limit of 1,500 lbs per 2 months and the proposed (Option 2) MNRF trip limit of 2,000 lbs per 2 months for the area between 42° and 40°10' N. lat. Landings from the proposed minor nearshore rockfish trip limit are projected to increase by 4 mt and increase ex-vessel revenue by $17,841 to $62,444 depending on the live market. The status quo and predicted mortality from the trip limits and total projected mortality from the non-trawl sector are in within the 2020 CA MNRF share of 37.9 mt.

Table 1-11. Status quo and proposed trip limits for Minor Nearshore Rockfish in the area between 42° and 40° 10' N latitude compared to the 2020 California share of Minor Nearshore Rockfish. Does not include black rockfish.

Option	Trip limit	Projected mortality (mt)	Non-trawl projected mortality (mt)*	CA MNRF Share
Opt 1 (SQ)	7,000 lb / 2 months, no more than 1,500 lb of which may be species other than black rockfish	11.3	20.1	37.9
Opt 2	7,000 lb / 2 months, no more than 2,000 lb of which may be species other than black rockfish	14.9	23.7	

**Include a CA recreational informal mortality projection of 8.8 mt based on 2019 harvest levels.*

ODFW and CDFW recommend the Council consider Option 2 trip limits for minor nearshore rockfish between 42º and 40º10' N lat.

Section 2: LEFG and OA trip limits south of 40°10' N. lat.

Similar to north of 40°10' N. lat, CDFW has received direct requests for relief from COVID-19 to open period 2 (Mar-Apr), increase shelf and lingcod trip limits, and provide more access to healthy shelf rockfish stocks. Reports from industry working in smaller, domestic markets in ports south of 40°10' N. lat have indicated that there has been a higher than normal demand for fresh local and sustainably caught fish. Due to the timing of this Council meeting relative to the response time to take action, opening of period 2 (Mar-Apr) could not be accommodated. However, the timing is such that higher trip limits and more access to the shelf rockfish could provide relief for the fixed gear fleet south of 40°10' N. lat.

Below are trip limits proposals that could provide immediate relief in meeting the current and rising demand of smaller domestic markets. If these proposals are postponed to the June Council meeting, the delay could further negatively affect the fixed gear fleet and markets as the period 2 closure has already prevented the market south of 40°10' N. lat. from being able to quickly adapt and maneuver to rapidly changing business operations. With the sudden and almost complete loss of restaurant business to sustain normal market orders, reports are flooding in to CDFW staff that fishermen are scrambling-as quickly as possible to meet the immediate demand for developing direct sale to the public through organized door delivery services, farmer's markets, and direct sales off docked vessels (where legal).

Deeper and Shallow Nearshore Rockfish south of 40°10' N. lat.

These are under attained stocks and are under a restricted access CA nearshore permit which means the impacts are not expected to change significantly but will afford additional opportunity.

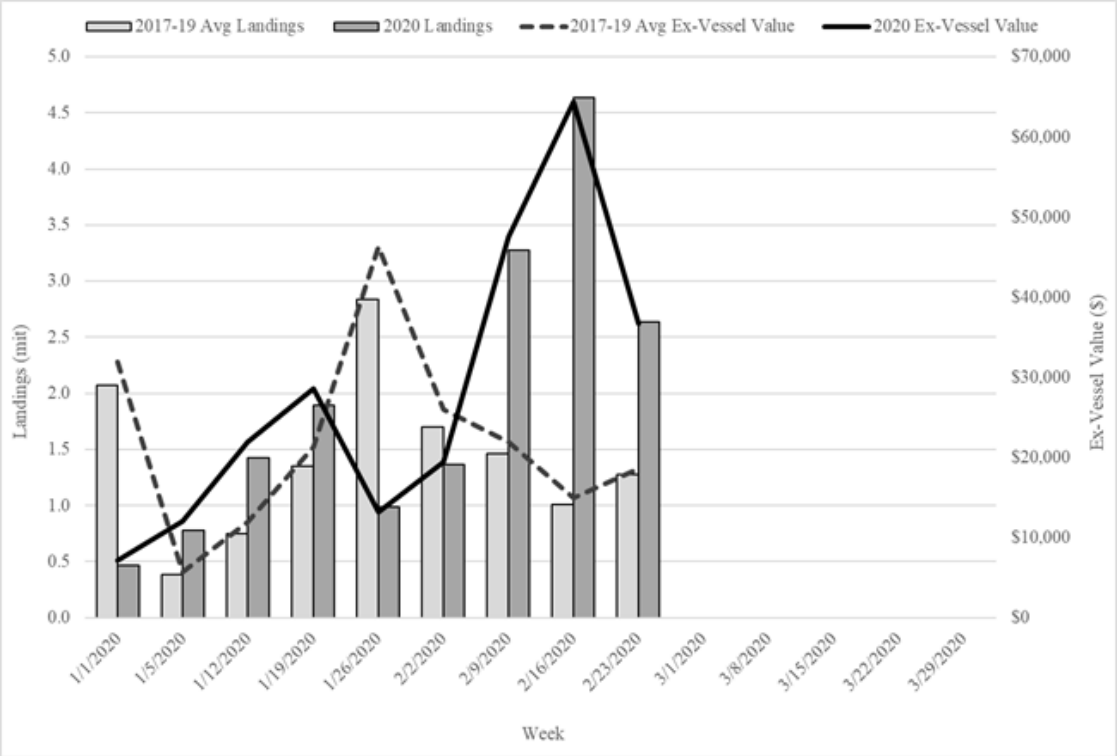

Figure 2-1. Weekly landings up through March 29, 2020 compared to the previous three year average (2017-2019) weekly landings with associated ex-vessel revenue for deeper and shallow nearshore rockfish south of 40º10' N. lat.

Error! Reference source not found.Error! Reference source not found. shows the proposed trip limits and the projected mortality compared to the 2021 non-trawl allocation for nearshore rockfish south of 40°10' N. lat. The proposed trip limits (Option 2) removes the period 2 closure. While the nearshore fishery is considered a federal OA fishery, it is a state restricted access fishery, and therefore the table breaks down the projected mortality for shallow and deeper trip limits opposed to LE and OA. The projected mortality for shallow and deeper nearshore rockfish fall within the nearshore rockfish south of 40°10' N. lat. non-trawl allocation. The adjustment to the shallow nearshore trip limit is projected to increase landings by 8.8 mt and ex-vessel revenue ranging from $77,829 to $144,345 depending on the live-fish market. The adjustment to the shallow nearshore trip limit is projected to increase landings by 54 mt and ex-vessel revenue ranging from $475,000 to $880,958 depending on the live-fish market. The adjustment to the deeper nearshore trip limit is projected to increase landings by 54 mt and ex-vessel revenue ranging from $219,245 to $$1,054,568 depending on the live-fish market.

Table 2-1. Status quo and proposed trip limits for nearshore rockfish south of 40°10' N. lat. with shallow and deeper nearshore projected mortalities compared to the 2021 non-trawl allocation.

Option	Trip limit	Projected mortality (mt)	Non-trawl projected mortality (mt)*	Non-trawl alloc. (mt)
Shallow 1 (SQ)	1,200 lbs. / 2 months, closed period 2	57.6	706.6	1,158.9
Deeper 1 (SQ)	1,200 lbs. / 2 months, closed period 2	58.1		
Total nearshore Option 1 (SQ)		***115.7***		
Nearshore 2	2,000 lbs. / 2 months	66.5	809.7	
Deeper 2	2,000 lbs. / 2 months	62.8		
Total nearshore Option 2		***212.8***		

**Include a CA recreational informal mortality projection of 590.9 mt based on 2019 harvest levels.*

Limited Entry and Open Access - Blackgill Rockfish south of 40°10' N. Lat

Recent landings have been variable, likely due to the disruption to international markets (Figure 2-2). To provide consistency to markets and to provide access to co-occuring species (e.g. sablefish), increasing to blackgill rockfish trip limits could provide stability in the current markets. Status quo (Opt 1) and proposed trip limits are in Table 2-2. Projected mortality is less than the 2020 HG of 158.9 in Table 2-3. Landings are projected to increase by 7.7 mt and ex-vessel revenue by $38,100.

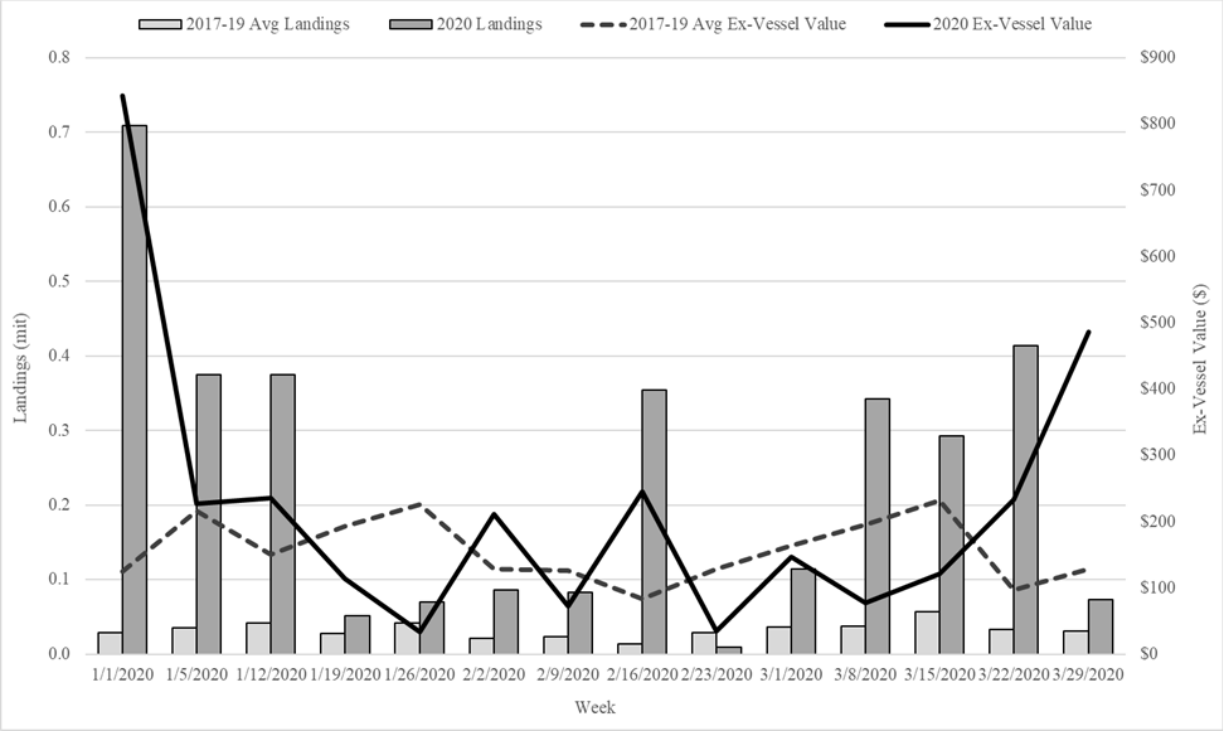

Figure 2-2. Weekly landings up through March 29, 2020 compared to the previous three year average (2017-2019) weekly landings with associated ex-vessel revenue for blackgill rockfish south of 40º10' N. lat.

Table 2-2 Status quo and proposed limited entry and open access for the blackgill rockfish sub trip limit in the Minor slope rockfish and darkblotched south of 40°10 N. lat. trip limit.

Option	Jan-Feb	Mar-Apr	May-Jun	Jul-Aug	Oct-Sep	Nov-Dec
LEFG 1 (SQ)	40,000 lb/ 2 months, of which no more than 1,375 lb may be blackgill rockfish		40,000 lb/ 2 months, of which no more than 4,000 lb may be blackgill rockfish			
OA 1 (SQ)	10,000 lb/ 2 months, of which no more than 475 lb may be blackgill rockfish		10,000 lb/ 2 months, of which no more than 800 lb may be blackgill rockfish			
LE 2	40,000 lb/ 2 months, of which no more than 1,375 lb may be blackgill rockfish		**40,000 lb/ 2 months, of which no more than 5,500 lb may be blackgill rockfish**			
OA 2	10,000 lb/ 2 months, of which no more than 475 lb may be blackgill rockfish		**10,000 lb/ 2 months, of which no more than 1,500 lb may be blackgill rockfish**			

Table 2-3. Projected blackgill rockfish, other slope rockfish, and darkblotched rockfish mortality compared to the 2021 non-trawl allocations based on A- 21 (SQ) and Amendment 26 allocation proportions.

Option	Blackgill rockfish non-trawl Projected mortality (mt)	Blackgill rockfish HG (mt)
LEFG 1 (SQ)	18.9	158.9
OA 1 (SQ)	2.0	
Total for Option 1	***20.9***	
LE 2	26.6	
OA 2	3.7	
Total for Option 2	***30.3***	

Limited Entry and Open Access - Lingcod south of 40°10' N. Lat.

Lingcod is a highly desirable stock and the southern fixed gear fleet has taken substantial reductions due to the outcome of the 2017 stock assessment. However, with less effort from the recreational fishery due to various closures, there is some opportunity (20-47 mt) for the commercial fleet to attain more lingcod that is in demand in markets that distribute locally. Recent weekly landings and ex-vessel revenue are higher compared to the three year average weekly landings and ex-vessel revenue (Figure 2-3); however, due to the period 2 closure landings have temporarily subsided.

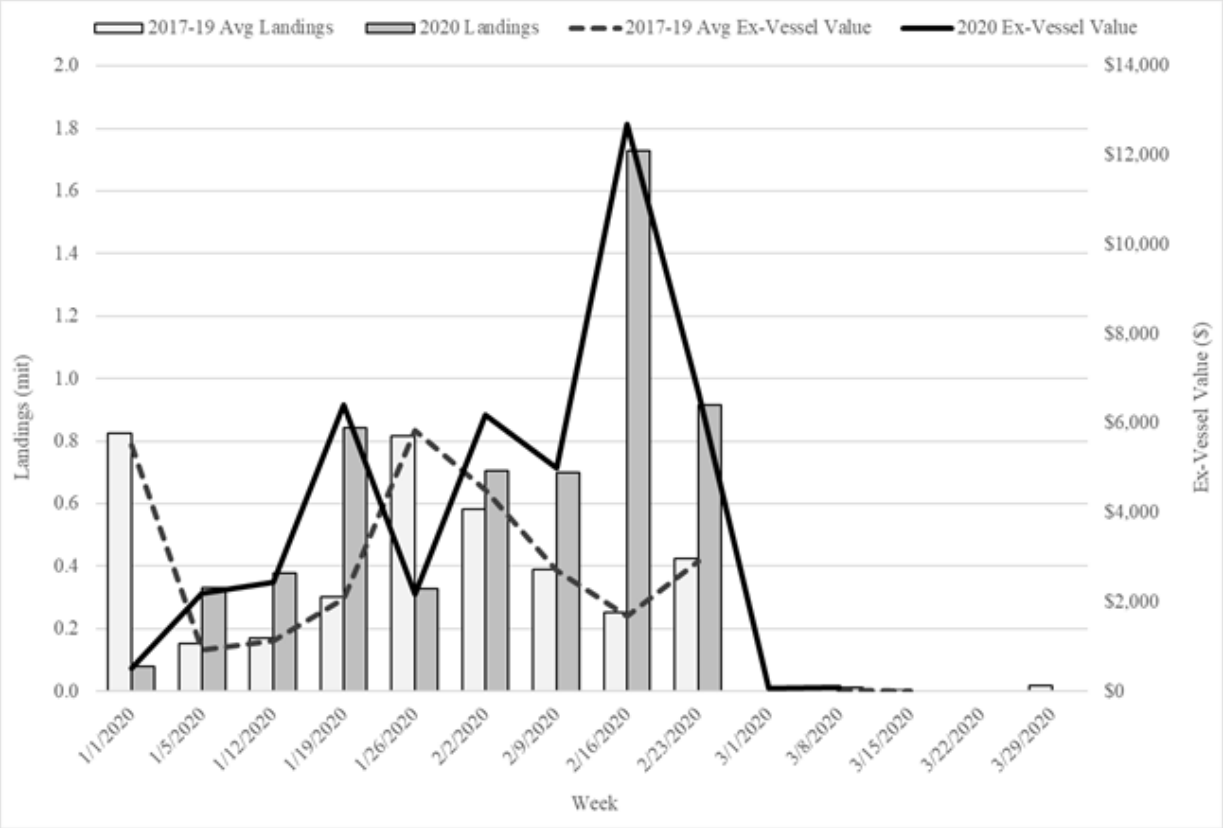

Figure 2-3. Weekly landings up through March 29, 2020 compared to the previous three year average (2017-2019) weekly landings with associated ex-vessel revenue for lingcod south of 40º10' N. lat.

If higher trip limits were implemented by the time the fishery re-opens (May 1) or as soon as possible thereafter, the fleet has better potential of continuing to meet the needs of the local communities, despite the two month gap in delivering product. Option 1 trip limit would remain status quo. Option 2 would increase LEFG from 1,200 lbs per 2 months to 1,500 lbs per 2 months and OA would increase from 500 lbs per month to 700lbs per month (Table LingS). Landings are projected to increase by 18.5 mt and ex-vessel by $130,000.

Table 2-4. Status quo and proposed trip limits with associated projected mortality for lingcod south of 40°10' N lat. Projected mortality from non-nearshore and nearshore fisheries are compared to the 2020 non-trawl allocation.

Option	Trip limit	Projected Mortality	Total projected mortality	Non-trawl alloc. (mt)
LEFG 1 (SQ)	1,200 lbs / 2 months, closed period 2	6.6	325.9	471.7
OA 1 (SQ)	500 lbs / month, closed period 2	54.5		
Total for Option 1 (SQ)		***61.1***		
LEFG 2	1,200 lbs / 2 months period 1, closed period 2, 1,500 lbs / 2 months period 3-5	7.9	344.4	
OA 2	500 lbs / month period 1, closed period 2, 700 lbs / month period 3-6	71.7		
Total for Option 2		***79.6***		

**Include a CA recreational informal mortality projection of 264.8 mt based on 2019 harvest levels*

ODFW and CDFW recommend the Council select Option 2 for LEFG and OA trip limits for lingcod south of 40°10' N. lat.

Limited Entry and Open Access - Canary Rockfish South of 40°10' N. lat.

Canary rockfish are another low attainment mid-water rockfish stock of which higher trip limits could benefit both current LEFG and OA participants. Canary rockfish, like the others, can be taken advantage of without the need of expensive state and federal limited entry permits for new fishermen who would like to fish OA. There are also no yelloweye rockfish bycatch concerns with higher trip limits as described in the sections above.

Recent weekly landings compared to the previous three-year average (2017-2019) weekly landings are slightly higher, but like lingcod, the period 2 closure has decreased landings and possibly disrupting local domestic markets (Figure 2-4).

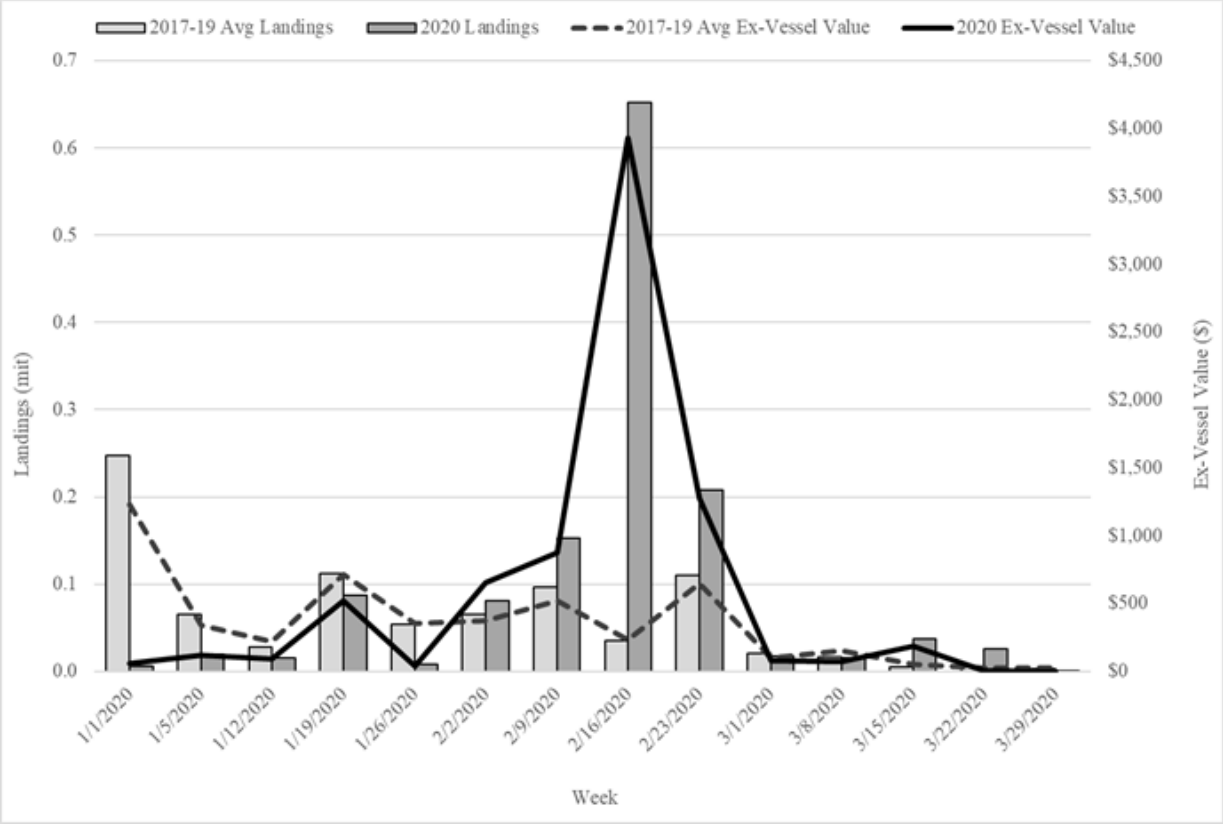

Figure 2-4. Weekly landings up through March 29, 2020 compared to the previous three year average (2017-2019) weekly landings with associated ex-vessel revenue for canary rockfish south of 40º10' N. lat.

Option 1 would be to remain status quo. Option 2 would be to increase LE trip limits from 300 lbs per 2 months to 3,500 lbs per 2 months and OA would increase from 300 lbs per 2 months to 1,500 lbs per 2 months (Table 2-5). The coastwide projected mortality for canary rockfish is within the commercial non-nearshore share (41.2 mt) and the nearshore share (88.7 mt) for 2020. The trip limit adjustment is projected to increase landings by 50.8 mt and ex-vessel revenue by $310,305.

Table 2-5. Proposed LEFG and OA trip limits and projected mortality for canary rockfish south of 40°10' in relation to the coastwide commercial non-nearshore and nearshore shares.

Option	Trip limit	Non-nearshore projected mortality, coastwide (mt)	Non-nearshore share (mt)	Nearshore projected mortality, OR + CA (mt)	Nearshore share (mt)
LEFG 1 (SQ)	300 lbs. / 2 months	1.0	41.2	1.3	88.7
OA 1 (SQ)	300 lbs. / 2 months	9.3		4.4	
Total for Option 1		***10.3***		***5.7***	
LEFG 2	3,500 lbs. / 2 months	5.3		8.9	
OA 2	1,500 lbs. / 2 months	32.5		28.3	
Total for Option 2		***37.8***		***37.2***	

ODFW and CDFW recommend the Council consider Option 2 for LEFG and OA trip limits for canary south of 40°10' N. lat.

Limited Entry and Open Access - Minor Shelf Rockfish, Widow Rockfish, Chilipepper, and Shortbelly Rockfish South of 40°10' N. Lat.

Shelf rockfish are some of the most accessible stocks to attain. Figure 2-5 compares the previous three year average (2017-2019) weekly landings and ex-vessel revenue of shelf rockfish, widow rockfish, and chilipepper to the current weekly landings and ex-vessel revenue, up through the end of March 2020.

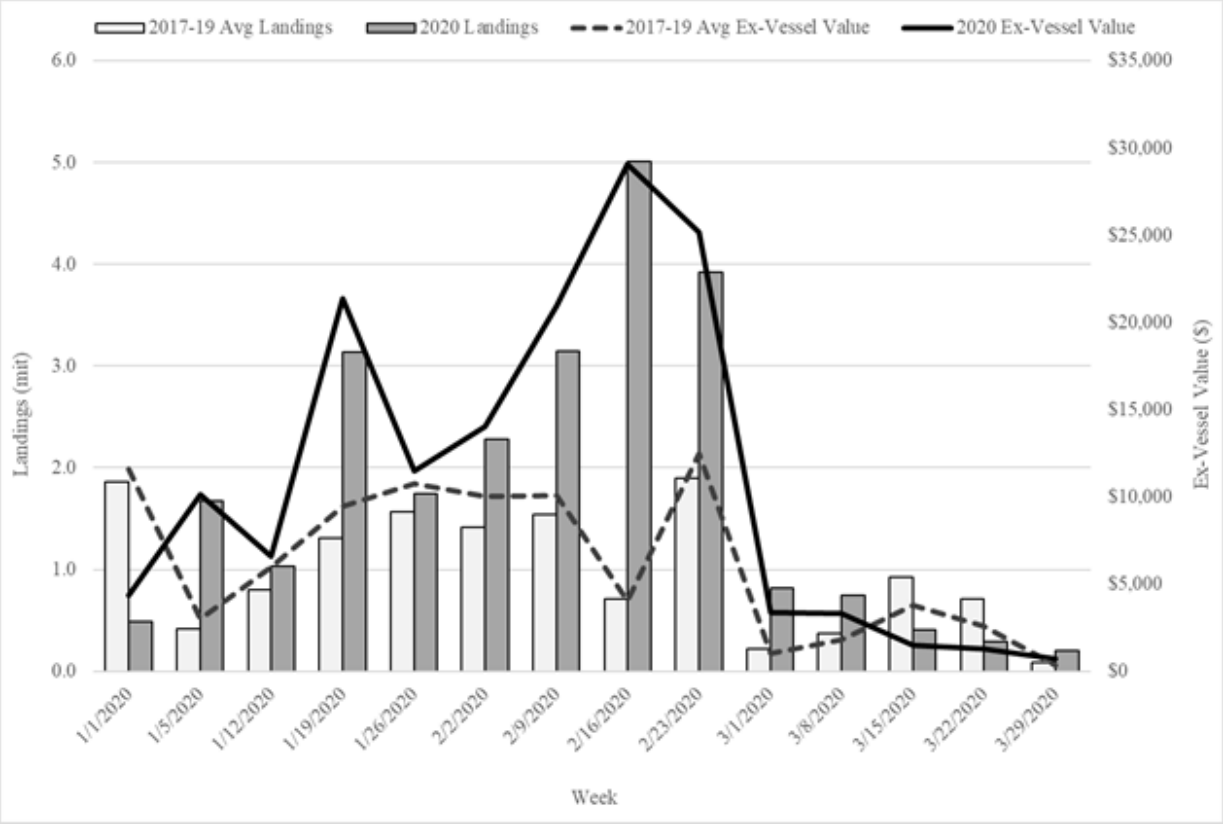

Figure 2-5. Weekly landings up through March 29, 2020 compared to the previous three year average (2017-2019) weekly landings with associated ex-vessel revenue for shelf rockfish, widow rockfish, chilipepper, and shortbelly rockfish south of 40º10' N. lat.

Table 2-6 and 2-7 provides the status quo and proposed trip limits and impacts for the minor shelf rockfish, widow rockfish, shortbelly rockfish, and chilipepper south of 40°10' N lat. Under the Option 2 trip limits, mortality is projected to remain below the respective non-trawl allocations. Landings are projected to increase by 111.7 mt and ex-vessel revenue by $664,600.

Table 2-6. Status quo and proposed limited entry and open access for minor shelf rockfish, widow rockfish, chilipepper, and shortbelly rockfish south of 40°10' N lat. Options and associated projected mortality are compared to the 2020 non-trawl allocation.

Option	Area	Trip limit	Projected impact (mt)	Non-trawl projected impact (mt) *	Non-trawl alloc. (mt)
LEFG 1 (SQ)	40° 10' to 34° 27' N. lat.	Minor shelf, shortbelly, widow and chilipepper rockfishes: 2,500 lb/ 2 months, of which no more than 500 lbs. /2 month may be any species other than chilipepper	2.5	712.9	1,357.3
	S of 34° 27' N. lat.	4,000 lb / 2 months, closed Period 2	22.7		
OA 1 (SQ)	40° 10' to 34° 27' N. lat.	400 lbs. / 2 months, closed Period 2	16.1		
	S of 34° 27' N. lat.	1,500 lbs. / 2 months, closed Period 2	23.5		
Total for Option 1			***64.7***		
LEFG 2	40° 10' to 34° 27' N. lat.	8,000 lbs. / 2 months, of which no more than 500 lbs. may be vermilion	18.3	773.1	
	S of 34° 27' N. lat.	5,000 lbs. / 2 months, of which no more than 4,000lbs. may be vermilion	28.9		
OA 2	40° 10' to 34° 27' N. lat.	4,000 lbs. / 2 months, of which no more than 400 lbs. may be vermilion	50.8		
	S of 34° 27' N. lat.	3,000 lbs. / 2 months, of which no more than 1,500lbs. may be vermilion	26.8		
Total for Option 2			***124.9***		

**Include a CA recreational informal mortality projection of 248.2 mt based on 2019 harvest levels.*

Table 2-7. Status quo and proposed limited entry chilipepper south of 34°27 N lat. Options and associated projected mortality are compared to the 2020 non-trawl allocation.

Option	Area	Trip limit	Projected impact (mt)	Non-trawl projected impact (mt) *	Non-trawl alloc. (mt)
LEFG 1 (SQ)	S of 34° 27' N. lat.	2,000 lbs. / 2 months, this opportunity only available seaward of the non-trawl RCA	0.1	6.0	581.3
LEFG 2	S of 34° 27' N. lat.	4,000 lbs. / 2 months, this opportunity only available seaward of the non-trawl RCA	0.6	6.5	

**Include a CA recreational informal mortality projection of 5.9 mt based on 2019 harvest levels.*

ODFW and CDFW recommend the Council consider Option 2 for LEFG and OA trip limits for minor shelf rockfish, widow rockfish, chilipepper, and shortbelly rockfish south of 40°10 N lat.

Limited Entry and Open Access - Dover Sole, Arrowtooth Flounder, Petrale Sole, English Sole, Starry Flounder, and Other Flatfish Coastwide

In addition to shelf stock and lingcod, there has been a demand for flatfish as well. The status quo (Option 1) trip limit, coastwide is 5,000 lbs per month for LE and 3,000 lbs / month, no more than 300 lbs of which may be species other than Pacific sanddabs for OA. The proposed adjustment to the flatfish trip limit, Option 2, is to increase the LE limit to 10,000 lbs per month and the OA to 5,000 lbs per month, for all flatfish. Table 2-8 shows the status quo and proposed trip limits and Table 2-9 shows the projected mortality and 2020 non-trawl allocations for all stocks within the Dover sole, arrowtooth flounder, petrale sole, English sole, starry flounder, and Other Flatfish trip limit.

The increase to the LE trip limit is projected to increase landings north of 40°10’ N latitude by 4.5 mt and ex-vessel revenue by $5,448 and projected to increase landings south of 40°10’ N latitude by 5.2 mt and ex-vessel revenue by $43,660 (Table 2-10). The increase to the OA trip limit is projected to increase landings north of 40°10’ N latitude by 35.8 mt and ex-vessel revenue by $30,648 and projected to increase landings south of 40°10’ N latitude by 12.4 mt and ex-vessel revenue by $83,542 (Table 2-11).

Table 2-8. No Action. Status quo and proposed trip limits for Dover sole, arrowtooth flounder, petrale sole, English sole, starry flounder, and Other Flatfish north and south of 40°10' N lat.

Option	Area	Trip limit
LEFG 1 (SQ)	CW	5,000 lbs / month
OA 1 (SQ)	CW	3,000 lbs / month, no more than 300 lbs of which may be species other than Pacific sanddabs
LEFG 2	CW	10,000 lbs / month
OA 2	CW	5,000 lbs / month

Table 2-9. Projected non-trawl mortality and 2022 allocations for all stocks within the Dover sole, arrowtooth flounder, petrale sole, English sole, starry flounder, and Other Flatfish trip limit.

Stock	Opt 1 (SQ) Coastwide		Opt 2 Coastwide		Non trawl allocation (mt)
	LE	OA	LE	OA	
Arrowtooth flounder	39.2	8.7	40.8	32.9	
Dover sole	4.7	0.7	7.1	3.2	
English sole	0.1	0.0	0.1	0.0	
Petrale sole	1.6	1.3	3.3	14.3	
Starry flounder	1.3	0.2	1.3	0.5	
Other flatfish*	4.1	1.4	8.3	9.6	
Total	63.3		121.2		

*Includes butter sole, curlfin sole, flathead sole, Pacific sanddab, rex sole, rock sole, and sand sole.

Table 2-10. Projected increases in landings and ex-vessel revenue for LEFG Dover sole, arrowtooth flounder, petrale sole, English sole, starry flounder, and Other Flatfish trip limits, north and south of 40°10' N latitude. Projected increases to landings and ex-vessel revenue are shown north and south of 40°10' N latitude because the average price per pound is greater south of 40°10' N latitude.

Stock	Projected landings increase N of 40°10' (mt)	Projected ex-vessel revenue increase N of 40°10' N lat	Projected landings increase S of 40°10' (mt)	Projected ex-vessel revenue increase S of 40°10' N lat
Arrowtooth flounder	1.6	$459	0.0	$0
Dover sole	1.3	$1,462	1.0	$3,527
English sole	0.0	$0	0.0	$0
Petrale sole	1.6	$3,527	0.1	$582
Starry flounder	0.0	$0	0.0	$0
Other flatfish*	0.0	$0	4.1	$30,551
Total	4.5	$5,448	5.2	$43,660

*Includes butter sole, curlfin sole, flathead sole, Pacific sanddab, rex sole, rock sole, and sand sole.

Table 2-12. Projected increases in landings and ex-vessel revenue for OA Dover sole, arrowtooth flounder, petrale sole, English sole, starry flounder, and Other Flatfish trip limits, north and south of 40°10' N latitude. Projected increases to landings and ex-vessel revenue are shown north and south of 40°10' N latitude because the average price per pound is greater south of 40°10' N latitude.

Stock	Projected landings increase N of 40°10' (mt)	Projected ex-vessel revenue increase N of 40°10' N lat	Projected landings increase S of 40°10' (mt)	Projected ex-vessel revenue increase S of 40°10' N lat
Arrowtooth flounder	24.1	$6,907	0.1	$285
Dover sole	1.9	$2,136	0.6	$2,099
English sole	0.0	$0	0.0	$0
Petrale sole	9.7	$21,385	3.3	$19,410
Starry flounder	0.0	$0	0.2	$1,226
Other flatfish*	0.1	$220	8.1	$60,523
Total	***35.8***	***$30,648***	***12.4***	***$83,542***

*Includes butter sole, curlfin sole, flathead sole, Pacific sanddab, rex sole, rock sole, and sand sole.

ODFW and CDFW recommend the Council consider Option 2 for LEFG and OA trip limits Dover Sole, Arrowtooth Flounder, Petrale Sole, English Sole, Starry Flounder, and Other Flatfish Coastwide

Section 3: Minor adjustment to non-trawl RCA from 40°10' - OR/WA border

Overview

ODFW and CDFW are proposing minor adjustments to the non-trawl shoreward RCA boundary line from 30 fathoms to 40 fathoms off Oregon and Northern California in order to provide vessels much needed access to the core distribution of healthy and underutilized mid-water rockfish stocks (e.g., canary rockfish, yellowtail rockfish, and shelf rockfish) and to minimize disruption to emerging marketing patterns of home delivery services, such as Community Supported Fishery (CSF) businesses. Option 1 would use the status quo non-trawl configuration of 30-100 fathoms off Oregon and Northern California and Option 2 would use 40 - 100 fathoms (Table 3-1, Figure 3-1, Figure 3-2, Figure 3-3). The non-trawl RCA off Washington would be unchanged and would remain at shore - 100 fathoms for both options. WDFW provided guidance that reopening the 30 - 40 fathom depths off Washington would be undesirable since it would open a narrow strip in the middle of a closure zone that would be difficult to enforce and would not provide much benefit.

Table 3-1: Proposed non-trawl RCA configurations to the north of 40°10' N. lat.

Option	40°10' - 46°16' (OR/WA)	North of 46°16'
1 (SQ)	30-100 fathoms	Shore - 100 fathoms
2	40-100 fathoms	

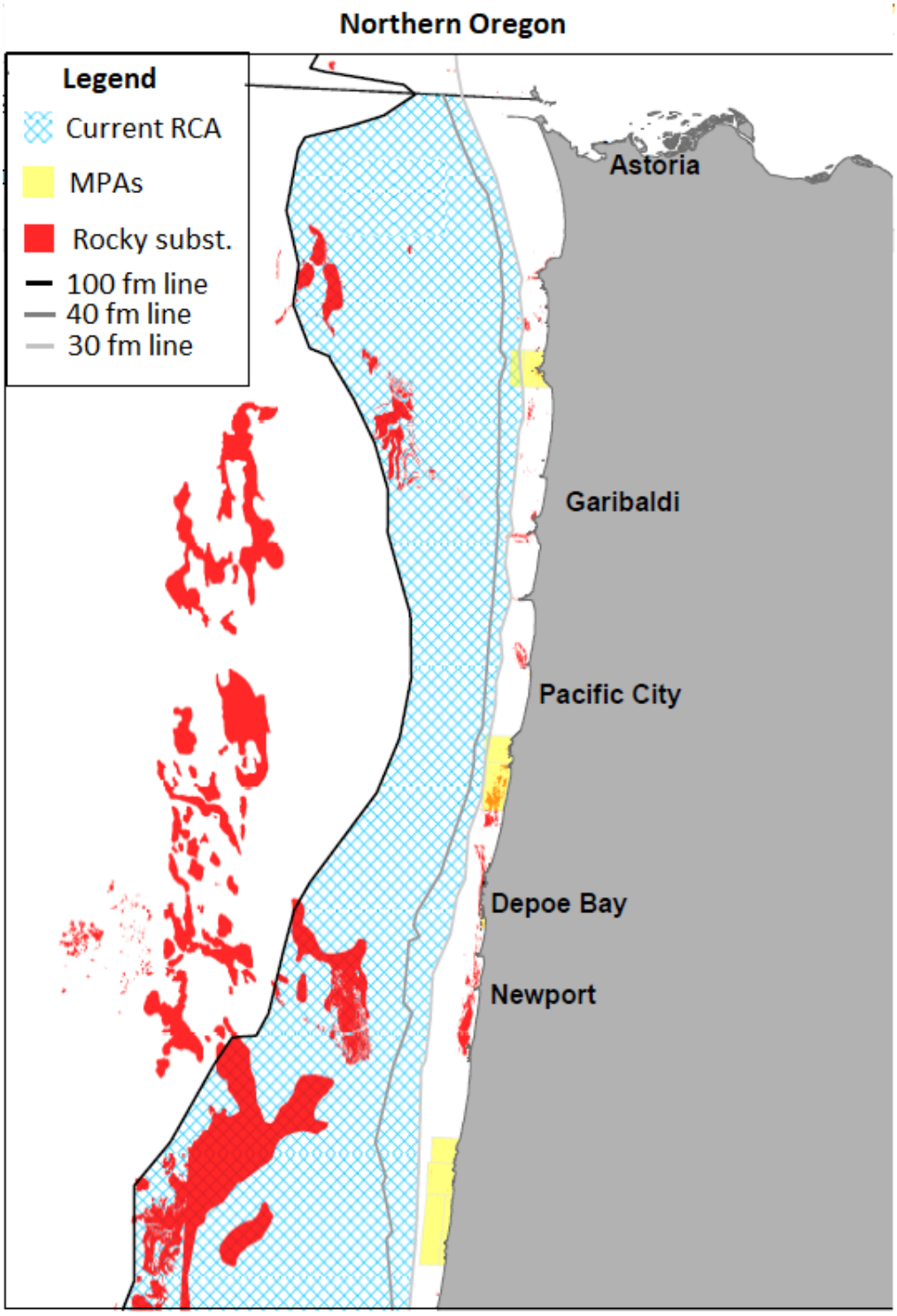

Figure 3-1. Map of the current non-trawl RCA off northern Oregon and the proposed minor adjustments (30 - 40 fathom) to the shoreward boundary.

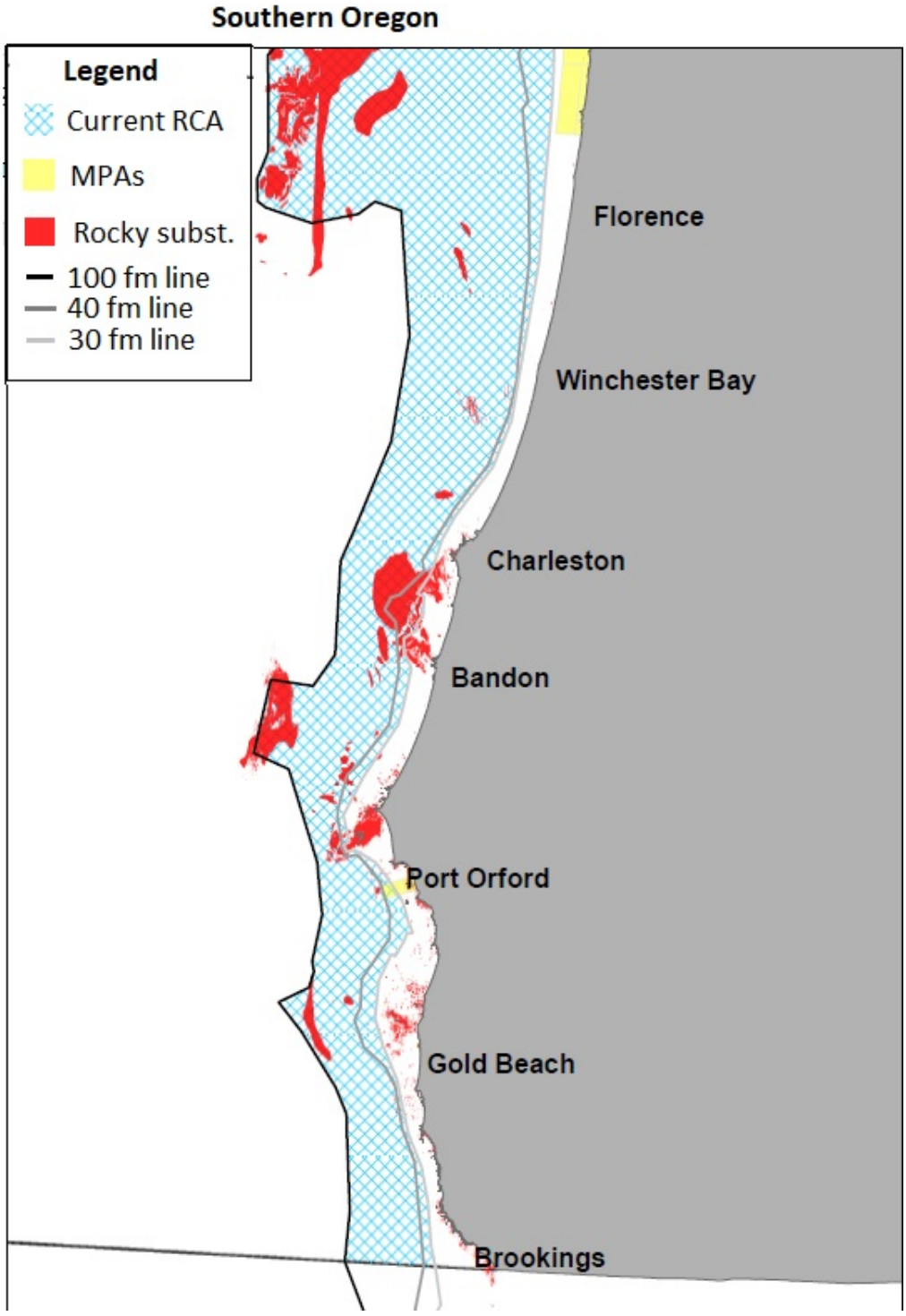

Figure 3-2. Map of the current non-trawl RCA off southern Oregon and the proposed minor adjustments (30 - 40 fathom) to the shoreward boundary.

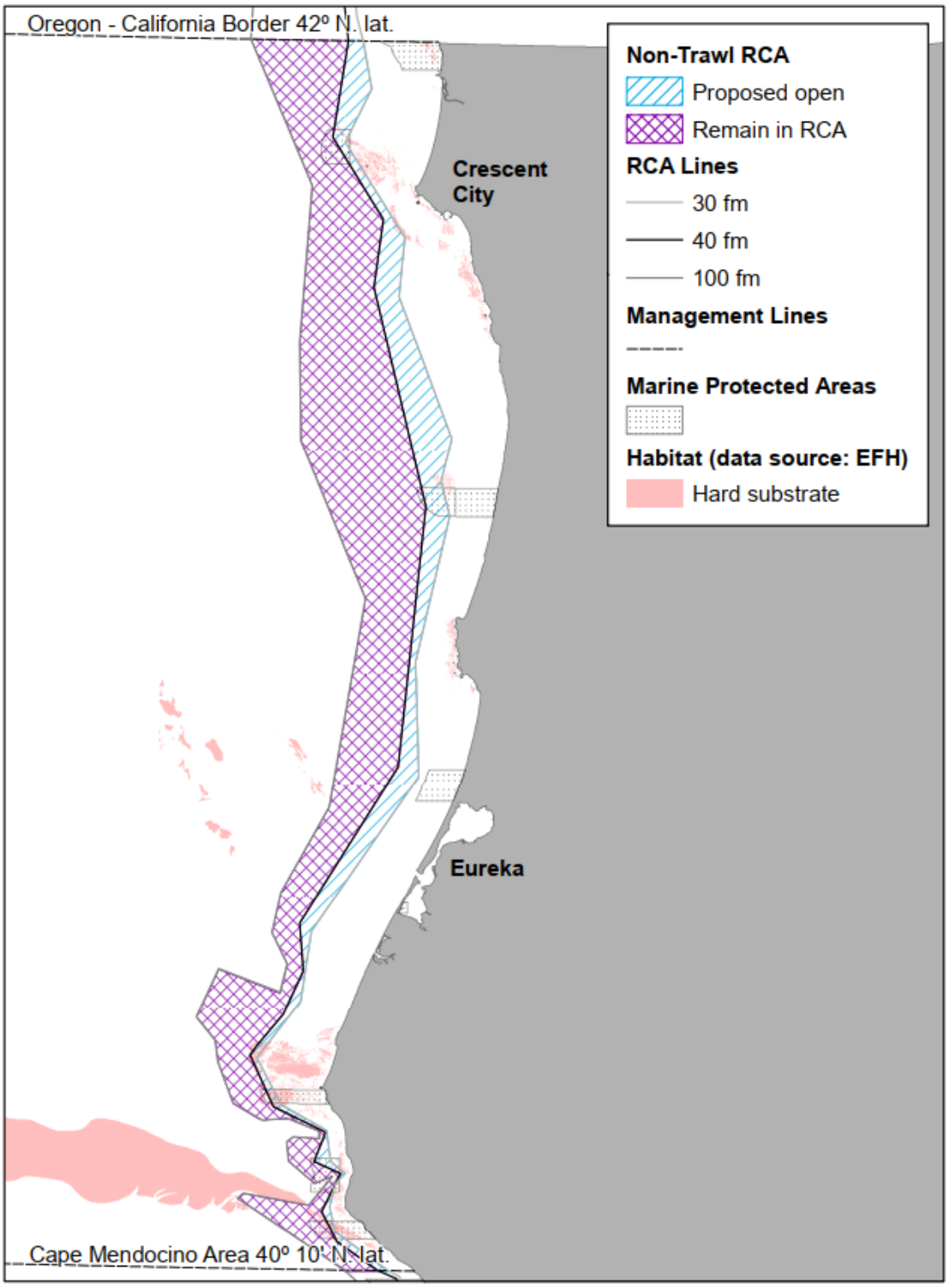

Figure 3-3. Map of the current non-trawl RCA off northern California and the proposed minor adjustments (30 - 40 fathom) to the shoreward boundary.

The non-trawl RCA was closed in this area starting in 2002 to help prevent bycatch of overfished yelloweye rockfish; however, Option 2 would open the 30-40 fathom depths that are no longer needed to mitigate risks to yelloweye rockfish ACLs or nearshore ACTs. These depths remained

closed during 2002-2018 because of the previous severely limiting yelloweye rockfish ACLs (14 - 27 mt range), which were approximately half the current 48 mt and 49 mt ACLs for 2019-20. The ACLs were increased during the 2019-2020 biennium to reflect faster than expected rebuilding of yelloweye rockfish per the 2017 yelloweye rockfish stock assessment. In response to this much more optimistic stock assessment, the Council revised the rebuilding plan for 2019-20 and beyond in order to provide considerably higher economic benefits and without delaying projected rebuilding by more than one year (Agenda Item E.4, Attachment 5, June 2018). Note that the rebuilding plan assumes that the full ACLs will be taken each year, and Option 2 is expected to result in total groundfish impacts that are below the ACL (as described in section 1 and below) thus this proposal will provide economic benefit and maintain conservation goals.

The nearshore fisheries used to be severely constrained by the yelloweye rockfish, but that is no longer the case as both the Oregon and California nearshore fisheries are only projected to take approximately half the 2020 yelloweye rockfish ACTs (Agenda Item H.10.a, Supplemental GMT Report 1, November 2019). The Option 1 RCA is no longer needed to keep the nearshore fisheries to their yelloweye rockfish ACTs thus there is strong justification for Option 2. Reopening 30-40 fathoms (Option 1) would provide nearshore fishermen, particularly displaced fishermen, more opportunity to target those healthy and underutilized stocks throughout Northern California and Oregon.

It would be too speculative to try to provide precise quantitative projections of Option 2 in regards to target stocks, economic benefits, and regard to bycatch given the effects of COVID-2019 are still highly uncertain. Qualitative risks assessments therefore have to be provided that can still robustly describe if there are potential concerns with the proposals.

The analysts received input from nearshore fishermen who fished the area before the RCAs were adopted in 2002 that Option 2 could increase total groundfish landings by 10 percent, would be +30 mt relative to the 2019 total nearshore landings of 305 mt in that area. The projected ex-vessel revenue gain could potentially range from $135,000-$150,000 per year due to increased attainments of healthy and low attainments stocks (e.g., lingcod and mid-water rockfishes).

The projected additional yelloweye rockfish impacts are +0.3 mt, which causes the nearshore total impacts to increase from 2.2 mt to 2.5 mt of the 4.7 mt ACT. Both the California and Oregon nearshore fisheries are expected to remain at ~50-55 percent of their individual shares of the 4.7 mt ACT. Yelloweye bycatch could be higher due to uncertainty in projections, but there is no risk to the ACL given the 2.2 mt residual to the nearshore ACT and the 10 mt residual to the ACL (as described in section 1).

It is also important to note that the proposed Option 2 reopenings are already being fished by the recreational sector that has the same types of impacts as the nearshore fishery. The Oregon recreational is already open year-round in the Option 2 depths and the Northern California recreational is open to these depths during the fall months. As the Council is aware, both the recreational and nearshore participants use similar size boats, use similar gear (92 percent of nearshore is “sport-like” jig-and-pole), and target the same species. The only main difference is that recreational keeps their catch whereas nearshore sells theirs. One beneficial difference is the nearshore is held to partial observer coverage and VMS requirements in the proposed Option 2 zone. There are also other fisheries (e.g., trawl, salmon troll, squid) that are open in these depths already. Nearshore gears are generally regarded as having low habitat impacts.

In conclusion, Option 2 could provide immediate benefit for fishermen who have been negatively impacted by the COVID-2019 issue without causing any conservation concerns As described above, the nearshore fisheries are apparently doing relatively well so far despite closures of restaurant markets due to COVID-2019 by using marketing efforts to support local fishermen during times of need. Raising trip limits (section 1) and Option 2 RCA could therefore be expected to help displaced fishermen whom do not have opportunity for much else given they do not have expensive limited entry state and federal permits.

ODFW and CDFW recommend the Council select Option 2 for non-trawl RCAs off Northern California and Oregon.

Section 4: *Minor Non-trawl RCA reopenings South of 40º10' N. lat.*

Overview

In an effort to accommodate the rapidly changing needs of the markets south of 40°10' N. lat., CDFW proposes minor adjustments to the shoreward boundary in the area between 40°10' N. lat. and 34°27' N. lat. to minimize disruption of re-directed or newly emerging marketing patterns. The proposals are to move either the shoreward 40 fathom or seaward 100 fathmon boundary lines in discrete areas (Table 4-1) and include minor adjustments to the seaward boundary line of the non-trawl RCA boundary line from 125 fm to 100 fm in the area between 40°10' N. lat. and 34°27' N. lat. and from 150 fm to 100 fm south of 40°10' N. lat. (Table 4-2; Figure 4-1; Figure 4-2; Figure 4-3). Table 4-3 contains the combined proposed adjustment to the non-trawl RCA south of 40°10' N. lat.

CDFW notes, the original intent of implementing the non-trawl RCA in the early 2000s was to protect numerous stocks that were declared overfished (widow, bocaccio, canary rockfish, yelloweye rockfish and cowcod). To-date the only remaining species that remain overfished are yelloweye rockfish which are rarely encountered south of Pt. Conception and incur very little to no impacts that far south, and cowcod which is rebuilt as of 2019. Considering these actions on an accelerated timeline will allow immediate relief to fishermen who have been impacted by sudden changes to market demand associated with COVID-19.

Table 4-1: Proposed minor adjustment to the shoreward boundary line of the non-trawl RCA configurations to the south of 40°10' N. lat.

Option	Area	Depth (fm)
1 (SQ)	40°10' - 34° 27' N lat.	40 - 125
2	38° 57.50 -34° 27' N lat.	50 -125

Table 4-2: Proposed minor adjustment to the seaward boundary line of the non-trawl RCA configurations to the south of 40°10' N. lat.

Option	Area	Depth (fm)
1 (SQ)	40°10' - 34° 27' N lat.	40 - 125
2	40°10' - 34° 27' N lat.	40 -100
1 (SQ)	S of 34° 27' N lat.	75 - 150
2	S of 34° 27' N lat.	75 - 100

Table 4-3: Combined proposed minor adjustment to the seaward boundary line of the non-trawl RCA configurations to the south of 40°10' N. lat (from Tables 4-1 and 4-2).

Option	Area	Depth (fm)
1 (SQ)	40°10' - 34° 27' N lat.	40 - 125
2	38° 57.50 - 34° 27' N lat.	50 -100
1 (SQ)	S of 34° 27' N lat.	75 - 150
2	S of 34° 27' N lat.	75 - 100

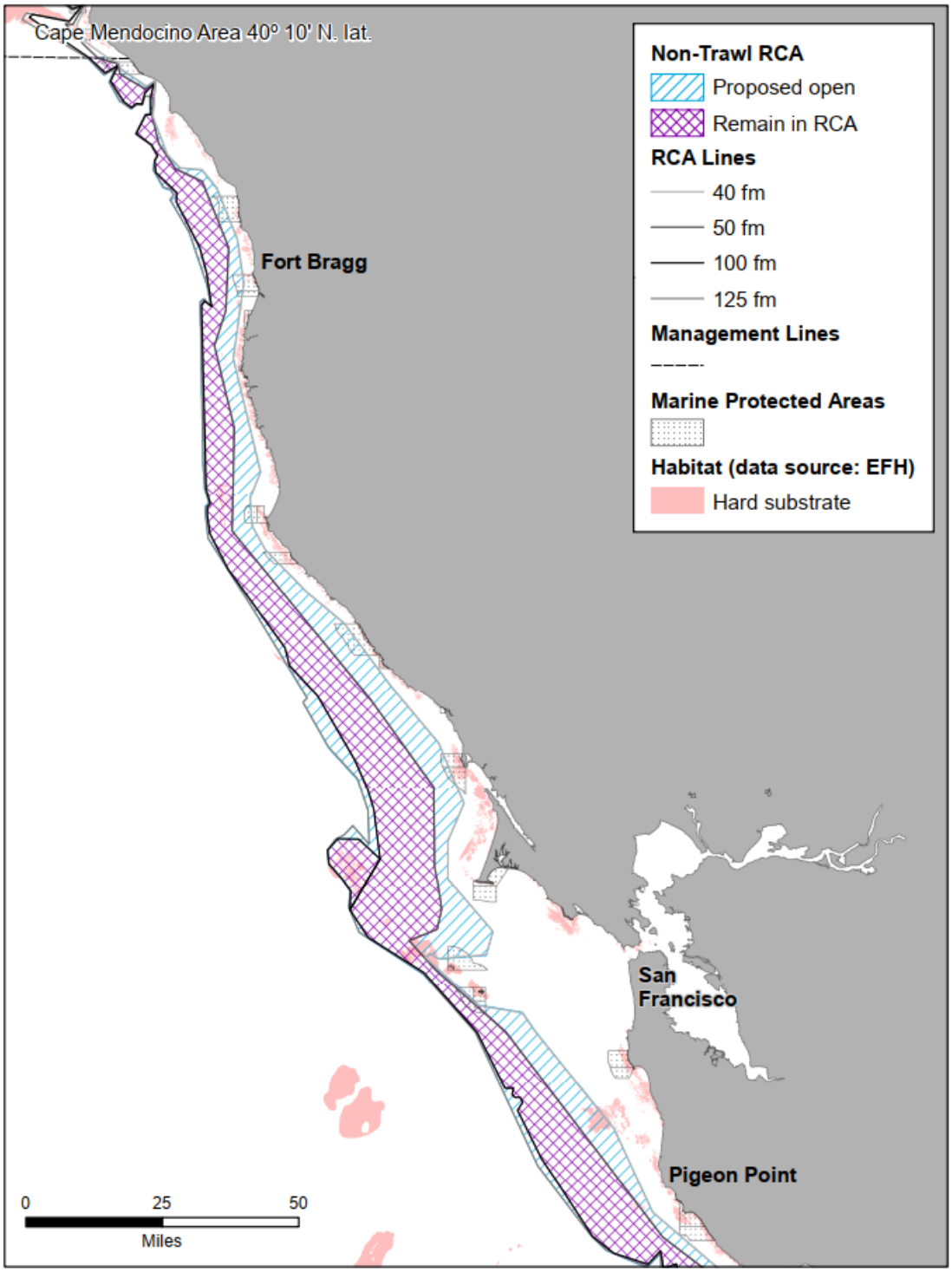

Figure 4-3. Map of the current non-trawl RCA off north-central California and the proposed minor adjustments to the seaward (125 fm to 100 fm) and shoreward (40 fm - 50 fm) boundary lines.

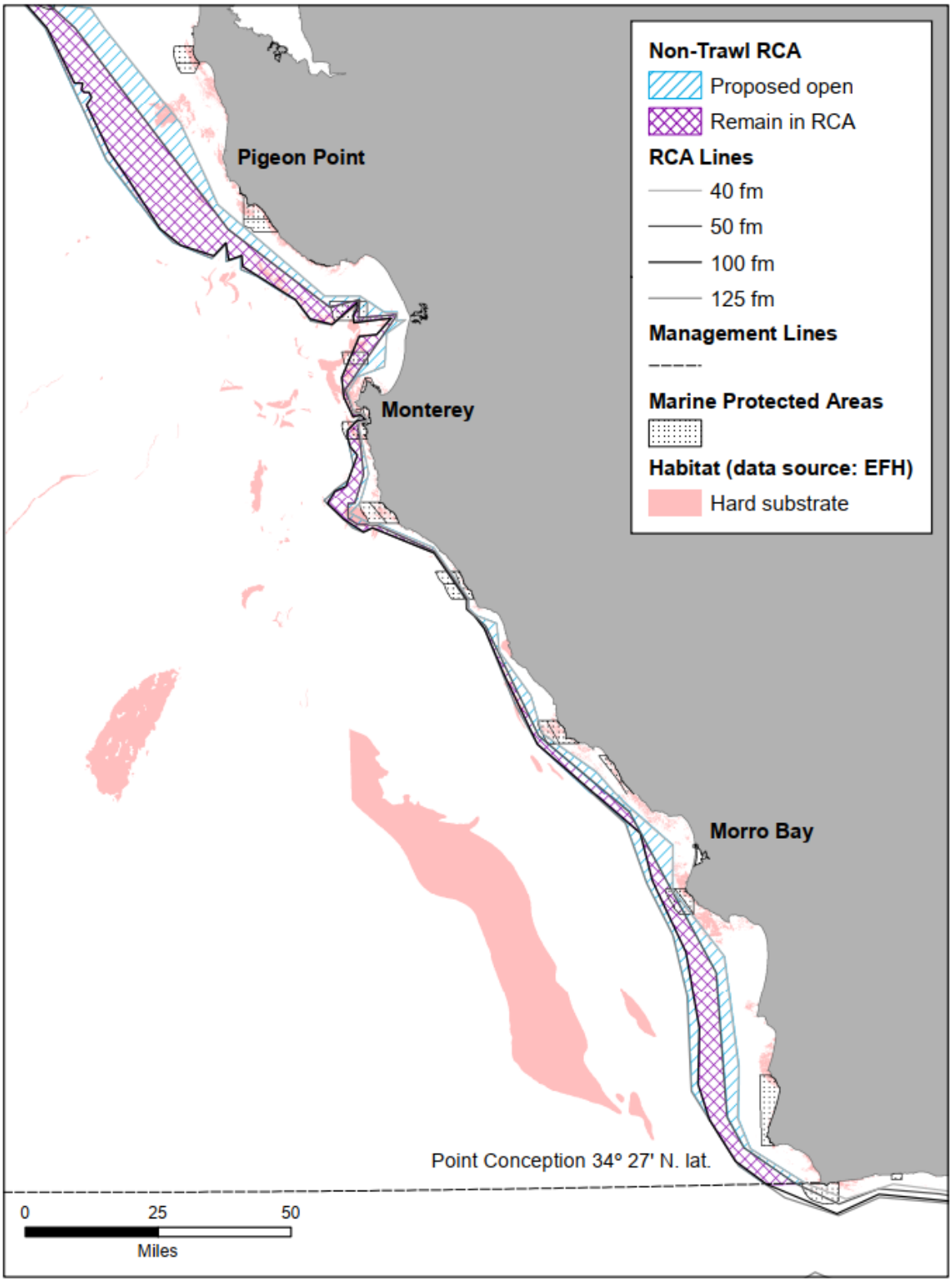

Figure 4-2. Map of the current non-trawl RCA off south-central California and the proposed minor adjustments to the seaward (125 fm to 100 fm) and shoreward (40 fm - 50 fm) boundary lines.

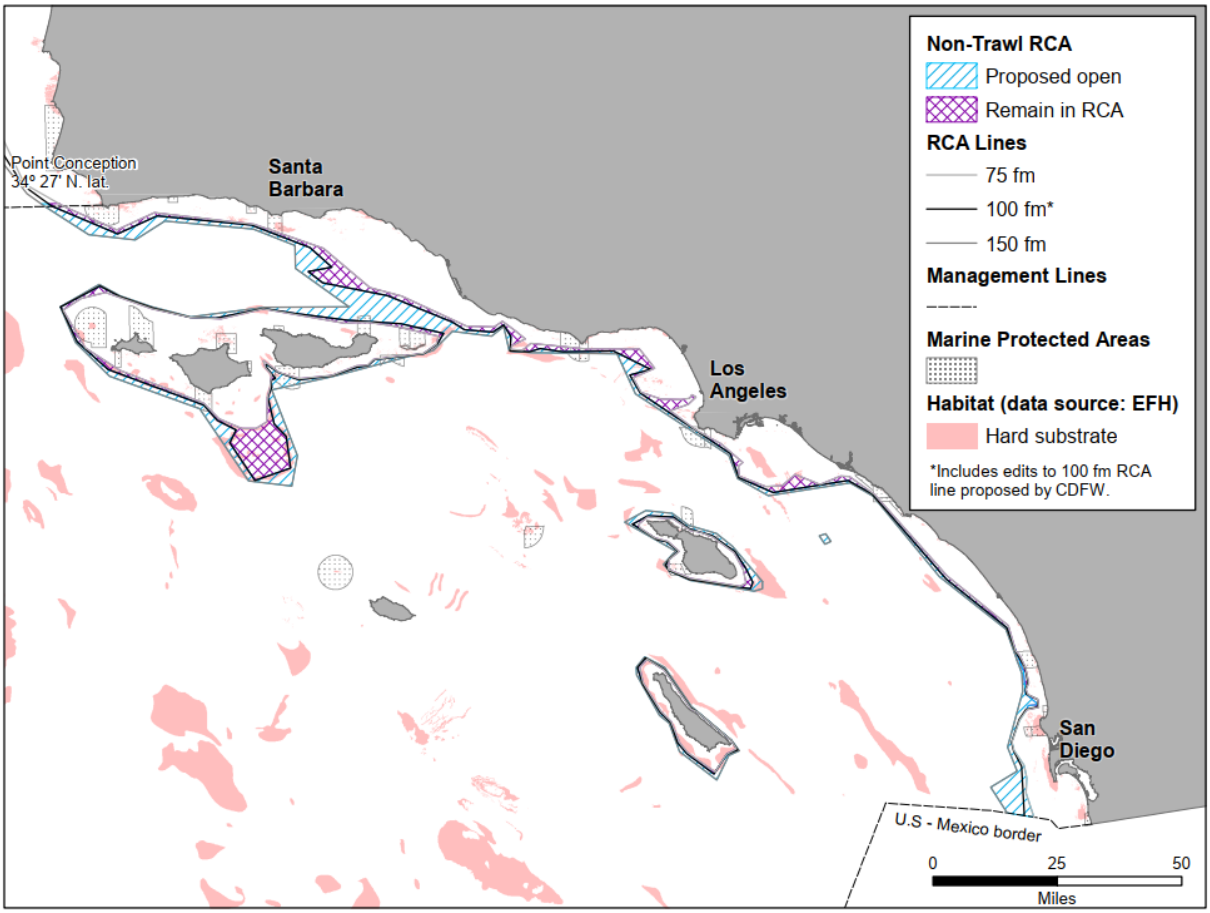

Figure 4-3. Map of the current non-trawl RCA off southern California and the proposed minor adjustment (from 125 fm to 100 fm) to the seaward boundary line.

Option 2 from Table 4-3 would reopen the 40 - 50 fathom and 125 fathom to 100 fathom depths between 40°10' N. lat. and 34°27' N. lat. that are no longer needed to mitigate risks to yelloweye rockfish ACLs, nearshore ACTs or previously overfished species (e.g. bocaccio, cowcod, canary rockfish, and widow rockfish). Section 3 provides a detailed description that the Council specifically revising the rebuilding plan for yelloweye rockfish to provide economic benefits sectors such as Option 2.

Additionally, Option 2 would reopen the 150 fathom to 100 fathom depths south of 40°10' N. lat. that are also no longer needed to mitigate risks previously overfished species (e.g. bocaccio and cowcod). A majority of these depths off central and southern California remained closed during 2002-2018 because of the severely limiting ACLs for yelloweye rockfish (projected to be rebuilt by 2029), bocaccio, canary rockfish, widow rockfish and cowcod. However, in June 2017, Council took inseason action to adjust the non-trawl RCA between 40°10' N. lat. and 34°27' N. lat. from 30 fathoms - 150 fathoms to 40 fathoms to 125 fathoms (Agenda Item F.10.a REVISED Supplemental GMT Report 2, June 2017).

Since 2018, bocaccio, canary rockfish, and widow rockfish have been rebuilt and the significantly higher ACLs have provided minor relief to the commercial non-trawl sector by allowing for adjustments to trip limits. For the 2019-2020 biennium and beyond, the Council revised the yelloweye rockfish rebuilding plan in order to specifically provide more non-trawl economic

benefits to industry and communities. Additionally, in 2019 the Council removed the 6 mt ACT for cowcod as the stock was declared rebuilt to alleviate constraints on the trawl sector and provide some flexibility to the non-trawl sector (Agenda Item H.4, Situation Summary, November 2019). Individually, the higher ACLs from the previously overfished species and revisions to the ACTs for yelloweye rockfish and cowcod have provided relief for select fisheries and communities.

Option 2 would provide relief in a cohesive package as it would allow the commercial non-trawl sector greater access to the rockfish with higher ACLs that are current in demand by the smaller domestic markets while still while still allowing yelloweye rockfish to rebuild as fast as possible (Agenda Item E.4, Attachment 5, June 2018) and remaining precautionary for cowocd. The nearshore fisheries used to be severely constrained by the yelloweye rockfish, but that is no longer the case as the California nearshore fishery south of 40 10' N lat are only projected to take approximately half the 2020 ACTs (Agenda Item H.10.a, Supplemental GMT Report 1, November 2019). The Option 1 RCA is no longer needed to keep the nearshore and non-nearshore fisheries to their yelloweye rockfish ACTs and to protect overfished species, thus there is strong justification for Option 2.

In addition, ODFW and CDFW have received numerous urgent requests from fishermen that Option 2 needs to be opened immediately in order to provide relief from impacts COVID-2019. They are highly supportive of the proposals to increase trip limits for lingcod as well as mid-water and nearshore rockfish stocks (Section 2), but note there is not much benefit to some of these proposals because the primary constraint in accessing healthy shelf rockfish species is due to the non-trawl RCA. Minor adjustments to the boundary lines south of 40°10' N. lat. (Option 1) would provide the commercial fixed gear fleet more opportunity to target those healthy and underutilized stocks throughout California. Rocky reefs are shown on the maps since that is where they would target lingcod and rockfishes.

It would be too speculative to try to provide precise quantitative projections of Option 2 in regards to target stocks, economic benefits, and regard to bycatch given the effects of COVID-2019 are still highly uncertain. Qualitative risks assessments therefore have to be provided that can still robustly describe if there are potential concerns with the proposals.

The analysts do not have concerns with Option 2 in regards to yelloweye rockfish or cowcod bycatch since model projections are updated inseason to reflect changes in fishing patterns, the the nearshore and non-nearshore non-sabelfish fisheries can be managed inseason to mitigate projected bycatch, because the the nearshore and non-nearshore non-sabelfish fisheries are only projected to take a portion of their respective south of 40°10' N. lat. non-trawl allocations.

In conclusion, Option 2 could provide immediate benefit for fishermen who have been impacted by the COVID-2019 issue without causing any conservation concerns. As described above, the nearshore and non-nearshore non-sabelfish fisheries are apparently doing relatively well so far despite closures of restaurant and international markets due to COVID-2019 by using marketing efforts to support local fishermen during times of need. Raising trip limits (Section 2) and Option 2 RCA could therefore be expected to help meet the continued unusually high demand for fresh locally caught fish.

ODFW and CDFW recommend the Council select Option 2 from Table 4-2 for non-trawl RCAs off Southern California.