

GROUND FISH ADVISORY PANEL REPORT ON PRELIMINARY PREFERRED MANAGEMENT MEASURES ALTERNATIVES FOR 2023-2024 FISHERIES

The Groundfish Advisory Subpanel (GAP) and Groundfish Management Team (GMT) held a joint discussion about preliminary preferred management measures. The discussion was informative and helpful; the GAP thanks the GMT for working with us on many of these difficult issues.

Referencing [Agenda Item F.4, Attachment 1, Supplemental Revised Action Item Checklist](#), the GAP provides comments on only those checklist items that differ from the GMT or the GAP believes require more rationale or comments to better inform the Council. For the purpose of this report, we will take the items in order and by reference number from the checklist.

5. Adopt ACTs: Confirm status quo or modify yelloweye rockfish nontrawl ACT of 39.8 mt

➤ Option to remove 50 mt Cowcod ACT south of 40 10' N. lat.

The GAP supports removing the 50 mt annual catch target (ACT) on cowcod, to provide flexibility and stability to the non-trawl sector south of 40° 10' N. lat. as described in [GMT Report 1](#) under this agenda item.

➤ Investigate and develop sector-specific ACTs for quillback rockfish and copper rockfish off of California

The GAP understands consideration of this item may require reconsideration in June and will be prepared to provide comments at that time.

12. 'New' Management Measures

➤ c) FMP amendment to establish shortbelly rockfish bycatch threshold to trigger Council review

The GAP recognizes the Council continues to explore refinements to monitoring catch of shortbelly rockfish in groundfish trawl fisheries. Fishery participants closely track and respond to our interactions with shortbelly. In addition, the GMT has developed robust inseason reporting to keep the public and Council apprised of shortbelly catch amounts with reports available on [PacFIN](#) and catch summaries provided by the GMT at Council meetings. When the Council categorized shortbelly as an ecosystem component (EC) species, Council discussion at the time identified 2,000 mt as a threshold value that, if exceeded, could be a trigger for the Council to consider whether action was needed. The GAP understands the Council is considering if the additional step of amending the fishery management plan (FMP) is necessary to include the 2,000 mt threshold value to be consistent with the EC categorization action. Relative to other actions in the 2023-2024 specifications and management package, the GAP considers this a low priority.

e) Non-bottom contact hook-and-line gear allowance in the non-trawl RCA

As the Council is aware, the non-trawl sector has been working for several years to get the Rockfish

Conservation Area (RCA) opened to non-trawl groundfish fishermen. For several reasons, this needs to happen as soon as possible. The status of some of our nearshore stocks make it imperative to move fishermen offshore to access healthy midwater stocks and take pressure off nearshore stocks such as copper and quillback rockfish.

The GAP has reviewed the documents under this agenda item, including the [National Marine Fisheries Service Report \(NMFS\)](#), and talked with Ms. Lynn Massey from NMFS. At this time, we support that recommendation to narrow the scope of Action Item 12e to the specific gear used in the Emley/Platt and the Real Good Fish [Monterey] exempted fishing permits. We further recommend that vessels entering the fishery declare into the fishery and declare which type of gear they are going to fish with, i.e., jig or troll gear. We request the council adopt action item 12e with the proposed changes and adopt it as the preliminary preferred alternative (PPA).

We understand that by doing this, the regulations will be finished and implemented January 1, 2023. To be clear, the GAP views this as a first step to get fishermen into the RCA and will be looking to have other gear types allowed in the future.

➤ [f\) Amendment to extend primary sablefish season end date from Oct. 31 to Dec. 31](#)

The GAP supported this in the past and continues to support this management measure. Most of the analysis has already been completed through emergency action during the pandemic, in 2020 and 2021. Furthermore, the GAP agrees with the [GMT for Option 1, sub-option 2](#). Ending halibut retention in the primary (tiered) sablefish fishery at the date or time specified by the International Pacific Halibut Commission (IPHC) or until the allocation is attained – whichever comes first – would afford the most flexibility for fishermen involved in this fishery.

➤ [CA Recreational Fishery Bag Limit Changes](#)

The GAP understands this measure would afford the Council and California Department of Fish and Wildlife (CDFW) more flexibility to take in-season action for management purposes. The GAP supports the development of bag limit analyses as proposed.

➤ [CA Recreational Fishery RCA Management Measures](#)

Similar to above, the GAP acknowledges this would provide managers with more flexibility to take inseason action. The GAP supports the proposed modifications to the RCA management boundaries, correcting various crossovers and following depth contours more closely.

➤ [Develop potential control catch management measures for Pacific spiny dogfish in groundfish fisheries, such as Block Area Closures \(BACs\) and Bycatch Reduction Areas \(BRAs\)](#)

As the GMT noted in its [Supplemental Report 2](#), industry efforts to control incidental catch through spatial management tools are generally more precise and timely than post facto actions taken by the Council or NMFS. Therefore, the GAP highlights that voluntary industry actions should be the first line of defense for responding to and minimizing incidental catch of non-target species, including spiny dogfish. However, the GAP understands that the Council wants to ensure it has all the tools necessary if Council action is needed and recognizes that BACs are a more precise tool

than fathom line-based BRAs. With that in mind, the GAP accepts the inclusion of development of BACs as a potential inseason catch control measure in the management measures package. The GAP will continue to coordinate with the GMT on this matter and will provide additional considerations and recommendations in June prior to final Council action.

14a. (OA N. 40° 10'): Adopt preliminary routine adjustments to the non-trawl RCA configuration, trip limits, size limits, as appropriate

➤ Sablefish north of 36° N. lat.:

The GAP recommends Option 1: 2,000 lbs./week, not to exceed 4,000 lbs./2 months (removal of the 600 lb. daily limit), as described in [GMT Supplemental Report 4](#).

14b. (OA S. 40° 10'): Adopt preliminary routine adjustments to the non-trawl RCA configuration, trip limits, size limits, as appropriate

The GAP recommends status quo.

15a. (LEFG N. 40° 10'): Adopt preliminary routine adjustments to the non-trawl RCA configuration, trip limits, size limits, as appropriate

The GAP agrees with the GMT and recommends status quo, as described in [Supplemental GMT Report 4](#).

15b. (LEFG S. 40° 10'): Adopt preliminary routine adjustments to the non-trawl RCA configuration, trip limits, size limits, as appropriate

The GAP recommends status quo.

16. Washington recreational

The GAP agrees with the proposals as outlined in the [Washington Department of Fish and Wildlife report](#).

17. Oregon recreational

The GAP agrees with the management measures proposed in the [Oregon Department of Fish and Wildlife report](#), with the addition of allowing longleader gear fishing on the same trip as all-depth Pacific halibut and otherwise legal groundfish with all-depth halibut (sablefish, Pacific cod, and other flatfish species), as noted in the [Supplemental GMT Report 4](#) under this agenda item.

16. California recreational

The GAP understands CDFW proposed several options and is prepared to comment on these in the future.

All the alternatives within the PPA provided for Council's consideration within [CDFW Report 1](#) under this agenda item include variations on the theme of several months of no recreational angling access to waters inshore of the 50-fathom lines and additional access beyond.

Previous measures which included areas where groundfish fishing was prohibited, also disallowed possession of the no-take groundfish species, irrespective of where or how they were obtained.

The GAP notes language within the CDFW report states, "In all areas of the state, during months that an offshore fishery is active, retention of nearshore rockfish, cabezon, and greenlings is prohibited."

It is important that both shelf and slope rockfish complexes as well as other species which are legally accessible, remain legally possessed while fishing in waters inshore of the 50-fathom lines, even during times where they are closed to the take of nearshore complex rockfish, cabezon and greenlings.

Waters beyond the 50-fathom lines are much more exposed to prevailing westerly winds and seas and these winds, strongest in afternoon hours. The wind-line typically moves shoreward with the time of day. It's the afternoon hours when recreational anglers most need inner waters access. Anglers must be able to legally possess legally caught fish from deeper waters while fishing inshore areas for non-groundfish species like bass, bonito and salmon.

PFMC
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