

GROUND FISH MANAGEMENT TEAM REPORT ON NON-TRAWL SECTOR AREA MANAGEMENT MEASURES - RANGE OF ALTERNATIVES

The Groundfish Management Team (GMT) attended a joint briefing with the Groundfish Advisory Subpanel (GAP) by Ms. Jessi Doerpinghaus and Mr. Brett Wiedoff of the Pacific Fishery Management Council (Council) staff, reviewed the documents in the briefing book, and had some detailed discussion. The GMT would also like to thank Ms. Lynn Massey of the National Marine Fisheries Service (NMFS) for providing additional information on the gear description portion. Below are some GMT thoughts for Council consideration, which are based on questions posed in [Agenda Item F.6, Attachment 1, April 2022](#) along with any additional questions posed by Council staff during GMT discussion.

In addition to the recommendations provided below, **the GMT recommends including the development of Block Area Closures (BACs) coastwide in the Range of Alternatives (ROA), because BACs could be a useful tool for mitigating bycatch of other groundfish stocks, as well as protected or prohibited species, if action is taken under any or all of Alternatives 1 through 6. The GMT also recommends aligning Alternatives 1 and 2 with what is being proposed in the 2023-24 management measures package by extending the southern edge of the non-trawl Rockfish Conservation Area (NT_RCA) proposals to the Mexico/US border in order to reduce regulatory, management, and enforcement complexity.**

On an overarching note, the GMT does not believe that the actions pertaining to habitat protection (e.g., adding protections to existing bottom trawl Essential Fish Habitat Conservation Areas [EFHCAs]) meet the purpose and need statement as adopted by the Council in November 2021. We recommend Council staff revise the purpose and need based upon feedback received from this meeting. Specifically the purpose and need should address some of the habitat needs outlined in the Habitat Committee (HC) report ([Agenda Item F.6.a, Supplemental HC Report 1](#)) but broadened to include more than just EFHCA concerns.

Alternative 1: Allow Open Access (OA) vessels targeting groundfish to fish in the NT_RCA using approved hook & line gear

The GMT recommends including Alternative 1 in the Range of Alternatives (ROA) as it could provide additional opportunity and flexibility to vessels to target midwater rockfish outside of that considered in the 2023-24 management measures.

In response to a question about additional gear configurations or bait types to include, besides what is proposed in [Agenda Item F.4.a, Supplemental NMFS Report 1, April 2022](#), the GMT does not offer any additional gear configurations beyond what have already been proposed and looks to the GAP for any additional requests and the Enforcement Consultants (EC) for any refinements. In general, the GMT is supportive of an inclusive range of alternatives and of allowing for flexibility around gear innovation, bait types, and improvements above and beyond what is found in the 12e item that is proposed in the 2023-2024 biennial management measures ([NMFS Report](#)).

Alternative 2: Allow Limited Entry Fixed Gear (LEFG) vessels targeting groundfish to fish in the NT RCA using approved hook & line gear up to LEFG trip limits

For equity reasons, the GMT recommends including Alternative 2 in the ROA as it could provide additional opportunity for LEFG vessels to fish to the LEFG limits for midwater rockfish, which is outside the scope of measures analyzed and considered in the 2023-24 management measures package.

The GMT also recommends including Individual Fishing Quota (IFQ) gear switching vessels to utilize the proposed gear types in the NT_RCA in the ROA for further analysis. The team notes that the Council’s motion ([November 2021 Decision Summary Document](#)) only specified “Limited Entry trip limits”, and gear switching vessels fish under IFQ quota pounds, so it is unclear to the GMT whether the Council intent was to allow gear switchers to have access to the NT_RCA and continue to fish under their IFQ limits. The GMT is generally supportive of simplifying regulatory burden while allowing equitable access to newly opened areas.

Alternative 3: Reconfiguration of NT RCA boundaries

The GMT recommends including Alternative 3 in the ROA, because this could provide increased opportunity for multiple sectors to harvest underutilized species in areas that have not been open to groundfish fishing in 20 years.

Currently, the non-tribal directed commercial Pacific halibut fishery is prohibited from fishing in the NT_RCA. The GMT notes that many participants in the directed Pacific halibut fishery also retain groundfish, if they have the appropriate license and vessel monitoring system. Participants in this fishery have previously requested changing the NT_RCA for the directed Pacific halibut fishery to 75 fathoms, as there is thought to be more Pacific halibut in that depth range during the summer months when the directed fishery is open. If changes are made to the NT_RCA boundaries in the groundfish regulations, Pacific halibut regulations would also need to reflect such changes for them to apply to the non-tribal directed commercial Pacific halibut fishery. It is the GMT’s understanding that if the Council wishes to include the Pacific halibut fishery in this action, both regulations can be adjusted via one Council action. To ensure that all directed Pacific halibut participants (including both those who also participate in groundfish and those who do not) are aware of the potential for change, careful consideration would need to be given in how this agenda item is noticed, so that all of the interested parties have the opportunity to participate. **The GMT recommends including the Pacific halibut fishery in the ROA to address their requests for access to those areas within the NT_RCA.**

Alternative 4: Remove the NT RCA

The GMT recommends removing this alternative from the ROA, because of a lack of data available for analysis. However, the GMT recommends including it on the workload prioritization list for consideration at a later date. Given that the ability to predict impacts from full removal is limited, if Alternative 3 moves forward, the GMT anticipates a data stream to help inform this action at a later date.

Alternative 5: Repeal the Cowcod Conservation Areas (CCAs) For Commercial and Recreational Fisheries

The GMT recommends including Alternative 5 in the ROA, as cowcod south of 40° 10' N. lat. is rebuilt and no longer needs the area-specific protection. Further, the GMT recommends that all NT-RCA lines around the islands, banks, and high spots within the CCAs proposed in [Agenda Item E.5.a, CDFW Report 1, November 2021](#) be included in the ROA for further analysis. This item has been under consideration for multiple management cycles. Moving the CCA repeal forward in a package that would be modifying other groundfish conservation areas where the intent is to provide access to additional areas that are currently closed to groundfish fishing makes sense. For many years, sablefish, thornyheads, and other deepwater species have been under-attained south of Pt Conception, partially due to the extremely limited access in the CCA. Ability to access the deepwater species could help rebuild markets in southern California. Additionally, opening the CCA would allow for more unrestricted research access to a large portion of the southern California Bight. The additional research opportunity could reduce the uncertainty in biomass estimates for species of concern and economically important species.

Alternative 6: Open Limited Areas of the Non-trawl RCA to Pot Gear Only (off Washington)

The GMT recommends including Alternative 6 in the ROA but reiterates that there is less urgency in implementing this alternative than other alternatives in the ROA. The GMT agrees with the rationale provided in [Agenda Item E.6.a, Supplemental WDFW Report 1, November 2021](#), specifically that opening select areas could provide vessels access to larger sablefish and potentially a higher price per pound. The GMT understands that the Washington Department of Fish and Wildlife (WDFW) is still working with stakeholders to identify areas of interest and will likely have options for September 2022.

The Council will want to look carefully at any areas of interest that overlap with EFHCAs given the objective in the November WDFW report to minimize habitat impacts ([Agenda Item E.6.a, Supplemental WDFW Report 1, November 2021](#)), noting that the interest is to only open these areas to pot gear, which could be considered as bottom contact gear. **The GMT recommends analyzing pot gear impacts from groundfish fishing to any bottom trawl EFHCAs that overlap with the area 75-100 fathoms off Washington**, and a formal decision on a prohibition can be made at a later date. The GMT looks to the EC on the ability to enforce this prohibition within the Olympic 2 and Willapa Canyon EFHCAs given the small amount of overlap with the current NT_RCA. The Grays Canyon EFHCA may be much easier to enforce and covers more habitat within the NT_RCA.

Summary of GMT Recommendations

The GMT recommends the Council:

- 1. Include the development of Block Area Closures (BACs) coastwide in the Range of Alternatives (ROA), because BACs could be a useful tool for mitigating bycatch of other groundfish stocks, as well as protected or prohibited species if action is taken under any or all of Alternatives 1 through 6.**
- 2. Align Alternatives 1 and 2 with what is being proposed in the 2023-24 management measures package by extending the southern edge of the NT_RCA proposals to the**

Mexico/US border in order to reduce regulatory, management, and enforcement complexity.

3. **Include Alternative 1 in the Range of Alternatives (ROA) as it could provide additional opportunity and flexibility to vessels to target midwater rockfish outside of that considered in the 2023-24 management measures.**
4. **Include Alternative 2 in the ROA as it could provide additional opportunity for LEFG vessels to fish to the LEFG limits for midwater rockfish which is outside the scope of measures analyzed and considered in the 2023-24 management measures package.**
5. **The GMT also recommends including Individual Fishing Quota (IFQ) gear switching vessels to utilize the proposed gear types in the NT_RCA in the ROA for further analysis.**
6. **Include Alternative 3 in the ROA, because this could provide increased opportunity for multiple sectors to harvest underutilized species in areas that have not been open to groundfish fishing in 20 years.**
7. **Include the Pacific halibut fishery in the ROA to address their requests for access to those areas within the NT_RCA.**
8. **Remove Alternative 4 from the ROA, because of a lack of data available for analysis, and include it on the workload prioritization list for consideration at a later date.**
9. **Include Alternative 5 in the ROA as cowcod is rebuilt and no longer needs the area-specific protection.**
10. **Include all NT-RCA lines around the islands, banks, and high spots within the CCAs proposed in [Agenda Item E.5.a, CDFW Report 1, November 2021](#) in the ROA for further analysis.**
11. **Include Alternative 6 in the ROA but reiterates that there is less urgency in implementing this alternative than other alternatives in the ROA.**
12. **Analyze pot gear impacts from groundfish fishing to any bottom trawl EFHCAs that overlap with the area 75-100 fathoms off Washington.**

PFMC
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