

## GROUND FISH ADVISORY PANEL REPORT ON EXEMPTED FISHING PERMITS, HARVEST SPECIFICATIONS AND MANAGEMENT MEASURES

The Groundfish Advisory Subpanel (GAP) and Groundfish Management Team (GMT) discussed the issues and reviewed the documents under this agenda item and offers the following comments and recommendations.

### Exempted Fishing Permits

The GAP supports moving forward with all the proposed EFPs. Additionally, the GAP supports modifying the [Yellowtail Rockfish Jig Fishing \(Emley-Platt\) Proposal](#) (Attachment 4) to accommodate expansion of the EFP north of 40° 10' N. lat. to the Oregon/Washington border, 46° 16' N. lat. and south of Pt. Conception, 34° 27' N. lat., to the Mexican border, to test the gear using natural bait in the non-trawl Rockfish Conservation Area (RCA). For the expansion north of 40° 10' N lat., the GAP supports the participants testing the gear using natural bait under open access (OA) trip limits north of 40° 10' N. lat. and to be subject to the 2023-24 yelloweye rockfish ACTs set for the non-trawl commercial fishery (2023 & 2024 = 8.4 mt).

This amendment or modification aligns with the long-term goal of the EFP, “to allow commercial jig fishing with this gear off the entire West Coast, including in the RCAs, by the Open Access and Limited Entry participants.”

Additionally, this will gather information to better inform NMFS and the U.S. Fish and Wildlife Service of bird interactions with this gear type on the shelf north of 40°10' N. lat. That is, these changes would provide a more “real-world” environment of this fishing gear with natural bait under federal cumulative trip limits.

Lastly, by fishing the EFP under current OA trip limits north of 40°10' N lat., this alleviates the need to make further adjustments to the off-the-top deductions and all other allocations below the fishery harvest guideline.

As noted in the Emley-Platt EFP application:

The long-term goal, if experiments prove successful, is to allow commercial jig fishing with this gear off the entire West Coast, including in the RCAs, by the Open Access and Limited Entry participants. If successful, this gear could also be used by the Nearshore fleet to avoid species of concern and could create a fishery that would fill out the portfolios of those who make up the bulk of the fishermen in the West Coast’s coastal communities. The recreational fleet might also benefit from using a similar gear with fewer hooks, similar to the Oregon Yellowtail EFP previously mentioned. Thus, the benefits of this EFP would extend beyond the initial EFP participants. Despite the generally depressed condition of many west coast groundfish stocks, there are some stocks that remain healthy. These healthier stocks could safely sustain increased harvest levels if they could be fished more cleanly and without bycatch of more depleted stocks. If stronger stocks could be targeted without increasing fishing mortality on depressed stocks, the West Coast commercial fishing fleet would have alternative fishing opportunities that would provide some

economic relief to the industry while providing the public with highly desirable sustainably harvested local seafood.

## Biennial Harvest Specifications

Referencing the Action Item Checklist under this item, the GAP has the following comments related to particular items in that list relative to harvest specifications and management measures.

### #1, Adopt quillback rockfish harvest specifications

The GAP supports option 2, as listed in the Action Item Checklist: ACL<ABC, SPR 0.55 & P\* 0.45. This option provides the most fishing opportunity for the fleet and the public. The GAP recognizes this opportunity is not to target quillback, but to access the more robust stocks in the complex. This will allow access to quillback for research purposes to inform the tentatively scheduled 2025 stock assessment.

The GAP did not include an ACL for copper rockfish, for which the GMT provided additional analysis since April. To that end, the GAP believes the No Action alternative is the best option. That is, applying the DHCR 40-10 adjustment to each assessment area ABC as the FPA, as detailed in [Supplemental GMT Report 2](#).

### #5, Annual Catch Targets (ACTs); consider ACTs for quillback and copper rockfish off California

The GAP agrees with the GMT and recommends setting the ACTs for copper and quillback rockfishes off of California equal to the species-specific ACL contributions to the complex ACLs.

## Management Measures

### #12, New Management Measures

#### ***c, FMP amendment to establish shortbelly rockfish bycatch threshold to trigger Council review***

As the [GAP noted in April 2022](#), we recognize the interest in continuing to refine monitoring catch of shortbelly rockfish in groundfish trawl fisheries. Fishery participants closely track and respond to our interactions with shortbelly rockfish. In addition, the GMT has developed robust inseason reporting to keep the public and Council apprised of shortbelly rockfish 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 trigger Council review of current information and consideration of whether action was needed. The GAP understands that this review process would need to be codified in the groundfish fishery management plan as part of the 2023-2024 specifications and management package. While the GAP continues to view this as a low priority relative to other elements w/in the suite of new management measures, we also clearly understand Council intent to move this item forward.

#### ***e, Non-bottom contact hook-and-line gear allowance in the non-trawl RCA***

The GAP concurs with the [NMFS report](#) on this item, with the changes that the vertical line gear specifies a 50-foot leader between the sinker and lowest hook, the carriage of an extra 25 hooks onboard as spares, and for the troll gear, the substitution of separation of segments by a “marker” rather than specifying a float.

***h, CA recreational fishery Bag Limit Changes***

The GAP supports the PPA to adopt the bag limit range for quillback rockfish, copper and vermilion rockfish. It provides needed flexibility with regard to management measures the Council may desire for use.

***i, CA recreational fishery RCA management measures***

The GAP concurs with the PPA, which provides flexibility to use management lines to delineate recreational closure areas shoreward of the line where previously their use was restricted to seaward application. It provides for additional use in conservation of groundfish not declared as overfished in addition to those declared overfished.

***j, Consider Block Area Closures (BACs) for groundfish mitigation***

As the GMT states in [Supplemental REVISED GMT Report 1](#), “[BACs] should be considered a last-resort measure behind industry-implemented avoidance measures.”

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 currently available fathom line-based Bycatch Reduction Areas. With that in mind, the GAP accepts the inclusion of development of BACs as a potential in-season catch control measure in the management measures package.

**#16 Fishery adjustments: WA Recreational trip limits, bag limits, seasons, etc.**

The GAP supports the sport fishing management measures as outlined in the Washington Department of Fish and Wildlife’s [Supplemental REVISED WDFW Report 1](#) under this agenda item.

**#17 Fishery adjustments: OR Recreational trip limits, bag limits, seasons, etc.**

The GAP supports the management measures as outlined in [GMT Report 4](#) under this agenda item and the [Oregon Department of Fish and Wildlife Report 1 from April 2022](#).

**#18 Fishery adjustments: CA Recreational trip limits, bag limits, seasons, etc.**

The GAP supports the CDFW’s Recreational Fishery Season Structure FPA in [supplemental-cdfw-report-1](#). While this option is far from ideal for participants in the fishery, it is the least worst of available options, according to stakeholders. Many were uncertain if the limited season structure was “survivable.” Their best hope is outlined in that report, with respect to demonstrating their ability to avoid copper and quillback rockfish in this year, 2022 season, In addition they hope to provide sufficient samples in support of a full assessment of copper rockfish in 2023. However, it is critical that the CDFW FPA for season structure survive intact, without further restricted access to the grounds so critical to them and the public’s continued access to our rich fisheries resources. The Council should understand, once shelf rockfish species are aboard, it restricts their ability to fish inshore waters, and yet it’s mornings when the outer waters are most

accessible due to weather patterns. It's afternoons when winds generally make exposed deep waters unfishable and inshore access is most needed.

PFMC  
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