

## GROUND FISH ADVISORY SUBPANEL REPORT ON PHASE 2 STOCK DEFINITIONS – PLANNING

Under this agenda item the Groundfish Advisory Subpanel (GAP) was tasked to respond to two considerations with respect to attachments [1](#) and [2](#).

1. Is everything in there?
2. The order and timing of portions of Phase 2

The GAP found no issues with the proposed schedule outlined in [Attachment 2](#). However, we have identified two items the Pacific Fishery Management Council (Council) should consider as this process moves forward (as outlined in Attachment 1).

When considering management to stock complexes, the GAP has two questions that should be considered in those decisions that are related to National Standard 1 (excerpted below)

National Standard 1 provides:

“Conservation and management measures shall prevent overfishing while achieving, on a continuing basis, the optimum yield (OY) from each fishery for the U.S. fishing industry.

(d) *Stocks and stock complexes* —

(2) *Stock complex*. Stocks that require conservation and management can be grouped into stock complexes. A “stock complex” is a tool to manage a group of stocks within a Fishery Management Plan (FMP).

(i) At the time a stock complex is established, the FMP should provide, to the extent practicable, a full and explicit description of the proportional composition of each stock in the stock complex. **Stocks may be grouped into complexes for various reasons, including where stocks in a multispecies fishery cannot be targeted independent of one another; where there is insufficient data to measure a stock's status relative to SDC; or when it is not feasible for fishermen to distinguish individual stocks among their catch...**”

1. Is it to optimize as a whole, the productivity of stocks in a multispecies fishery that cannot be targeted independently of one another?
2. Or, is it to maintain the relative abundances of the co-occurring rockfish species by holding all at their B-40 target.

The current debacle with respect to quillback rockfish is an iconic example of how attempting to hold the species within a multispecies fishery, each individually, at target population levels based on a percentage of their unfished relative abundances can result in much more fisheries damage than good. In this case, the rebuilding of quillback to target projects costs much more in the foregone productivity of its co-occurring species than quillback can ever return. Even at optimum

yield (OY), maintaining California quillback at target is projected to result in much reduced net productivity by the nearshore complex as a whole. In the case of quillback in California, the effort is patently contrary to the goal of maintaining optimum yield fisheries.

Secondly, the Council should consider whether as a policy, they want to continue to avoid fisheries management characterized by independent management of shared resources. Partitioning the management of stocks that live in both state and federal waters can re-create the disconnected management dynamics of the 1970s.

Over the years, this Council has made great strides in coordinating the management of many trans-boundary stocks all along our Pacific Coast. These include salmon, coastal pelagic species, highly migratory species and groundfish, including Pacific whiting. The GAP sees some of the outlined tasks in Attachment 1 of this agenda item under the heading “Federal Jurisdiction and State Management” as potentially contrary to this path of progress.

We note that states can provide for conservation irrespective of their state boundaries. However, where corresponding regulations do not exist for federal waters, states are limited to doing so on the basis of possession-based regulations enforced in-state for catches occurring outside their boundaries.

We encourage the Council to consider establishing a goal for the Phase 2 Stock Definitions process of maintaining the Council as a venue for the continued coordinated management of all stocks within the waters of the West Coast Economic Exclusion Zone of the contiguous United States.

PFMC  
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