

**GROUND FISH ADVISORY SUBPANEL REPORT ON 2025-2026 FISHERIES
ANALYSIS UPDATE AND ADOPT CALIFORNIA QUILLBACK ROCKFISH HARVEST
SPECIFICATIONS AND REBUILDING PARAMETERS**

Table 1. Summarized Groundfish Advisory Subpanel (GAP) recommendations for the 2025-2026 Fisheries Analysis Update and California Quillback

Item	GAP Recommendation
California Quillback Harvest Specifications and Management Measures	Adopt a Rebuilding Strategy using the ABC Rule for quillback rockfish off California ($T_{\text{target}}=2060$) with the corresponding PPA harvest specifications ($P^* 0.45$, 2025 ACL 1.3 mt, 2026 ACL 1.5 mt)
Clarification on Copper Rockfish	If an ACT is selected by the Council for copper rockfish south of Pt. Conception ($34^{\circ} 27' \text{ N. Lat.}$), do not apply a trigger for automatic action but notify the Council when approaching attainment.
Widow Rockfish Allocation	Include all widow rockfish trawl/non-trawl allocation options for analysis: <ul style="list-style-type: none"> ● Option 1 (Status Quo): a fixed 400 mt of the fishery HG is allocated to the non-trawl sector and the remainder is allocated to trawl ● Option 2: a fixed 300 mt of the fishery HG is allocated to the non-trawl sector and the remainder is allocated to trawl ● Option 3: a fixed 200 mt of the fishery HG is allocated to the non-trawl sector and the remainder is allocated to trawl
Canary Rockfish Allocation	Include the following canary rockfish allocation options for analysis: <p>Trawl/non-trawl allocations</p> <ul style="list-style-type: none"> ● Option 1 (Status Quo): 72.3% trawl, 27.7% non-trawl <p>At-sea set-asides:</p> <ul style="list-style-type: none"> ● Option 1 (Status Quo): 36 mt ● Option 2: 30 mt ● Option 3: 20 mt <p>Commercial non-trawl and recreational non-trawl sharing arrangement:</p> <ul style="list-style-type: none"> ● Option 1 (Status Quo): the commercial non-trawl sector receives 36% of the non-trawl allocation <p>State-specific recreational shares:</p> <ul style="list-style-type: none"> ● Option 1 (Status Quo): Shares are based on the status quo proportions of the collective recreational share
Shortspine Thornyhead Management Measure	Include the following shortspine thornyhead management measure pathway for analysis: <p>Pathway 2 - Removal of the Management Line at $34^{\circ} 27' \text{ N. lat.}$</p> <ul style="list-style-type: none"> ● Option 2 with GAP modifications: Remove the management line at $34^{\circ} 27' \text{ N. lat.}$, and set a coastwide ACL. Set trawl/non-trawl allocations for 2025 at 64% trawl, 36% non-trawl, using the A20 component rule for area combinations (requires 2024 value). For 2026, update the trawl/non-trawl allocations to 71% trawl, 29% non-trawl in order to return trawl to the 2025 value. Establish non-trawl ACTs and/or trip limits to protect non-trawl fishermen south of $34^{\circ}27' \text{ N. lat.}$
Petrale Sole	Maintain status quo trawl/non-trawl allocations

Longleader Gear	Include for analysis using longleader gear for the California recreational fishery
Continuous Transit	Include for analysis allowing California recreational vessels to stop and/or anchor shoreward of the 50 fm line when the offshore fishery is in place, with the requirement that no hook-and-line gear is in the water

California Quillback Harvest Specifications and Management Measures

The GAP recommends the Council adopt a Rebuilding Strategy using the Acceptable Biological Catch (ABC) Rule for quillback rockfish off California ($T_{\text{target}}=2060$) with the corresponding preliminary preferred alternative (PPA) harvest specifications [P^* , annual catch limit (ACL)] as described in Table 2 below. These amounts provide the most opportunity for groundfish fisheries off of California, but meet the mandated rebuilding requirements to rebuild as soon as possible, while meeting the needs of fishing communities.

Table 2. GAP-recommended rebuilding strategy for Quillback rockfish off of California

Rebuilding Strategy	ABC Rule
P^*	0.45
2025 OFL/ACL	1.52/1.3
2026 OFL/ACL	1.7/1.5
SPR	-
T_{target}	2060
T_{max}	2071
Probability of recovery by T_{max}	0.736

The GAP anticipates that inseason changes adopted by the Council for quillback rockfish in California will be very similar to what will be included in the 2025-2026 biennial harvest specifications and management measures. At the time the GAP submitted this statement, the inseason agenda item at this meeting had not yet been taken up on the Council floor. However, the required quillback management measures - both for inseason and under 2025-2026 specifications process - will be devastating for all the non-trawl fisheries from Central California to the Oregon border.

The ACL values that will result from the ABC Rule provide the largest available ACLs in the [Rebuilding Analysis](#) adopted under Agenda Item F.2, and yet are even smaller than the annual catch targets (ACTs) we are managing to in 2024.

The economic impacts of these harvest specifications and resulting management measures are expected to be devastating to non-trawl commercial fisheries, as well as the many charter businesses that provide public access to California’s rich marine fisheries resources. Those devastating impacts will extend community-wide within Northern California’s small coastal towns, including to the businesses that support the commercial and recreational fishing industry (e.g., bait shops, ice plants). We point to the [comments](#) provided to the Council by the [American Sportfishing Association](#) in November of 2023 under Agenda Item E.5.b as an example of these impacts.

Further, the GAP notes these measures to rebuild quillback numbers to the B-40 target are counter-productive and contrary to the objectives outlined in the Magnuson-Stevens Fishery Conservation and Management Act [National Standard 1](#) and will have impacts to fishing communities considered under [National Standard 8](#).

Indeed, once rebuilt, just holding quillback at target will continue to cost fisheries many times more in foregone access to the entire nearshore rockfish complex than would be gained by having quillback rockfish at target. We point to the [public comment of Dr. Ray Hilborn](#) in the November 2023 meeting under Agenda Item E.5.b.

Clarification on Copper Rockfish

The GAP understands the Council is interested in the development of an ACT for copper rockfish south of Pt. Conception (34° 27' N. Lat). The GAP accepts this in the context of understanding localized impacts. However, the GAP recommends no trigger for automatic action be considered. The projected attainment of the ACT may be difficult to determine due to recreational seasons opening later in the year. Very limited concrete data will be available early enough in the season to confidently support an automatic change in management. We support notifying the Council when the ACT is approached.

Widow Rockfish Allocation

The GAP recommends including all widow rockfish trawl/non-trawl allocation options for analysis:

- Option 1 (Status Quo): a fixed 400 mt of the fishery harvest guideline (HG) is allocated to the non-trawl sector and the remainder is allocated to trawl
- Option 2: a fixed 300 mt of the fishery HG is allocated to the non-trawl sector and the remainder is allocated to trawl
- Option 3: a fixed 200 mt of the fishery HG is allocated to the non-trawl sector and the remainder is allocated to trawl

At the November 2023 meeting, the GAP recommended what is now Option 3 (200 mt to the non-trawl sector, remainder to trawl) be included for analysis, due to high attainment in the trawl sector, and low recent attainment in the non-trawl sector relative to the 400 mt status quo non-trawl allocation ([Agenda Item E.7.a, Supplemental GAP Report 1, November 2023](#)). Since that time, the GMT added what is now Option 2 (300 mt to the non-trawl sector, remainder is to trawl) ([Agenda Item F.7.a, Supplemental GMT Report 1, March 2024](#)), and the GAP recommends that the Council include this option in the range for analysis.

Canary Rockfish Allocation

The GAP recommends including the following canary rockfish allocation options for analysis:

Trawl/non-trawl allocations

- Option 1 (Status Quo): 72.3 percent trawl, 27.7 percent non-trawl

At-sea set-asides:

- Option 1 (Status Quo): 36 mt
- Option 2: 30 mt
- Option 3: 20 mt

Commercial non-trawl and recreational non-trawl sharing arrangement:

- Option 1 (Status Quo): the commercial non-trawl sector receives 36 percent of the non-trawl allocation

State-specific recreational shares:

- Option 1 (Status Quo): Shares are based on the status quo proportions of the collective recreational share

We recommend removing all other options from the range for analysis in order to focus on the alternatives the GAP has presented here. We discuss each item in more detail below.

In line with our November statement ([Agenda Item E.7.a, Supplemental GAP Report 1, November 2023](#)), the GAP continues to recommend the status quo trawl/non-trawl allocation for canary rockfish. All sectors will be faced with a substantial reduction and the 2025-2026 harvest specifications will be severely constraining compared to the maximum mortality seen in recent years in both the trawl and non-trawl fisheries.

The GAP recommends keeping the same range of alternatives for the at-sea set-asides, and at-sea members noted that during a prior negotiation, the at-sea sectors agreed to reduce their set-aside from 46 mt to 36 mt (decrease of 10 mt) in order to provide more canary for the individual fishing quota sector.

For the commercial non-trawl and recreational non-trawl sharing arrangement and state-specific recreational shares, the GAP recommends analyzing status quo only. We do not recommend moving forward with further analysis of changing either sharing arrangement, since all non-trawl sectors will be severely constrained already.

We note for the Council that it took a lot of collaborative effort over several meetings to arrive at our recommendations on this contentious allocation issue that will severely impact all sectors. The GAP reiterates that the survey and stock assessment is not aligned with the increased encounters we are seeing on the grounds.

Shortspine Thornyhead Management Measure

The GAP recommends including the following shortspine thornyhead management measure pathway for analysis:

Pathway 2 - Removal of the Management Line at 34° 27' N. lat.

- Option 2 with GAP modifications: Remove the management line at 34° 27' N. lat, and set a coastwide ACL. Set trawl/non-trawl allocations for 2025 at 64 percent trawl, 36 percent non-trawl, using the Amendment 20 component rule for area combinations (requires using the 2024 value). For 2026, update the trawl/non-trawl allocations to 71 percent trawl, 29 percent non-trawl in order to return trawl to the 2025/26 value. Establish non-trawl ACTs and/or trip limits to protect non-trawl fishermen south of 34°27' N. lat.

The GAP spent several hours reviewing, asking questions on, and discussing the GMT report for shortspine thornyhead ([Agenda Item F.7.a, Supplemental GMT Report 3, March 2024](#)). We believe, with some modifications to the GMT-proposed Pathway 2, that we have come up with a solution that could be equitable while maintaining opportunity for the non-trawl shortspine target fishery north of 34° 27' N. lat.

If the Council were to proceed with status quo allocations for shortspine thornyheads under the reduced 2025-2026 harvest specifications, the allocation scheme is set up such that it would result in significantly reduced trip limits for the non-trawl shortspine target fishery north of 34° 27' N. lat. - reducing limited entry fixed gear (LEFG) from about 2,500 lbs per 2 months to 350 lbs per 2 months (-86 percent), and open access (OA) from 50 lbs per 2 months to 40 lbs per 2 months (-20 percent). The GAP agrees that these reductions must be avoided, particularly on the LEFG side, and that status quo allocations could effectively end this non-trawl targeted shortspine fishery at a time when it is more crucial than ever to maintain it (due to the loss of so many other non-groundfish fishing opportunities and decreases in so many groundfish ACLs).

The GMT identified two pathways to maintain the non-trawl targeted shortspine fishery north of 34° 27' N. lat. The first would reallocate some of the trawl allocation north of 34° 27' N. Lat. (currently 95 percent) to the non-trawl sector north of 34° 27' N. Lat. (currently 5 percent). However, with shortspine becoming so constraining in this next biennium on both sectors in the north, trawl representatives expressed that asking the trawl sector to take an additional cut (beyond the proportional cut both sectors are already taking due to decreased ACLs) and moving quota to the non-trawl sector so that they can keep status quo trip limits does not feel fair. This is compounded when considering shortspine trawl quota would be stranded in the south. The GAP therefore decided to focus on the second pathway (described below). We recommend that Pathway 1 is therefore not moved forward for analysis.

The second pathway the GMT identified would remove the management line at 34° 27' N. lat., and set a coastwide ACL that would closely maintain the total trawl/non-trawl allocations. While this would allow unutilized shortspine in the south to be used in the north, the GAP foresees a couple of issues with this pathway, and we are proposing some ideas to fix them.

The first issue is that shortspine is an important fishery for participants south of 34° 27' N. Lat., which had higher attainment prior to COVID - and the management line that currently exists protects that fishery for the future under higher attainment scenarios that are likely to occur with the redevelopment of markets. The GAP heard from several fishermen targeting shortspine south of 34° 27' N. Lat., which brings in high market values and provide a vital source of income in this area. In order to preserve the fishery in the south, the GAP recommends including area-specific ACTs and differential trip limits for analysis under this pathway (option 2 in the GMT report under Pathway 2).

The second issue is that the Council and the National Marine Fisheries Service (NMFS) would need some mechanism in order to set the trawl/non-trawl allocations under a coastwide ACL. The trawl rationalization/individual fishing quota program under Amendment 20 set a “component rule,” requiring that when re-combining two areas, the quota share (QS) or individual bycatch quota (IBQ) held by individuals in each area will be adjusted proportionally such that: 1) the total QS or IBQ for the area sums to 100 percent, and 2) a person holding QS or IBQ in the newly-created area will receive the same amount of total QP or IBQ pounds as they would if the areas had not been recombined. The GAP reads this regulation to mean that the total 2025 quota pounds issued to QS accounts should match what they would have been if the areas had not been recombined. This would result in values that, if carried up to the trawl/non-trawl allocation level, would result in a 71 percent trawl, 29 percent non-trawl allocation for shortspine for 2025/2026. However, upon input from NMFS, they would have to use the 2024 values, resulting in a 64 percent

trawl, 36 percent non-trawl allocation. The GAP recommends that if the Council moves forward with analyzing or recommending Pathway 2, that the trawl/non-trawl allocations for 2025 be set at 64 percent trawl, 36 percent non-trawl initially to meet the requirements of the A20 component rule for area combinations. Then, in 2026, change the trawl/non-trawl allocations to 71 percent trawl, 29 percent non-trawl in order to return trawl to the expected 2025 value.

Petrale sole

In line with our November statement ([Agenda Item E.7.a, Supplemental GAP Report 1, November 2023](#)), the GAP does not recommend analyzing changes to the trawl/non-trawl allocations for Petrale sole.

Longleader Gear

As in November 2023, we support the inclusion of longleader gear for California recreational fishery for analysis ([Agenda Item E.7.a, Supplemental GAP Report 1, November 2023](#)). This would create another tool in the toolbox to minimize impacts to nearshore species in need of conservation (quillback and yelloweye rockfish, specifically) while targeting abundant species. Given the current restrictive seasons and potential for further limitations, this tool may provide critical opportunities in future years.

Continuous Transit

The GAP appreciates the effort of NMFS, and particular Ms. Lynn Massey, for working on a short-term solution to modify the continuous transit provisions at [50 CFR 660.360\(c\)\(3\)\(i\)\(a\)](#) to allow California recreational vessels to stop and/or anchor shoreward of the 50 fm line when the offshore fishery is in place, with the requirement that no hook-and-line gear is in the water. This will allow California recreational vessels to fish for non-groundfish species or anchor on overnight trips. We understand that the emergency rule is only good for 180 days with the ability to extend for an additional 186 days if there is a permanent fix in process. Therefore, this provision should be included in the 2025-2026 biennial package because there is a need for a permanent fix for 2025 and beyond. This is a critical need for recreational vessels.

PFMC

03/09/24