GROUNDFISH ADVISORY SUBPANEL REPORT ON BIENNIAL HARVEST SPECIFICATIONS FOR 2025-2026 FISHERIES - FINAL PREFERRED ALTERNATIVES

The Groundfish Advisory Subpanel (GAP) recommends the Pacific Fishery Management Council (Council) select the default harvest control rules (HCR) for all stocks as the Final Preferred Alternative (FPA) except recommends Alternative 2 (P* = 0.45) for rex sole, shortspine thornyhead, and Dover sole as shown in Table 1. The GAP also recommends the Council adopt Alternative 2 (acceptable biological catch (ABC) Rule as their Preliminary Preferred Alternative (PPA) for quillback rockfish in California.

Table 1. GAP Recommendations for species with alternative harvest control rules (highlighted and bolded below)

Stock	**Alternative**	**Harvest Control Rule**	**Resulting ACL (mt)**	
			2025	**2026**
Rex Sole	Alternative 1	Default: ABC = ACL (P* = 0.40)	3,967	3,310
	Alternative 2 (Council PPA)	**ABC = ACL (P* = 0.45)**	**4,550**	**3,719**
Shortspine Thornyhead	Alternative 1	Default: Precautionary; ACL < ABC, 40-10 rule ACL split N (70.6%) and S (29.4%) of 34° 27' N. Lat. 5-yr rolling avg of biomass estimates from WCGBT survey (P* = 0.40)	711 (N 34°27': 502 S 34°27': 209)	713 (N 34°27': 503 S 34°27': 210)
	Alternative 2 (Council PPA)	**Precautionary; ACL < ABC, 40-10 rule. Delay consideration of N/S apportionment until after management line decision under F.5.**	**815 (N 34°27': 575.62, S 34°27': 239.70)**	**825 (N 34°27': 582.29, S 34°27': 242.48)**
Dover Sole	Alternative 1	Default ACL = 50,000 mt	50,000	50,000
	Alternative 2 (Council PPA)	**ABC = ACL (P* = 0.45)**	**47,424**	**42,457**
Quillback Rockfish in California	Alternative 1	Default HCR: SPR=0.55, ACL = ABC (P* = 0.45)	1.26	1.47
	Alternative 2	**ABC Rule (P* = 0.45)**	**1.30**	**1.50**
	Alternative 3	CDFW proposed (November 2023)	5.06	?
	Alternative 4	F=0 (i.e. no fishing mortality)	0	0

Rex Sole

The GAP recommends the Council adopt Alternative 2 (P* of 0.45, ABC=ACL) as the FPA for rex sole, providing more flexibility for the trawl sector, particularly if interest in rex sole deliveries increases as markets change, and given that annual catch limits (ACLs) for other important stocks are decreasing. The current assessment estimates the stock is at 76.1% of unfished spawning output in 2023, above the 25 percent management target level, indicating the stock is healthy. There is no risk in going from a P* of 0.40 to 0.45.

Shortspine Thornyhead

The GAP recommends the Council adopt Alternative 2 (P* of 0.45, ACL<ABC with 40-10 adjustment) as the FPA for shortspine thornyhead. Under both alternatives, groundfish fisheries face substantive reductions from the 2023-2024 ACLs in prior cycles. Alternative 1 results in a 65.8 percent drop from the summed 2023 N and S ACLs (2,078 mt) to the total 2025 ACL (combined=711 mt). Alternative 2 results in a 60.8 percent drop from the 2023 combined ACLs (2,078 mt) to the 2025 combined ACL (815 mt). The GAP agrees with the GMT in Agenda Item F.2.a, Supplemental GMT Report 1, March 2023 that the Council delay specifying area-specific ACLs that are based on the management line until the Council selects a PPA or FPA on the new measure that would remove the management line under Agenda Item F.5.

Table 2. ACL Percent Change under Shortspine Thornyhead Alternatives Considered

	2023	2025		2026	
	ACL (mt) (sum of N and S)	ACL (mt)	% Change from 2023	ACL (mt)	% Change from 2023
No Action	2,078				
Alternative 1 (P* = 0.40)		711 N 34°27': 502 S 34°27': 209	- 65.8%	713 N 34°27': 503 S 34°27': 210	- 65.7%
Alternative 2 (P* = 0.45)		815 N 34°27': 576 S 34°27': 240	- 60.8%	825 N 34°27': 582 S 34°27': 243	-60.3%

Under both alternatives, the significant decreases in ACLs will be restrictive for groundfish fisheries, particularly north of 34° 27′ N. lat. where attainment has exceeded the 2025-2026 alternatives in several years (see table 3 below). Due to anticipated increases in sablefish ACLs over the next few years, the trawl fleet that targets Dover sole, thornyheads, and sablefish (DTS) may expand effort, so full attainment of shortspine thornyhead is a reasonable expectation. The at-sea whiting fishery has also experienced increased encounters with shortspine thornyheads in recent years. Overall, shortspine is one of the highest grossing limited entry fisheries on the West

Coast, and south of 34° 27′ N. lat. markets continue to build and with the reopening of the Cowcod Conservation Area, the assumption is that landings will increase. Given the ACL decreases for other important species, access to shortspine is critical.

While Alternative 1 would rebound above the 40 percent management target over the ten-year projection, the tradeoff of increasing the time to rebounding above 40 percent by selecting Alternative 2 as the FPA would provide a higher ACL (in 2025, 104 mt or 13 percent higher than Alternative 1; in 2026, 112 mt or 16 percent higher than Alternative 1), which could at least slightly reduce the negative impacts that will be felt from the large reduction between bienniums. Additionally, it would provide room under Agenda Item F.5 at this meeting to consider an at-sea set-aside that would more closely accommodate recent catch. The depletion projections also assume 100 percent attainment of the ACL, which is unlikely to occur given the management stratifications, so the timeframe to rebound above the 40 percent management target under Alternative 2 may be shorter.

Table 3. Recent Directed Groundfish Mortality Compared to Alternative 1 ACL (years where mortality exceeds Alternative 1 ACL value for 2025 highlighted and bolded below) (data compiled from Tables 3 and 4 in Agenda Item F.7.a, Supplemental GMT Report 3, March 2024)

Year	Total Directed Groundfish Mortality North of 34° 27′ N. lat. (mt)	Total Directed Groundfish Mortality South of 34° 27′ N. lat. (mt)	Total Directed Groundfish Mortality (mt)
2011	**804**	192	**996**
2012	**788**	129	**917**
2013	**924**	113	**1,037**
2014	**762**	96	**858**
2015	**785**	80	**865**
2016	**806**	114	**920**
2017	**836**	146	**982**
2018	**765**	111	**876**
2019	**659**	84	**743**
2020	408	52	460
2021	437	41	478
2022	**641**	33	674
2023 Estimate	304	28	332

Dover Sole

The GAP recommends the Council adopt Alternative 2 (P* of 0.45, ABC=ACL) as the FPA for Dover sole. The Council has previously set the ACL at 50,000 mt, but because this value would now exceed the Acceptable Biological Catch (ABC) based on updated projections, the GAP supports using a P* of 0.45 and setting the ACL equal to the resulting ABC, which would result in ACLs of 47,424 and 42,457 mt in 2025 and 2026 respectively.

Quillback Rockfish in California

The GAP recommends the Council adopt Alternative 2 (P* of 0.45, ABC Rule) as the PPA for quillback rockfish in California. While Alternative 3 would provide the much-needed higher ACLs, the GAP understands that the proposal put forward by California Department of Fish and Wildlife (CDFW) in November 2023 (that became Alternative 3) was based on assumptions made from the 2021 stock assessment alone, and not the rebuilding analysis that was later adopted by the Council in March, so therefore would not meet National Standard 1 requirements. The GAP recommends removing Alternative 3 from the range of alternatives now that the rebuilding analysis has been adopted.

Alternative 2 would adopt a rebuilding strategy using the ABC Rule for quillback rockfish off California (T_{target} = 2060), and would result in ACLs of 1.3 mt for 2025 and 1.5 mt for 2026. This is almost identical to the ACLs that would result from Alternative 1 (default HCR - ACLs of 1.26 mt for 2025 and 1.47 mt), but the very slight increase in the 2025-2026 ACLs under Alternative 2 (0.04 mt for 2025 and 0.03 mt for 2026) is preferred by the GAP because even these small amounts would provide more flexibility than Alternative 1. We understand that ACLs are only managed to the tenth of a percentage, so Alternative 2 would result in identical ACLs to Alternative 1, would take two years less to rebuild and would have a higher likelihood of rebuilding by T_{target}. For these reasons, we recommend removing Alternative 1 from the range. This could help reduce some workload for Council staff and the GMT.

Although the GAP understands that Alternative 4 (or another option for fastest rebuilding) must be included in the range of alternatives, Alternative 4 is untenable for our fishing communities in California because it would set the ACL to 0. Beyond the fact that Alternative 4 is impractical, as some non-directed mortality would be expected to occur, this pathway would have even more severe socioeconomic consequences than the very restrictive Alternatives 1 and 2.

The economic impacts of these harvest specifications and resulting management measures, even under our preferred Alternative 2, 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. The industry has already been experiencing the extreme negative impacts from the low annual catch targets in the 2023-2024 cycle, and the ACLs in the 2025-2026 cycle are even smaller. GAP members are aware of young fishermen who are investing in the fishery and have not been able to fish under the new regulatory constraints, as well as participants who have been forced out of the business. As described by Dr. Ray Hilborn in November 2023, "In mixed stock fisheries under current U.S. management approaches, a mandatory rebuilding plan for a single species can dramatically decrease the social and economic benefits derived from a fishery" (Agenda Item E.5.b, Public Comment, November 2023). 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 2023 as an example of these impacts (Agenda Item E.5.b, Supplemental Public Presentation 1, November 2023).

Washington Cabezon

From the September 2023 Harvest Specifications under the Default HCR (Agenda Item G.6, Supplemental Revised Attachment 1, September 2023), Tables 1 and 2 showed the following amounts for Washington Cabezon, while this April update (Agenda Item F.2, Supplemental Revised Attachment 2, April 2024) presents a significant decrease.

Table 4. Differences between anticipated and updated harvest specifications for Washington Cabezon

	2025			2026		
	OFL (mt)	ABC (mt)	ACL (mt)	OFL (mt)	ABC (mt)	ACL (mt)
September 2023	18.30	14.24	14.24	14.90	11.59	11.59
April 2024	11.72	9.12	9.12	11.59	9.02	9.02
Difference	- 6.58	- 5.12	- 5.12	- 3.31	- 2.57	- 2.57
Percent Change	- 40%	- 40%	- 40%	- 22%	- 22%	- 22%

We understand that a new assessment to inform harvest specifications was needed per the Scientific and Statistical Committee (SSC) in March 2023 (Agenda Item F.7.a, Supplemental SSC Report 1, March 2023) and information was quickly summarized for this meeting by the Northwest Fisheries Science Center in Agenda Item F.2, Supplemental Revised Attachment 2, April 2024. However, it is difficult to receive such technical information that was not incorporated into the overwinter analysis by the GMT. Therefore, it is difficult to understand the impacts on our fisheries and participants, especially when it results in a significant change to the originally analyzed amounts described in Agenda Item F.5, Attachment 2, April 2024. We want to improve the process where data gaps like this are identified earlier in the process, so that all the outflowing documents and analysis cover this information.

The GAP hopes this decrease will not have an effect on Washington recreational fisheries. The recreational fishery is already managed with a one fish bag limit, so there is not a lot of room for adjustment, and we do not want this to translate to time and area closures or other restrictions that could impact access to other available species.

PFMC
04/06/24