

GROUND FISH ADVISORY SUBPANEL REPORT ON PRELIMINARY
PREFERRED MANAGEMENT MEASURE ALTERNATIVES FOR 2025-2026 FISHERIES

Referencing [Agenda Item F.5, Supplemental REVISED Attachment 1, April 2024](#), the Action Item Checklist, the Groundfish Advisory Subpanel (GAP) recommends the following management measures for 2025-2026 fisheries, summarized in a table below, with each item discussed in more detail later in the report. Our numbering corresponds with the Action Item Checklist.

Below the checklist, we provide further discussion about specific management measures and rationale for our recommendations.

#	Category	Sector	2025-2026 Management Measures	GAP Recommendation
Groundfish Conservation Area Coordinate Updates				
1	Area Management	All	<ul style="list-style-type: none"> Consider modifications to the rockfish conservation area off of California proposed in G.6.a, Supplemental CDFW Report 1, September 2023 	Adopt changes in Supplemental CDFW Report 1 to modify the 50 fm RCA boundary line near Bodega Bay
Off-the-Top Deductions				
2	Off-the-top deductions	Research, EFP, IOA, and Recreational	<p>Confirm:</p> <ul style="list-style-type: none"> ➤ New methodology to calculate set-asides ➤ Set-aside values adopted in November 2023 (Agenda Item E.7.a, Supplemental GMT Report 2, November 2023) ➤ Confirm increase to sablefish north of 36° N. lat. recreational set-aside 	<p>Use 10-year rolling max as a starting point for research and IOA set-asides, but consider some on a case-by-case basis.</p> <p>Research Set-Asides:</p> <ul style="list-style-type: none"> • Shortspine: 10.48 mt • Cowcod: something lower than 10 mt <p>Sablefish North of 36 N. lat. Recreational Set-Aside: 30mt</p>
2025-26 Treaty Fisheries Management Measures				
3	Off-the-top deductions	Tribal	Confirm Treaty fisheries set-asides as detailed in Agenda Item F.5.a Supplemental Tribal Report 1, November 2024	Adopt the tribal off-the-top deductions identified in Agenda Item F.5.a, Supplemental Tribal Report 1, April 2024
Annual Catch Targets				
4	ACT	All	<p>Recommend annual catch targets (ACT), set below the fishery HG:</p> <ul style="list-style-type: none"> • Confirm or modify yelloweye rockfish: non-trawl ACTs (2025 = 31.7 mt, 2026 = 32.3 mt) • Confirm the California quillback rockfish stock statewide ACT is equal to the statewide ACL ➤ Consider <ul style="list-style-type: none"> a. Removing current California copper rockfish ACT (ACT equal to the ACL contributions for each management area) b. Establishing a recreational ACT for California copper rockfish south of 34° 27' N. lat. 	<p>Yelloweye rockfish: remove the non-trawl ACTs (both for the sector and within-non-trawl, Action Item Checklist #10)</p> <p>California quillback: no ACT.</p> <p>California copper rockfish: Option 3, Sub-Option 1</p>

Allocations and Harvest Guidelines (HG)				
5	Two Year Allocations	Trawl/ Non-Trawl	<p>Adopt preliminary 2-year trawl/non-trawl allocations:</p> <ul style="list-style-type: none"> ● Big skate: – 95 percent trawl, 5 percent non-trawl ● Bocaccio south of 40°10' N. lat. – 39 percent trawl, 61 percent non-trawl ● Cowcod south of 40°10' N. lat. 36 percent trawl, 64 percent non-trawl ● Lingcod south of 40°10' N. lat. – 40 percent trawl; 60 percent non-trawl ● Longnose skate – 90 percent trawl, 10 percent non-trawl ● Petrale sole – 30 mt non-trawl, remainder trawl ● Shelf Rockfish north of 40°10' N. lat. – 60.2 percent trawl, 39.8 percent non-trawl ● Shelf Rockfish south of 40°10' N. lat. – 12.2 percent trawl, 87.8 percent non-trawl ● Slope Rockfish Complex south of 40° 10' N lat. including blackgill rockfish ● Yelloweye rockfish – 8 percent trawl, 92 percent non-trawl <p>➤ Reconsider allocations for:</p> <ol style="list-style-type: none"> a. Canary rockfish b. Widow rockfish c. Petrale sole 	<p>Status quo (no action) for two-year trawl/non-trawl allocations for all species <i>except</i> for widow rockfish.</p> <p>For widow rockfish, Option 2, 300 mt to non-trawl, the remainder to trawl.</p> <p>Additional discussion and rationale relating to petrale sole and canary rockfish are included for Council consideration.</p>
6	Rebuilding/ Overfished Species Allocations	All	<p>Confirm yelloweye rockfish rebuilding allocations: 8 percent trawl, 92 percent non-trawl</p> <p>➤ Consider California quillback rockfish allocation, as appropriate</p>	<p>Yelloweye rockfish: status quo (no action)</p> <p>California quillback: no change in allocation</p>
7	A21 Allocation Changes	Trawl/ Non-Trawl	<p>Adopt preliminary Amendment 21 (A21) species allocations, as appropriate</p> <p>➤ Consider changes to the Amendment 21 shortspine thornyhead allocation structure</p>	<p>Shortspine</p> <ul style="list-style-type: none"> ● Decision #1: Remove the management line ● Decision #2a: Sub-Option B for the 2025-2026 biennium, and revisit later as needed.

				<ul style="list-style-type: none"> Decision #2b - Sub-Option 2, with 2a Sub-Option B Decision #2c - Option 2
8	HGs/State Shares for Stocks in a Complex	All	<p>Adopt HGs for:</p> <ul style="list-style-type: none"> Blackgill rockfish (within the slope rockfish complex south of 40°10' N. lat.) <p>Adopt species-specific HGs, as appropriate, for:</p> <ul style="list-style-type: none"> Oregon Black/Blue/Deacon Rockfish Complex OR and WA cabezon/kelp greenling complexes 	<p>Blackgill rockfish HG: keep the blackgill rockfish HG</p> <p>Species-specific HGs: no other species-specific HGs</p>
Whiting Set-Asides, Within Trawl HGs, ACTs, and Shares				
9	Within trawl set-aside	At-sea whiting	<p>Adopt preliminary at-sea whiting fishery 2025-2026 set-asides.</p> <ul style="list-style-type: none"> Evaluate need for adjustments to set-asides 	See Table 2, below
Within Trawl and/or Non-Trawl HGs and Shares (continued)				
10	Within non-trawl and trawl HGs, State Shares, etc.	LEFG/OA/Recreational	<p>Adopt 2-year within trawl and/or non-trawl HG or shares, as appropriate, for:</p> <ul style="list-style-type: none"> Blackgill rockfish and slope rockfish south of 40°10' N. lat. Canary rockfish Cowcod south of 40°10' N. lat. Bocaccio south of 40°10' N. lat. Sablefish south of 36° N. lat. <p>Consider a 10 mt sablefish south of 36° N. lat. set-aside for the recreational sector south from the non-trawl sector allocation</p> <ul style="list-style-type: none"> Nearshore Rockfish Complex north of 40°10' N. lat. by state <ul style="list-style-type: none"> Consider Federal HGs for the area 42° to 40°10' N. lat. Consider state-specified HGs for Washington and Oregon. Yelloweye rockfish 	Status quo 2-year within trawl and/or non-trawl HG or shares, as appropriate,
Trip Limits, Bag Limits, and Season Structures				
11	IFQ	Shorebased IFQ	Adopt preliminary IFQ based on allocations, trip limits for non-IFQ species	Status quo (no change)
12	Open Access (OA)	OA (north of 40°10' N. lat.)	Adopt preliminary adjustments to the non-trawl RCA configuration, trip limits, size limits	Option 2 for all species <i>except</i> lingcod.

13		OA (south of 40°10' N. lat.)	Adopt preliminary adjustments to the non-trawl RCA configuration, trip limits, size limits	For OA lingcod N. of 42° 00' N. Lat., Option 3 (9,000 lbs. per two months)
14	Limited Entry Fixed Gear (LEFG)	LEFG (north of 40°10' N. lat.)	Adopt preliminary adjustments to the non-trawl RCA configuration, trip limits, size limits	For sablefish: Option 1 (status quo - north of 36° N. lat.); for all other species, Option 2 (change monthly limits to bimonthly)
15		LEFG (south of 40°10' N. lat.)	Adopt preliminary adjustments to the non-trawl RCA configuration, trip limits, size limits	For sablefish: Option 1 (status quo - north of 36° N. lat.); for all other species, Option 2 (change monthly limits to bimonthly)
16	Recreational	WA Recreational	Adopt preliminary adjustments to bag limits, season structure, size limits, etc.	Agree with WDFW report
17		OR Recreational	Adopt preliminary adjustments to bag limits, season structure, size limits, etc.	Agree with ODFW report
18		CA Recreational	Adopt preliminary adjustments to bag limits, season structure, size limits, etc.	Agree with CDFW report
		New Management Measures		
19	New Management Measures	Commercial and Recreational	<p>Adopt preliminary new management measures:</p> <p>Commercial:</p> <ul style="list-style-type: none"> ➤ a) Create Open Access Permit/Registration. ➤ b) Update electronic monitoring program discard and retention requirements regulations ➤ c) Create coastwide Federal sorting requirements for rockfish by processors (see F.5.a, Supplemental GMT Report 1, April 2024) ➤ d) Shortspine thornyhead management changes (see F.5.a, Supplemental GMT Report 2, April 2024) <p>Recreational:</p> <ul style="list-style-type: none"> ➤ e) Require recreational anglers to possess a descending device aboard while fishing in Federal waters. ➤ f) Modify continuous vessel transit limitations for California recreational vessels in Federal waters 	<p><i>Commercial</i></p> <p><u>Create Open Access Permit/Registration: Option 2</u></p> <p><u>Update Electronic Monitoring Program Discard and Retention Requirements Regulations: Option 2</u></p> <p><u>Create Coastwide Federal Sorting Requirements for Rockfish by Processor: Move this item to the groundfish workload list</u></p> <p><u>Shortspine Thornyhead Management Changes: See GAP recommendation under #7</u></p> <p><i>Recreational</i></p>

			<p>➤ g) NEW- GAP recommendation: Longleader gear in California in Federal waters.</p>	<p><u>Require Recreational Anglers to Possess a Descending Device Aboard While Fishing in Federal Waters: Option 2</u></p> <p><u>Modify Continuous Vessel Transit Limitations for California Recreational Vessels in Federal Waters: Option 2</u></p> <p><u>Longleader gear</u>: Include for use in Federal waters off of California.</p>
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1. Groundfish Conservation Area Coordinate Updates (Rockfish Conservation Area modifications off California)

The GAP supports the recommendations as proposed in [Agenda Item F.5.a, Supplemental CDFW Report 1, April 2024](#). The fishing industry requested these coordinate updates in September 2023 to improve the realignment of the 50-fathom waypoint contour. The GAP appreciates the California Department of Fish and Wildlife (CDFW) resolving this issue.

2. Off-the-top Deductions (research, EFP, IOA, recreational)

a. New methodology to calculate set-asides

The GAP generally supports the GMT recommendation to use the 10-year rolling maximum (instead of long-term historical maximum) as the starting point when calculating research and incidental open access (IOA) off-the-top deductions, noting there may be constraining or other species in this and future cycles we will want to review on a case-by-case basis.

b. Set-aside values adopted in November 2023

The GAP generally supports the updates to the research set-asides and incidental IOA set-asides identified in Table 20 (numbered page 31) and Table 21 (numbered page 33) of the Draft 2025-2026 Management Measure Analytical Document ([Agenda Item F.5, Revised Attachment 2, April 2024](#)), with a few exceptions and notes.

- Shortspine thornyhead: Table 14 (page 22) of the Draft 2025-2026 Management Measure Analytical Document shows a significant increase (5.32 mt or 51%) in the 2025-2026 shortspine thornyhead north of 34° 27' N. lat. research set-aside value (15.8 mt) compared to the 2023 value (10.48 mt) under the 10-year rolling maximum. The GAP recommends adding the 2023 status quo research set-aside amount of 10.48 mt for shortspine thornyhead north of 34° 27' N. lat. to the range of alternatives, and selecting that as the preliminary preferred alternative (PPA). This would move 5.32 mt for use in our groundfish fisheries, and would cover research for all years from 2008-2022, with the exception of the anomalous 2021 value of 15.8 mt. As noted below, the GMT did something similar for canary, excluding the anomalous year. While we are making this recommendation to decrease the set-aside, we understand there is a planned halibut survey that will seek 12-15mt and therefore our recommendation may not accommodate that project unless research plans change. If the Council proceeds with the 15.8 mt set-aside, the GAP would like more information on what will be done with any shortspine thornyhead bycatch on the halibut survey, and if any samples or research will be conducted.
- Canary rockfish: The GAP tentatively supports using the 2023-2024 research set-aside value of 10.08 mt for canary recommended in the Draft 2025-2026 Management Measure Analytical Document, rather than using the 10-year rolling maximum value of 19.06 mt, given the severe ACL reduction that will impact all fisheries, and the fact that the 19.06 mt value was anomalous. However, as described in our ([Agenda Item E.7.a](#),

[Supplemental GAP Report 1, November 2023](#) - see Item 3) we note that the status quo 10.08 mt still seems high for research when all other fisheries are taking such severe cuts.

- **Cowcod:** Maximum research mortality was 0.63 mt, but the recommendation in the Draft 2025-2026 Management Measure Analytical Document is 10 mt (same as 2023-2024 cycle). The GAP understands that this value is to account for research in California in recent cycles - but we wonder if this entire amount is needed or if some could be instead allocated to the fishery with recent changes to the Cowcod Conservation Areas.

c. **Confirm increase to sablefish north of 36 N. lat. recreational set-aside**

The GAP recommends increasing the sablefish north of 36 N. lat. recreational set-aside amount from 6 mt to 30 mt. Sablefish annual catch limits (ACLs) are increasing 238 percent in the 2025-2026 biennium, and under the most recent stock assessment should remain high for the coming years. The GAP notes some recreational fishermen are starting to target sablefish as stock assemblages change and opportunity to access other fisheries decrease.

In November 2023, the GAP supported the establishment of a recreational set-aside for sablefish south of 36 N. lat. of 10 mt ([Agenda Item E.7.a, Supplemental GAP Report 1, November 2023](#) - see Item 3), but understands this should be accomplished as a set-aside under the non-trawl sector allocation, Action Item #10, rather than as an off-the-top deduction - north is covered here due to a different allocation structure in the FMP.

3. **Off-the-top Deductions (Tribal):** The GAP recommends adopting the tribal off-the-top deductions identified in [Agenda Item F.5.a, Supplemental Tribal Report 1, April 2024](#). The GAP understands the rationale for these requests, and notes that the set-asides make sense for how the Washington treaty tribes will prosecute their fisheries this biennium. The GAP and tribal representatives on both the GAP and Groundfish Management Team (GMT) had a robust discussion about the reasons surrounding any changes in requests to off-the-top deductions. The GAP appreciates the tribes' consideration to adjust some of the set-asides to ensure equitable sharing of the resources.

4. **Annual Catch Targets (ACT):**

a. **Yelloweye Rockfish**

The GAP recommends removing the non-trawl ACTs (both for the sector and within-non-trawl, Action Item Checklist #10) for yelloweye rockfish. The non-trawl HG/ACT structure was established as an extra buffer for management when there was a high level of uncertainty with projections with areas opening with the new status of yelloweye rockfish starting in 2019. We already have HGs and these are sufficient for management, especially now that we have more information. The yelloweye catch is closely tracked inseason. With all of the other reductions in our fisheries, GAP members believe we need to reduce artificial management boxes. Removing the non-trawl ACTs would provide significant benefits for fishing communities.

Table 1. Difference between yelloweye rockfish HGs and ACTs for the non-trawl sector (using information from Table 22 (page 35) of the Draft 2025-2026 Management Measure Analytical Document, [Agenda Item F.5, Revised Attachment 2, April 2024](#))

	2025			2026		
	HG (mt)	ACT (mt)	Difference (mt)	HG (mt)	ACT (mt)	Difference (mt)
Non-Trawl Sector	40.46	31.72	8.74	41.2	32.3	8.9
<i>Non-nearshore / Nearshore (20.9%)</i>	8.46	6.63	1.83	8.61	6.75	1.86
<i>WA Rec (25.6%)</i>	10.36	8.12	2.24	10.55	8.27	2.28
<i>OR Rec (23.3%)</i>	9.43	7.39	2.04	9.6	7.53	2.07
<i>CA Rec (30.2%)</i>	12.22	9.58	2.64	12.44	9.75	2.69

b. California Quillback Rockfish

Since California quillback will be removed from the nearshore complex, the GAP understands that there is no need for an ACT as the species will be managed to its own individual ACL. The GAP therefore recommends no ACT for California Quillback rockfish.

c. California Copper Rockfish

Setting a California copper rockfish ACT for the recreational sector is challenging since the proposed ACT is lower than the catch in 2023, when harvesters were actively avoiding copper voluntarily. While status quo (Option 1) would be preferred, the GAP understands that there is a depletion concern, so the GAP recommends Option 3, with Suboption 1 as the PPA, as described in Agenda Item F.5, [Attachment 2](#).

Option 3 would establish a within non-trawl copper rockfish ACT for the recreational sector south of 34° 27' N lat. that is equal to the proportion of the ACL for south of 34° 27' N lat., as determined by the assessment (i.e. 2025 = 15.8 mt, 2026 = 18.0 mt). Option 3 is the GAP's PPA, because the ACT would be set equal to the full proportion of the ACL south of 34° 27' N lat., whereas in Option 2 the ACT would be set to 80 percent of the proportion of the ACL south of 34° 27' N lat. Option 3 provides more room for the recreational fishery, and when combined with either suboption would help ensure the ACT is not exceeded.

The GAP selected Suboption 1 as our PPA. The Council would consider management measures to mitigate impacts on copper rockfish south of 34°27' N. lat. if the ACT is exceeded or projected to be exceeded.

5. Two Year Trawl/Non-Trawl Allocations: The GAP recommends adopting the status quo (no action) two-year trawl/non-trawl allocations for all species with biennial allocations except for widow rockfish (discussed below):

- Big skate – 95 percent trawl, 5 percent non-trawl
- Bocaccio south of 40°10' N. lat. – 39.04 percent trawl, 60.96 percent non-trawl
- Canary rockfish – 72.3 percent trawl, 27.7 percent non-trawl
- Cowcod south of 40°10' N. lat. – 36 percent trawl, 64 percent non-trawl
- Lingcod south of 40°10' N. lat. – 40 percent trawl, 60 percent non-trawl
- Longnose skate – 90 percent trawl, 10 percent non-trawl
- Petrale sole – 30 mt non-trawl, remainder trawl
- Shelf rockfish north of 40°10' N. lat. – 60.2 percent trawl, 39.8 percent non-trawl
- Shelf rockfish south of 40°10' N. lat. – 12.2 percent trawl, 87.8 percent non-trawl
- Slope rockfish complex south of 40° 10' N lat. including blackgill rockfish – 63 percent trawl, 37 percent non-trawl
- Yelloweye rockfish – 8 percent trawl, 92 percent non-trawl (note: the trawl/non-trawl split for yelloweye is also covered under Action Item #6, Rebuilding Allocations)

While the Council is considering revisions to the two-year trawl/non-trawl allocations for canary rockfish and petrale sole, the GAP has consistently agreed not to change these allocations in the 2025-2026 biennium, which is why they are listed above. With respect to widow rockfish, the GAP has supported analyzing a change to the two-year trawl/non-trawl allocation, and now recommends Option 2 (a fixed 300 mt of the fishery HG to non-trawl, remainder to trawl) as the PPA, in line with the GMT's recommendation. Our rationale for each of these three species (canary, petrale, and widow) is described in greater detail below.

Canary rockfish

Most of the GAP continues to support status quo allocations (72.3 percent trawl/27.7 percent non-trawl) for canary rockfish, recognizing that all sectors will be subject to reduced ACLs and allocations due to the recent assessment that resulted in a severe decline in the proposed allocations to each sector. The GAP acknowledged the 55.5 percent decrease in canary rockfish will cause extreme harm to all sectors of the groundfish fishery but most members agreed that status quo allocations are the most equitable at this time.

The GAP had several discussions at the November 2023 and March 2024 meetings where members were aware that all sectors would be negatively impacted. GAP members represent and advocate for our respective sectors, but collectively the GAP does not think one fishery is more important than the other. It is subjective to say which fishery is taking a bigger hit.

The GAP preliminarily agreed to status quo allocations, as we stated in our [Agenda F.7a., Supplemental GAP Report 1](#) from March 2024:

“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.”

As detailed in the GMT’s analysis and in [Agenda F.7.a, Supplemental GMT Report 2](#) from March 2024, canary rockfish constraints will negatively affect every sector. The Washington Department of Fish and Wildlife (WDFW), in [Supplemental WDFW Report 1](#), indicates total mortality figures under status quo management measures that will exceed status quo proposed canary allocations for 2025-2026.

The sole Washington recreational fishing representative on the GAP discussed particular challenges facing Washington charter fisheries, noting that sub-bag limits for canary rockfish of three fish or fewer (needed to be under the 17.3 mt proposed HG) will not result in enough of a draw for members of the public to book fishing trips. A different allocation resulting in 22.1 mt would help keep recreational fishing businesses operational.

However, GAP members discussed the history of low canary ACLs and fishery impacts to all sectors between the early 2000s and 2017. One sector requesting an increase in canary rockfish, when all sectors will be severely constrained, resulted in a lively discussion about how other sectors dealt with or will have to deal with lower ACLs and allocations.

For example:

- Trawlers were subject to extensive closed areas, gear limitations and not fishing shoreward of 200 fm for a decade. In addition, lower access to canary quota limits the flexibility for trawlers to trade quota and cover potential lightning strikes;
- With quillback restrictions causing a shift for non-trawl commercial vessels onto the shelf, limited trip limits for canary rockfish will limit access to the areas that are opened - either through the use of non-bottom contact gear types or in the newly opened areas of the non-trawl Rockfish Conservation Area.
- Oregon recreational fishermen recalled the times when they were subject to zero retention for some species and that a smaller sub-bag limit for canaries is better than no retention; and
- California recreational fishermen said they are facing multiple constraints, not just in the groundfish fishery (zero retention of quillback), but additional closures in the salmon fishery and restrictions to crabbing.

For these reasons above, the majority of the GAP continues to support status quo allocations for canary rockfish.

Petrale sole

The GAP continues to recommend no change to the petrale sole two year trawl/non-trawl allocation of 30 mt non-trawl and the remainder to trawl. The petrale ACL is decreasing by 32.5 percent. Under the status quo trawl/non-trawl allocation, the 2025 trawl allocation is dropping to 1,946 mt (a 37 percent reduction from 2023) while the non-trawl allocation is staying the same. Average trawl mortality from 2011-2023 was 2,293 mt or 118 percent of the 2025 allocation. Comparatively, average non-trawl mortality 2011-2023 was 8.24 mt, or 27 percent of the 2025 allocation. The non-trawl sector slightly exceeded their 30 mt allocation in 2023, with mortality of 30.23 mt (100.9 percent). The trawl sector consistently attains over 90 percent of their allocation. Petrale is foundational to the bottom

trawl program, which has been underperforming overall since the implementation of the trawl catch program.

The GAP agreed at our November 2023 and March 2024 meetings that it would not be fair for the trawl allocation to decrease by 37 percent due to the recent assessment without a corresponding decrease to the non-trawl allocation, and then move an additional amount to the non-trawl sector, so we continue to recommend status quo.

Widow rockfish

In line with the GMT, the GAP recommends selecting Option 2 as the PPA for the two-year trawl/non-trawl allocations for widow rockfish. This option would allocate 300 mt to the non-trawl sector and the remainder to the trawl sector.

Prior to GAP and GMT discussions at this April meeting, some members of the GAP had supported Option 3, which would allocate 200 mt to the non-trawl sector and the remainder to the trawl sector. This option would provide an additional 100 mt to the trawl sector, which has high attainment of widow rockfish, while the maximum attainment of widow by the non-trawl sector from 2011-2023 was 38.5 mt (note: this value is from the text of the document, and is higher than what's shown in the table because it includes additional catch estimates from Washington), well below the non-trawl value specified in all three of the 2025-2026 trawl/non-trawl allocation options. These GAP members felt that under Option 2, a 161.5 mt buffer above recent max catch for non-trawl to increase their catch in the 2025-2026 biennium would be sufficient.

Other GAP members had come in supporting Option 1, which would retain the status quo 400 mt allocation for the non-trawl fishery for increased opportunity in the coming 2025-2026 biennium. With shifts from quillback, and with the CCA open, there is a lot of uncertainty about what could be attained. Widow is a species that can be targeted cleanly, and effort is expected to increase.

Ultimately, the GAP agreed to split the difference and support the GMT-recommended Option 2, to allocate 300 mt to the non-trawl sector and the remainder to the trawl sector. This will provide 261.5 mt above recent max catch for non-trawl to increase their catch in the 2025-2026 given nearshore restrictions due to quillback rockfish shifting vessels onto the shelf, while also providing an additional 100mt for the trawl sector, and everyone on the GAP hopes that both sectors have high widow attainment in this next cycle, given the many challenges we face across our groundfish fisheries.

6. Rebuilding Allocations:

Yelloweye rockfish

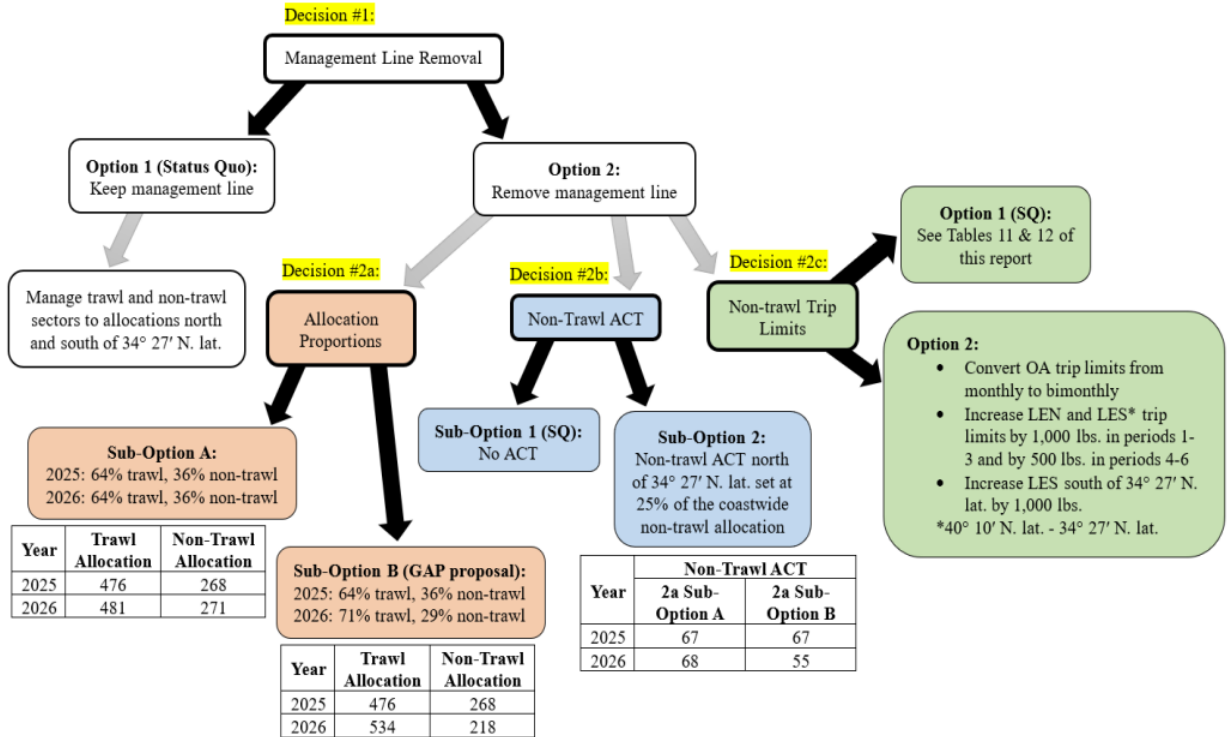
For yelloweye rockfish, the GAP supports the status quo (no action) two-year trawl/non-trawl allocation of 8 percent trawl, 92 percent non-trawl.

California quillback

For California quillback, the GAP does not recommend allocations.

7. Amendment 21 Allocation Changes

Shortspine Thornyhead



Using the Decision Tree provided by the GMT in Figure 2 of [Agenda Item F.5.a, Supplemental GMT Report 2, April 2024](#) (repasted above), the GAP makes the following recommendations:

- **Decision #1 - Management Line:** Remove the management line for shortspine thornyhead.
- **Decision #2a - Allocation Proportions:** Select Sub-Option B for the 2025-2026 biennium (in 2025, allocate 64% to trawl and 36% to nontrawl; in 2026, allocate 71% to trawl and 29% to nontrawl), and revisit later as needed.
- **Decision #2b - Non-Trawl ACT:** Select Sub-Option 2 (set a non-trawl ACT north of 34°27' N. lat. set at 25% of the coastwide non-trawl allocation), with 2a Sub-Option B (2025 ACT of 67 mt and a 2026 ACT of 55 mt)
- **Decision #2c - Non-Trawl Trip Limits:** Option 2 [Convert OA trip limits from monthly to bimonthly. Increase limited entry north and limited entry south (40° 10' N. lat. - 34°27' N. lat.) trip limits by 1,000 pounds in Periods 1-3, and by 500 pounds in Periods 4-6. Increase limited entry south of 34°27' N. lat. by 1,000 pounds].

The decisions summarized above continue to align with our recommendations from March ([Agenda Item F.7.a, Supplemental GAP Report 1, March 2024](#)), with some of that rationale reincorporated here:

For Decision #1, the GAP supports removal of the line. 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 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).

For Decision #2a, the GAP supports Sub-Option B for the 2025-2026 biennium, and will revisit later as needed. In March, the GAP learned from NMFS and the GMT about the “component rule” under the trawl rationalization/individual fishing quota program, which states 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. 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 continues to agree that the result of removing the line should align with the trawl/nontrawl splits that would ensure QS participants 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 in 2025. It would be more efficient if we could do this in 2025, but since there is not a mechanism to, the GAP recommends adjusting in 2026 to return trawl to the expected 2025 value. This adjustment reflects the repatriation of 50 tons of trawl allocation under the Status Quo that has been stranded south of Point Conception where the trawl fleet has no access. GAP members agreed that this could be revisited in future bienniums.

For Decisions #2b on ACTs, the GAP recommends Sub-Option 2 (set a non-trawl ACT north of 34°27' N. lat.), with 2a Sub-Option B (2025 ACT of 67 mt and a 2026 ACT of 55 mt), which aligns with the values that result from our decision #2a on trawl/non-trawl splits for the coming biennium. For Decision #2c on trip limits, the GAP recommends Option 2 [Convert OA trip limits from monthly to bimonthly. Increase LEFG north and LEFG south (40° 10' N. lat. - 34°27' N. lat.) trip limits by 1,000 pounds in Periods 1-3, and by 500 pounds in Periods 4-6. Increase LEFG south of 34°27' N. lat. by 1,000 pounds]. In March, the GAP heard from shortspine participants south of 34° 27' N. Lat. where shortspine is an important fishery and had higher attainment prior to the Covid-19 pandemic. Their shortspine catch brings in high market values and provides a vital source of income in this area. In order to preserve the fishery in the south, the GAP continues to recommend including these area-specific ACTs and differential trip limits.

8. Harvest Guidelines (HG)/State Shares for Stocks in a Complex:

Blackgill rockfish HG: The GAP recommends keeping the blackgill rockfish HG for the slope rockfish south of 40° 10' N. lat. complex as outlined in [Agenda Item F.5, Attachment 2](#).

Species-specific HGs: The GAP recommends no other species specific HGs.

9. At-Sea Set-Asides:

The GAP recommendations are summarized in table 2 below. The GAP recommends adopting Option 1 (Status Quo) as the PPA for the following at-sea set-aside species:

- Dover sole (10 mt)
- Lingcod north of 40° 10' N. lat. (15 mt)
- Longnose skate (5 mt)
- Pacific halibut (10 mt)
- Pacific ocean perch (300 mt)
- Petrale sole (5 mt)
- Shelf rockfish complex north (35 mt)
- Slope rockfish complex north (300 mt)
- Shortspine thornyheads (70 mt)

The GAP recommends selecting a PPA other than status quo for the remaining at-sea set-aside species:

- Arrowtooth flounder (Option 2: 100 mt)
- Canary rockfish (Option 3: 20 mt)
- Darkblotched rockfish (Option 2: 100 mt)
- Other flatfish (Option 2: 100 mt)
- Sablefish north of 36° N. lat (Option 3: 429 mt)
- Widow rockfish (Option 2: 300 mt)
- Yellowtail rockfish (Option 2: 360 mt)

All of the GAP recommendations align with the GMT, and several species are discussed further below.

Table 2. 2025-2026 At-Sea Set-Asides Range of Alternatives (catch bolded where it exceeds status quo set-aside value; GAP recommendations shaded where they don't align with GMT recommendation)

Species Category	Catch 2017-2023		Option 1 - Status Quo (mt)	Option 2 (mt)	Option 3 (mt)	GMT Recommendation (mt)	GAP Recommendation (mt)
	Max (mt)	Ave (mt)					
Arrowtooth flounder	71.33	38.04	70	100	-	Option 2: 100	Option 2: 100
Canary rockfish	20.14	7.12	36	30	20	Option 3: 20	Option 3: 20
Darkblotched rockfish	100.48	61.77	76.4	100	150	Option 2: 100	Option 2: 100
Dover sole	6.27	2.27	10	-	-	Option 1: 10	Option 1: 10
Lingcod north of 40° 10' N. lat.	3.37	1.58	15	-	-	Option 1: 15	Option 1: 15
Longnose skate	3.06	1.47	5	-	-	Option 1: 5	Option 1: 5
Other flatfish	47.48	23.00	35	100	-	Option 2: 100	Option 2: 100
Pacific halibut	1.75	0.88	10	-	-	Option 1: 10	Option 1: 10
Pacific ocean perch	141.93	55.33	300	-	-	Option 1: 300	Option 1: 300
Petrable sole	0.00	0.00	5	-	-	Option 1: 5	Option 1: 5
Sablefish north of 36° N. lat	304.59	125.60	100	300	429	Option 3: 429	Option 3: 429
Shelf rockfish complex north	15.53	10.16	35	-	-	Option 1: 35	Option 1: 35
Slope rockfish complex north	143.69	98.43	300	-	-	Option 1: 300	Option 1: 300
Shortspine thornyhead	244.53	83.43	70	100	50	Option 1: 70	Option 1: 70
Widow rockfish	475.23	211.17	476	300		Option 2: 300	Option 2: 300
Yellowtail rockfish	317.59	195.16	320	360	450	Option 2: 360	Option 2: 360

For arrowtooth flounder, the GAP recommends 100 mt such that the recent maximum catch of 71.33 mt in 2022 would fall below the set-aside amount.

For canary rockfish, the GAP had lengthy discussions throughout all harvest specifications and management measures agenda items about the importance of canary. Trawl GAP members recommend a 2025-2026 at-sea set-aside of 20 mt, which with the prior 46 mt set-aside would result in a proportional decrease to other sectors and provide more canary to the IFQ fishery.

For darkblotched rockfish, the GAP recommends 100 mt to cover recent maximum catch, make it more likely that catch would be able to stay within the set-aside amount, and provide flexibility under likely canary constraints, and for movement away from chinook salmon.

For other flatfish, the GAP agreed that replacing the 35 mt 2023/24 set-aside value with 100 mt was appropriate for the 2025/26 period to provide greater flexibility and make it more likely that the set-aside will accommodate potential catch. With the ACL doubling in this cycle, a set-aside that at least doubles the status quo would provide the at-sea sectors the opportunity to benefit from ACL increases in line with other sectors.

For sablefish north of 36° N. lat., at-sea representatives noted that the prior maximum catch of 305 mt in 2022 took significant effort to achieve. For example, as reported by the Whiting Mothership Cooperative manager, Ms. Kristin McQuaw, in [Agenda Item G.8.b, Supplemental Public Presentation 1](#) at the September 2023 Council meeting, the mothership fleets encountered a sablefish lighting strike of 119 mt in a single day on May 24, 2022, and through the rest of the year moved 75 times due to sablefish encounters in order to keep additional bycatch to 74 mt. The at-sea representatives described their effort to avoid sablefish at great cost while encountering an unprecedented sablefish year class, and described sablefish access as critical for harvesting their whiting allocations and/or avoiding other high priority bycatch species. The GAP therefore recommends a set-aside of 429 mt for the at-sea sectors.

For shortspine thornyhead north of 34°27' N. lat., the GAP notes the at-sea sectors had a maximum catch of 245 mt in 2022, but acknowledging the ACL decrease recommends the status quo set-aside of 70 mt.

For widow rockfish, some members of the GAP initially wanted to stay with the 476 mt status quo set-aside, but after review of recent data think 2017 was an anomalous year. In line with the GMT, the GAP recommends a set-aside of 300 mt to provide more widow to the IFQ sector.

For yellowtail rockfish, the GAP recommends an at-sea set-aside of 360 mt to provide more flexibility since other species are decreasing.

10. Within Trawl and/or Non-Trawl HGs and Shares

The GAP recommends adopting the status quo 2-year within trawl and/or non-trawl HG or shares, as appropriate, for the following species and complexes as they appear to be sufficient for ongoing fisheries in 2025-2026:

- Blackgill rockfish and slope rockfish south of 40°10' N. lat.
- Canary rockfish (See discussion under Action Item 5)

- Cowcod south of 40°10' N. lat.
- Bocaccio south of 40°10' N. lat.
- Sablefish south of 36° N. lat.
 - Include a 10 mt sablefish south of 36° N. lat. set-aside for the recreational sector south from the non-trawl sector allocation (see discussion under Action Item 2)
- Nearshore Rockfish Complex north of 40°10' N. lat.
- Yelloweye rockfish

11. Shorebased IFQ Trip Limits

The GAP suggests no change to IFQ trip limits (keep status quo), consistent with our recommendation in [November 2023](#).

12. Open Access North of 40°10' N. lat. Trip Limits

The GAP appreciates the GMT working with GAP members to standardize the LEFG and OA fixed gear trip limit tables to bimonthly trip limits for all the species listed in the Appendix to Supplemental GMT Report 4 under this agenda item except for OA lingcod N. of 42° N. Lat. The GAP agrees with the GMT and supports Option 2 for all species, except for lingcod.

For OA lingcod N. of 42° 00' N. Lat., the GAP agrees with the GMT and supports Option 3, 9,000 lbs. per two months, which is lower than the LEFG bimonthly trip limits.

13. Open Access South of 40°10' N. lat. Trip Limits

see #12, above

14. Limited Entry Fixed Gear North of 40°10' N. lat. Trip Limits

For sablefish: **Option 1**; all other species **Option 2** (change monthly limits to bimonthly limits)

15. Limited Entry Fixed Gear South of 40°10' N. lat. Trip Limits

For sablefish: **Option 1** (status quo - north of 36° N. lat); all other species **Option 2** (change monthly limits to bimonthly limits)

16. Washington Recreational

Referencing [Supplemental WDFW Report 1](#) under this agenda item, the GAP supports moving forward for additional options contained therein. WDFW provides options (various sub-bag limits; setting an ACT) with resultant management actions and deal with the problem of insufficient canary rockfish available for recreational fisheries. At this juncture, the options seem reasonable for analysis and potential implementation.

17. Oregon Recreational

Regarding Oregon recreational fisheries, the GAP supports the potential seasons and limits as outlined in [Supplemental ODFW Report 1](#) but advises the Oregon Department of Fish and Wildlife to analyze sub-bag limits for black and canary rockfish with a higher overall

rockfish bag limit to maximize fishing opportunity and maintain an aggregate limit of at least five rockfish inside of 30 fathoms.

The GAP fully supports the exploration of recreational sablefish access as an option for sport fishermen to pursue as more restrictions may be implemented to traditional recreational fisheries. Inside 30 fm, the GAP supports a 5-fish daily bag limit.

18. California Recreational

Referencing [Supplemental CDFW Report 1](#), the GAP supports the proposed changes to California recreational fisheries for analysis. Allowing the 2025 season to start based on inseason changes made for 2024 seems reasonable, especially if it will provide more data to inform subsequent inseason adjustments in 2025 and 2026.

Regarding removal of size limits for cabezon, greenling and California scorpionfish, the GAP sees value in this for the recreational fishery since these stocks are in healthy condition and the recreational sector is under its attainment for these species. However, California commercial fixed gear representatives on the GAP request parity on size restrictions between the recreational sector and the commercial fixed gear sector. Therefore, the GAP recommends CDFW, in the future, analyze removing the size limit restrictions for the commercial sector.

19. New Management Measures

Commercial

a. Create Open Access Permit/Registration

The GAP continues to recommend Option 2, Federal Open Access Registration/Permit Requirement, We understand there would be limited cost to the fishermen associated with this (lower end of range of current West Coast permits - \$18-\$170 (see [F.5.a, Attachment 2](#)). The goal of a simple permit registration action would be to better account for the number of fishermen involved in the open access fishery, and would also allow for better inseason tracking and communication to the fleet.

b. Update Electronic Monitoring Program Discard and Retention Requirements Regulations

The GAP recommends Option 2: Update EM discard and retention requirements in regulation to include sablefish and rex sole, and remove California halibut. While the original GAP request was to remove the list entirely from Federal regulations and locating/updating it in the vessel monitoring plan (VMP) only, we understand from NMFS that it isn't possible due to enforcement reasons. The original request would have added flexibility to make small changes without the process being hardwired and requiring a regulatory process- but this option would align current VMP regulations with the federal groundfish regulations.

c. Create Coastwide Federal Sorting Requirements for Rockfish by Processor

The GAP supports moving this item to the groundfish workload list and will provide further comments on that issue under that item at a later date.

d. Shortspine Thornyhead Management Changes

The GAP provides our recommendation on this matter under Action Item #7

Recreational

e. Require Recreational Anglers to Possess a Descending Device Aboard While Fishing in Federal Waters

The GAP recommends Option 2: Federal requirement for all recreational vessels in the EEZ to have at least one functional descending device on board the vessel while fishing for groundfish. While Washington and Oregon already have requirements, this would bring coastwide consistency to federal waters and should provide conservation benefits through decreased in post-release mortality with minimal economic costs (particularly as a majority of vessels, even in California, already have a descending device on board).

f. Modify Continuous Vessel Transit Limitations for California Recreational Vessels in Federal Waters

The GAP continues to recommend Option 2, Modify federal continuous transit provisions for California recreational vessels. This has been a high priority for the GAP as it is crucial for recreational vessels. The current regulations (noting an emergency rule is in place for 2024) prevent recreational vessels from anchoring overnight, and prevent fishing legal non-hook-and-line gears while in waters shoreward of 50 fm with legally possessed groundfish aboard. This prohibition results in safety concerns as well as lost opportunity to offer overnight trips important to the charter fleet and the angling public. The GAP also supports the proposed change by the GMT in Supplemental GMT Report 5 to generalize the reference to the RCA boundary by removing the mention of the 50fm line so that there is flexibility in the future if the RCA boundary were to change.

g. Longleader gear: While this management measure is not currently in the suite of alternatives for this biennium, the GAP continues to recommend the inclusion of the use of longleader gear for California recreational fishery in federal waters. The GAP believes that having this tool in the toolbox may be advantageous in the future in providing access to healthy mid-water stocks while avoiding encounters with constraining benthic species like quillback. Furthermore, the GAP notes it has been successful in Oregon and provides opportunity when access to some stocks are restricted.