

GROUND FISH ADVISORY SUBPANEL REPORT ON 2025-2026 HARVEST SPECIFICATIONS, MANAGEMENT MEASURES AND EXEMPTED FISHING PERMITS – FISHERY MANAGEMENT PLAN (FMP) AMENDMENT FINAL ACTION

Exempted Fishing Permits (EFP)

The Groundfish Advisory Subpanel (GAP) recommends that the Pacific Fishery Management Council (Council) adopt both EFP renewals for the 2025-2026 management period:

- West Coast Seafood Processors Association (WCSPA) and Oregon Trawl Commission (OTC) Year-Round Trawl Gear (Midwater Rockfish) EFP
- California Department of Fish and Wildlife (CDFW) Fishery-Dependent Biological Data Collection EFP - renew for cowcod and add quillback and yelloweye for 2025-2026

For the WCSPA/OTC Year-Round Trawl Gear (Midwater Rockfish) EFP, the GAP recommends that this be moved to regulation through the workload prioritization process (scheduled for March 2025). This EFP has been in place for eight years, since 2017, and the GAP believes sufficient data has been collected. There are several inefficiencies for vessel operators under this EFP that could be resolved once moved to regulation.

Harvest Specifications and Management Measures

The GAP recommends that the Council adopt its Preliminary Preferred Alternatives (PPA) for 2025-2026 harvest specifications and management measures as Final Preferred Alternatives (FPA) at this meeting, with the following exceptions and notes. These recommendations are summarized in Appendix 1.

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

The GAP supports the Council’s PPA for off-the-top deductions, but in line with in our April statement ([Agenda Item F.5.a, Supplemental GAP Report 1, April 2024](#)), continues to request that information and samples be collected from any bycatch of shortspine thornyhead on the halibut survey. Under the new 2025-2026 annual catch limits (ACL), this will be a constraining species for all sectors, and the GAP had recommended reducing the research set-aside amount from 15.8 mt to the status quo 10.48 mt in order to provide a little more room for the prosecution of our fisheries. It is our understanding that the Council selected 15.8 mt as their PPA, and chose not to exclude the anomalous year from the 10-year rolling average as we did for canary, in part to accommodate expected shortspine thornyhead bycatch on the halibut survey. If this additional 5.32 mt is made available to the halibut survey rather than our groundfish fisheries, the GAP hopes that we can at least gain some samples and research on shortspine from it. We request that the Council communicate this intent to the halibut survey team.

As a note for future cycles, it came to our attention during GAP discussion that, currently, all hook-and-line research and non-nearshore commercial catch for the majority of rockfish species are assumed to have 100 percent mortality by the West Coast Groundfish Observer Program

(WCGOP) within the Groundfish Multi-year Mortality Report, regardless of whether they were descended or released at the surface. In some cases where rockfish are caught in shallow depths and descended, this may overestimate true mortality. Currently, the only species with discard mortality rates applied to hook-and-line research catch are cowcod, canary rockfish, and yelloweye rockfish, which was based on previous Council action. For WCGOP to apply either surface or descended mortality rates to all rockfish there needs to be additional Council action.

For California quillback and other species with low or declining ACLs, given increasing sigma values, this difference could be a meaningful amount. The GAP requests that the Council recommend that the Observer Program use the same depth-based discard mortality rates for research and non-nearshore discards, when appropriate, that are applied to the commercial nearshore fishery discards when estimating overall species mortality from fishing.

4. Annual Catch Targets (ACT)

Along with the Groundfish Management Team (GMT; [Agenda Item F.6.a, Supplemental GMT Report 1](#)), the GAP continues to recommend removing the non-trawl ACTs for yelloweye rockfish (both for the sector and within-non-trawl). The non-trawl harvest guideline (HG)/ACT structure was established as an extra buffer for management when there was a high level of uncertainty in projections, with fishing areas opening and the new status of yelloweye rockfish starting in 2019. While HGs and ACTs don't functionally change the management structure, because there is not a penalty for exceedance, they do have an impact on perception, and an effect of preventing access to fishing communities, because managers and fishermen would not set out to exceed an ACT. Yelloweye will be tracked closely inseason regardless of the existence of HGs/ACTs, and if management measures are designed to target the HG, rather than the ACT, it could provide for further opportunity with 8.74 mt and 8.9 mt difference. This is especially true when considered in tandem with other reductions in fish stocks for these sectors. GAP members believe we need to reduce artificial management boxes that have no functional purpose but prevent access to sustainable fishing. Removing the non-trawl ACTs would provide significant benefits and flexibility 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

12-15. Open Access and Limited Entry Fixed Gear Trip Limits

The GAP supports the Council PPA for Action Items #12-15, except recommends that the Council adopt the updated trip limits in [Agenda Item F.6.a, Supplemental GMT Report 1, Appendices 2 and 3](#).

16. Washington Recreational

The GAP reviewed Supplemental Washington Department of Fish and Wildlife (WDFW) Report 1 ([Agenda Item F.6, Supplemental REVISED WDFW Report 1, June 2024](#)), and noted that in Table 1 of the report the 2025 projected mortality of 18.8 mt exceeds the 2025 HG of 17.3 mt by 1.5 mt. The GAP had a lengthy discussion on this, and recommends that the Council clarify expectations that the states should not plan to set their season structure to exceed their harvest guidelines, especially on a species like canary which is likely to be highly attained across all groundfish sectors. However, the GAP recognizes the uncertainty in projections and the commitment and ability from WDFW to stay within the HG. WDFW has an impressive ability to close or change fishing regulations as quickly as one day. We would like to thank Ms. Lorna Wargo for walking us through the report and answering questions.

19d. New Management Measures- Shortspine Thornyhead Management

The GAP continues to support the Council's PPA on the shortspine thornyhead management changes. Our understanding from the Council's April motion is that the Council selected a two-year allocation structure for shortspine as their PPA, and the GMT is supporting that for the Council's FPA - but within the GAP there is a difference of opinion about whether this allocation structure should be a two-year or formal Pacific Coast Groundfish Fishery Management Plan (FMP) allocation.

Non-trawl participants highlighted the uncertainty in the entire fishery in the short term, and with the shortspine management structure changing felt that a two year allocation would be appropriate, at least in the short term, to provide flexibility in the trawl/non-trawl allocation for the next cycle. Shortspine is currently the highest value species in the non-trawl sector, and attainment of the ACL is expected to increase.

Trawl participants are seeking to continue the formal FMP allocation in order to prevent more species for which we have to conduct a forced and potentially contentious allocation review every two years. The Council can review the allocation structure for any species at any time, regardless of whether it's on a two-year allocation review or allocated as part of the FMP. Formal intersector allocations are reviewed periodically per Council Operating Procedure 27.

For all sectors, shortspine will be significantly more constraining under the 2025-2026 harvest specifications. Shortspine attainment declined post-pandemic for trawl and non-trawl. Both sectors look to rebuild their fisheries back closer to pre-pandemic levels. Therefore, shortspine is very important for the future and could be very constraining for both sectors at reduced ACL levels starting in 2025.

20. Rebuilding Plan

Although extremely restrictive, the GAP supports the Council's PPA for the California quillback rebuilding plan (ABC rule), and upon reviewing the sections of the rebuilding plan that pertain to the impacts to communities, found the analysis well-written and complete. We offer a few additional comments.

Under the PPA commercial fisheries operating in central and northern California will continue to be severely limited - even so, the PPA, when compared to Alternative 4 (F=0) may provide some opportunity to commercial vessels. The GAP is hopeful that the current management structure that is also proposed under the PPA will show limited quillback catch and allow further opportunities that stay within the proposed allocation in the future, for example, to allow limited retention of lingcod. This may not sound like much, but it is significant for the commercial nearshore fishermen who are currently required to discard lingcod and all shelf species due to concerns over gear that is intended to target midwater stocks and may unintentionally result in quillback mortality.

Recreational fishing for groundfish in California is one of the most reliable fishing opportunities. It is important to shore-based and especially boat-based angling. However, quillback rockfish catch has never represented more than a tiny fraction of the total rockfish catch. It would be devastating if anglers were to lose all access with F=0, in order to more speedily rebuild a single non-targeted species that hardly matters as a catch.

Overall, the implementation of the F=0 rebuilding strategy would have devastating economic effects to many California communities. Fishing for rockfish is a staple on the Northern and Central California Coast. Other fisheries like salmon and halibut have been constrained by short seasons or even no seasons at all. That leaves rockfish. Coastal communities from Monterey to Crescent City rely on rockfish to support charter boats, campgrounds, tackle shops, restaurants, motels and more. Some communities like Trinidad and Shelter Cove almost completely rely on the dollars that fishing for rockfish provides.

PFMC
06/10/24

Appendix 1. Summarized GAP recommendations for each harvest specifications and management measures item from the Action Item Checklist ([Agenda Item F.6, Attachment 1, June 2024](#)). “PPA ✓” indicates that the GAP recommends the Council’s April PPA move forward as the FPA without any changes or notes. Where we have any departures from or clarifying comments on the Council’s April PPA, we have noted it below.

#	Category	Sector	2025-2026 Management Measures	GAP Recommendation
Groundfish Conservation Area Coordinate Updates				
1	Area Management	All	PPA: Adopted modifications to the rockfish conservation area off of California proposed in Agenda Item F.5.a, Supplemental CDFW Report 1, April 2024	PPA ✓
Off-the-Top Deductions				
2	Off-the-Top Deductions	Research, EFP, IOA, and Recreational	<p>PPA: Set-asides detailed in Agenda Item F.5.a, Supplemental GMT Report 3, April 2024:</p> <ul style="list-style-type: none"> ● Research Set-Aside: Adopted rolling 10 yr. maximum for all set-asides, except: <ul style="list-style-type: none"> ○ Canary Rockfish 10.1 mt ○ Cowcod 10 mt ○ California Quillback Rockfish 0.1 mt ○ Yelloweye Rockfish 2.9 mt ● Incidental Open Access: adopted rolling 10 yr. maximum for all set-asides, except: <ul style="list-style-type: none"> ○ Bocaccio South of 40°10' N. lat. 2.2 mt ○ Canary Rockfish 2.8 mt ○ Darkblotched Rockfish 10.7 mt ○ Longspine Thornyhead north of 34°27' N. lat. 1.3mt ○ Petrale Sole 4.4 mt ○ Sablefish south of 36 N. lat. 25.0 mt ○ Widow Rockfish 1.0 mt ○ Nearshore Rockfish north of 40°10' N. lat.1.1 mt ○ Slope Rockfish south of 40° 10' N. lat. 0.9 mt ○ Yelloweye rockfish 3.9 mt ● Exempted Fishing Permits: Adopted no set-asides ● Recreational Set-Aside: 30 mt sablefish north of 36° N. lat. 	<p>PPA, and:</p> <p>The GAP requests that information and samples be collected from any bycatch of shortspine thornyhead north of 34° 27' N. lat. on the halibut survey</p> <p>The GAP requests that the Council recommend that the Observer Program use the same depth-based discard mortality rates for research and non-nearshore discards, when appropriate, that are applied to the commercial nearshore fishery discards when estimating overall species mortality from fishing</p>
2025-26 Treaty Fisheries Management Measures				
3	Off-the-Top Deductions	Tribal	PPA: Treaty fisheries set-asides as detailed in Agenda Item F.5.a, Supplemental Tribal Report 1, April 2024 and Agenda Item F.5.a,	PPA ✓

#	Category	Sector	2025-2026 Management Measures	GAP Recommendation
			Supplemental Tribal Report 2, April 2024 , noting the following changes from No Action: <ul style="list-style-type: none"> ● Petrale Sole 290 mt ● Starry Flounder 2 mt ● Yelloweye 8 mt 	
Annual Catch Targets				
4	ACT	All	PPA: Annual Catch Targets (ACT): <ul style="list-style-type: none"> ● Status quo yelloweye rockfish: non-trawl ACTs (2025 = 31.7 mt, 2026 = 32.3 mt) ● Remove California quillback rockfish stock statewide ACT ● Establish a recreational ACT for California copper rockfish south of 34° 27' N. lat. and remove statewide ACT 	PPA, except: Yelloweye rockfish: remove the non-trawl ACTs (both for the sector and within-non-trawl)
Allocations and Harvest Guidelines (HG)				
5	Two Year Allocations	Trawl/ Non-Trawl	PPA: 2025-26 two-year trawl/non-trawl allocations: <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 ● 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.: 63 percent trawl, 27 percent non-trawl ● Yelloweye rockfish: 8 percent trawl, 92 percent non-trawl ● Widow rockfish: 300 mt to non-trawl, remainder to trawl 	PPA ✓
6	Rebuilding/ Overfished	All	PPA: Yelloweye rockfish rebuilding allocations: 8 percent trawl, 92 percent non-trawl	PPA ✓

#	Category	Sector	2025-2026 Management Measures	GAP Recommendation
	Species Allocations			
7	Formal Allocation Changes	Trawl/ Non-Trawl	PPA: Status quo formal species allocations, except for: shortspine thornyhead (see item # 19)	PPA ✓
8	HGs/State Shares for Stocks in a Complex	All	PPA: <ul style="list-style-type: none"> ● HGs for: Blackgill rockfish (within the slope rockfish complex south of 40°10' N. lat.) ● Status quo species-specific HG –i.e., <i>no species specific</i> HG: <ul style="list-style-type: none"> ○ Oregon Black/Blue/Deacon Rockfish Complex ○ OR and WA cabezon/kelp greenling complexes 	PPA ✓
Whiting Set-Asides, Within Trawl HGs, ACTs, and Shares				
9	Within-Trawl Set-Aside	At-Sea Whiting	PPA: Adopt at-sea whiting fishery 2025-26 set-asides as detailed in Agenda Item F.5.a, Supplemental GAP Report 1, April 2024, noting departures from status quo for the following: <ul style="list-style-type: none"> ● Arrowtooth flounder 100 mt ● Canary rockfish 20 mt ● Darkblotched rockfish 100 mt ● Other flatfish 100 mt ● Sablefish north of 36° N. lat. 429 mt ● Widow rockfish 300 mt ● Yellowtail north of 40°10' N. lat. 360 mt 	PPA ✓
Within Trawl and/or Non-Trawl HGs and Shares (continued)				
10	Within Non-Trawl and Trawl HGs, State Shares, etc.	LEFG/OA/ Recreational	PPA: Status quo 2-year within trawl and/or non-trawl HG or sharing agreement for: <ul style="list-style-type: none"> ● Blackgill rockfish and slope rockfish south of 40°10' N. lat. ● Canary rockfish: 36 percent commercial non-trawl, 12.3 percent WA recreational, 18.5 percent OR recreational, 33.2 percent CA recreational ● Cowcod south of 40°10' N. lat.: 50 percent commercial non-trawl, 50 percent recreational ● Bocaccio south of 40°10' N. lat.: 30.9 percent commercial non-trawl, 69.1 percent recreational ● Sablefish south of 36° N. lat.: 70 percent LEFG, 30 percent OA 	PPA ✓

#	Category	Sector	2025-2026 Management Measures	GAP Recommendation
			<ul style="list-style-type: none"> ○ 10 mt sablefish south of 36° N. lat. set-aside for the recreational sector ● Nearshore Rockfish Complex north of 40°10' N. lat. by state <ul style="list-style-type: none"> ○ No Federal HGs for the area 42° to 40°10' N. lat. ○ Status Quo state-specified informal HGs for Washington and Oregon ● Yelloweye rockfish: 20.9 percent commercial non-trawl, 25.6 percent WA recreational, 23.3 percent OR recreational, 30.2 percent CA recreational 	
Trip Limits, Bag Limits, and Season Structures				
11	IFQ	Shorebased IFQ	PPA: Status quo amounts for shorebased IFQ trip limits for non-IFQ species	PPA ✓
12	Open Access (OA)	OA North of 40°10' N. lat.	PPA: Adopt GAP recommendations as described in Agenda Item F.5.a, Supplemental GAP Report 1, April 2024 and detailed in Supplemental GMT Report 5, April 2024 : <ul style="list-style-type: none"> • Option 2: Standardize OA/LEFG trip limits to bimonthly where applicable • Option 3 for OA lingcod north of 42° N. lat.: 9,000 lbs per two months • Option 1 for LEFG Sablefish north and south of 36° N. lat. 	PPA, except: Adopt updated trip limits in GMT Report 1, Appendices 2 and 3
13		OA South of 40°10' N. lat.		
14	Limited Entry Fixed Gear (LEFG)	LEFG North of 40°10' N. lat.		
15		LEFG South of 40°10' N. lat.		
16	Recreational	WA Recreational	PPA: Adopt the recreational fishery analysis and recommendations in Agenda Item F.5.a, Supplemental WDFW Report 1, April 2024	PPA, as updated by: Agenda Item F.6.a, WDFW Report 1, June 2024 , with GAP comments
17		OR Recreational	PPA: Adopt recreational fishery management measures as described in Agenda Item F.5.a, Supplemental ODFW Report 1, April 2024	PPA ✓
18		CA Recreational	PPA: Adopt the recreational fishery season structure and sub-bag limits (same as 2024) and remove size limits for cabezon, greenling, and CA scorpionfish as described in Agenda Item F.5.a, Supplemental CDFW Report 1, April 2024 - include EC filet skin requirements as described in Agenda Item F.5.a, Supplemental EC Report 1, April 2024	PPA ✓
New Management Measures				

#	Category	Sector	2025-2026 Management Measures	GAP Recommendation
19	New Management Measures	Commercial and Recreational	<p>PPA:</p> <p>Commercial:</p> <ul style="list-style-type: none"> ● a) Option 2, establish an open access permit/registration ● b) Option 2, correct EM program discard and retention requirements regulations ● c) Removed ● d) Adopt shortspine thornyhead management changes (as noted in Agenda Item F.5.a, Supplemental GAP Report 1, April 2024 and detailed in Agenda Item F.5.a, Supplemental GMT Report 2, April 2024): <ul style="list-style-type: none"> ○ 1) Remove the management line for shortspine thornyhead ○ 2a) Sub-Option B allocation proportions for the 2025-2026 biennium (in 2025, 64% trawl/36% to non-trawl; in 2026, 71% trawl/29% non-trawl) ○ 2b) Sub-Option 2 (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 67 mt and 2026 ACT 55 mt) ○ 2c) Option 2 non-trawl trip limits: <ul style="list-style-type: none"> ■ Convert OA trip limits from monthly to bimonthly. ■ Increase trip limits for LEFG north 40° 10' N. lat. and between 40° 10' N. lat. - 34° 27' N. lat. trip limits. ○ Confirm two-year or formal (FMP) allocation ○ Adopt proposed amendment language, as appropriate <p>Recreational:</p> <ul style="list-style-type: none"> ● e) Option 2, Require recreational anglers to possess a descending device aboard while fishing in Federal waters ● f) Option 2, Modify continuous vessel transit limitations for California recreational vessels in Federal waters <p>Other</p> <ul style="list-style-type: none"> ● g) Update scientific name of Pacific sand lance and common name of Pacific spiny dogfish in Federal regulation 	<p>PPA, except for shortspine allocation process - the GAP had a difference of opinion on whether the shortspine allocation structure should be handled as a two-year or formal allocation</p>
Quillback Rockfish Rebuilding Plan				
20	Rebuilding Plan	All	<p>PPA:</p> <ul style="list-style-type: none"> ● Quillback rockfish removed from the nearshore rockfish complexes off of California 	PPA, with GAP comments

#	Category	Sector	2025-2026 Management Measures	GAP Recommendation
			<ul style="list-style-type: none"> ● Harvest specification Alternative 2, ABC Rule from rebuilding analysis ● Adopt California quillback rockfish rebuilding plan for 2025 and beyond ● Adopt proposed FMP language and changes (Agenda Item F.6, Attachment 5, June 2024) 	
Shortspine Thornyheads				
21	Harvest Specifications	All	PPA: Convert current north and south of 34°27' N. lat. shortspine thornyhead ACLs to a single coastwide ACL based on 19d decision, as appropriate	PPA ✓