

## GROUND FISH ADVISORY SUBPANEL REPORT ON CORDELL BANK CONSERVATION AREA REVISIONS

The Groundfish Advisory Subpanel (GAP) recommends that the Pacific Fishery Management Council (Council) adopt the purpose and need and range of alternatives presented in [Agenda Item I.5, Attachment 1](#), and adopt Alternative 1 as the preliminary preferred alternative (PPA). The Cordell Bank Groundfish Conservation Area (GCA) was implemented to help rebuild overfished rockfish, which are now all rebuilt or nearly rebuilt. This purpose has been met and now industry should have access to these fishing grounds, especially given that opportunities continue to be restricted off of California due to quillback rockfish for groundfish participants, no salmon seasons and restrictions to other fisheries. The GAP believes Alternative 1 (originally proposed by the California Department of Fish and Wildlife (CDFW)), is a compromise that protects the sensitive habitats on the bank, reduces regulatory complexity, and provides limited, but key, additional opportunities for the California groundfish fleets.

GAP members said both trawl and non-trawl commercial fisheries operated in this area in the past, as did recreational fishermen and fishermen participating in the state-managed Dungeness crab fishery. The GAP recognizes that things have changed over time and that just because there may be fewer fishermen in general in the area, based on available data, this action shouldn't preclude existing fishermen from taking advantage of fishing in areas that have productive rockfish populations.

Regarding recreational fleets, Cordell Bank historically supported five or six inspected charter boats that operated from Bodega Bay. Since the groundfish closure, the number of inspected boats has dwindled to one. There are also several "six pack" boats that fish out of Bodega Bay. These businesses would all benefit from opening the area around Cordell Bank. However, as outlined in several of the public comments and the analysis, we anticipate that the overall level of effort would be constrained by the distance offshore, weather restrictions, and current seasonal restrictions related to quillback rockfish that limit the opportunity outside of 50 fm to a few months. Overall, the California recreational members on the GAP discussed how the reopening of part of this area would benefit anglers who have been affected by closed salmon seasons and ever changing and restrictive rockfish regulations to add another fishing location to their rotation. Returning to areas that have been closed would provide minor, but real economic benefits and increased opportunities to California coastal communities.

For commercial fisheries, the GAP does not anticipate significant pot gear vessel fishing activity in the area, given the habitat present in the area proposed to be opened. It is too shallow for sablefish, but some limited lingcod opportunity could be gained. It is most likely that commercial participants will fish hook-and-line gear (which is already permitted for flatfish) and target abundant midwater stocks. There are limited trawling vessels in the vicinity of the area and the opening of 10.2 sq. mi. is not likely to attract a lot of activity.

The GAP fully supports Alternative 1. Alternative 1 reopens areas that were closed to protect certain fish stocks that were once overfished but are now rebuilt or rebuilding ahead of schedule. It also protects some of the most sensitive and critical habitat. Additionally, the alternative and the inherent nature of the Cordell Bank and its location provides several protections: 1) A number of regulatory protections are in force, as indicated by the Groundfish Management Team (GMT)

report (example: trawl footrope size restrictions in areas shallower than 100 fathoms); 2) The bank's distance from shore will discourage an overwhelming amount of recreational effort; and 3) Changes in fisheries management have reduced the number of fishermen participating in groundfish fisheries.

We would like to thank CDFW for taking a hodgepodge of overlapping and confusing regulations and developing an alternative that is clear and understandable and that encourages compliance.

#### Process and Considerations for the Range of Alternatives

The GAP also expressed frustration that additional proposals or "asks" were brought forward at this stage in the process. While we understand this is the time to adopt a full ROA and consider any additional alternatives, some comments to the GAP made it seem like this item was a new, rushed, idea and sufficient opportunity to reach out to stakeholders had not been available. However, this issue was brought forward by CDFW in March 2023 and was scoped by the Council in September 2023, so proponents of more conservative alternatives have had more than a year to reach out to industry to collaborate.

If the Council chooses to include a more restrictive alternative in the ROA (i.e., keep more of the GCA closed), the extent of that restriction should not exceed the current footprint of the GCA. As an example, the proposal outlined by Oceana and Ocean Conservancy extends outside of the GCA footprint and therefore is closing off the currently opened fishing ground for non-trawl vessels. However, if the Council does include this type of alternative, the GAP recommends also including a less restrictive alternative that simply removes the GCA, without implementing a Groundfish Exclusion Area, in the ROA.

PFMC

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