#### GROUNDFISH MANAGEMENT TEAM REPORT ON INSEASON ADJUSTMENTS -FINAL ACTION

The Groundfish Management Team (GMT) discussed the current status of groundfish fisheries and the need for any inseason adjustments. Below, the GMT details the action items that have been brought to the GMT for Pacific Fishery Management Council (Council) consideration. Scorecards for Chinook salmon and yelloweye rockfish are included in Appendix 1.

# **Inseason Changes**

With high sablefish allocations in 2025, the GMT explored whether trip limit increases could be implemented for the remainder of 2025 to allow for greater opportunity to utilize sablefish. At least some vessels in both the Limited Entry Fixed Gear (LEFG) and Open Access (OA) sectors north and south of 36° North latitude (N lat.) have attained more than 90 percent of the Status Quo (SQ) sablefish trip limits, and landings information to-date indicates growing utilization and participation in all four sector-areas compared to recent years. Therefore, the GMT modeled sablefish trip limit increases for all four sector-areas and provides recommendations for precautionary increases, accounting for the uncertainty in impacts to shortspine thornyhead. For both sectors north of 36° N lat., the GMT modeled an Option 1 that is identical to the next highest option modeled in the 2025-26 harvest specifications analysis. For both sectors south of 36° N lat., the Option 1 trip limits were requested by industry members.

Option 1 provides a precautionary increase while minimizing the risk of exceeding the shortspine thornyhead non-trawl allocation and annual catch target (ACT) north of 34° 27' N lat. Given that sablefish attainments are projected to be low under both options, but at least some vessels would benefit from higher trip limits, the GMT recommends Option 1 sablefish trip limit increases for all four sectors: LEFG (Table 2) and OA (Table 4) north of 36° N lat., and LEFG (Table 7) and OA south of 36° N lat. (Table 5).

#### Sablefish North of 36°N lat.

#### **Limited Entry North**

So far this year, nine out of all 19 LEFG vessels landing sablefish north of 36° N lat. (LEN) have attained more than 90 percent of the SQ bimonthly limit in at least one of the two bimonthly periods to-date. Overall landings in this sector are tracking higher this year compared to this time in prior years (since 2020), despite similar trip limits across all recent years.

Sablefish price per pound (adjusted for inflation and calculated as total revenue divided by total pounds [lbs.] landed, by period and sector) is used in the model to predict vessel participation. Predicted prices for the remainder of the year are calculated using prices in each respective period of 2023 and 2024. Low predicted prices are calculated as 10 percent lower than the average true price for that period, and high predicted prices are calculated as 10 percent higher. Prices in 2023 and 2024 were still relatively low compared to all other years in the time series, which means that even predicted prices in the "high" price scenario are still low relative to historical prices. Actual prices to-date in 2025 and predicted prices used in the model are shown in **Table 1**.

The 2025 average bimonthly sablefish prices per pound in the LEN sector have ranged from \$1.97 to \$2.21, which falls within the average to high price scenario estimated for the bimonthly periods from July through December (**Table 1**). Note that there is some overlap across the three price scenarios because certain bimonthly periods (*e.g.*, Period 4, July-August) typically fetch a higher price per pound than other periods (*e.g.*, Period 6, November-December), which means that the "average" Period 4 price is higher than the "high" Period 6 price. Because landings are estimated per bimonthly period, this overlap does not conflict with the ability to compare projections across price scenarios.

Trip limit options and projected 2025 landings for the LEN sector are shown in **Table 2** below. Under SQ trip limits, LEN landings for the full year are projected to be 17-20 percent of the 2025 landings target, and under Option 1 trip limits, LEN landings are projected to be 19-23 percent. Year-end impacts to shortspine thornyhead were projected in the <u>Council Analytical Document</u> (CAD) under full attainment of the sablefish non-trawl allocation. The GMT paired the CAD projection with the gear specific attainment of sablefish under Option 1, resulting in an estimated additional 3.0 metric tons (mt) of shortspine thornyhead mortality when compared to the SQ trip limit.

Table 1. Range of actual average LEN sablefish prices per pound by period from periods 1-3 (January through June) along with the range of calculated predicted prices by period for the remainder of the year under each of the three prices scenarios, based on true prices from 2023 and 2024.

Actual Avg. Prices By Period (Periods 1-3)	Price Scenario	Predicted Prices By Period (Periods 4-6)
	low	\$1.59 - \$2.09
\$1.97 - \$2.21	average	\$1.77 - \$2.32
	high	\$1.94 - \$2.55

Table 2. Options for sablefish trip limit increases in the LEN sector. Bolded row represents the GMT recommendation. Projected landings are based on actual landings through April 30 combined with predicted landings for the remainder of 2025, assuming July 1 implementation.

Option	Trip Limit	Projected Landings (rd. wt. mt) under Three Price Scenarios			Target (mt)	Attainn Pri	nment under Three Price Scenarios	
		Low	Average	High		Low	Average	High
SQ	4,500 lbs./week not to exceed 9,000 lbs./2 months	243	263	283	1 412	17%	19%	20%
1	5,500 lbs./week not to exceed 11,000 lbs./2 months	274	297	319	1,413	19%	21%	23%

#### **Open Access North**

So far this year, seven out of all 44 OA vessels landing sablefish north of 36° N lat. (OAN) have attained more than 90 percent of the SQ bimonthly limit in at least one of the two bimonthly periods

to-date. OAN participation started out tracking higher in 2025 compared to recent years, and overall landings are tracking higher this year than 2024 but comparable to other years.

The 2025 average bimonthly sablefish prices per pound in the OAN sector have ranged from \$2.55 to \$2.96, which exceeds the high price scenario estimated for the bimonthly periods from July through December (**Table 3**). Trip limit options and projected 2025 landings for the OAN sector are shown in **Table 4** below. Under SQ trip limits, OAN landings for the full year are projected to be 19-22 percent of the 2025 landings target, and under Option 1 trip limits, OAN landings are projected to be 22-24 percent. OAN impacts to shortspine thornyhead were projected as they were in the LEN sector resulting in additional 0.3 mt of shortspine thornyhead mortality when compared to the SQ trip limits.

Table 3. Range of actual average OAN sablefish prices per pound by period from periods 1-3 (January through June) along with the range of calculated predicted prices by period for the remainder of the year under each of the three prices scenarios, based on true prices from 2023 and 2024.

Actual Avg. Prices By Period (Periods 1-3)	Price Scenario	Predicted Prices By Period (Periods 4-6)
	low	\$1.78 - \$2.07
\$2.55 - \$2.96	average	\$1.98 - \$2.30
	high	\$2.18 - \$2.53

Table 4. Options for sablefish trip limit increases in the OAN sector. Bolded row represents the GMT recommendation. Projected landings are based on actual landings through April 30 combined with predicted landings for the remainder of 2025, assuming July 1 implementation.

Option	Trip Limit	Projected Landings (rd. wt. mt) under Three Price Scenarios			Target (mt)	Attainment under Three Price Scenarios		
		Low	Average	High		Low	Average	High
SQ	3,250 lbs./week not to exceed 6,500 lbs./2 months	452	477	503	2 2 2 7	19%	20%	22%
1	4,000 lbs./week not to exceed 8,000 lbs./2 months	503	532	561	2,327	22%	23%	24%

Sablefish South of 36° N lat.

#### **Open Access South**

The GMT received a request to increase the Open Access South (OAS) trip limit for sablefish south of 36° N lat. from the current limit of 2,000 lbs. per week, not to exceed 6,000 lbs. per two-month period, to 2,500 lbs. per week, not to exceed 7,500 lbs. per two-month period. This request aims to:

- 1. Provide greater logistical flexibility for OA participants to supply buyers with a more consistent and reliable source of sablefish.
- 2. Improve utilization of the historically under-attained sablefish harvest limits in the south.

Currently, three OAS vessels are landing 90 percent or more of their weekly and bimonthly trip limits at least once this year. In most cases, the entire weekly limit is landed on a single trip, effectively limiting these vessels to three trips every two months, or approximately 18 trips annually. According to the request, this intermittent supply has led to situations where buyers seek alternative sources during the off-weeks when vessels are not active. Trip limit options and projected 2025 landings for the OAS sector are shown in **Table 5** below. Trip limit projections for the OAS sector are not bracketed by price scenarios, because price was not used as a predictor variable in this sector's model. Rather, the GMT assumed that vessel participation in 2024, by two-month period, is representative of expected 2025 participation.

Under SQ trip limits, OAS landings for the full year are projected to be 0.9 percent of the 2025 landings target, and under Option 1 trip limits, OAS landings are projected to be 1.1 percent. The non-nearshore model does not predict mortality from species caught while targeting sablefish. However, given the four mt increase in sablefish mortality projection, the GMT does not see this increased catch as a threat to the coastwide non-trawl shortspine thornyhead allocation of 267.6 mt in 2025 nor the 218.3 mt in 2026. Discards in this sector have been zero since 2020 (Groundfish Expanded Mortality Multiyear [GEMM]) and the GMT does not expect that to change.

Table 5. Options for sablefish trip limit increases in the LES sector. Bolded row represents the GMT recommendation. Projected landings are based on actual landings through April 30 combined with predicted landings for the remainder of 2025, assuming July 1 implementation.

Option	Trip Limit	Projected Landings (rd. wt. mt)	ccted Landings rd. wt. mt) Target (mt)	
SQ	2,000 lbs./week not to exceed 6,000 lbs./2 months	22	2 227	0.9%
1	2,500 lbs./week not to exceed 7,500 lbs./2 months	26	2,327	1.1%

#### **Limited Entry South**

The GMT noticed that the LEFG trip limit for sablefish south of 36° N lat. is listed incorrectly in the Federal regulations at Table 2b (South) to Part 660, Subpart E. The trip limit is listed as 2,500 lbs. per week, not to exceed 6,000 lbs. per 2 months, however, there has never been a bimonthly trip limit for sablefish south of 36° N lat. for the LEFG sector, nor did the Council adopt one for 2025-26. Given this, the SQ option provided in this report for the LEFG sector south of 36° N lat. is 2,500 lbs. per week even though the SQ trip limit currently in regulations is 2,000 lbs.

Although the request was initiated by the OA sector, seven LEFG vessels are similarly attaining 90 percent or more of their weekly trip limits at least once this year. Consistent with past GMT recommendations, LE trip limits are typically set higher than OA limits to reflect the greater cost and commitment associated with LE permits. Therefore, the GMT evaluated increased trip limit scenarios for both sectors south of 36° N lat. Trip limit options and projected 2025 landings for the OAS sector are shown in **Table 7** below.

The 2025 average bimonthly sablefish prices per pound in the LES sector have ranged from \$2.30 to \$2.64, which falls within the low to average price scenario estimated for the bimonthly periods from July through December (**Table 6**). Under Option 1, the proposed increase in sablefish trip limits is projected to result in an additional 30-31 mt of sablefish landings south of 36° N lat. Even assuming a conservative 1:1 catch ratio of thornyhead while targeting sablefish—which is higher than ever historically observed—this level of increase does not present a risk to the non-trawl allocation for shortspine thornyhead. The average discard mortality of shortspine thornyhead for the most recent three years in the GEMM (2021-2023) is 3.8 mt. Under SQ trip limits, LES landings for the full year are projected to be 9-11 percent of the 2025 landings target for sablefish, and under Option 1 trip limits, LES landings are projected to be 10-12 percent.

Table 6. Range of actual average LES sablefish prices per pound by period from periods 1-3 (January through June) along with the range of calculated predicted prices by period for the remainder of the year under each of the three prices scenarios, based on true prices from 2023 and 2024.

Actual Avg. Prices By Period (Periods 1-3)	Price Scenario	Predicted Prices By Period (Periods 4-6)
	low	\$2.36 - \$2.49
\$2.30 - \$2.64	average	\$2.63 - \$2.76
	high	\$2.89 - \$3.04

Table 7. Options for sablefish trip limit increases in the LES sector. Bolded row represents the GMT recommendation. Projected landings are based on actual landings through April 30 combined with predicted landings for the remainder of 2025, assuming July 1 implementation.

Option	Trip Limit	Projected Landings (rd. wt. mt) under Three Price Scenarios			Target (mt)	Attainment under Three Price Scenarios		
		Low	Average	High		Low	Average	High
SQ	2,500 lbs./week	286	312	337	2 1 2 2	9%	10%	11%
1	3,000 lbs./week	317	342	367	3,122	10%	11%	12%

#### **California Recreational**

The GMT provides the following response to requests from the California Recreational Groundfish Advisory Subpanel (GAP) Commercial Passenger Fishing Vessel (CPFV) and skiff representatives for an inseason change to the recreational groundfish season in the San Francisco Groundfish Management Area (GMA). The San Francisco GMA spans from 38° 57.5' N lat. (Point Arena, California) to 37° 11.0' N lat. (Pigeon Point, California). Specifically, the request is to consider moving September 2025 from an inshore fishery, where fishing is permitted shoreward of the 20 fathom boundary line (<u>Title 14 of the California Code of Regulations (CCR) §35.00</u>), to an offshore fishery, where fishing is allowed seaward of the 50 fathom Rockfish Conservation Area (RCA) line (<u>Code of Federal Regulations (CFR) §660.72(a)</u>).

The rationale for this request included reportedly increased fishing pressure resulting in reported localized depletion on nearshore rockfish in the San Francisco GMA (primarily the local reefs off Marin County, California). In 2024, the nearshore complex South of 40° 10' N lat. attained only 37 percent of the Annual Catch Limit (ACL). As a currently rebuilding nearshore species, quillback rockfish impacts were also considered. Despite the restrictive harvest limit (1.0 mt) for the area South of 40° 10' N lat., quillback rockfish mortality in 2024 did not exceed the limit at 77% attainment of the ACL contribution to the complex (Agenda Item H.9.a., Supplemental CDFW Report 1, March 2025). At the time of this report writing, California recreational mortality estimates are only available through the end of March 2025, which coincides with the period in which boat-based fishing is closed for rockfish, cabezon, greenlings, and lingcod. The GMT has no new information indicating the nearshore rockfish complex or quillback rockfish South of 40° 10' N lat. exceeded their respective harvest limits in 2024 or are at risk of doing so in 2025.

In the San Francisco GMA, the 50-fathom RCA line is primarily located within Federal waters, while the 20-fathom boundary is located solely within state waters. Recognizing that the proposed change is requested to take effect in order to have additional offshore fishing opportunities beginning this year, this would require changing state (<u>Title 14 CCR §27.35</u>) and Federal regulations (50 CFR 660.360(c)(3)(i)(A)(3)) using emergency rulemaking authority. However, the Council only has jurisdiction over fisheries in Federal waters. If the Council were to approve the request, there is no guarantee the California Fish and Game Commission would approve conforming regulations in California state waters.

Most private and rental vessels are not large enough or well-equipped to safely travel the distance required to reach the 50-fathom RCA line, which is located approximately 33 miles from the mouth of San Francisco Bay, as an example. In addition, there are many smaller skiffs and kayak anglers in the area. This proposed change raises equity concerns as it would effectively take away a month of fishing opportunity from the majority of recreational groundfish anglers in the area. The proposed change would only affect the San Francisco GMA, with the Northern, Mendocino and Central North of 36° N lat. GMAs remaining unchanged. Differences in season structure between GMAs increases regulatory complexity, hindering public understanding and compliance with fishing regulations. Additionally, the California state transit provision would preclude transit through the San Francisco GMA while nearshore groundfish species are aboard, even if they were taken from a GMA where take of nearshore species is permitted (<u>Title 14 CCR §27.20(b)(1)(A)(1)</u>). As a result, approval of this request would create enforcement concerns.

Given the considerations outlined above, the GMT does not support this request at this time.

#### California Quillback Rockfish

With the information available to the GMT through March 2025 for recreational data and to-date for commercial data, no quillback rockfish catch has been reported.

## Appendix 1.

#### **Chinook Salmon Scorecard**

Sector a/	Sub-Sector	Catch To Date (# of fish)	Percent of Threshold	Total Threshold (# of fish)	
	СР	248	2.3%		
	MS	*	*		
Whiting	Shoreside	32	0.3%	11,000	
	Tribal	264 b/	2.4%		
	Total	544	4.9%		
	Bottom Trawl	151	2.7%		
	Midwater Trawl	81	1.5%		
	Tribal	*	*		
Non Whiting	Fixed Gear			5 500	
Non- winning	WA Rec	500 c/	0 1%	3,500	
	OR Rec	500 0/	2.170		
	CA Rec				
	Total	732	13.3%		
All groundfish fisheries & EFPs		1,276			

Table A1. 2025 Chinook salmon catch (numbers of fish) as of June 11, 2025 in relation to the sector thresholds (Source: PacFIN IFQ021 Combined Sector Salmon Bycatch ESA Report).

\* Confidential data

a/ There is a reserve of 3,500 fish, in addition to the number of fish in the whiting and non-whiting thresholds.

b/ Current year tribal landings are estimated as the maximum of the historic landings for the last 5 years.

c/ GMT proposed assumption of annual mortality, which assumed maximum historical mortality (154) plus a 250 fish buffer from the 2017 BiOp and an additional 96 fish to account for some uncertainty in recreational salmon seasons; recreational estimates only apply to groundfish fisheries occurring outside of salmon seasons.

## Yelloweye Rockfish Scorecard

Sector	Sub-sector	Projection (mt)	<b>Reference Point</b>	Tracking Limit (mt)	Projected Percent (%) Attainment	
Grand Total a/		37.3	ACL c/	56.0	66.6%	
Off the to	р b/	14.8	Set Asides	14.8	100.0%	
	СР					
<b>T</b> 1	MS		Trawl allocation	3.3	12.1%	
Irawi	IFQ	0.4				
	Sub Total	0.4	Trawl allocation	3.3	12.1%	
	Non-nearshore + Nearshore	4.0		7.9	50.8%	
	WA Rec	3.0	HG	9.7	30.8%	
	OR Rec	6.2		8.8	70.6%	
	CA Rec	8.9		11.4	78.2%	
	Sub Total	22.1	HG d/	37.7	58.6%	
Non-trawl	Non-nearshore + Nearshore	4.0		6.2	64.8%	
	WA Rec	3.0	ACT	7.6	39.3%	
	OR Rec	6.2		6.9	90.0%	
	CA Rec	8.9		8.9	99.7%	
	Sub Total	22.1	ACT	29.6	74.7%	

Table A2. 2025 allocations and year-end projected mortality impacts (mt) of yelloweye rockfish as of June 11, 2025.

a/ The Grand Total is the sum of the Trawl Sector Total and Non-trawl Sector ACT Total.

b/ off the top set asides: Tribal = 8.0 mt; EFPs = 0.0 mt; Research = 2.9 mt; Incidental Open Access = 3.9 mt. c/ ACL = Set asides + Trawl allocation + Non-trawl allocation.

d/ The non-trawl allocation is the sum of the non-trawl HGs, 37.7 mt.

PFMC 06/12/25