

## GROUND FISH ADVISORY SUBPANEL REPORT ON INSEASON MANAGEMENT – FINAL ACTION

The Groundfish Advisory Subpanel (GAP) provides the following recommendations on action items and provides some informational updates on the unforeseen outcomes of drastic harvest specification declines on the 2025 fishery-to-date.

# Action Items

## Sablefish

The sablefish market has stabilized a bit and prices for product have increased in some areas. The GAP actually received a request to increase open access (OA) sablefish trip limits south of Point Conception, which is somewhat unusual due to traditionally more difficult market conditions in the south. The GAP fixed gear reps, both OA and limited entry (LE), requested that the GMT analyze some larger sablefish trip limits for consideration. Complicating matters is the concern of the potential for shortspine thornyhead bycatch under the low allocation due to the most recent assessment with any increase of sablefish trip limits. Following a detailed GMT analysis, the GAP is comfortable going somewhat conservative on a sablefish trip limit increase at this time and then will reconsider further trip limit increases at the September Council meeting when more data is available.

Working off Agenda Item E.3.a, Supplemental GMT Report 2, the GAP recommends the following:

LE North of 36° N. Lat: GMT **Option 1**, 5,500 lbs./week, not to exceed 11,000 lbs./2 months

OA North of 36° N. Lat: GMT **Option 1**, 4,000 lbs./week not to exceed 8,000 lbs./2 months

LE South of 36° N. Lat: GMT **Option 1**, 3,000 lbs./week

OA South of 36° N. Lat.: GMT **Option 1**, 2,500 lbs./week not to exceed 7,500 lbs./2 months

## California Quillback

The implementation of the rebuilding plan for California Quillback rockfish and associated management measures has resulted in significant impacts to California fishing communities. However, the recent draft full assessment of California Quillback suggests the population is not overfished.

Northern California charter boat businesses have been struggling due to two years of closed salmon fishing and rockfish regulations designed to protect overfished Quillback. The lack of salmon opportunity has moved many charter boats that would otherwise fish for salmon into the groundfish fishery. This has created more competition for a declining customer base and has harmed businesses that normally focus on groundfish and not salmon. The limited fishing areas due to Quillback protections have concentrated effort and also reduced customer interest.

Private recreational anglers have been restricted for the last two years in fishing in historic areas due to the quillback related depth constraints. Recreational anglers have been forced to fish either shallower than 20 fathoms or deeper than 50 fathoms, ultimately concentrating effort and increasing pressure on nearshore species. The current regulations also make it difficult for anglers to fish for other species. For example, if rockfish are aboard a boat during the 20-fathom restriction, then the boat cannot fish for other species such as Pacific Halibut in waters over 20 fathoms.

The non-trawl commercial sector in California has suffered some of the most restrictive regulations that the State has ever seen, due to the 2023 California Quillback assessment. This led to an almost complete closure of commercial fisheries in California state waters north of the 37° 07' N. Lat., eliminating all non-trawl access opportunities with the exception of nearshore permit holders. This led to complete prohibition of all Federal groundfish species in State waters.

The GAP recommends that if the new full quillback assessment is approved by the Scientific and Statistical Committee and is deemed not overfished that the California Department of Fish and Wildlife and the National Marine Fisheries Service rescind all of the quillback related management measures implemented in late 2023 as soon as possible.

## California Recreational

The GAP requested that the GMT analyze moving the San Francisco Management Zone from shoreward of 20 fathoms to seaward of 50 fathoms during the month of September to provide more equitable fishing opportunities for anglers targeting deep-water areas. Currently, the season allows six months of shallow-water access (i.e., shoreward of 20 fathoms) and only three months for deep-water fishing (i.e., seaward of 50 fathoms). The adjustment would balance this to four months deep and five months shallow. Inshore reefs shoreward of 20 fathoms near the San Francisco Bay and Golden Gate Bridge area experience heavy fishing pressure during the nearshore portions of the season and this proposal would relieve some of that pressure. If the current quillback-related depth restrictions are changed as described above, then this request would not be needed, but the GAP would like to see it addressed in case there are no quillback-related depth restriction changes in 2025.

## Informational Item

The GAP would like to provide more context to the 2025 landings data described in [Agenda Item E.3.a, Supplemental GMT Report 1, June 2025](#). While the GAP and industry recognized that the impacts of the declining annual catch limits (ACLs) for canary, petrale, and shortspine would be significant, the impacts seen to date are more serious than anticipated. As a reminder, the 2025-2026 harvest specifications were finalized in June 2024 and therefore fishing data and experiences

from the remainder of 2024 were not considered in the determination of the specifications and management measures.

## Shorebased IFQ

In the shorebased individual fishing quota (IFQ) trawl fishery, the remaining four bottom trawlers left in the Eureka area described being paralyzed by the ACL reductions and have only made four total groundfish deliveries this year - despite their buyer wanting fish. They are concerned about canary lightning strikes and don't have enough canary to confidently fish on the shelf, yet they don't have enough shortspine quota to fish in the Dover/thornyhead/sablefish (DTS) fishery on the slope either. No one is in a hurry to go out and risk it, and they are shifting effort to try to make ends meet and retain crew – crabbing longer, for example, and at least one vessel is making shrimp trips. The others are tied up.

Bottom trawl captains on F/V Iron Lady and F/V Cape Windy explained to the GAP that opportunities they used to have to diversify have dried up. Boats used to be able to bring in rex sole, sanddabs, English sole, and other species to round out their trips, or when constraining species shifted their fishing areas. But because of market constraints on processors, delivery opportunities have become much more prescriptive, to bring in specific amounts of specific species - and nothing else - with price penalties for going over the trip limits set by the processor. Moving around to find the exact fish you're supposed to bring in, and find a place you can access that cleanly, costs money and time. They also described disparities in quota pricing throughout the year, with constraining species quota pounds (QPs) being more expensive at the beginning of the year, and less so when there's less time to fish toward the end of the year. However, processors can't just take deliveries during the second half of the year, so those who fish first can end up paying more in quota pound lease prices to do so.

The vessel manager for two Newport-based vessels, F/V Miss Sue and F/V Seeker, described their highest combined shortspine bycatch year during whiting operations in the last decade was in 2024. The trend of increased shortspine encounter rates off of Oregon continued in bottom trawl for F/V Miss Sue in December 2024 through February 2025. F/V Miss Sue switched over from DTS to midwater rockfish earlier than they wanted in order to conserve shortspine quota if they need it later in the year. Other Newport-based bottom trawl and midwater trawl vessels that don't traditionally trawl the first few months of the year realized by early spring they would be much more constrained in their 2025 fishing plans because of both the lower shortspine allocations and the limited options for leasing quota. The canary market has all but seized up. F/V Miss Sue has avoided fishing for whiting off Washington altogether to this point because of higher canary encounters, forgoing opportunity.

The fear of lightning strikes is well-founded, with one bottom trawl vessel already having a large catch of canary in Oregon this year. That particular vessel had enough quota in its account to cover the catch, but it left them with much less room under the vessel cap for the remainder of the year. There was an approximately 11,000 pound lightning strike of canary in the shoreside hake fishery last week, and another hit of approximately 3,000 pounds this week. While we wouldn't normally classify 3,000 pounds as a lightning strike, with reduced quotas, it qualifies as a large catch event. Few vessels have access to enough canary quota to cover large amounts of canary catch, and the quota market is choked up. For shortspine, high encounter rates and reduced allocations have also made trading quota difficult. Petrale quota is always hard to find, but the reduced allocation has reduced trading. The handful of people who are willing to lease these coveted species are mostly

quota share (QS) permit owners without an active vessel, and prices are exorbitant. On Jefferson State Trading Company, an online auction used by many shoreside trawl participants, quota pounds prices from 2024 to 2025 have increased by 66 percent for petrale, 99 percent for canary, and 233 percent for shortspine thornyhead.

Active vessels need every pound they have of canary, shortspine, and petrale as insurance for the year - either to catch themselves, or to trade for a different bycatch species. QP for these species are so difficult to come by that they are sometimes more valuable than money, and vessels that don't fish that particular species will hold onto QPs as insurance. For example, Sea Storm's vessel manager described that her vessel does not catch petrale, but owns petrale QS, which she usually trades to vessels who target petrale, in exchange for widow rockfish or whiting. But this year, Sea Storm is holding back some petrale as the only insurance for later obtaining canary or shortspine if it's needed - since trading one of the three species may be the only way to get the other. However, this behavior on a large-scale hampers quota movement and efficient harvest and utilization of the sector allocation. While quota movement is an ongoing problem in the trawl fishery, it has been exacerbated this year due to the ACL declines for canary, shortspine, and petrale.

The short quota market and high quota prices for the few trades that are occurring has also created an issue of equity within the fishery. The most efficient vessels that are most profitable or are part of a larger company or are owned by a processor can afford to pay a higher price to get quota to move, but this drives up the price for QP of those species for everyone in the fishery. For vessels that are already struggling to remain in the fishery, every quota pound purchased decreases profitability, and it's worsened when lease prices skyrocket. Vessels are faced with the dilemma: Do I leave the dock and risk bycatch of species I don't have access to or can't afford, or do I stay at the dock? At some point leasing quota out to others becomes more profitable than operating a vessel and catching it yourself. But if we lose vessels in this fishery, we lose history, independent boats, generational fishing families, port infrastructure, and vibrant fishing communities. We lose the identity of the groundfish fishery. So many market conditions are already changing the face of the fishery, and the combination of three significant ACL declines for critical species is bringing this trawl fishery to the brink.

## **Shorebased Processors**

Many of the constraints that apply to trawl vessels, above, also apply to shorebased processors. Processors own vessels and quota and therefore are experiencing similar challenges.

While petrale prices are currently up, at both the ex-vessel level and the sales market to customers, it is unclear whether the increased prices will make up for the potential revenue loss. Based on attaining a full petrale vessel cap at estimated average prices from last year, a vessel that caps out (~200,000 lbs) is likely to experience up to a \$100,000 estimated loss in revenue. There is also a smaller sales market able to absorb the higher prices. As an example, a vessel delivering 10,000 to 12,000 pounds per trip results in roughly 16 to 20 trips per year. That doesn't stretch very far, especially for a boat that is fishing flatfish and midwater rockfish as their primary fishery. Processors have had to meter the landings this year, more so than in the past, in the hopes of maintaining some level of consistency throughout the year. Fishing for a lower target amount is challenging, but the trip must generate enough revenue to be economically viable and petrale is typically the major revenue driver on a flatfish trip.

These examples are all indicative of the instability problem at the processor and consumer levels. Simple supply and demand would seem to indicate a limited supply would lead to an automatic increase in price. While that is good for fishermen and processors, a limit exists as to what the consumer will pay for each wild, domestic seafood species when alternatives – other seafood species, other proteins – exist on the market at lower prices. Seafood and grocery markets want year-round stability; absent that, it is difficult for processors to retain those markets that depend on volume. Holding quota until the end of the year on the assumption that prices will rise carries more risk for fishermen on whether the market for certain species will exist and whether those markets will exist in sufficient quantity to make fishing profitable at that time of year. While we knew challenges were coming, the reality has far exceeded our fears. One processor representative shared with the GAP that one company has been making progress selling petrale to the East Coast, and they are concerned that the reduced allocation and inconsistency in supply will jeopardize that market.

Additionally, the uncertainty in assessments and rumors about potential drastic changes in assessments put off fishermen and processors from investing in equipment, gear, markets, etc.

## **At-Sea Sector**

The mothership whiting fishery is just getting started for 2025, but in pre-season meetings, Whiting Mothership Cooperative (WMC) members discussed concerns about accessing whiting with so many species to avoid. WMC has long implemented closed areas, precautionary areas, and inseason hotspot closures, as well as other bycatch mitigation methods. The concern is that if hake aggregates in areas with canary or shortspine (or salmon, darkblotched, widow, yellowtail, Pacific Ocean Perch, etc.), there become very few places to safely access to avoid those species, and there won't be enough whiting in small clean areas to sustain the fleet. Especially after a record-low whiting attainment in 2024, the tolerance for a fleet (mothership, MS, processor "platform" plus two to four mothership catcher vessels, MSCVs) to burn fuel, time, and money searching for clean fishing becomes lower and hampers participation altogether. At least one MS processor has decided not to participate at all this year.

The MS processor Arctic Storm, together with three MSCVs, F/V Leslie Lee, F/V Marathon, and F/V Sea Storm, was the first MS fleet to the grounds in 2025, and (at the time of writing this statement) are currently searching down the coast. The fleet made the difficult decision to bypass the only whiting they've found so far in southern Washington because of the potential for canary bycatch. The GAP understands that one other MS processor plans to participate this year, but it's unclear if others will, in part because the bycatch restrictions add significant operational costs.

At the time the 2025-2026 harvest specifications were analyzed, the industry was also not aware that the value of the MS fishery would drop by 59 percent in 2024, or that the MS cost recovery fee percentage would increase from 1.8 percent to 3 percent in 2025. This increased cost combined with heightened bycatch restrictions places extra burden on MSCVs.

The catcher/processor (CP) sector has had clean whiting fishing so far but is frontloading as much spring harvest as possible due to chronic shortspine encounters in the fall fishery last year. Two CP vessels delayed deployment to the Alaska pollock fishery and instead went whiting fishing this spring. Delayed deployment to Alaska shifts operational risks (utilization, bycatch) from the fall whiting fishery to the Alaska pollock B-season. The decision to deploy into the whiting fishery was based in part on the combination of clean spring fishing and the highly uncertain scenario that

the fall whiting fishery presents. They also implemented restrictive bycatch avoidance measures and a large canary closure on a shelf where there is often productive hake harvest.

## **Commercial Non-Trawl**

As described above in the request for sablefish trip limit changes, vessels are seeing improvements in the markets and vessels are hitting the current trip limits and asking for increases. However, there is the concern about increasing the sablefish limits due to concerns about shortspine bycatch due to the low ACLs.

Non-trawl representatives also note that with the cowcod conservation area (CCA) opening in 2024, vessels are still exploring the area that has been closed for over two decades. While the analysis for [Amendment 32](#) noted that there would “likely be increases in mortality for shelf rockfish south, slope rockfish south, shortspine thornyheads, and sablefish south of 36° N. lat. as key fishing grounds for these stocks,” the degree of that increase was uncertain. The GAP understands that shortspine catches south of 34° 27’ N. lat. are doubled compared to this point last year.

Additionally, vessels trying to target shelf stocks such as yellowtail, widow and bocaccio are having issues finding areas without significant amounts of canary. This results in vessels having to move to other areas, increasing operational costs or forgoing opportunity in general.

## **Recreational**

Recreational members on the GAP recognize that the season hasn’t been open long enough, and can provide further updates on fishery conditions in September.

PFMC  
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