GROUNDFISH ADVISORY SUBPANEL REPORT ON WIDOW ROCKFISH ALTERNATIVE HARVEST CONTROL RULE PRELIMINARY PREFERRED ALTERNATIVE

The Groundfish Advisory Subpanel (GAP) recommends that the Pacific Fishery Management Council (Council) refine the range of action alternatives for widow rockfish harvest control rules as follows, listed in order from lowest to highest annual catch limit (ACL), including our preliminary preferred alternative (PPA):

- **Alternative 2, suboption d (*new*)** (Scientific and Statistical Committee's (SSC) overfishing limit (OFL) minus one) = ACL of 6,238 mt
- **Alternative 2, suboption b** (20% ramp down), **GAP Recommended PPA** = ACL of 6,720 mt

The harvest control rules (HCR) resulting from these alternatives are shown and compared in Table 1, below.

Table 1. GAP-Recommended Range of Alternatives for 2027-2028 Widow Rockfish Harvest Specifications (in order from lowest to highest ACL)

Alternative	Alternative 1		Alternative 2d		Alternative 2b	
Description	No Action - Default Harvest Control Rule		SSC's OFL-1		20% Ramp Down (GAP PPA)	
Year	2027	2028	2027	2028	2027	2028
OFL (mt)	4,916	5,172	6,239	6,239		
ABC (mt)	4,596	4,810	6,238	6,238		
ACL (mt)	4,596	4,810	6,238	6,238	6,720	6,720
ACL difference from 2025 (11,237mt)	-6,641 (-59%)	-6,427 (-57%)	-4,999 (-44%)	-4,999 (-44%)	-4,517 (-40%)	-4,517 (-40%)
ACL difference from dHCR			+1,642 (+35%)	+1,428 (+30%)	+2,124 (+46%)	+1,910 (+40%)

As described in Agenda Item C.3.a, Supplemental SSC Report 1, April 2026, the SSC is recommending an alternative overfishing limit (OFL) of 6,239 mt, equal to the yield corresponding to B40% (Agenda Item C.3.a, Supplemental SSC Report 1, April 2026). This means that the only ACL alternatives in the existing range that would fall under the SSC's OFL are no action and Alternative 2c. Therefore, the GAP recommends adding a new alternative that would set the acceptable biological catch (ABC) and ACL at 6,238 mt, just under the SSC's OFL of 6,239 mt. In addition, the GAP recommends that the Council keep Alternative 2b in the range and identify it as the PPA, and request that the SSC take another look at their OFL recommendation for the

following reasons. The Council's adopted problem statement specified that the harvest control rule policy "should continue to prevent overfishing and keep the **long-term average stock status** at or above target biomass (i.e., Bmsy), while moderating socio-economic disruption to the fishing fleet, processing landscape, and coastal communities."

Appendix A of Agenda Item C.3, Attachment 1, April 2026 shows that all of the alternatives adopted by the Council in March 2026 keep the fraction unfished above 40 percent in the long-term by 2036. Only Alternative 2a (10 percent ramp down, ACL=8,400 mt), which the GAP is not recommending even though we believe the population can support this harvest and would provide significantly more opportunity to the fleet and coastal communities, drops below 40 percent fraction unfished over the time series for three years (2028-2030). The GAP's PPA of Alternative 2b only drops to 0.397 in 2029, which rounds to 0.40. Note that these projections assume 100 percent attainment of the ACL and the use of the default HCR starting in 2029 and beyond based on the current stock assessment. The probability of dropping below B40% (management target) or B25% (overfished level) in 2029 is strikingly similar when comparing the No Action alternative to Alternative 2b or 2c, as summarized in Table 2 below (sourced from Tables 1, 5, and 7 in Agenda Item C.3, Attachment 1, April 2026). The probabilities for Alternative 2d would likely be between 2b and 2c, given the ACL proposed is between those two Alternatives.

Alternative	**Prob < B40% in 2029**	**Prob < B25% in 2029**
Alternative 1 (no action - default harvest control rule)	0.468	0.198
Alternative 2c (equilibrium MSY @ SB40)	0.489	0.213
Alternative 2b (20% ramp down)	0.505	0.225

The GAP, fishermen, and fisheries stakeholders want access to healthy stocks for the long-term and would not support an alternative harvest control rule without weighing the risk and trade-offs. Fishing participants have recently advocated to set ACLs lower than the default HCR for Pacific whiting, sablefish, rougheye/blackspotted rockfish, and chilipepper. For all of the reasons previously stated in Agenda Item F.2.a, Supplemental GAP Report 1, November 2025, including that fishing is only occurring on a portion of the widow rockfish range, we think the risk of overfishing under any of the alternatives is extremely low.

The impact of this decision is critical to West Coast fishing communities and all sectors of the groundfish fishery, which are still recovering from 10 overfished declarations in the early 2000s. As described in our March statement (Agenda Item D.4.a, Supplemental GAP Report 1, March 2026) many businesses never came back, and those declarations decimated infrastructure and processing capacity for commercial fishing and processing, particularly in California. Now we are missing years of fishery-dependent data for widow rockfish and other species from areas that would have gone into stock assessments. Most participants in the Council process agree that we need more information and data collection to accurately estimate widow rockfish, but in the meantime, it's the fishing participants and fishing communities that will suffer the consequences.

Figure 1 (provided by the Groundfish Management Team) demonstrates that a significant cut is coming no matter the option chosen. There are vast portions of the coast that have widow congregations that are unfished or very lightly fished. Based on these two points, the GAP does not see a biological concern and seeks to mitigate as much as possible the loss to markets,

processors, vessels, and communities. History shows that market and infrastructure muscle memory can be difficult to regain once lost.

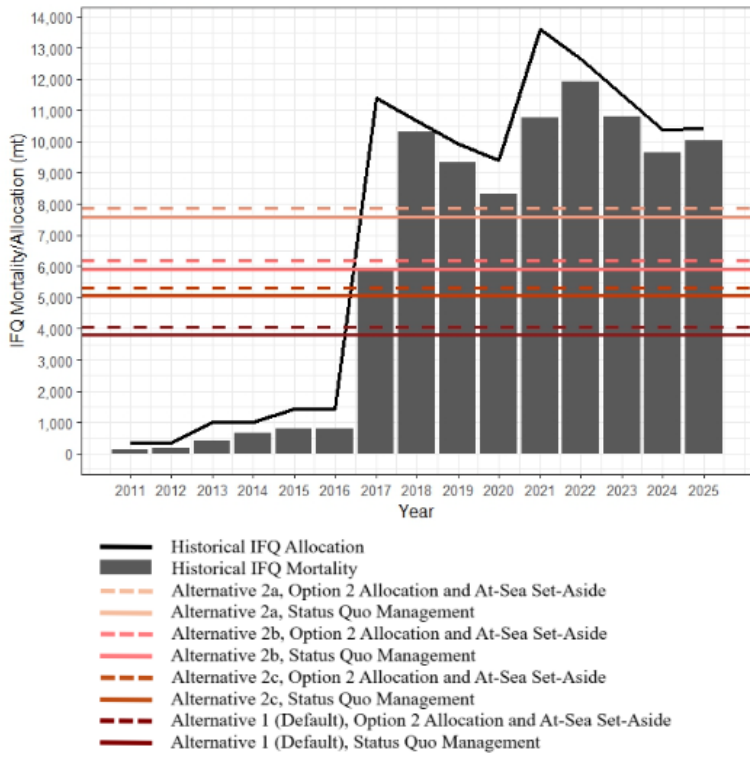

Figure 1. 2027-2028 Widow Rockfish Harvest Specification Alternatives Compared to Historical Individual Fishing Quota (IFQ) Trawl Sector Allocations and Mortality

If the Council were to select an alternative with a small buffer between the OFL and ABC (such as Alternative 2d), the GAP believes the risk of exceeding the OFL is low. The fishery harvest guideline is currently allocated 300 mt to non-trawl, and remainder to trawl (note that considerations to allocations will occur under Agenda Item C.7). Trawl comprises the largest portion of the widow allocation, and the risk of exceeding the trawl allocation (combined at-sea set aside and IFQ allocation) is very low. Low allocations usually cause participants to hold onto their quota for incidental catch insurance (i.e., holding widow rockfish quota pounds for incidental catch in the whiting fishery) or trading power (i.e., quota pounds of valuable species – petrale sole, widow rockfish - are often more powerful than money in terms of trading for other needed species), so it is unlikely that the sector as a whole would achieve 100 percent of the IFQ allocation. All trawl sectors have immediate catch reporting, so inseason updates would be very timely and accurate. Approximately 15 IFQ vessels targeted midwater rockfish in 2025. The at-sea sectors have a cooperative manager, monitoring service, a suite of mitigation measures including hot spot closures, and enhanced communication protocols.

This agenda item underscores the importance of the Council taking up the risk management framework (scoping of this item is currently shaded for the November 2026 Council meeting on the Year-at-a-Glance, Agenda Item I.2, Attachment 1, April 2026), and the urgency of additional research efforts for rockfish species like widow, which are difficult to accurately assess with the bottom trawl survey.

The GAP appreciates efforts to explore tools such as eDNA, fishery catch per unit effort indices, spatial based data, communication between fishermen and scientists to provide more context to data, and confirmation of past recruitment indices. These tools could inform future assessments with the hope that a better understanding of the stock would provide more confidence and stability over time.

PFMC
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