WASHINGTON DEPARTMENT OF FISH AND WILDLIFE REPORT ON 2027 AND 2028 GROUNDFISH MANAGEMENT MEASURES

The Washington Department of Fish and Wildlife (WDFW) met with stakeholders on December 10, 2025, as well as February 17, March 23, and May 20, 2026, to review and discuss proposed recreational management measures for 2027 and 2028. At the May 20th meeting, we reviewed the range of alternatives and discussed final preferred alternatives (FPA) for recommendation to the Pacific Fishery Management Council (Council). The alternatives are fully described and analyzed in Agenda Item C.7.a. Suppl. WDFW Report 2, April 2026, with the exception that this report provides additional options for a yelloweye rockfish sub-bag limit change.

Based on stakeholder input, WDFW recommends the following management measures as the final preferred alternatives (FPA) for Washington recreational bottomfish in 2027-2028:

Changes to depth restrictions

North Coast (Marine Area 4)

1. Modify the 20-fathom line depth restriction currently in place June–July to exclude Duntze and Duncan Rocks from the depth-restricted area by changing the coordinates defining the 20 fathom line (50 CFR 660.71(b)) as follows:

   (1) 48°25.00′ N. lat., 124°44.06′ W. long. (added)
   (2) 48°25.00′ N. lat., 120°45.22′ W. long. (added)
   ~~(1) 48°23.90' N. lat., 124°44.20' W. long.~~ (removed)
   (3) 48°23.60′ N. lat., 124°44.90′ W. long. (unchanged)

South Coast (Marine Area 2)

1. Remove the 30-fathom lingcod restriction currently in place in May.

Columbia River and South Coast (Marine Areas 1 and 2)

1. Modify the deepwater lingcod restriction in Marine Area 1, so that the closure in both Marine Areas 1 and 2 would be described by a line extending from 47°31.70'N. lat., 124°45.00'W. long to 46° 33.00' N. lat., 124° 28.55′ W. long.
2. Modify the open dates for deepwater lingcod from September 1–30 to September 1–15.

Sub-bag limits and seasons

Yelloweye Rockfish

1. Allow yelloweye rockfish retention under a 1-fish daily sub-bag limit in May and September.

WDFW estimates allowing a 1 fish sub-bag limit in May and September would keep harvest within the Washington HG and below the ACT (Table 1). WDFW would use in-season monitoring to compare actual to projected May mortality and would use in-season management to reduce the sub-bag limit in some or all of September to zero, if needed.

Table 1. Projected total mortality in mt for yelloweye rockfish for various options of allowing a 1 fish sub-bag limit on select month(s). The WA HG in both 2027 and 2028 is 22.8 mt and the ACT is 17.9 mt. The presented range takes into account uncertainty in angler behavior shift, effort, discard mortality rate, and average weight. The recommended preferred alternative is bolded.

Month(s) with a 1 fish sub-bag limit	**2027 Projected Total Mortality (mt)**
May	6.2 – 10.0
June	5.6 – 9.2
September	4.2 – 7.0
May & September	**7.2 – 11.8**
May & June	8.3 – 14.0
June & September	6.4 – 10.8
May, June & September	9.5 – 16.1

Canary Rockfish

1. Maintain Status Quo of a 5 fish sub-bag limit.

WDFW recommends the Status Quo sub-bag limit for canary rockfish for the reasons laid out in Agenda Item C.7.a. Suppl. WDFW Report 2, April 2026. In addition, WDFW has received stakeholder feedback that halibut fishing this year has been exceptionally poor so far. Some of the reasons for this are related to things like weather which are a factor every year but others, like fuel and other higher-than-normal costs are impacting effort. While just speculative, higher costs may may linger into next year and could be expected to reduce demand for halibut fishing trips next year (2027). If that is the case, we expect 2027 canary rockfish mortality to be at the low end of the projected range of 20.1 - 23.7 mt (Table 2).

Table 2. Projected total mortality in mt for canary rockfish for various bag limit options. The WA HG for canary rockfish is 20.5 mt in 2027 and 21.2 mt in 2028. The presented range takes into account uncertainty in angler behavior shift, effort, discard mortality rate, and average weight. The recommended preferred alternative is bolded.

Sub-bag option	2027 Projected Total Mortality (mt)
5 (Status Quo)	**20.1 – 23.7**
4 in May, 5 otherwise	19.5 – 23.6
4 year-round	17.2 – 21.9

Further discussion regarding yelloweye rockfish management

In line with the preference expressed to us by stakeholders, we are advocating that the Council take a cautious approach to yelloweye retention. This caution arises because we are uncertain how the fishery will respond to reopening. To help think through that uncertainty, we offer the following terminology from an article recently made available in preprint form:

> A *prediction* typically implies a singular, expected outcome. A *forecast* communicates probabilistic information across a range of possible outcomes. A *projection* provides a conditional statement: "if these assumptions hold, then this outcome follows." A *scenario,* by contrast, constructs a coherent narrative about a possible future without asserting it to be the most likely one.[1]

The numbers we show above for yelloweye (Table 1) fit somewhere between projections and scenarios in that they are based on assumptions from scenarios of how anglers may respond to being able to keep a yelloweye. We certainly do not have a singular, expected outcome. And with retention prohibited for over 20 years, the data cannot reliably support probabilistic forecasts.

We lay this out for two main reasons. First, the Council should contemplate the possibility of inseason or mid-biennium adjustments to yelloweye retention. We believe the 2027-2028 analysis would be sufficient to support such adjustment if the need were to arise. In brief, the catch projections are based heavily on assumptions that new information and circumstances may prove wrong.

One of those assumptions is the average fish weight. Recreational fisheries are monitored primarily in numbers of fish, which are then converted to weight (to match the weight-based allocation tracking system) by multiplying number caught by fish average weight. Average weight is obtained through port sampling of retained catch. For yelloweye, there has been no retention for over 20 years which adds uncertainty around the assumption of future average fish weight. In fact,

[1] Lo Piano, Samuele and Kuc Czarnecka, Marta and Pielke, Roger and Saltelli, Andrea, What Demographic Prediction Can and Cannot Achieve (May 15, 2026). Available at SSRN: https://ssrn.com/abstract=6771298

assumption of how much the average yelloweye will weigh is one of the largest sources of the spread in the catch projections shown above. For one hypothetical situation, if the average weight of a yelloweye turns out to be substantially higher than assumed, the Council may want to reduce the number of days when yelloweye can be kept. Conversely, it is possible to imagine a situation where new information may lead the Council to consider increasing allowable retention. For instance, the catch projections assume that fishing effort remains similar to recent years. There is some worry that fishing effort is dropping. If it does drop substantially from what was assumed without a concurrent increase in angler fishing success (i.e., the average catch per angler or CPUE), it may be possible to increase retention allowances and have catch end up within the range expected.

In sum, the Council recommends management measures in this planning phase based on expectations of what will happen. Fishing effort is a key component of those expectations. On that point, one reason stakeholders wish to be cautious with yelloweye is that they do not want the core bottomfish fishing opportunity to be adversely affected by ramping up yelloweye catches too fast and in a manner that brings back the need for restrictions. Maintaining and growing that core bottomfish opportunity should be the guiding principle in adaptively managing yelloweye retention in upcoming cycles.

This last point then relates to the second reason we highlight the challenges with uncertainty. The MSA requires rebuilding restrictions and recovery benefits to be shared fairly and equitably. Importantly, understanding how effort and CPUE respond to recovery benefits requires time and learning, recognizing that stock status will always be uncertain, as highlighted by the major change to stock status from the 2023 canary assessment. We urge to keep the lessons learned in mind for yelloweye. And emphasized in the next section, we urge the Council to continue the fair and equitable sharing discussion using more flexible planning.

Further rationale for the canary rockfish recommendation

Much of what was discussed above for yelloweye applies to canary as well. We may have more data available, yet the total mortality numbers shown in Table 2 above are projections based on assumptions about effort and CPUE. Effort and CPUE are uncertain and subject to variability that still cannot be quantified probabilistically at this time. For example, CPUE for canary rockfish is likely linked to halibut fishing in non-linear and hard-to-predict ways. If halibut fishing this year is bad, as we have heard, there may be less halibut effort next year. However, CPUE for canary may also be higher on bad halibut trips, as anglers and charter operators pivot to a more productive deeper water species on unsuccessful halibut trips.

We produced a range of total mortality projections for each canary sub-bag limit option because of this uncertainty in assumptions about effort and CPUE. The projected ranges all span the HGs, thereby acknowledging the possibility that they may be exceeded in 2027 and 2028. However, the nature of the projections is such that we have low confidence that they are centered on the “most likely” outcome. Instead, we have higher confidence that reality will end up within the range or

close to it. Knowing which part of the range requires knowing which assumptions are most likely. If effort is lower than assumed, and this seems a real possibility if the high costs of fuel and living continue, we would expect to be below the HGs. And lower effort for halibut would be enough, all else being equal, to expect projections to come in at the lower end of the range. At the same time, it is also possible that CPUE, effort, or both run higher than assumed. And if so, then the HG could be exceeded barring inseason action. Importantly, however, inseason monitoring and adjustment has long been a key feature of how WDFW and the Council have cooperatively managed the Washington recreational fishery. This remains true for 2027-2028. If the fishery approaches or exceeds the HG, inseason action would be a possibility.

The potential for inseason action next brings us to the risk to the ACL topic. The Council has evaluated whether inseason action is necessary or appropriate primarily by asking whether it was necessary to keep total catch below the ACL. As we have pointed out, the Council would ideally plan its season using this same evaluation criterion. Best available data and information continue to suggest that there will be little to no risk of exceeding the canary ACL even if the Washington recreational fishery were to come in at the upper range of projected total mortality reported above. It would take extraordinary and surprising changes to patterns in the IFQ fishery for this not to be the case. For instance, the status quo option shows an upper range that is 2.5 – 3.2 mt above the HG. Even if the IFQ fishery were to reach 80 percent attainment, there would be around 80 mt (i.e. ~25-30 times more than the expected overage of the Washington HG) left unused across all sectors. In public comment and GAP testimony, the Council has heard it expressed that even 70 percent attainment in the IFQ fishery would be very surprising.

With the very real possibility that the WA recreational fishery will stay below its HG in 2027-2028 and the extremely low probability that there would be a risk to the ACL if it didn't, **WDFW recommends that the Council adopt the status quo canary bag limit.** Beginning the seasons with a more restrictive bag limit does not appear warranted by conservation need. Inseason management capabilities underscore this. Limiting fishing participation without corresponding conservation benefit is contrary to National Standards 7 and 8 and National Standard 1's preeminent goal of achieving optimum yield.

We left the 2025-2026 planning process believing the Council's evaluation of canary rockfish allocations was incomplete. We are concerned to find ourselves finalizing 2027-2028 planning in much the same position. We do not repeat the points made in the reports WDFW submitted throughout 2027-2028 planning. However, we do wish to make clear that we continue to stand behind them. There seems to be a perception from some that the WDFW reports were suggesting a single approach to addressing the concerns. Our emphasis was instead on the need to do better and to urge discussion on improvements among all involved in the Council process.

With those concerns expressed, we are encouraged by greater recognition of the problem and willingness to address it as part of discussions on risk management and improved flexibility for achieving conservation goals. If not for the lengthy Government Shutdown this past fall, we

believe more progress would have been made. Importantly, this is not just an issue for the Washington recreational sector. More flexible sharing of the canary ACL has the potential to benefit every sector. We will continue to encourage that the Council begin work on this topic for canary and other stocks as part of risk management and other agenda items where the Council will consider how to achieve conservation goals more flexibly and consistently with National Standard 8.