

GROUND FISH ADVISORY SUBPANEL REPORT ON  
BIENNIAL MANAGEMENT MEASURES FOR 2019-2020

The Groundfish Advisory Subpanel (GAP) met with members of the Groundfish Management Team (GMT) to discuss biennial management measures for 2019 and 2020 groundfish fisheries. The GAP offers the following comments and recommendations. In crafting our recommendations, we worked from the Council action list on page 2 of the situation summary ([Agenda Item F.9](#)). In making recommendations for new management measures, we worked from the Action Item Checklist ([Agenda Item F.9.a, Attachment 1](#)).

**1. Adopt any remaining groundfish harvest specifications for 2019-2020.**

The Council has already taken action on this topic.

**2. Adopt stock complex alternatives for analysis, as appropriate.**

The GAP comments on this issue below in item 18 from the Action Item Checklist.

**3. Adopt deductions from the ACLs and the trawl allocations for analysis, as appropriate.**

The GAP supports the requests in the tribal report ([Agenda F.9.a, REVISED Supplemental Tribal Report](#)), including the higher petrale sole allocations for bottom trawl fisheries.

**4. Adopt preliminary two-year allocations for analysis, as necessary.**

The GAP notes that because of the structure of the individual fishing quota (IFQ) program, the trawl sector would not benefit from an increased yelloweye buffer. Therefore, the GAP recommends formally shifting a portion of the increase in the yelloweye annual catch limit (ACL) to the trawl sector pre-season. The GAP notes that because trawl fishermen would use yelloweye to access other target species, and because historically the usage of IFQ yelloweye relative to the total trawl quota has been low, yelloweye shifted to the trawl sector may serve as an ACL buffer in itself.

**5. Adopt a range of new management measures for more detailed analysis.**

As described above, we worked from the Action Item Checklist to develop our recommendations on this topic. As an overarching comment, and to reiterate past statements on this issue, implementing 2019-2020 harvest specifications on January 1 is the highest priority. There are a number of proposed new management measures that could benefit commercial and recreational fishermen. To the extent that these can be included without jeopardizing the implementation of the specifications on January 1, 2019, we support moving them forward. The GAP understands that not all of these items can be included while keeping trailing amendments on track and implementing specifications by January 1. Therefore, the GAP recommends including the following measures as workload permits. Where we do not address a routine or new management measure below, it is either required to move forward in the specifications process, or we are in agreement with the National Marine Fisheries Service (NMFS) and GMT positions.

6. Trawl/non-trawl allocations

Relative to allocations for cowcod and yelloweye, the GAP understands that the GMT is looking to analyze a range of alternatives for each species. For cowcod, they intend to analyze annual catch targets ranging from 4-6 mt. For yelloweye, they will analyze a range of ACL values based on the rebuilding analysis. The GAP supports this analysis because as we've said previously, while past allocations have provided opportunities across fisheries, if there is the ability to improve opportunity we think this analysis could help inform that future decision.

7. Within trawl allocations

The GAP recommends status quo.

8. At-sea set asides

The GAP agrees with the GMT recommendations.

11. & 12. Routine adjustments to the near shore and non-near shore non-trawl RCA configuration, trip limits, size limits

The GAP reviewed public comment on this issue ([Agenda Item F.9.b, Public Comment 1](#)). We were unsure whether the requested analysis for trip limit modifications best fit within items 11 or 12, but wherever they fit, we support including the recommendations for analysis.

Specifically:

Shallow Nearshore 1,200 lb/2 months, March-April closed.

Deeper Nearshore 1,000 lb/2 months, March-April closed.

Lingcod 400 lb/month May-November; December, January, February 200 lb/month; March-April closed.

The GAP does not recommend supporting proposal B in the same public comment letter.

13. Routine adjustments for treaty fisheries

As described above, the GAP supports the tribal statement including the request for increased petrale sole.

16. CA recreational fisheries

The GAP supports analysis of the California Department of Fish and Wildlife recommended items. Specifically, a year-round fishery in the southern management area; evaluation of changes in other management areas; considering removal of the California scorpionfish closure in Sept-Dec; bag limits for black, canary rockfish, and lingcod; increase the lingcod size limit from 22" to 24"; recreational access to 75 fathoms in Southern CA bight; and Western Cowcod Conservation Area access for the recreational sector to 40 fm.

The GAP would also like to add consideration of a differential bag limit for lingcod north and south of 40.10.

17. Update FMP scientific name for giant grenadier

This appears to be a simple housekeeping item. The GAP believes this will require a low workload and recommends making this change through whatever process mechanism is easiest and doesn't delay analysis or implementation of other important actions.

18. Recommend stock complex alternatives for analysis (Agenda Item F.9.a WDFW Report 1, Agenda Item F.9.a, GMT Report 1, Item 8)

The GAP recommends leaving this item on the list of new management measures. We support the GMT recommendation to remove alternative 2.

19. Modify the outer boundary of the Western Cowcod Conservation Area (Agenda Item F.9.a, GMT Report 1, Item 11)

The GAP supports this item, and despite the high workload designation by the GMT, the GAP believes that much of the work has already been completed by the California Department of Fish and Wildlife.

20. Mid-Biennial harvest specifications adjustments, “green light” (Agenda Item F.5, Agenda Item F.9.a, GMT Report 1, Item 1)

The GAP recommends removing this item. While finding a mechanism to increase available quota mid-biennium after a new assessment indicates a more positive stock status has been a priority of the GAP, ultimately we believe that given the workload, and the likely timing of the increased allocation, it does not make sense to include this measure at this time.

21. Carryover, including IFQ carryover and at-sea carryover (Agenda Item F.2, Agenda Item F.9.a, GMT Report 1, Item 2)

The GAP agrees with the NMFS and GMT recommendations that the workload for the all-sector carryover measure would be high and that this measure may lend itself better to a separate development pathway, rather than being included in the 2019–20 harvest specifications.

22. Multi-year average catch policy for determining overfishing and adjusting management measures (Agenda Item F.9.a GMT Report 1, Item 3)

The GAP recommends removing this item from the list of new management measures. It appears to require a high workload and would likely be of limited benefit.

23. U.S. Fish and Wildlife Service (USFWS) Endangered Species Act (ESA) mitigation measures

The GAP support the NMFS recommendation for the Council to create a separate agenda item for the implementation of mitigation measures to meet the incidental take statement terms and conditions.

24. ESA Salmon Consultation Measures (Agenda Item F.7, Agenda Item F.9.a, GMT Report 1, Item 13)

The GAP recommends leaving this item on the list of new management measures, but concurs with the NMFS statement that timing for development of mitigation measures through the specifications process may be challenging, and that existing measures, at least for the trawl sectors, appear to be effective at keeping bycatch of Chinook well below established management thresholds.

25. Modify the trawl regulations regarding Dungeness crab retention in California (Agenda Item F.9.a, GMT Report 1, Item 19)

The GAP recommends leaving this item on the list of new management measures, with the understanding that this is just a matter of ensuring conformity between state and Federal regulations. If it requires a significant workload, the GAP recommends removing this item.

26. Establish biennial set-asides for Pacific whiting bycatch in research and incidental open access fisheries (Agenda Item F.9.a, GMT Report 1, Item 17)

The GAP recommends removing this item from the list of new management measures. Instead, it should be done yearly (November) during inseason action.

27. Remove the FMP formula for establishing the darkblotched and POP at-sea set-asides for catcher/processors and motherships

The GAP recommends replacing the existing measure with the following language: Manage canary and widow as set-asides for the at-sea sectors, and remove the automatic authority for closure under 21-3 to manage all four at-sea set-asides as true set-asides, as was recommended in the Community Advisory Board report. Note that the GMT recommends the same approach, but under different numbering (#34 and #36).

28. Update regulation language regarding the Adaptive Management Pass-Through

The GAP supports taking whatever action is needed to maintain the pass-through until there is a permanent disposition of the issue. We understand this is a minor action and could be easily handled in the specifications process.

29. Lingcod and sablefish discard mortality rates applied to IFQ quota pounds (Agenda Item F.9.a, GMT Report 1, Item 14)

The GAP recommends leaving this item on the list of new management measures.

It's not clear to the GAP if removal or normalization of size limit or discard survivability credits would be more helpful to the trawl sector. The GAP would like to see analysis of the tradeoffs and benefits.

30. Modifications or removal of the IFQ quota pound daily vessel limits (Agenda Item F.2, Agenda Item F.9.a, GMT Report 1, Item 15)

The GAP recommends leaving this item on the list of new management measures.

31. Modifications to the IFQ quota pound individual species limits (Agenda Item F.2, Agenda Item F.9.a, GMT Report 1, Item 16)

This is an area of interest for the GAP, but we believe it should be pursued under an alternate track. The GAP also notes that any consideration of modifications to IFQ individual species limits should carefully consider unintended consequences.

32. Depth restrictions for the directed Pacific halibut fishery

The GAP agrees with the NMFS and GMT recommendations to remove this item due to high workload and questionable benefit.

33. Vessel monitoring requirements for the directed Pacific halibut fishery

The GAP agrees with the NMFS and GMT recommendations to remove this item due to high workload and questionable benefit.

***Other new measures and considerations:***

The GAP was briefed by Ms. Jessi Doeringhaus of the GMT on several new management measures for consideration.

At-Sea set-aside management (adding canary rockfish and widow rockfish to set-aside management, and removal of automatic authority for closure under 21-3 to manage all four at-sea set-asides as true set-asides)

We understand the GMT is treating at-sea set-aside management considerations as two separate measures. First, adding canary and widow rockfish to the list of species in set-aside management. And second, removal of automatic authority for closure under 21-3. We think that the GMT recommendations in combination capture the spirit of what we recommended in #27 above.

Removal of the 36° management line for trawl sablefish

There was no consensus on the GAP on whether to include this as a new management measure. A majority of the GAP would like to see this addressed in March in conjunction with gear switching, and they therefore recommend against including this in the list of new management measures at this time. The majority believes that taking action to remove the 36 line without action to limit gear switching will exacerbate the current problem. The majority also believes the workload associated with this item would weigh down the specifications process at a time where we have been asked to reduce the number of new management measures, not add more.

A minority recommends including analysis of removal of the 36 line as part of the biennial specifications process, because of the potential to make approximately 1.6 million pounds of sablefish, currently unharvested in the south, available to the trawl sector coast wide. The minority viewpoint on the GAP references the GMT Supplemental Report 2 ([Agenda Item F.2.a, Supplemental GMT Report 2](#)), highlighting the volume and the value of the additional sablefish that could be harvested.

**6. Provide guidance on routine adjustments to management measures.**

Guidance on several of these measures is included in the list above.

PFMC  
11/19/17