

GROUND FISH ADVISORY SUBPANEL REPORT ON HARVEST SPECIFICATIONS,  
REBUILDING PLAN REVISIONS, AND  
MANAGEMENT MEASURES FOR 2011-2012 FISHERIES

Annual catch limits (ACLs) for overfished species are the primary driver limiting target commercial and recreational catch along the coast. The Groundfish Advisory Subpanel (GAP) wishes to reiterate that even seemingly small reductions in ACLs can have catastrophic impacts on fishermen and communities. Provided below are highlights of the problems and economic impacts caused in each sector due to low ACLs.

One issue the GAP wishes to highlight in particular is the cowcod ACL. The GAP is concerned that the recent Ninth Circuit court ruling on cowcod specifications was a misinterpretation of the assessment results that influenced the decision to adopt a 4 mt optimum yield (OY) in 2010. This is of particular concern since the GAP believes the preliminary preferred decision to specify a 3-mt ACL for cowcod may threaten fishery stability and harm fishing communities in California.

### **Trawl**

We would like to point out that what is “bycatch” today will become “accountable catch” after implementation of the trawl individual quota (IQ) program. There have been numerous comments about the limited availability of overfished species and resultant impacts to harvest of target species. In addition, we understand that all fishing mortality will come out of the annual catch target (ACT), therefore setting the yelloweye ACT 3 tons below the ACL will continue to constrain the fleet without providing us any additional flexibility.

In regards to the petrale ACL, the GAP would recommend a set aside to accommodate any current incidental non-trawl catch and whatever is needed for research and exempted fishing permits (EFPs). The GAP feels the 5% to the non-trawl sectors may be more than what those sectors need to prosecute their fisheries. The GAP recommends that the maximum amount possible of petrale sole be allocated to the shoreside trawl sectors until petrale is rebuilt. The importance of every pound of petrale in the trawl fishery both to fishermen, processors and communities can't be stressed enough.

The GAP recommends raising the shortbelly ACL to 200 mt. While it is unlikely that ACL would ever be attained, it would be unfortunate if shortbelly, a healthy non-target stock, ended up constraining access to targets. Specifically, once the widow rockfish fishery is rebuilt, a minimal amount of shortbelly will be needed and the GAP feels that 50 mt represents an artificial and needlessly low ceiling with little benefit given the high overfishing limit for shortbelly.

### **Limited Entry Fixed Entry**

The conservative Rockfish Conservation Area (RCA) restrictions, on the commercial fixed gear fleet, that have been put into place to protect yelloweye rockfish off the coast of Washington have had significant economic and employment affects. The RCA restrictions that push the fleet further off the coast are resulting in the following:

1. More intense fishing pressure on increasingly less productive fishing grounds. The fleet is having more gear conflicts with fixed gear as well as trawl operations as fishable ground is restricted.
2. The deeper areas assigned to the fixed gear fleets can produce reasonable catch rates, but when the entire fleet is put in more limited areas, catch rates will go down and more gear is run (more hooks hauled, and more pots lifted and set). This can result in increased catch of rebuilding species.
3. The RCA restriction on fixed gear has had a direct impact in losing a major fish buyer in northern Puget Sound, Arrowack Seafoods. This has resulted in the loss of a major dogfish and sablefish market along with the loss of 70 permanent shore based jobs for the community of Bellingham, WA and the loss of local fishing opportunities.

### **Nearshore Commercial**

The GAP met with the Groundfish Management Team to understand the impacts by sector and to explore ways to accommodate the nearshore commercial fisheries that are constrained by yelloweye. The GAP recommends that an additional 0.2 mt of yelloweye be allocated to the nearshore fisheries for a total of 0.9 mt to restore status quo fishing opportunities coastwide (Table 1).

In the nearshore commercial fishery north we have seen our supply chain infrastructure crumble as buyers release drivers and trucks are downsized. Overall, buying is reduced and good fishing days are lost. The trucks that now serve us are smaller causing buyers to put fishermen on limits. The more fishermen who fish, the smaller the limits, which further reduces the money that can be made each day. Struggling buyers drive their own trucks and bounce more checks. Stores with live tanks that stand empty consider replacing them with other products. Weak markets tend to disappear.

### **Oregon Recreational**

The Oregon Recreational Fishery has suffered dramatic economic losses due to yelloweye restrictions. For example, the Port of Winchester Bay no longer has any groundfish fishing which resulted in the closure and loss of several fishing related businesses. The economic ripple effects of those lost boats and businesses on the surrounding community is substantial. Up and down the Oregon Coast we have seen a dramatic reduction in the number of charter vessels operating. Many are just hanging on. All of these losses equate to further economic hardship to the community and additional deterioration of fishing infrastructure.

### **Northern California Recreational Impacts**

Since the year 2000, the impacts to the recreational fishery in the North Coast region have been dramatic. Particularly, the formation of RCA's in 2002 with the 20-fathom restrictions, has severely constrained groundfish fishing. The season lengths in the north have been reduced from a full year down to four months, a 66% loss of time on the water. Below Cape Mendocino the season is only three months or a 75% cutback in fishing time.

With the further constraints of weather most boats are not on the water more than 20 days a season due to northerlies and bar conditions. Even the Commercial Charter boats only average about 60 days in a season.

The yelloweye bycatch concern with the levels set at 17 mt or lower have had severe economic effects on the north coast. The 2007 season shutdown parked the 14,129 recreational boats on the north coast. That two months period potentially lost more than \$21,000,000 for the north coast region during that year. Over the 2007 and 2008 year a 42% loss of revenue was lost in our region by marine businesses. Further season restrictions below 20 mt effectively will push the fishing community over the edge where the last few tackle stores, marine mechanics and marine business may call it quits and fold up. That is already starting to happen at the current levels and restrictions.

The Charter boat vessels are a specific illustration of these trends. Formerly five charter vessels could accommodate 150 anglers per day from Eureka, now the number has dropped to three six-packs vessels that average 12 anglers per day. At \$130.00 day per angler, that is a revenue drop of \$17,940 per day or \$1,076,000 per year for charter vessels revenue only. This trend is common across all our ports, restaurants, camp grounds, motels and related businesses. This trend cannot continue for our small coastal communities and maintain a viable fishery.

### **Coastal Communities**

As noted in previous GAP statements, due to the cumulative effect of constraining ACL's for rebuilding stocks, Neah Bay's trawl fleet has been completely eliminated. Likewise, Westport's traditional groundfish trawl fleet, once active in significant numbers, is decimated. Only two vessels remain active of which the total catch is trucked away from Westport for processing.

Much has been made about the need to justify even the smallest increases in OYs of depleted species. It's expected that recent and current levels of exploitation are somehow adequate simply because some fishermen have survived the constraints placed on target species by rebuilding stocks. Those who have survived are merely hanging on, in wait of the last straw.

As is apparent in Neah Bay and Westport, Washington, much of the traditional groundfish fleet has not survived.

All species currently under rebuilding plans are in fact rebuilding – some at a much faster pace than anticipated. As stocks are rebuilding at accelerated rates, the incidence of interactions with these stocks also increases, requiring higher ACLs for the fleet to avoid illegal take.

Closed areas, gear restrictions, bag limits, seasonal closures, trip limits, lower ACLs and other management measures for individual species under a rebuilding plan have created a cumulative effect that has depressed the economic potential of the recreational and commercial fleets with resulting ripple effects of coastal communities from Bellingham, Washington to San Diego, California.

### **SPECIFIC MANAGEMENT MEASURES**

#### **California Recreational**

The GAP recommends adopting all of California's proposed management measures for 2011-2012 found in Supplemental CDFG Report 2, B.3.b, page 3. In particular the GAP supports combining the Monterey South-Central and Morro Bay South-Central management areas, but wants ensure that the line between the two is maintained for future use if needed. On lingcod, dropping the size limit will reduce impacts on overfished species as fishermen will be off the water sooner. Likewise, upping the cabezon bag limit to 3 will have the same effect. We also

support the California recreational season structure as crafted according to the GMT's tentatively adopted ACLs. We recognize that this has onerous impacts on the Fort Bragg/Shelter Cove area, but looking at different model runs it appears that there is no good solution out of that box. An additional 17% loss of fishing opportunity at the end of July will be at the peak of the recreational season, which will result in significant negative economic impacts to the North Central North area. On the positive side, we appreciate the expansion of time on the water for other areas of the state that will provide economic benefit with reduced impact on overfished species.

### **Southern California Recreational**

The GAP supports the CA management measures for the increase in the recreational depth restriction in the CCA from 20 to 30 fathoms. We feel that the increase in the depth will have negligible impacts on cowcod. The best available science says that the common range of cowcod starts at about 50 fathoms. "Submersible surveys at the northern end of the southern California bight indicate that juvenile cowcod were most common from 49 fm to 82 fm and adults were most common at depths of 66 fm to 115 fm." (Butler et al 1999) CPFV MRFSS data from 1999 to 2001 shows 1 cowcod caught between 20 and 40 fathoms and the CRFS data from 2004 to 2009 also shows 1 cowcod caught between 20 and 40 fathoms. Based on the above mentioned data, moving the line from 20 to 30 fathoms would have effectively zero impacts on cowcod as it still leaves us with a nearly 20 fathom buffer between the line and the common range of cowcod. Moving the line will help offset some of the effort shift caused by an increasing MPA network under the MLPA. In addition, the GAP supports the CDFG management measures to modify the list of groundfish species allowed to be taken recreationally in the CCA to include shelf rockfish. We feel that it will minimize bycatch on the shelf complex and help us achieve our target limit sooner.

### **Conception Area Sablefish**

The GAP recommends the following trip limits:

- Limited entry – no daily limit and 2,000 pounds per week with no bi-monthly limit
- Open access – 400 pounds per day or 1 weekly landing of up to 1,500 pounds not to exceed 6,000 pounds in 2 months

### **Conception Area Nearshore**

- 2010 Status quo RCA – 60 fathoms
- 2010 status quo trip limits for both LE and OA
- California scorpionfish: 1,200 pounds per 2 months for both LE and OA

In conclusion, the GAP notes that there are significant effects of the proposed management measures to the different sectors of the groundfish fishery that vary by fishing community. Members of the GAP intend to provide more specificity in their public testimony.

Table 1. GAP recommendations for catch shares of overfished species in 2011 and 2012 nearshore commercial fisheries.

| <b>Management Measures 2011 and 2012</b>   |            |
|--|------------|
| <b>55/45 Yelloweye Catch Sharing</b>   |            |
| 2006-2008 avg landings; 20 fm<br>between 42 and 40 10' only,<br>status quo north and south |            |
| <b>OREGON</b>  |            |
| NORTH OF 42 N. LAT.  |            |
| BLACK ROCKFISH   | 74         |
| BLUE ROCKFISH  | 7          |
| CABEZON  | 14         |
| KELP GREENLING   | 14         |
| LING COD   | 28         |
| OTHER MINOR NEARSHORE ROCKFISH   | 10         |
| <b>CALIFORNIA</b>  |            |
| 42 TO 40 10' N. LAT.   |            |
| BLACK ROCKFISH   | 130        |
| BLUE ROCKFISH  | 7          |
| CABEZON  | 7          |
| KELP GREENLING   | 0          |
| LING COD   | 15         |
| OTHER MINOR NEARSHORE ROCKFISH   | 6          |
| SOUTH OF 40 10' N. LAT.  |            |
| BLACK ROCKFISH   | 3          |
| BLUE ROCKFISH  | 7          |
| CABEZON  | 63         |
| DEEPER NEARSHORE ROCKFISH  | 29         |
| KELP GREENLING   | 1          |
| LING COD   | 21         |
| SHALLOW NEARSHORE ROCKFISH   | 51         |
| <b>OVERFISHED SPECIES</b>  |            |
| BOCACCIO   | <b>0.3</b> |
| CANARY ROCKFISH  | <b>2.9</b> |
| WIDOW ROCKFISH   | <b>0.3</b> |
| YELLOWEYE ROCKFISH   | <b>0.9</b> |