

CALIFORNIA DEPARTMENT OF FISH AND GAME REPORT ON ALLOCATIONS FOR BLACKGILL ROCKFISH AND COWCOD SOUTH OF 40°10' N LATITUDE

Based on public testimony received at the March 2012 Council meeting, public comment received under this agenda item (Agenda Item I.3.c), and the most recent fishery information, the California Department of Fish and Game (CDFG) requests additional allocations be analyzed for both blackgill rockfish and cowcod south of 40°10' N latitude and included in the 2013-14 DEIS.

Blackgill Rockfish south of 40°10' N latitude

Under status quo, blackgill rockfish are managed as part of the slope rockfish complex, meaning that in establishing harvest guidelines (HG) or ACLs, the Amendment-21 allocation for slope rockfish (63% trawl: 37% non-trawl) is applied. This allocation was based on the years 2003-2005 and included all slope rockfish south of 40°10' N latitude. Alternatively, if a HG or ACL is established for blackgill, an allocation based exclusively on blackgill catch history south of 40°10' N latitude should be considered. When catch history for blackgill rockfish is examined separately from the slope complex during those same years (2003-2005), the resulting allocation would be 47% trawl and 53% non-trawl.

Public comment submitted on this subject (Agenda Item I.3.c, Public Comment) indicates that the low blackgill rockfish sub-limits would be very constraining to the fleets and could actually restrict access to other target stocks (e.g., sablefish). Since blackgill rockfish can be encountered while targeting sablefish, some amount of blackgill rockfish is necessary in order to prosecute the sablefish fishery. If the sub-trip limits are set too low, discarding will occur when blackgill rockfish are encountered.

Based on the public comments and the fact that blackgill rockfish has not historically been a trawl dominant species, CDFG requests an allocation of 47% trawl: 53% non-trawl be analyzed and included in the DEIS. This allocation would align the needs of the current fishery and historic fishing practices.

Cowcod south of 40°10' N latitude

The preliminary preferred allocation for cowcod south of 40°10' N latitude is 66% trawl and 34% non-trawl, which is the 2011-12 status quo allocation. The 2011-12 allocation was originally set to align the needs of the trawl fishery with historic catches and accommodate the fleet as it transitioned into a rationalized fishery. Projected impacts in the non-trawl sectors had historically been estimated at lower levels, and it was thought

that the current allocation to this sector would be sufficient to cover the needs of all non-trawl fisheries.

Recent fishery information reveals that cowcod encounters have increased in the recreational fishery south of 34° 27' N latitude, while impacts post IFQ implementation suggest that needs of the trawl fleet may be lower than previously thought since most of the fishing activity has occurred well north of 34° 27' N latitude where cowcod interactions are less of a concern. Additionally, the current needs of the fixed gear fisheries are largely unknown because few data are available from the West Coast Groundfish Observer Program to adequately characterize the needs of this sector.

Based on the transition of the trawl fisheries to more northerly areas and the changing needs of the non-trawl fisheries, alternatives to status-quo should be considered for use in 2013-14. CDFG requests development of alternative allocation schemes which more closely reflects the current needs of the sectors. The intent would be to create a "buffer" in the non-trawl allocation, not increased opportunities for non-trawl fisheries. Cowcod allocations are only two year allocations and there will be the opportunity to revisit allocation decisions in 2015-16 as more information becomes available.