

RE: Stock Definitions – Scoping

Statement of Merit McCrea I find two considerations in defining stock complexes most important. The first is the importance of grouping species that are concomitantly caught in concert, within a species complex. This is essential as both spatial and seasonal closures to reduce catch of one such species negatively impacts fisheries' access to the entire suite of co-occurring species. The second is careful consideration of which co-occurring species are unlikely to contribute to sustainable yield in a meaningful way. Unproductive, non-target fish might be best managed for non fisheries goals instead. For example, seabirds are not managed for OY population levels but are instead managed to prevent the possibility of extinction. Functionally every species of co-occurring (sympatric) rockfish has been held to the same standard of conservation, irrespective of their ability to contribute to the fishery. All species are equally held to the goal of optimizing productivity by targeting OY and population sizes of 40 percent of unfished biomass. As outlined within Attachment 1 under this agenda item, management has slipped incrementally down a path of considering each species within a complex for stock assessment and management measures individually. This includes many rockfish species which could provide little benefit to the fishery, either due to growth-limiting life-history traits or their being historically rarely encountered. A few of these are so uncommon we know them from less than a handful of observations (*S. rufinanus*, *S. moseri*). Management has slipped incrementally down a path of serially removing underperforming rockfish species from their management complexes, then adopting management measures to bring that species to its optimum yield population level. That has often resulted in restricted access to the entire co-occurring rockfish complex through shortened seasons and limited fishing areas. This de-optimizes yield of the complex as a whole. It reduces the catch of healthy populations of co-occurring species. It focuses fisheries impacts and data availability on areas and species in places remaining open. Limiting access in these ways has in the past and could in the future, cause long term damage to fishing communities and the public's direct and indirect access to our rich fisheries resources. In support of MSA National Standards 1, 3 and 8, there is a need to consider fundamental changes to the stock definitions within the Groundfish Management plan. I thank NMFS staff for recognizing this need and bringing the issue forward for Council consideration. Ultimately we have arrived at a system which manages co-occurring species to optimize the productivity of the least productive species in the bunch, foregoing the sustainable yield of the rest. This needs fixing.