

GROUND FISH ADVISORY SUBPANEL REPORT ON
UNMANAGED FORAGE FISH PROTECTION FINAL ACTION

The Groundfish Advisory Panel (GAP) heard a presentation from Mr. Mike Burner on the Forage Fish Initiative and reviewed the Environmental Assessment (EA) on this topic.

The GAP continues to support the Council's preliminary preferred alternative, Alternative 2, as the appropriate means to protect unmanaged forage fish. Further, the GAP believes the EA is ready for final action. Likewise, the GAP supports the proposed language for Council Operating Procedure 24, notably because it sets out an appropriate process for considering exempted fishing permits.

GAP members are committed to protecting unmanaged forage fish and we recognize that forage fish are an important ecosystem component for groundfish and other federally managed fisheries. Various groundfish fisheries have historically caught incidental amounts of these forage fish species. The GAP firmly believes that Alternative 2 provides appropriate levels of protection. The GAP does not support Alternative 1, the No Action Alternative, as it does not meet the intent of the Council and stakeholders to protect unmanaged fish. Similarly, the GAP does not support Alternative 3, which prohibits the retention of several forage fish species because it treats forage fish species as "in the fishery" versus "ecosystem component" species by applying specific management measures to prohibit retention, which is out of sync with National Standard 1 guidelines. Further, this alternative will negatively affect existing fisheries with no real benefit to conservation and biology.

The GAP is aware that there has been some discussion about limiting the amount of bycatch under Alternative 2. However, nothing tangible has been provided for the GAP to review. On principle, the GAP strongly opposes prescriptive measures to cap incidental catch of the forage fish species addressed by this action.

The GAP supports the Statement of Purpose and Need developed for this initiative. We believe that Alternative 2, as described in the EA, is the most appropriate means of meeting the Council's goal to protect unmanaged forage fish without disrupting or hurting existing target fisheries.