

GROUND FISH ADVISORY SUBPANEL REPORT ON ECOSYSTEM-BASED FISHERY MANAGEMENT ROADMAP

The Groundfish Advisory Subpanel (GAP) received a presentation from Ms. Heather Sagar on the National Marine Fisheries Service Ecosystem Based Fishery Management (EBFM) Road Map.

The GAP notes that EBFM could lead to better informed fishery management. The Council has made steady progress in bringing ecosystem-related information into the Council decision-making process. The NOAA Road Map could be a helpful addition in this endeavor. We therefore look forward to assisting in future planning for incorporating EBFM into fisheries regulation and future fisheries business plans.

After informal discussions with members from other advisory bodies, reviewing the materials under this agenda item and the discussion with Ms. Sagar, the GAP has the following concerns:

1. The GAP is concerned if this effort leads to redirection of funds or other resources of already limited resources, existing programs such as groundfish management could be subject to even more regulatory delay. Already, the Pacific Fishery Management Council (Council) has integrated Ecosystem-Based Fishery Management components into fishery management plans under its jurisdiction. Redirection of funding or resources in the NMFS West Coast Region or Council would be exacerbating existing problems in specific fisheries. [The Ecosystem Advisory Subpanel also reflected on this in its report](#) under this agenda item: “The EAS notes that substantial *new* resources will likely be required to accomplish all of the goals included in the report. Members of the EAS cautioned against diversion of funds from existing programs.”
2. The GAP also is concerned this may add more review time to amendments to fishery management plans. It already takes months – sometimes more than a year – to get regulations implemented due to National Environmental Policy Act (NEPA) review and other agency review. Added analyses and time would reduce implementation of both potential problem-solving and routine amendments or regulations to a glacial pace.
3. Coordination with other jurisdictions: The GAP also is concerned about how the goals and objectives of the EBFM policy could be achieved under single-species management with multiple jurisdictions. This directly relates to resources, as mentioned in No. 1: NMFS will have to lead and coordinate with other federal and state agencies, taking personnel away from existing duties.
4. The GAP would like to note the variability of Pacific Ocean environmental conditions and we should be cautious when arriving at conclusions based on one or two years of data. Keeping the Road Map a living document and integrating meaningful time series would help alleviate making changes to fisheries based on inadequate data.
5. GAP members also would like to reiterate the incorporation of vertical temperature measurements, as the Salmon Advisory Subpanel (SAS) noted in its [Agenda Item D.1.a, SAS Report](#) and we noted in our [D.1.a, Supplemental GAP Report](#).