The Groundfish Advisory Subpanel (GAP) met with Mr. John DeVore regarding the proposed groundfish fishery management plan (FMP) Amendment 23 framework and offers the following comments.

The GAP agrees with the preliminary Council guidance to adopt a relatively simple Amendment 23 framework that is not overly prescriptive. The GAP does not believe a complicated framework is necessary, especially since the FMP served as the template for new National Standard 1 guidelines. However, the GAP is concerned that the new Amendment 23 framework may be adding unnecessary buffers (e.g., scientific uncertainty buffers defining the ABC) to our current management framework which has performed well to prevent overfishing.

The GAP reviewed the two options for defining the 40-10 harvest control rule under the Amendment 23 framework presented in Agenda Item E.4.a, Attachment 3. The GAP recommends option 1 for the 40-10 rule, which is a direct translation of the current rule under Amendment 23. Option 2 was considered overly precautionary by the GAP since it begins the 40-10 adjustment after the scientific uncertainty buffer specifying the ABC is applied. The GAP believes this is another example of an unnecessary buffer under the proposed framework.

The GAP also agrees with the concept of removing dusky and dwarf-red rockfish from the FMP. These species do not occur on the U.S. west coast according to the literature. The categorization of those species in Agenda Item E.3.a, Attachment 5 as Ecosystem Component (EC) species is also recommended by the GAP. These species are not encountered in west coast fisheries and appear to be good candidates for an EC designation.