

GROUND FISH ADVISORY SUBPANEL STATEMENT ON
REBUILDING PLANS

The Groundfish Advisory Subpanel (GAP) met jointly with the Scientific and Statistical Committee (SSC) to review rebuilding plans for several groundfish species. The GAP appreciates the SSC accommodating the joint meeting.

The GAP has three general concerns about the rebuilding plans that have been presented, and believes the canary rockfish plan in particular should be appropriately modified, as it will serve as the template for other rebuilding plans.

First, since rebuilding plans will be subject to environmental analysis, there is a need for complete social and economic data to be included, especially regarding the economic impact of plan alternatives on coastal communities. The canary plan, along with the others, is seriously lacking in this regard. Both the Magnuson-Stevens Fishery Conservation and Management Act and the National Environmental Policy Act call for full analysis of the effect of federal actions on the human environment. This includes economic impacts. It would be ironic if the Council corrected legal deficiencies regarding environmental information, but left itself open to legal challenge on lack of economic information.

Second, rebuilding plans must be flexible enough to accommodate new information, good or bad. We should not lock ourselves into a rebuilding strategy which may be based on incomplete information and find that our rebuilding program doesn't work or works better than we thought.

Third, the GAP continues to be concerned as to how rebuilding will be monitored and how rebuilding plans can be designed to respond to the results of that monitoring. There appears to be no clear strategy for monitoring the progress of rebuilding.

PFMC
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