

GROUND FISH ADVISORY SUBPANEL COMMENTS ON ADOPTION OF
DRAFT REBUILDING PLANS FOR PUBLIC REVIEW FOR PACIFIC OCEAN PERCH, LINGCOD,
COWCOD, WIDOW ROCKFISH, AND DARKBLOTCHED ROCKFISH

The Groundfish Advisory Subpanel (GAP) reviewed Draft Amendment 16 (Exhibit C.5, Attachment 2) and provides comments below on the options it contains. In addition, the GAP used the Draft Darkblotched Rebuilding Plan as a template to discuss rebuilding plans in general.

In regard to rebuilding efforts in general, the GAP continues to urge the use of the widest variety of science available. Although progress has been made, we continue to rely primarily on swept area trawl surveys of limited scope that cannot accurately assess many species, including several overfished species of rockfish. Larval surveys, while helpful, are of limited duration. The seafood industry and the public have suggested ways to better coordinate cooperative research, which have been ignored. If NMFS is truly committed to rebuilding populations designated as overfished and not just shutting down fishing as a way of sweeping the issue under the rug, then they need to start doing a better job.

In regard to the particular options in Draft Amendment 16, the GAP provides the following specific comments, which track the issues listed on pages 2-1 through 2-10:

Issue 1 - Form

The GAP believes the Council should try to maintain maximum flexibility within the bounds of legal requirements. The GAP supports using a regulatory amendment, rather than a plan amendment, for rebuilding plans, with the majority of specific details being included in annual regulations.

Issue 2 - Periodic Review

First, the GAP notes the section is written with the assumption that rebuilding will fall short of goals and not exceed goals. Review must take into account the fact that we could rebuild more quickly than anticipated. Second, the GAP suggests the review process be aligned as closely as possible with the stock assessment schedule and new multi-year management processes. This will reduce the number of times that a single stock will have to undergo a formal review.

Issue 3 - Adequacy of Progress

In line with our previous comments on the need for flexibility, the GAP recommends the Council adopt Option 3d with two modifications: first, the fishery management plan (FMP) needs to recognize that a rebuilding probability of 50% within T_{max} is the minimum that is legally acceptable; and second, that standards for adequacy of progress must also recognize that a stock may rebuild faster than projected in a rebuilding plan. We need to be prepared to deal with rebuilding that is more successful than initially assumed.

Issue 4 (Endangered Species Act [ESA] listing) and Issue 5 (Housekeeping)

The GAP has no specific recommendations or comments on these issues.

The GAP also suggests that an additional issue needs to be considered: where to set the "overfished" level in the Council's control rule.

Under the National Standard Guidelines, Councils are advised to set control rules to deal with species that are below B_{msy} . For groundfish, the Council has developed the "40/10" rule which assumes $B_{40\%}$ as the proxy for MSY and sets the overfished level at $B_{25\%}$. However, the National Standard Guidelines also suggest the overfished level be set at $\frac{1}{2}$ of B_{msy} . In the case of groundfish then, the level for groundfish could be $B_{20\%}$, not $B_{25\%}$. A minority of the GAP disagrees with this conclusions.

The GAP recommends the Council analyze two options in relation to the control rule: status quo, with the overfished level set at $B_{25\%}$; and a modification in line with the National Standard Guidelines that would set the overfished level at $B_{20\%}$. The analysis should include information on the biological and social and economic impacts of the alternatives.

In regard to rebuilding plans themselves, the GAP makes the following comments based on using the darkblotched rebuilding plan as a template:

1. Rebuilding plans need to analyze the effects of interspecific competition and predator / prey relationships in determining rebuilding. Very little emphasis has been given to problems that exist when one species at high levels is consuming another species at low levels and what effect this may have on rebuilding. Further, given that species can compete for the same habitat or ecological niche, it may not be possible to simultaneously recover some species.
2. Rebuilding plans need to explicitly analyze the trade-off between rebuilding times and availability of harvest. For example, a rebuilding time (T_{target}) that is less than allowable (T_{max}) might be achieved only by severely restricting catch. On the other hand, those catch restrictions could be somewhat relieved by adopting a T_{target} closer to T_{max} . This choice has obvious social and economic effects and needs to be analyzed and presented.
3. Analysis needs to be done on varying social and economic impacts that occur from a rapidly reduced fishery versus a fishery that is reduced in stages. If the option exists to stagger rebuilding adjustments, then it may be less harmful to reduce catches over time than to do it all at once, giving the seafood community time to adjust.

PFMC
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