

GROUND FISH ADVISORY SUBPANEL STATEMENT ON THE UPDATE ON GROUND FISH FISHERY MANAGEMENT PLAN PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

The Groundfish Advisory Subpanel (GAP) received a briefing from Mr. Jim Glock on the groundfish fishery management plan (FMP) programmatic environmental impact statement (EIS). Six alternatives focusing on how to monitor and control bycatch of groundfish species were presented.

While the GAP agrees that achieving a sustainable and economically viable groundfish fishery depends on effective bycatch accounting and control, there are concerns with draft alternatives 4, 5, and 6 which focus on the use of bycatch caps. The concerns include the implications of using bycatch caps which will require increased observer coverage; there is no indication of who will bear the cost of this coverage, what that cost might be, or what benefits might offset the cost. The vessel-based bycatch cap alternatives (alternatives 5 and 6) would probably require 100% observer coverage, and alternative 4 would probably, at least require enhanced observer coverage. It is also unclear whether these alternatives would apply to the recreational fishery. Having vessel owners bear the cost of increased observer coverage is not a viable option for an industry already on the economic edge due as a result of current groundfish management decisions.

Alternative 6 also focuses on the use of "broad, long-term Marine Protected Areas (MPAs) encompassing primary habitat areas of all overfished groundfish stocks" as a means to control groundfish bycatch. The GAP believes that, due to a lack of compelling scientific information on the efficacy of MPAs to control groundfish bycatch, this strategy should only be considered as a last resort. The GAP also notes that we already have one of the largest MPAs in the continental United States off the West Coast - an area approximately the size of the states of Vermont, New Hampshire, Rhode Island, and Delaware combined.

Other alternatives that are not considered, but should be included in the programmatic EIS are gear modifications, full retention strategies, and alternative fishing strategies. The GAP recommends a refined analysis of current bycatch control strategies such as depth-based management which has not been adequately evaluated. The GAP also recommends there be a complete analysis - including social and economic impacts - of the individual sub-alternatives contained within the main alternatives.

PFMC
06/19/03