

## GROUND FISH ADVISORY SUBPANEL REPORT ON COUNCIL INPUT INTO NOAA FISHERIES CONSTITUENT SURVEY

The Groundfish Advisory Subpanel (GAP) appreciates your visiting the West Coast and conducting a constituent listening session during the Council meeting. Although GAP members may have individual comments, we would also like to offer these collective points of view.

One of the highest priorities of the GAP is improvement of the science that is used to assess and manage Pacific groundfish. As you know, groundfish research has long been the poor stepchild of NMFS funding on the West Coast in spite of the tremendous contribution of groundfish to our commercial, recreational, and tribal fisheries, as well as coastal communities. We continue to assign harvest levels on the basis of three to four-year-old data. Our observer data, which is supposed to provide real-time management, is over one year old and doesn't reflect current management situations. As a result, we have seen precipitous economic declines to the point where one segment of the fleet sees a buyback as the best way to maintain a sustainable fishery.

While some of these problems are funding related, there are also operational research improvements that can be made to improve the amount, precision, and timeliness of data collection.

We recommend the following:

- \* the administration needs to request funding for the level of groundfish research needed;
- \* additional full time employees need to be assigned to the groundfish observer program so that observer data can be analyzed in a more timely manner;
- \* data collection needs to be conducted using means that are appropriate for the species and location; using swept-area trawl surveys for rockfish that are primarily found in un-trawlable areas makes no sense;
- \* consideration needs to be given to natural functions, including, but not limited to, changes in ocean productivity, the impacts of lunar cycles and tides, population cycles, and predator/prey relationships, when collecting and analyzing data;
- \* data sources need to be centralized to ensure higher quality stock assessments; assessment authors should not have to spend their time searching for obscure sources of data, or trying to figure out which state or federal office has the data needed for an assessment;
- \* additional peer review of stock assessments which precludes full analysis by the Council's Stock Assessment Review Panels should be questioned; and
- \* a card-swipe system to record landings, which would provide better real-time data, should be initiated.

In addition to concerns about science, the GAP believes that improvements can be made to management. Far too often, management measures are changed without determining whether they have met their goals. This not only represents a cost to the taxpayers but creates significant instability among participants in the fishery. Processes are started and then faced with premature termination due to end of funding, such as the essential fish habitat EIS now being conducted. The National Standard 1 Guideline review needs to be completed as quickly as

possible.

Finally, the GAP has some general comments about NMFS. There is concern about lack of communication, when efforts to get general information are stymied, due to fears of lawsuits. There is concern that NMFS does not do enough to defend itself when lawsuits are filed; it is worth noting that NMFS lost three lawsuits in a row on groundfish management measures and only won the fourth lawsuit when industry groups intervened. Of special concern to the West Coast is the continued erosion of fisheries management authority within National Marine Sanctuaries, where NMFS appears to be willing to let the National Ocean Service assume management over important commercial and recreational fisheries in vast stretches of the ocean. Current language in many designation documents reference fishing regulatory authority now and in the future as under NMFS and state control, not the Sanctuaries. That includes those regulations that directly or indirectly affect fishing.

We hope that these comments and recommendations are helpful to you as you seek to improve fisheries conservation and management. GAP members are interested in working with you and your staff to ensure achieve a groundfish fishery that is sustainable for users and the coastal communities in which they live.