

GROUND FISH ADVISORY SUBPANEL STATEMENT ON  
ON GROUND FISH ESSENTIAL FISH HABITAT ENVIRONMENTAL IMPACT  
STATEMENT ANALYTICAL MODEL

The Groundfish Advisory Subpanel (GAP) attended the briefing on the essential fish habitat (EFH) analytical model conducted by Mr. Steve Capps of the NMFS Northwest Region staff and then discussed both the model and the time frame for future action on an EFH environmental impact statement (EIS).

The GAP is aware of court imposed deadlines for producing a final EIS and developing regulations in regard to EFH. The GAP agrees that additional knowledge of groundfish habitat can provide a good baseline for future conservation and management decisions. The GAP also recognizes the effort made to develop a database using fishermen's knowledge

Nevertheless, the GAP has serious concerns about some of the data - or lack thereof - in the model. While the intent is to update the model as new data are available, the GAP sees no way, at present, the model can take into account changes in fish habitat resulting from changes in the water column, including such things as water temperature and currents. Finally, the GAP is concerned an incomplete or inaccurate model will again lead to changes in regulations. The fisheries are already suffering from decisions made on incomplete or inaccurate data; use of a less than adequate model will only exacerbate the problem.

Finally, the GAP notes that while NMFS is putting extensive effort into producing a habitat model for use in management, other elements of NOAA are using different models in conjunction with making decisions on marine protected areas in national marine sanctuaries. There appears to be no coordination of these modeling efforts. The GAP urges the Council to make clear to NOAA that a single, coordinated model should be used for all purposes.

PFMC  
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