

GROUND FISH ADVISORY SUBPANEL STATEMENT ON CHANNEL ISLANDS NATIONAL MARINE SANCTUARY

The Groundfish Advisory Subpanel (GAP) met with representatives of each of the National Marine Sanctuaries (NMS) to discuss NMS proposals. The GAP also received a report from its ad hoc subcommittee that was established to more fully analyze the NMS proposals. The GAP expresses its appreciation to the members of its volunteer subcommittee and to Mr. Sean Hastings, Mr. Huff McGonigle, and Ms. Anne Walton of the NMS program for the time they spent meeting with the GAP.

The GAP discussions resulted in some overall recommendations that apply across the board to all of the NMS proposals. Those recommendations are included in this statement, but apply equally to all three of the NMS agenda items. Specific recommendations regarding each NMS are included under each agenda item.

IN GENERAL

The GAP strongly opposes amendment of NMS designation documents to allow regulation of fishing. While the NMS have excellent staff, they do not have specific expertise in fisheries conservation and management, a broad familiarity with the coastwide fisheries the Council manages, historical perspective on fisheries management on the West Coast, or a capability to encompass the complexities of fisheries management, including through the use of expert advisory panels. The Council and its advisory bodies does have all of these things and can accommodate the fisheries-related concerns of the NMS through its authority under existing law.

Further, the NMS' approach of establishing localized protective areas and regulations moves us further away from a holistic examination of coastwide fisheries and their habitats. An ecosystem approach to management, cited by the NMS as a rationale for some of their proposals, dictates taking a broad view. Incremental management proposals do not support this approach.

While it is true the Council cannot regulate some things that affect NMS resources, such as land-based pollution, neither can the NMS. What both parties can potentially regulate is human interaction with NMS resources, i.e., fishing. The Council has already shown a willingness to address issues of concern by agreeing to develop a ban on krill fishing. If necessary, similar action could be taken involving other marine organisms to the extent they are not already protected by other laws. The GAP notes, as an example, that the Western Pacific Council has adopted a coral management plan, and the North Pacific Council is addressing coral protection. While we encourage a cooperative working relationship between the Council and the NMS, we believe that retaining management with the body that has both the responsibility and the expertise is the best course of action.

CHANNEL ISLANDS NATIONAL MARINE SANCTUARY PROPOSALS

The Channel Islands National Marine Sanctuary (CINMS) proposal involves changing its designation document to allow creation of marine reserves, thereby at least indirectly regulating fishing. Based on material presented by CINMS, the marine reserves would protect NMS

resources and allow creation of natural areas that could be appropriately studied. Among other things, CINMS cites the decline of several managed fish species as a rationale for needing this protection. CINMS also proposes several boundary changes.

In reference to our general comments, the GAP believes the protections desired can be achieved by the Council using existing tools, including science-based management and the Council's ongoing essential fish habitat process. Species decline is already addressed by the Council through the development of rebuilding plans. In regard to scientific study, there are several marine reserves in the state water portions of CINMS that could serve as an adequate source of data. The GAP recommends that the Council oppose these changes in the designation document.

In regard to boundary changes, the GAP has no comment as the proposals are unfamiliar to most of the GAP members.