GROUNDFISH ADVISORY SUBPANEL STATEMENT ON
INSEASON MANAGEMENT RESPONSE POLICY

The Groundfish Advisory Subpanel (GAP) reviewed the proposed policy on groundfish inseason adjustments and came to the same conclusion that it reached on this issue at the March 2005, Council meeting.

The GAP agrees that March is too early to allow increases in commercial groundfish cumulative limits or recreational seasons and bag limits, absent a data or modeling error. However, by April, sufficient data exists to begin making adjustments, especially since increases could provide benefits to the early summer fishery in May and June. The GAP reminds the Council of the problem that occurred in 2004 with an early increase in slope rockfish and excessive darkblotched rockfish catches resulted from a monitoring problem, not a cumulative limit problem. The Groundfish Management Team (GMT) has already taken steps to rectify the monitoring problem, and the GAP supports this effort.

As a further example, the Council will immediately be faced, under Agenda Items B.6 and B.7, with potential exceptions to the policy: a request to liberalize California recreational seasons and a request to fix (finally) a data problem involving slope rockfish in northern California that has been controversial for at least two years. As we will discuss further under those agenda items, both of these changes are warranted based on new data and both meet the National Standard 1 goal of achieving the optimum yield. Yet, a strict application of the proposed policy would preclude both of these changes, thereby causing hardship for fishermen, processors, and local coastal communities.

The Council has engaged in conservative management for a number of years; and while the GAP has not always agreed with the degree of conservatism, the Council cannot be accused of refusing to take necessary management measures. If an inseason increase is not warranted, we expect the GMT will not recommend, it and the Council will not approve it. However, we do not believe a blanket policy of this type that can cause hardship to many users is necessary.

PFMC
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