

GROUND FISH ADVISORY SUBPANEL REPORT ON
FMP AMENDMENT 20-TRAWL RATIONALIZATION-ANALYSIS PARAMETERS FOR
ADAPTIVE MANAGEMENT PROGRAMS

The Groundfish Advisory Subpanel (GAP) discussed the topic of development of and the need for an Adaptive Management Program (AMP) under Amendment 20 to the Groundfish Fishery Management Plan (FMP). The GAP reiterates our remarks from November 2008 in that the AMP should have a clearly defined purpose, should be used to address unintended consequences, should not be used to allocate fish away from the trawl sector, and, annually, unused AMP quota pounds should be rolled over to trawl quota share holders.

The GAP recommends adoption of the AMP proposal submitted by the Fishermen's Marketing Association (Agenda Item F.5.c, April 2009) as a strawman proposal to go forward with program development, dependent upon funding and resources. The GAP recommends that progress on developing the AMP should not impede implementation of the Trawl Rationalization Program by 2011.

Related to the Fishermen's Marketing Association's proposal, the GAP has the following specific recommendations:

- References to quota shares or shares should be changed to quota pounds or pounds, which is in line with our understanding of how quota shares will be used to fund the AMP.
- Under the PURPOSE section, the GAP recommends the primary goal should be that AMP quota pounds should be used to mitigate unforeseen negative consequences. That is, the third paragraph in this section should be identified as the primary goal. The GAP's primary concern is to protect existing ports and communities, and preserving fishery-dependent infrastructure.
- Under the PROTOCOL section, Number 1, the GAP recommends revising the first sentence to read "In allocating quota pounds between the states of Washington, Oregon, and California, the Council will consider processing history in each of those states." Under Number 2, the GAP recommends this subsection be revised to read "The states will establish their own process for submission and review. The states may choose to use either a proposal or formulaic approach. Under a proposal-based approach, completed proposals and recommendations for consideration must be received by the Council for review at least two weeks prior to the June Council meeting."