

GROUND FISH ADVISORY SUBPANEL REPORT ON FISHERY
ECOSYSTEM PLAN INITIATIVES: SCOPING SELECTION

The Groundfish Advisory Subpanel (GAP) received a report from Dr. Kit Dahl, Pacific Fishery Management Council (PFMC) and reviewed the documents and advisory body reports under this agenda item and offers the following comments.

The GAP had a lengthy discussion about the three alternatives proposed to move forward (A.2.6, Human recruitment to the fisheries; A.2.7, Effects of fisheries management on fishing communities; and A.2.8, Cross-Fishery Management Plan (FMP) climate shift.

GAP members discussed the anomalies they are seeing on the water. It's hard to ignore some of the conditions that have appeared in recent years, such as the "warm blob," pyrosomes this summer, species of fish that have moved into waters they don't usually frequent, changes in fish and shellfish breeding cycles, changes in some predator-prey relationships and diminishing populations of some species in nearshore areas. These situations and changes are interesting and of concern for many industry representatives on the GAP, especially in the long-term.

However, the GAP considered the [Ad Hoc Ecosystem Workgroup Report 1](#) under this agenda item and the introduction to section 3.0 (Alternative A.2.7) on Page 6 grabbed our attention:

3.0 Effects of Fisheries Management on Fishing Communities Initiative (A.2.7)

The goal of a fishing communities initiative is to assess how different Federal, state, and tribal fisheries regulations and management systems – including Council FMPs – interact with each other to affect how fishing fleets operate in different coastal communities. This assessment would help identify potential changes to our regulations that the Council could consider to help increase operational flexibility for fisheries participants, bring more stability across fisheries for fishery participants, improve the safety of fishing operations, better support fishing-related community infrastructure, and benefit West Coast fisheries' access to markets.

The scope of work described in this section is pertinent and timely. As noted in the report, it could build on existing work, such as the trawl catch share review and the Highly Migratory Species (HMS) [Management Team report on North Pacific albacore fisheries](#), making this an alternative that is narrower in scope than the cross-FMP climate shift initiative. It also has tangible, quantifiable elements, as it is abundantly clear the current fisheries management process is having a negative effect on fisheries performance and community resiliency.

The effects of regulations on fishing communities has been a longstanding theme for the GAP. One of the clearest examples of this is the trawl catch shares program, where the non-whiting trawl industry has new regulations for the individual fishing quota (IFQ) program but are constrained by regulations from an outdated management regime. The Council has approved many of the regulations designed to make the IFQ program work but they have not been implemented. Similarly, all groundfish sectors are hampered by regulations, many that are stuck in the NMFS

regulatory development bottleneck. Regulations from other state and federal agencies also play a role in limiting the success and flexibility of our seafood communities.

More examples of the above include:

- **Port infrastructures are failing:** Ports are losing ice plants because the numbers of sport and commercial fishermen are dwindling. Smaller ports consistently have problems with dredging, which leads to an ongoing struggle of access to the ocean and harbor facilities.
- **The culture of regulatory development:** It frequently seems NMFS' guiding principle to regulation development is a focus on defense, to constrain fishing to an excessive point to avoid lawsuits altogether. That philosophical guidance must shift for the industry to be viable and successful. An overabundance of caution will not eliminate lawsuits. The industry and management environment has changed dramatically in the last 20 years.
- **Planning for the future:** California fishermen said ocean changes have indeed supplied them with different species of fish that could have affected their long-term business plans. On the flip side, other California ports had fewer traditional species. But it is the state and federal regulatory changes making it through the pipeline and changing week to week that are the most burdensome. It's difficult to plan for the long term climate shifts if you don't know if you'll be fishing next week due to changing regulations.

The GAP sees value in each of the three initiatives and appreciates the efforts of the Ecosystem Working Group. We do agree that examining climate shifts and changing ocean conditions are important. Several ecosystem studies already are being done and likely will help inform the cross-FMP climate shift initiative in the future.

Likewise, the GAP considered the human recruitment to fisheries initiative. While important and informative, it does not have the immediacy of A.2.7, the effects of fisheries management on communities initiative.

Further, some advisory bodies and public groups suggested combining two initiatives. Ever cognizant of NMFS workload and the request to *narrow* the scope of some of the initiatives, the GAP advises against this.

PFMC
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