

GROUND FISH ADVISORY SUBPANEL REPORT ON  
AMENDMENT 24 (IMPROVEMENTS TO THE GROUND FISH  
MANAGEMENT PROCESS)

The Groundfish Advisory Subpanel (GAP) received a presentation on the Amendment 24 Workgroup report (Agenda Item I.2.a, Attachment 1) and discussed the recommendations made by the Workgroup. The GAP offers the following comments on those recommendations.

NEED FOR AN AMENDMENT

The purpose for convening the Amendment 24 Workgroup was to explore ways to streamline the groundfish management process and reduce workload, thereby expediting the development and approval of implementing regulations under the biennial specifications process. Developing an amendment to the Pacific Coast Groundfish Fishery Management Plan (FMP) would seem to defeat this purpose, especially when the same goals can be accomplished through other means. Further, if an amendment is used, the Council potentially will be limiting its flexibility if future process changes are needed, as the Council will then have to develop and adopt another amendment. A better alternative would be to develop an FMP “appendix,” similar to what is done with rebuilding plans. This would allow changes to be made in a two-meeting process.

NEPA REQUIREMENTS

The GAP agrees with the Workgroup recommendations on the use of tiering, supplementation, and incorporation by reference to meet the requirements of the National Environmental Policy Act (NEPA). Following these recommendations should result in less time and effort being spent on producing large and complex environmental impact statements every two years.

DEVELOPMENT OF MANAGEMENT MEASURES

In general, the GAP agrees with the Workgroup recommendation to bifurcate management measure development between “new” and routine measures but with some cautions:

- There needs to be a clear distinction of what constitutes “new” and “routine” measures so that we do not inadvertently slow down the management process. For example, there was a question raised as to whether a change in Rockfish Conservation Area (RCA) line coordinates would be “new” – and thus need to be handled under a separate process – or “routine” so that the change can be handled either as part of the biennial process or even as an in-season measure. The GAP understands that the Groundfish Management Team (GMT), Council groundfish staff, and NMFS staff are examining past management measures to provide examples of how the process would work and encourages this examination.
- Treating new measures separately, similar to what the Council has been doing with trawl rationalization Program Improvements and Enhancements (PIE) rule, requires prioritization and the willingness to follow those priorities. The GAP is encouraged that this has worked well with the PIE rules and believes it can work well with other groundfish management measures.

## DEFAULT PROCEDURES FOR DEVELOPING ANNUAL CATCH LIMITS (ACL)

The GAP does not support establishing default P\* values or other harvest control rules to be used by the Scientific and Statistical Committee (SSC) in recommending acceptable biological catches. The Council has already established a cap on P\* of .45 as a precautionary buffer. Given the variability in fisheries and stock assessments and the uncertainty in data, the risk of overfishing (which P\* represents) can change from one biennial process to the next. Other harvest control rules can change as the fisheries change. For example (using Table 1 on page 13 of Agenda Item I.2.a, Attachment 1), the Council has set a constant catch for Dover sole from 2011 through 2014. This was done primarily for perceived market conditions, not for biological reasons. Under the Workgroup proposal, this control rule would remain in effect and become part of the SSC recommendation to the Council. Since this Council has an excellent record of following SSC recommendations and separating science and management, we do not want to put the Council in a position to ignore a management change if it is warranted.

## REVISION OF REBUILDING PLANS

The GAP understands that the GMT and the SSC are discussing how to incorporate variability in rebuilding analyses into rebuilding plans and ACL recommendations. The GAP encourages examining how to avoid sharp changes in ACLs based on relatively small changes in the probability of rebuilding.

## OTHER ISSUES

The GAP believes that the Council should re-examine its harvest policies in regard to overfished and rebuilding species, along with adoption of a “red light, green light” policy that reflects positive developments in rebuilding to replace the current “red light, red light” policy that only recognizes negative developments. The GAP notes that NMFS has a policy of not identifying species that have rebuilt above the overfished level as being “overfished” (boccacio and darkblotched are good examples), yet the Council is held to using the rebuilding plan in place until a stock exceeds B<sub>40%</sub>. Moving to a simpler harvest policy will help alleviate workload over time. The GAP recognizes that this is a longer term and more complex discussion and that it should not interfere with the streamlining process being considered under this agenda item. However, it is a discussion that should be held in the future.

PFMC  
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