

GROUND FISH MANAGEMENT TEAM REPORT ON THE SALMON ENDANGERED SPECIES ACT (ESA) RECONSULTATION UPDATE

The Groundfish Management Team (GMT) received a presentation from Susan Bishop of the National Marine Fisheries Service (NMFS) regarding salmon bycatch in the groundfish fishery during their pre-meeting conference call on June 4, 2015. The GMT is very appreciative of the efforts by NMFS to engage in the Council process to get buy-in from co-managers and stakeholders during development of the consultation. This collaborative approach may help improve the consultation's outcomes, and reduce the likelihood of re-consultation, at least for the near term. The GMT also reviewed the briefing book documents and offers the following thoughts and recommendations.

In April, NMFS notified the Council that a combination of factors has spurred NMFS to move towards reinitiating a Section 7 Endangered Species Act (ESA) consultation on the impacts of the groundfish fishery on ESA-listed salmon, as well as reviewing salmon bycatch information relative to National Standard 9¹ of the Magnuson-Stevens Act² (MSA). The Council requested more information on details of annual bycatch of salmon by year and sector in the groundfish fishery. In response to this request, NMFS has provided information on salmon bycatch in the groundfish fishery and has described the history of ESA consultations, going back to the early 1990s ([Agenda Item D.3.a, NMFS Report 1](#) and [Agenda Item D.3.a, NMFS Report 2](#)).

The next step in development of the consultation is to clearly characterize the proposed action, e.g. the ongoing Pacific coast groundfish fishery and implementation of the Pacific Coast Groundfish Fishery Management Plan (PCGFMP). [NMFS Report 1](#) describes where the fishery is now relative to its effects on salmon. This is the first of several opportunities for the Council to review how the current bycatch mitigation measures have been working, whether they are still appropriate in the current iteration of the groundfish fishery, and if they will be appropriate in the foreseeable future. Considering the proposed action as “the fishery as it will exist in the near future” may reduce the need for reinitiation when new actions are implemented. **The GMT understood the main task under this agenda item was to comment on the proposed action and that in September we would have the opportunity to continue to provide feedback on the proposed action is defined and described, as well as considerations for incidental take statements and reasonable and prudent measures.** Therefore that is where we have focused our comments.

Additional Information or Data Request

The GMT requests some additional information/data be included in the documentation presented at the September 2015 Council meeting.

Catch per Unit Effort Data

Although [NMFS Report 1](#) shows catch per unit effort (CPUE) for whiting fisheries in some tables (e.g., Table 12), it would be useful to see similar tables for salmon CPUE (e.g., salmon / trawling hour or salmon / target species) for the non-whiting shoreside fisheries (midwater and bottom trawl

¹ http://www.nmfs.noaa.gov/sfa/laws_policies/national_standards/documents/national_standard_9_cfr.pdf

² <http://www.nmfs.noaa.gov/sfa/magact/>

separately). Salmon catch rates were not presented in this document for non-whiting fisheries, with the exception of salmon catch relative to yellowtail rockfish catch by midwater trawls in Table 23. Furthermore, although the density plots are very useful for visualizing hotspots (e.g., Figure 9), similar density plots should be produced using CPUE (all density plots are provided for catch, but not CPUE). These CPUE tables and figures will be useful for predicting potential impacts of management measures, such as area or seasonal closures. Showing only salmon catch/square mile (Figure 9) or salmon catch (numbers) may not provide a clear representation of areas with highest (or lowest) salmon abundance, but rather are reflective of a combination of fishing effort and salmon abundance. CPUE data are needed to tease apart information on where and when salmon are most abundant.

Non-whiting Midwater Trawl Data

In some cases, it unclear in [NMFS Report 1](#) where the salmon bycatch by non-whiting midwater trawl are accounted for (e.g. combined with whiting or with bottom trawl). The GMT suggests that analyses be provided for these strategies separately, because these fisheries operate in different areas using different gears. In addition, there are seasonal differences in fishing effort between these two fisheries. As such, catch rates (and overall catch) may be much different between the two. For example, [NMFS Report 1](#) (see Tables 22 and 23) and Erickson and Pikitch (1994) show relatively high bycatch rates for non-whiting midwater trawls. A clear separation of non-whiting midwater trawl and bottom trawl should be provided in the next version of this report to enable the Council to decide whether these strategies should be combined or separated when establishing ITS limits.

The Fisheries Tomorrow

In order for NMFS to move forward with reinitiation of the Section 7 ESA consultation, they must have a clear understanding of the proposed action. The proposed action could be structured to foresee the ongoing management of the groundfish fishery under changing conditions. In September 2014, the Council took steps to prioritize future management measures that, in part, define how groundfish fishery management is likely to change in the near future. The most recent groundfish workload priorities document can be found under [Agenda Item F.5, Attachment 3](#). In general, the Council expressed a desire to increase attainment of non-overfished species annual catch limits (ACLs), while keeping the harvests of overfished species within the ACLs. For the trawl fishery, the Council focused on management measures to increase flexibility, improve efficiency, and reduce regulatory complexity. The Council also moved to consider measures to reduce the costs of monitoring while maintaining individual accountability for the trawl fishery. A common theme was to investigate removal of time and area closures. Relative to habitat, the Council has expressed an interest in looking at midwater trawl gear relative to the integrity of Essential Fish Habitat conservation measures and considering groundfish fishing intensity patterns since 2011. New information, particularly since September 2014, changes the management perspective relative to overfished species, including new stock assessments showing that canary rockfish, bocaccio, and petrale sole may be rebuilt. This may result in measures that increase access to shelf species for all sectors.

Figure 1 at the end of this report attempts to illustrate a potential process the Council and NMFS could use, in a collaborative process to shape the proposed action and the consultation.

Moving Forward

On how to move forward, the GMT has some initial thoughts and/or questions in the bullets below:

- Continue engagement of the Council and its advisory bodies in the consultation process
- Is there a way to build more flexibility into reinitiation triggers, such as something like rolling multi-year averages?
- Could ITS limits be tied to changes in abundance, in either the target species (such as whiting) or salmon?
 - so far the data hasn't detected a correlation between abundance of Chinook salmon and bycatch in the whiting fishery
 - should triggers change when salmon stocks are at record lows (e.g. Puget Sound salmon)?
- How will the re-emerging mid-water non-whiting trawl fishery be considered?
 - It is our understanding that in 2014 their bycatch counted against the whiting fishery amount, should that continue?
 - Or, should it count against the bottom trawl amount?
 - Or, should the existing bycatch amounts be divided to create a separate group of bycatch for this fishery?
- How does the Council want the available bycatch of salmon to be distributed among fisheries? Should there be hard caps between the sectors?
 - Would prevent one sector from impacting the other
 - Would limit some flexibility
- Are there inseason measures that could be implemented if a sector is exceeding their bycatch amount?
 - What would the indicators be to inform NMFS/Council that action needs to be taken?
 - If it is an automatic action, it can happen very quickly, it must be non-discretionary on NMFS' part

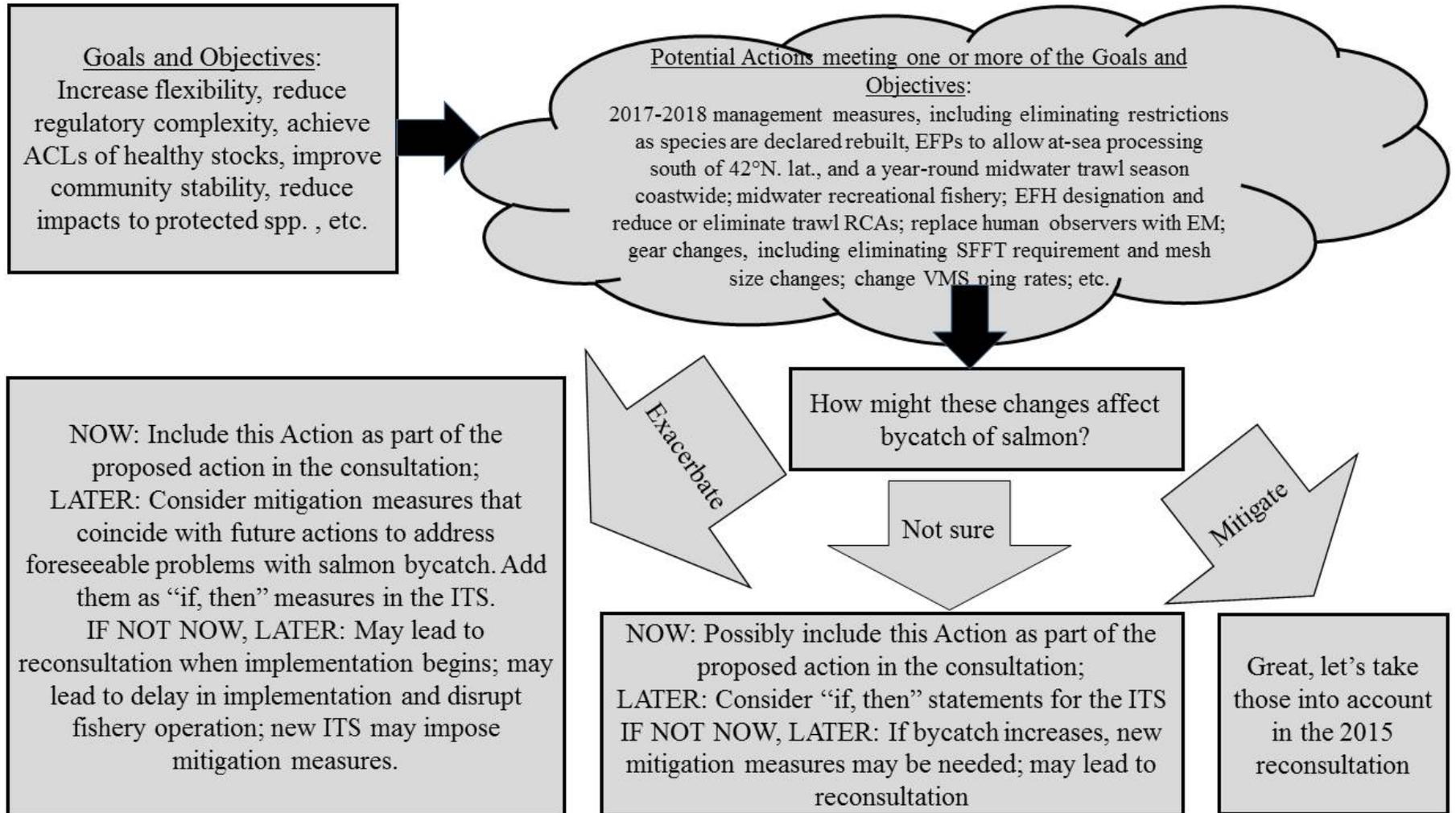
The GMT looks forward to digging into the details of the proposed action and any additional information at the September Council meeting.

Reference

Erickson, D.L. and E.K. Pikitch. 1994. Incidental catch of chinook salmon in commercial bottom trawls off the U.S. West coast. North American Journal of Fisheries Management 14:550-563.

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Figure 1. Flow chart of a potential process the Council and NMFS could use, in a collaborative process to shape the consultation.



Note: the most recent groundfish workload priorities document can be found under Agenda Item F.5., Attachment 3.