

## GROUND FISH ADVISORY PANEL REPORT ON NON-SALMON ENDANGERED SPECIES ACT REPORT

The Groundfish Advisory Subpanel (GAP) heard a report from Ms. Sarah Williams describing non-salmon Endangered Species Act (ESA) issues and the recommendations of the Pacific Coast Groundfish and Endangered Species Workgroup. The GAP offers the following comments and recommendations.

First and foremost, the GAP would like to highlight that, as the Biological Opinion (BiOp) concluded, the groundfish fishery "... is not likely to jeopardize the continued existence and is not likely to destroy or adversely modify designated critical habitat of green sturgeon, eulachon, and leatherback sea turtles, and is not likely to jeopardize humpback whales." Further, it looks like abundance is increasing for several of these species. Given the promising results achieved under the current framework, the GAP believes that any new management measures for the 2017-18 Biennial Management Period be carefully evaluated to minimize constraints to the fleet and ensure they result in actual benefit to listed species.

In addition to the overarching comments above, the GAP offers the following specific comments pertaining to the workgroup report.

Relative to implementation of logbooks for all Federal fisheries, the GAP believes that is a duplicative and unreasonable requirement for fully observed fisheries. Further, the GAP believes that this could be a burdensome requirement for all sectors. If a logbook requirement is going to be implemented, the GAP requests that fishermen have an opportunity for input to shape the requirement in a way that works best for the fleet.

With regard to examining the statistical methods being used in the drift gillnet fishery to address rare events with protected species to see if they are applicable to the Groundfish fishery, the GAP believes that there are major differences between the fisheries, and the comparison is not appropriate.

### **Humpback Whales**

The GAP would like to highlight that there were no takes during the review period. In response to a growing humpback whale population, the GAP supports National Marine Fisheries Service's (NMFS') efforts to update the population estimate.

There have not been any humpback whale interactions with stored gear, nor is storing gear at sea a prevalent practice. Therefore, the GAP believes that addressing interactions with stored gear is a low priority and would result in little to no benefit. Nevertheless, the GAP continues to believe that facilitating the removal of derelict gear is a high priority and could reduce interactions with protected species.

### **Leatherback Sea turtles**

As with humpback whales, the GAP is pleased to note that there were no takes during the review period.

In response to workgroup recommendation #3 (Modify observer coverage plan to increase the coverage rate in the open access fishery), the GAP agrees with the workgroup that "...moderate increases in observer coverage do not lead to a more realistic estimate for those species where fishery interactions are rare." It is the view of the GAP that increasing observer coverage rates would increase costs to the agency and create additional challenges for the fleet, while not necessarily improving knowledge about interactions with listed species.

### **Eulachon**

The GAP recommends conducting an update of the incidental take statement (ITS) in response to increasing eulachon abundance. In the GAP's view, those population increases and the resulting "rebuilding paradox" were what led to the eulachon catch exceeding the target.

### **Green Sturgeon**

The GAP notes that the green sturgeon take was lower than the target. The GAP is curious about the data supporting the conclusion that green sturgeon abundance has declined significantly relative to historical abundance.

### **Short-tailed albatross**

The GAP notes that the estimated take of short-tailed albatross in groundfish fisheries is extremely low, averaging less than one bird per year. The GAP recommends developing an ITS that fluctuates with population estimates. Given the increasing population of short-tailed albatross, a static ITS is highly restrictive to the fleet.

The GAP supports the night fishing exemption to the streamer line requirement as information in Dr. Melvin's report (Agenda Item F.1.a, April 2015) demonstrates that bycatch is six times lower at night.

Lastly, the GAP understands that some boats have a much higher mortality of black footed albatross than others. That information is not public and NMFS is not currently sharing that information with the fishermen responsible, so in some instances the fishermen may not be aware of their high bycatch rate relative to the rest of the fleet. It seems logical to inform fishermen so that they are aware of the issue and can take actions to reduce bycatch as appropriate.

PFMC  
06/12/15