

GROUND FISH MANAGEMENT TEAM REPORT  
ON ESSENTIAL FISH HABITAT (EFH) EVALUATION CRITERIA  
AND PHASE 2 REPORT

The Groundfish Management Team (GMT) reviewed the available material in the Briefing Book and appreciated receiving a presentation from the Essential Fish Habitat Review Committee Chair, Brad Pettinger, and Dr. Michelle McClure from the Northwest Fisheries Science Center. We focus our comments here on measures to minimize the adverse effects of Magnuson-Stevens Act fishing activities.

Some on the GMT agree with the Phase 2 Report that much of the confusion in the review process to date is the lack of a problem statement which would provide some criteria for evaluating the action needed under Phase 3. Habitat science is fairly uncertain and there are few, if any, quantitative measures of impacts to habitat that translate into groundfish production. As such, with current information, it is virtually impossible to answer how much habitat protection is enough to provide for the needs of fish stocks. Likewise, it will be unlikely that the Council will get a definitive answer on what proposal or parts of proposals will best meet their policy goals from a National Environmental Policy Analysis (NEPA) analysis. It would be most useful for Phase 3, particularly NEPA scoping and alternative development, to have clear guidance from the Council on what they see as the purpose and need for action. For example, the Council might consider what we know about habitats (i.e., from the Phase 1 Report and the Synthesis Report) that we didn't know in 2005 and how that changes their view of whether the habitat protections in place are meeting the stated policy goals. While that is not a decision scheduled for this meeting, it is something that the Council should start planning for.

The Council should also consider the scope of action in terms of workload and competing priorities. If the Council amends the Fishery Management Plan, a Plan Amendment Team to develop alternatives for analysis would have to come from existing staff and resources. Fully analyzing all of the impacts from all of the proposals received will likely take considerable time and effort. Alternatively, the Council could focus more on their policy goals than the proposals that have been received and analyses that would measure how well those goals are being met or could be met with any of the proposals.

Further, some on the GMT think that the rationalization of the trawl fishery (through the individual fishing quota program) in 2011 likely changed the fishing impacts to habitat. We do not yet know the extent of those changes (the existing analyses are on fishing effort through 2010) or how that might affect decision-making on minimizing the adverse effects of fishing on EFH. We do not know whether this is doable with existing logbook data from the last three years prior to scoping.

In summary, the Council needs to find a way of grading themselves on how well they think they are achieving their goals under Amendment 19, given that existing data will not provide a definitive answer. This will ultimately come down to a policy decision. The GMT recommends the Council consider how broad they want the scope of action to be given the considerations we raise, as well as articulating the purpose and need for that action.