

**GROUNDFISH ADVISORY SUBPANEL REPORT ON CONSIDERATION OF TRAWL
ROCKFISH CONSERVATION AREA (RCA) BOUNDARY MODIFICATIONS**

The Groundfish Advisory Subpanel (GAP) heard a presentation from Mr. Colby Brady walking through the key elements of the draft Environmental Assessment (EA) analyzing effects from potential changes to the trawl Rockfish Conservation Area (RCA) boundaries. The GAP commends Mr. Brady and his fellow authors on the thoroughness of the document, which was completed in a relatively short time frame and which contains a lot of helpful information and analysis. The GAP was also made aware of the proposed rule on this topic which was published in the federal register on Thursday, September 14th.

The GAP continues to support the Council’s recommended changes to the trawl RCA boundaries made at the June meeting, which is reflected in Alternative 1 in the EA and described in detail in the federal register proposed rule:

Area	Boundary	Line
40°10’ -48°10’	Seaward	150 fathoms
40°10’ -48°10’	Shoreward	100 fathoms

Need For Action

As stated in the Purpose and Need section from the EA (Section 1.2 on page 11): “The action is needed to enable participants the ability to more fully and efficiently utilize their quota pounds while still meeting the Council’s and Agency’s goal for sustainability of the Pacific Coast groundfish fishery.”

Specifically, the fleet is not achieving annual catch limits (ACLs) for many important groundfish target species. This is due, in part, to restrictions imposed by current trawl RCA boundaries. While aggregate attainment for all non-whiting IFQ groundfish species increased 5% in 2012 (29% versus 24% in 2011), there is clearly room for significant improvement on several economically important species:

Species	2012 Allocation	2012 Landings	2012 Attainment
Dover Sole	49,018,682 lbs	16,051,104 lbs	33%
Lingcod	3,991,800 lbs	839,096 lbs	21%
Pacific Cod	2,502,247 lbs	873,674 lbs	35%
Yellowtail	6,850,556 lbs	2,194,137 lbs	32%
Minor Shelf Rockfish N	1,150,813 lbs	87,528 lbs	8%
Minor Slope Rockfish N	1,828,779 lbs	485,108 lbs	27%

Source: Annual Catch Report for the Pacific Coast Groundfish Shorebased IFQ Program in 2012 (NOAA) page 25

There are many costs for participating in the trawl catch share program (monitoring & observers, cost recovery, buyback loan payments and state landings taxes) and some of these costs continue to increase. The ability for the fleet to increase ACL attainments and generate additional economic value from the non-whiting groundfish fishery is imperative. Implementing the boundaries represented in Alternative 1 is a good step forward.

Rationale For Alternative 1

The EA does an excellent job of laying out the risks and opportunities associated with the three alternatives. Alternative 1 offers the most opportunity to the fleet when compared with the other two options. The risks associated with all three alternatives are fairly consistent. Conservation risks are negligible. The GAP believes that the fleet will realize significant benefits from Alternative 1.

Impacts to Species of Concern

When the RCA was initially implemented there were no other tools available to the Council that would accomplish the objective of minimizing catch of certain rockfish species. Since that time the trawl rationalization program was developed and implemented and particular characteristics of the catch share program provide much better tools to address catch of species of concern. The 100% monitoring and the personal accountability afforded through the program have reduced catch of species of concern significantly as reported beginning on page 60 of the draft EA.

- 60% decrease for yelloweye rockfish bycatch
- 37.8% decrease for canary rockfish bycatch
- 68.1% decrease for Pacific Ocean Perch bycatch
- 68% decrease for darkblotched rockfish

These reductions are post implementation of the catch share program and the savings outlined above are direct results of the individual accountability required in the rationalization program NOT because of the RCA itself.

The EA further analyzes the potential effects on species of concern based on the various options and concludes in Section 4.4.2.1 that for Alternative 1 “based on analysis of post-rationalization haul-level observer data, as well as aggregate total catch data from the two years before and the two years after trawl rationalization does not suggest any obvious danger of either extreme catch events, or accumulated aggregate high catch of rebuilding species that would exceed the trawl allocation, compared to the No Action alternative.”

Other Potential Impacts

The EA finds that none of the alternatives will have a significant impact on physical oceanography, west coast marine ecosystems, or on biological resources in the nearshore, shelf, and slope regions of the California Current Ecosystem. Section 4.4.1.2 reports that the expected impact on target species is higher attainment of ACLs, which is the primary goal of this action.

Economic Impacts

The EA recognizes that Alternatives 1 and 2 both provide increased access to target species and will result in higher ACL attainments and presumably this will result in increased economic

opportunities for harvesters and processors both. Quantifying the potential economic benefit is a challenge because there are many factors that will influence the economic opportunity.

Using the Oregon average ex-vessel value for trawl caught species – increases in revenue could be expected to range as follows:

Species	Average OR ex-vessel value to-date in 2013	Additional metric tons	Potential additional value
Dover sole	\$0.45 / pound	4,000 mt (8,816,000 lbs)	\$3,967,200.00
Yellowtail rockfish	\$0.54 / pound	1,000 mt (2,204,000 lbs)	\$1,190,160.00
Lingcod	\$0.93 / pound	1,000 mt (2,204,000 lbs)	\$2,049,720.00
Pacific cod	\$0.57 / pound	700 mt (1,542,800 lbs)	\$879,396.00
Total		6,700 mt (14,766,800 lbs)	\$8,086,476.00

Essential Fish Habitat Versus Rockfish Conservation Area

As clearly stated in the EA, the trawl RCA was implemented to minimize the catch of species of concern – initially canary and darkblotched rockfish. Areas where higher bycatch events had occurred or where larger densities of fish were suspected to live were identified. Large boxes were created around these areas and they included additional ground in order to facilitate easier enforcement: straight lines versus discrete and specific areas. At the time, this was the only tool available to address the catch of overfished species in this area.

Habitat designation was not the impetus for designating these areas. The GAP believes it is important not to confuse the EFH process with the action being taken at this time to modify the RCA boundaries. This action does not affect any of the existing EFH designations or closed areas or the ongoing EFH designation process. Approximately 5% of the ground that would be opened up under Alternative 1 is included in proposals being considered in the EFH review process over the next year- this action does not change or affect that process.

We would also like to point out that this area is fished with other gear, which has effects on the bottom – including pot and long-line gear. In addition, this area is bottom-trawled on an annual basis during the NOAA slope survey – so to assert that this ground is not “affected” by fishing gear is untrue. Current gear restrictions that will remain in place will prevent the fleet from fishing in all of the area opened up under Alternative 1. In addition, the incentives to avoid overfished species afforded through the catch-share program that tend to congregate around high-relief habitat will keep them out of sensitive areas. Finally, Alternative 1 continues to prohibit bottom trawling by the fleet in over 1,300 square miles of ground.

Alternative 2

The GAP appreciates that NMFS added an additional option to the draft EA for consideration. This makes the EA and analysis much more robust and meets the need to examine a reasonable range of alternatives. Alternative 2 allows more opportunity than no action, but the benefits to the fleet will be less with essentially the same risk to rebuilding species as Alternative 1 and the no action alternative.

Bottom Line

The GAP believes that Alternative 1 is a prudent first step. We believe the EA adequately analyzed the affects of each of the options as well as the potential benefits to the fleet of adjusting the RCA boundaries. In summary:

- The EA demonstrates no harm to rebuilding species by implementing Alternative 1, including minimal chance of “disaster tows” that exceed the trawl allocation or an individual’s allocation
- The EA demonstrates positive economic benefit to the fleet and subsequently processors and coastal communities
- There is no change to existing EFH closed areas or the ongoing EFH designation process
- Over 1300 square miles of ocean is still off-limits to bottom trawling by the fleet as a result of the RCA boundaries in Alternative 1.
- Single boundary lines for all periods results in less confusion among the fleet and is easier to abide by as well as enforce
- Administrative burden on the agency will be less to manage
- The EA demonstrates that annual ACL attainment rates will likely increase meeting the requirements of National Standard 1 of the Magnuson Act as well as one of the goals of Amendment 20.
- Allowing the fleet to exercise their personal accountability afforded and mandated by the catch share program and 100% monitoring will keep catch of rebuilding species low as has been demonstrated in the first two years of the program
- Inseason adjustments to RCA boundaries are still an available tool if unintended consequences of this action occur (which is not anticipated or expected)

Further, the GAP is supportive of a comprehensive approach to RCA reform that will hopefully take place over the next few years under the T-Flex or Trawl Trailing Amendment Process. The GAP believes that this current rulemaking process is cumbersome and not the preferred method for modifying RCA boundaries in the future. However we do agree that this approach has been worthwhile in terms of understanding the affected environment and the positive impacts that can accrue to the fleet.

PFMC
09/14/13