

## SCIENTIFIC AND STATISTICAL COMMITTEE STATEMENT ON GROUND FISH BYCATCH PROGRAM ENVIRONMENTAL IMPACT STATEMENT

Mr. Jim Glock presented a progress report on the Bycatch Program Environmental Impact Statement (EIS) (Exhibit C.9, Attachment 1). This initial draft is fairly complete with respect to the first three chapters (Purpose and Need; Alternatives; and Affected Environment). However, the fourth chapter (Impacts of the Alternatives), which will embody all of the analysis, will not be completed until the November 2003 Council meeting. The planned timeline for the EIS then includes: Council release for public review (November 2003); NEPA review (January through April 2004); and Council selection of the preferred alternative (April 2004).

The Scientific and Statistical Committee (SSC) discussion focused primarily on the (1) definition of bycatch and (2) aspects of the analyses that should be included in Chapter 4 of the next draft.

### **1. Definition of Bycatch**

The current draft first defines *groundfish* as those species covered by the Council's Groundfish Fishery Management Plan and *discards* as those animals that do not survive after being returned to the sea. *Bycatch* is then defined as the combination of groundfish discards and nongroundfish species caught during the course of a fishing operation. The SSC notes that this definition differs from that used in the Magnuson Act (discards only), and is more closely aligned with the definition of bycatch used in *Managing the Nation's Bycatch* (NMFS 1998) – the latter being the basis for the guidelines on implementation of National Standard 9.

While the bycatch definition in the current draft is workable, the SSC recommends that when completing the analysis of alternatives (Chapter 4), the components of bycatch under this definition be further delineated. Namely:

- A. Regulation-induced discards, (e.g., catch that exceeds a trip limit, undersized fish, etc.)
- B. Non-regulation-induced discards, (e.g., no or little economic value, recreational releases that do not survive, etc.).
- C. The retained part of bycatch that is managed by a something other than the Groundfish FMP, (e.g., Pacific halibut, California halibut, etc.).
- D. The retained part of bycatch that is not managed.
- E. Take of protected species.

### **2. Analysis of Alternatives**

For the most part, the alternatives identified in the draft EIS attempt to minimize only component A of the bycatch, as defined above. In order to meet the National Standard 9 guidelines, however, it will be necessary to minimize component B as well. In addition, the Council may also find it necessary to gauge the impact of each alternative on components C, D, and E, separately.

The various alternatives require greatly differing levels of observer coverage for proper implementation. The level of observer coverage and associated costs should be clearly identified for each alternative.

Logbook and other reporting requirements as well as levels of enforcement also differ among the alternatives. The respective costs and practicalities under each of the alternatives should be included in the next draft.

For the various alternatives, it is likely that substantial differing levels of bycatch will result as well as substantially differing implementation costs. Consequently, the selection of a preferred alternative may not be straightforward.

The SSC recognizes the analyses that will appear in Chapter 4 are likely to be qualitative, and this is customary for a programmatic EIS. However, it should be recognized that at some future time, it will become necessary to develop a fully-fledged quantitative model for such analyses. The trawl bycatch model may provide a convenient starting point for such model development.

PFMC  
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