

GROUND FISH MANAGEMENT TEAM REPORT ON
GROUND FISH ESSENTIAL FISH HABITAT ENVIRONMENTAL IMPACT STATEMENT -
PRELIMINARY ALTERNATIVES

The Groundfish Management Team attended the joint presentation on the EFH EIS on Monday and had a discussion with Steve Copps, NMFS, on the preliminary range of alternatives. The GMT reviewed the report of the ad hoc EFH EIS Oversight Committee and has the following comments and recommendations:

Alternatives for Designation of EFH

The GMT understands that designating EFH results in a definition of the area in which consultation requirements would apply (i.e., consultation on fishing and non-fishing activities which may adversely affect EFH), and that additional HAPC designation is not needed for purposes of consultation.

In reviewing the maps of the alternatives (Supplemental EFH EISOC Report 2), it appears that the result of Alternative 2 is similar to the result of Alternative 3, and Alternatives 4 and 5 are also similar. The GMT believes that, given the limited amount of time between this Council meeting and the November meeting, having thorough analyses of fewer alternatives which encompass the range is preferable to having multiple analyses of lower quality. To that end, the GMT recommends narrowing down the alternatives for designation of EFH to exclude Alternatives 2 and 5.

With regard to the analyses of these alternatives, the GMT suggests ordering them by degree of aerial coverage (such as highest-status quo-to lowest). The GMT also recommends that, in addition to describing the species and life stages which occur in the area resulting from the alternative, the analysis should include a full discussion of the trade-offs among the different alternatives. For example, if areas are covered in one alternative that are excluded by a subsequent alternative, a detailed description of the species and life stages that correspond to the excluded areas should be included.

Alternatives to Designate HAPC and Alternatives to Minimize Adverse Impacts to EFH

The GMT notes that an alternative which would link the designation of HAPCs to the alternatives to minimize adverse impacts is not included, with the exception of adverse impact Alternative 8 which is specifically linked to HAPC Alternative 7. The GMT believes that HAPC designation should be used as a management tool that is aligned with minimizing adverse impacts resulting from both fishing and non-fishing activities (i.e., HAPCs should be used to focus consideration of management measures on areas that are of “particular concern” to distinguish them from the broader definition of EFH). The GMT is aware of the apprehension by some that HAPCs would be used as “back door” approach to marine reserves and thinks that HAPCs should be a “front door” approach to minimizing adverse impacts, which may include fishing restrictions, such as gear requirements. Including a specific alternative that addresses

this link in a general way (not specifically tied to HAPC Alternative 7) would accomplish this. Again, the GMT recommends that the HAPC designation alternatives be listed in order of highest to lowest coverage. Additionally, the GMT recommends that a thorough discussion of fishing and non-fishing activities restricted in a designated HAPC vs. those same restrictions in areas outside HAPC designation should be included in the analysis. Also, the GMT notes that the EFH EIS covers a one-time HAPC designation and, as new stock assessments are completed, and changes in stock status occur, subsequent changes in HAPC designation may be warranted. As such, the GMT recommends that a process to develop criteria for future HAPC designation be identified.

Treaty Rights

The GMT notes that none of the alternatives include mention of treaty fishing and may in some cases directly conflict with the exercise of tribal treaty rights. The GMT recommends that the NMFS Northwest Regional staff consult with Washington coastal treaty tribes both in designating EFH and HAPCs within tribal U & As and developing measures to minimize fishing impacts within those areas.

GMT Recommendations

1. Reduce the number of alternatives for the designation of EFH to exclude alternatives with similar results to others (such as Alternatives 2 and 5), while keeping alternatives that encompass a full range.
2. List the alternatives for the designation of EFH and HAPCs in order from highest to lowest coverage.
3. In the analyses of EFH designation, describe the species and life stages which occur in the area resulting from the alternative as well as the trade-offs resulting from reduced coverage.
4. Include a general alternative for minimizing adverse impacts to EFH (fishing and non-fishing) in areas designated as HAPCs.
5. In the analysis of alternatives for minimizing adverse impacts, discuss the rationale for having fishing and non-fishing activities restricted in areas outside HAPC designation vs. having restrictions within HAPCs only.
6. Identify a process to develop criteria for future HAPC designation.
7. Request NMFS Northwest Region consult with Washington coastal treaty tribes regarding EFH and HAPC designation and measures to minimize fishing impacts within those areas.