

HABITAT COMMITTEE COMMENTS ON
GROUND FISH ESSENTIAL FISH HABITAT ENVIRONMENTAL IMPACT STATEMENT -
PRELIMINARY ALTERNATIVES

The Habitat Committee (HC) discussed the proposed range of alternatives for designation of essential fish habitat (EFH), habitat areas of particular concern (HAPCs), Alternatives to minimize adverse impacts to EFH, and research and monitoring alternatives. In general, the HC thinks there is value in clarifying that the fundamental purpose and needs of this proposed action is to ensure that EFH is capable of sustaining groundfish stocks at levels that support vibrant fisheries and not simply to provide information.

EFH

The HC supports the concepts outlined in Alternatives 4, 5, and 6. These have a probabilistic approach to determining EFH that is reasonable, given data uncertainties. In addition, it includes all species. The alternatives 4, 5, and 6 appear to be ample to bracket a comprehensive range of alternatives.

Furthermore, Alternative 8 attempts to address data uncertainty in deep water areas. This alternative might be appropriately modified to be an option for addition to either alternatives 4, 5, or 6 that would add all areas beyond depths where data become particularly uncertain. The HC suspects this might be less than 3,500 meters. The HC supports inclusion of a deep water option to the alternatives.

The Council should also consider adding krill and other forage species for groundfish in the EFH alternatives.

Alternatives 2 and 3 each have an approach of dealing only with overfished species. The HC believes that this approach is not appropriate because it fails to address habitat needs of healthy managed stocks.

Alternative 7 is also inappropriate in that it only deals with assessed species and has the same flaws as alternatives 2 and 3.

HAPC

The purpose of HAPCs is to identify areas with important ecological functions for groundfish, that are sensitive or rare habitats for groundfish, or that are at risk of disturbance. The HC suggests that means be identified to evaluate whether or not an alternative meets one or more of these criteria. Current alternatives identify a menu of ideas for meeting criteria, but do not identify which criterion each addresses. Also, it is not possible to evaluate a range of effects for alternative HAPC identification.

Alternatives 2, 3, 4, and 6 approach HAPCs from habitat types. These alternatives are not mutually exclusive; however we suggest that differing proportions of each habitat type be evaluated for overall effects.

Alternative 6 may be reasonably modified to deal with all rocky reef areas instead of just nearshore areas.

Alternative 5 deals with overfished species, which may be an appropriate approach to assist with rebuilding these stocks.

Alternative 7 takes a geographic area approach that appears to represent specific sensitive or rare habitats. This alternative would benefit from clarification as to why these sites were selected and/or how each location meets one or more HAPC criteria. A different approach would be to use data-driven criteria to select certain habitat types; this would lead to more comprehensive protection for key habitats.

Alternative 8 deals with an artificial, temporary habitat type. The HC is not sure how this fits into HAPC designation. Following this criterion, other artificial habitats such as piers, wharves, jetties, pipelines, sewer outfalls and other manmade structures could be considered if the Council were to proceed with this alternative. The HC is doubtful of the benefits of including this alternative.

Finally, the HC suggests that any intent to analyze HAPC as an implementation avenue for marine protected areas should be specifically stated so that constituents are aware of it.

Alternatives for Minimizing Impacts on EFH

This is a large array of different alternatives and approaches. The HC believes it may be appropriate to include all of the alternatives, at least for now. With the initial analysis of the alternatives, it should be possible to determine which are most appropriate to consider further.

Research and Monitoring Alternatives

Alternatives 1 and 2 are designed to provide better data from existing fisheries, and are in general worthwhile for evaluation. This can potentially link habitat data to a system that was designed for enforcement and bycatch needs.

In general, the objective of doing research to better quantify fishing effects on habitat, as suggested in Alternative 3, is admirable and necessary. It is not possible at this time to evaluate this proposal because not enough details are provided.

PFMC
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