

## GROUND FISH MANAGEMENT TEAM REPORT ON ESSENTIAL FISH HABITAT ENVIRONMENTAL IMPACT STATEMENT

The Groundfish Management Team (GMT) attended the joint presentation on the essential fish habitat (EFH) environmental impact statement (EIS) on Monday and had a discussion with Mr. Steve Copps, NMFS, on the preliminary range of alternatives. The GMT reviewed the EFH Draft EIS and notes that the GMT's recommendations from September have been addressed. While the GMT provided some suggested refinements to the Draft EIS, the GMT believes the current document contains sufficient information for the Council to consider and recommends the Council adopt preferred alternatives at this meeting.

In general, the GMT notes there are other groundfish initiatives (e.g., Bycatch Programmatic EIS, the current and potential use of "hotspots," and area management) with management tools that overlap those contained in the EFH Draft EIS and identified the need for coordination in applying these tools to avoid inconsistency. The GMT also has the following specific 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). The GMT notes that, while the Draft EIS is a thorough compilation of existing groundfish habitat data, the quantity of data in many instances is sparse. Given the purpose of designating EFH and the sparseness of the data, the GMT recommends the area defined as groundfish EFH be fairly broad in geographic scope.

The GMT also believes that habitat for all groundfish species in the fishery management plan (FMP) needs to be protected, regardless of status (i.e., overfished and non-overfished stocks). As a reminder, there are nearly 90 species in the FMP, and less than 25% of them have been assessed (and, of those assessed, eight have been declared overfished). Therefore, the status of most of the groundfish stocks on the West Coast is unknown.

### Alternatives to Designate Habitat Areas of Particular Concern (HAPCs)

The GMT recommends the Council consider selecting a combination of HAPC alternatives (e.g., core habitat for juvenile and adult overfished and precautionary zone groundfish species, as well as nearshore rocky reef areas), even if the resulting maps of the areas overlap one another. The reason for this is that, as more stock information becomes available and species move in and out of the overfished and/or precautionary categories, the additional designation of nearshore rocky reef areas would still afford protection to the current area of overlap.

The GMT also recommends there be consistent criteria applied and a common purpose to the areas designated as HAPCs (e.g., core habitat for juvenile and adult overfished and precautionary zone groundfish species). Specifically, with regard to HAPC alternative 7 (designating certain

areas of interest as HAPCs), the criteria for these areas is not apparent, and their selection appears random. It appears these areas were not selected by a pre-determined set of criteria, but were chosen and then justified based on the results.

Also, since the September meeting, the GMT received clarification that the five-year review period is not limited to EFH designation and includes “EFH components” (such as HAPCs). However, it is unclear as to whether the maps depicting the areas designated as HAPCs would automatically be updated as more habitat data becomes available. If the maps are automatically revised with new data, then the GMT does not believe that alternative # 9 (a process to consider proposals for HAPC designation outside the five-year review period) would be necessary.

#### Alternatives to Minimize Adverse Impacts to EFH

The GMT would like to clarify that the commercial (and, in most cases, recreational) area closures currently in place are for the purposes of protecting overfished species; in recommending those area closures, the GMT did not consciously propose them as habitat protection measures. The depth contours chosen for Rockfish Conservation Area (RCA) boundaries—both trawl and nontrawl—are proxies for the areas in which specific rockfish species occur (based on fishing and research data), and are used in conjunction with available NMFS observer data (stratified by depth of fishing activity) to assist the Council in estimating impacts to overfished species. As new stock status information becomes available and/or as more information becomes available to further refine the closed area (e.g., through the use of “hotspots” or “coldspots”), areas which were previously closed may become accessible in the future. As such, the GMT does not believe the RCA boundaries should form the bases for habitat protection measures, such as those specified in alternative 2.

Also, the GMT does not support alternative 6 (close 25% of representative habitat to all fishing) as the GMT does not believe there is sufficient data to demonstrate that areas need to be closed to all fishing for the purposes of habitat protection; this alternative would be better addressed in the Council’s discussions on marine reserves.

With regard to “hotspots” (alternative 7), as described above, the GMT believes this management tool should be used to address species-and-gear-specific areas based on fishing and/or research data (such as those data collected through exempted fishing permits). The use of “hotspots” is currently available to the Council and should be considered as part of the broader biennial management process. However, the GMT notes that the use of the term “hotspots” in alternative 7, and in the EFH EIS in general, is different because it refers to areas of high biodiversity.

The GMT does not support alternative 8 as it is linked with HAPC alternative 7 for the reasons described above.

With regard to alternative 9 (zoning), the GMT recommends that fishing restriction alternatives be limited to the area within the HAPC-designated area (i.e., not be broader than the HAPC area). This alternative would require zoning to be considered within the entire EFH-designated area. Secondly, the zoning and evaluation criteria are undefined making it difficult to predict (and subsequently analyze) the possible outcomes of this effort. As with alternative 6, this

alternative may be better addressed as part of the Council's consideration of marine reserve initiatives.

**GMT Recommendations**

The GMT recommends the Council adopt preferred alternatives for EFH Draft EIS analysis based on the recommendations described above.

PFMC  
11/04/04