

HABITAT COMMITTEE COMMENTS ON GROUND FISH ESSENTIAL FISH HABITAT B PREFERRED ALTERNATIVES

The Habitat Committee (HC) has reviewed the alternatives identified for analysis in the draft environmental impacts statement (DEIS). Our recommendations build upon our observations in September 2004, however we are concerned, in general, that lack of data limits the Council's ability to provide the comprehensive habitat protection needed to help ensure the continued productivity of groundfish resources. With limited data, we urge the Council to take a precautionary approach to these decisions.

Essential Fish Habitat (EFH) Designation:

The HC recommends adopting EFH Alternative 2 (currently identified as 100% of the area where habitat suitability probability (HSP) is greater than zero for all species and any additional area in depths less than or equal to 3,500 m) as the preliminary Preferred Alternative. This recommendation reflects our beliefs that the maximum probabilistic approach to determining EFH, as is represented in this alternative, is reasonable, given data uncertainties; and the added precaution of including some areas beyond depths where data become particularly uncertain is also wise. This alternative would also minimize restrictions to subsequent selections of Habitat Areas of Particular Concern (HAPCs) by the Council.

It is our understanding the proposed EFH designation includes not only substrate, but also the water column above that substrate, including surface waters.

HAPC Designation:

The purpose of HAPCs is to identify areas that (1) possess important ecological functions for groundfish, (2) are sensitive to human-induced environmental degradation, (3) are at risk of stress due to development actions, and/or (4) are rare habitat types for groundfish. In September, the HC suggested that means be identified to evaluate whether or not an alternative meets one or more of these criteria. A table relating the HAPC alternatives to these criteria would be useful.

The HC recommends that HAPC Alternatives 2, 3, 4, and 6 (estuary, canopy kelp, seagrass beds, and nearshore rocky reef areas) be combined and identified as HAPCs for Pacific Coast groundfish. Further, we recommend Alternative 6 be broadened to include all rocky reef areas in waters deeper than 35 fathoms that are outside of three nautical miles from shore, not just nearshore rocky reefs. The HC makes these recommendations because we believe these habitat types are particularly susceptible to degradation from human activities, and our intent would be to highlight the importance of the habitats as well as the relative risk.

In March 2004, the HC conveyed to the Council our concern regarding the need for protection of deepwater corals and other biogenic habitat as vulnerable habitat that may provide important fishery (and other) benefits. Because rocky banks serve as substrate for biogenic habitat, designating them as HAPCs would accomplish this goal.

The HC recommends the specific sites in HAPC Alternative 7 that are not already encompassed in Alternatives 2, 3, 4, and 6 be included in the Preferred Alternative, based on their status as sensitive and rare habitat types. In addition, the HC suggests canyons be included in the HAPC Preferred Alternative, because they are especially vulnerable and rare habitat types.

In addition, the HC recommends the Council include Alternative 9 in its Preferred Alternative as a mechanism to streamline future HAPC designations based on new information.

The HC wishes to emphasize that designating HAPC serves to concentrate attention on potential threats to these habitats, but provides no explicit protection.

Impacts Minimization:

The Council, the scientific community, and the public are developing an increasing awareness that complex habitats of relief, including biogenic habitats such as seagrasses and kelp, are important to the growth and survival of managed species. Consequently, the HC recommends the Council's Preferred Alternative include measures that will afford protection to these priority habitat types. The most direct method to protect these habitat types would be to identify zoning measures that would prohibit fishing with mobile bottom tending gear in these areas.

A comprehensive alternative that addresses habitat protection goals would involve zoning restrictions. Several of the alternatives include elements that would be useful in identifying zoning criteria. These include:

- Alternative 3 (use of habitat sensitivity values).
- Alternative 4 (limit expansion of bottom trawl fisheries).
- Alternative 8 (areas of interest as identified by HAPCs).
- Alternative 13 (Oceana alternative) (criteria used to select areas for protection; however, this alternative does not seem to protect some areas identified as HAPCs).

While the HC thinks Alternative 9 has merit as a zoning alternative, the issue of requiring NMFS to do extensive research without available funds makes it impractical.

Alternative 11 has merit and is progressive in its approach, but is limited in geographic scope. However, if the private parties involved (fishermen and the Nature Conservancy) jointly agree this is a productive proposal, we believe there are habitat benefits that deserve support.

In addition, the HC notes that several of the alternatives to protect habitat from adverse impacts due to fishing incorporate gear restrictions, but the HC feels it is not able to adequately evaluate the efficacy of these measures.

The HC notes the public and the fishing industry will provide additional insight and information on the efficacy of gear restrictions, and all alternatives should be made available for public review in order to take advantage of this broader pool of expertise.

Research and Monitoring:

For research and monitoring, the HC recommends the Council designate a combination of Alternative 2, Option 1 (mandatory logbooks for all groundfish operations) and Alternative 4 (a system of research closures to provide areas for experimentation and observation of habitat condition in open and closed areas) as a Preferred Alternative.

Evaluation of the Council's measures to protect habitat from adverse effects of fishing is essential to understanding whether any restrictions to fishing activities are warranted and justified. Developing these evaluations through carefully structured comparisons of open and closed areas that are matched for habitat type is necessary in order to clearly differentiate changes that are the result of Council management and conservation actions, as opposed to changes that may result from changes in oceanographic conditions and recruitment events that may take place over broader areas.

Clearly, implementation of research closures requires that goals and objectives be identified, as well as mechanisms for siting and monitoring. This is a topic the Council has endorsed for inclusion in a recommended Marine Protected Area policy white paper.

Additionally, as the technology becomes available and affordable, adoption of an electronic logbook format would facilitate more broad and rapid use of logbook data.

PFMC
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