

SCIENTIFIC AND STATISTICAL COMMITTEE REPORT ON
GROUND FISH ESSENTIAL FISH HABITAT – ENVIRONMENTAL IMPACT STATEMENT

The Scientific and Statistical Committee (SSC) discussed the Draft Environmental Impact Statement (DEIS) for Essential Fish Habitat. Mr. Steve Copps (NMFS-Northwest Region) and analysts from Oceana were present for discussions and responded to SSC questions. The DEIS for Essential Fish Habitat (EFH) is a complex and lengthy document, with alternatives for EFH designation, Habitat Areas of Particular Concern (HAPC) designation, and mitigation of adverse impacts.

Comparison of alternatives is the core of an EIS, and it is important the criteria by which alternatives are ranked be carefully defined and clearly articulated. EFH designation alternatives were evaluated with respect to geographic resolution and scientific uncertainty with scores ranging from environmentally positive to negative (E+ + + to E-). It was not clear to the SSC how to interpret these scores, nor how the different alternatives were scored. A similar lack of clarity is present in the scoring of HAPC alternatives and mitigation alternatives.

The main body of the EIS lacks any discussion of the link between impacts on EFH and the productivity of Council-managed groundfish, and does not address why impact mitigation measures are needed. While definitive proof would be difficult to demonstrate, the EIS should make a reasoned argument that fishing impacts on habitat are more than minimal and not temporary in nature, and thus require mitigation measures. Some of this rationale may be available in the Comprehensive Risk Assessment, and could be brought forward in the main EIS document.

A document describing a mitigation alternative developed by Oceana was distributed during the meeting, so the SSC was unable to conduct a comprehensive review of the analytical approach. However, the Oceana proposal is the only one to contain an alternative that deals explicitly with protection of habitat-forming invertebrates, such as deep-water corals and sponges. The introduction to the Oceana proposal lists five categories of management measures, including closed areas, catch restrictions, gear restrictions, and enhanced monitoring and research. Only measures relating to closed areas are developed and analyzed in the document, so at this point the alternative cannot be considered fully developed.

Economic impacts of mitigation alternatives involving spatial closures were evaluated using “revenue at risk” derived from logbook data by 10-minute blocks. Different methods were used for the Oceana alternative and other alternatives. The Oceana alternative assigned revenue to a closed area proportionately according to the fraction of the 10-minute block inside the closed area, while other alternatives used the entire revenue associated with the block. For the comparisons across alternatives to be meaningful, the same methods need to be used for all alternatives. Using the revenue for the entire block gives an upper bound on the potential revenue at risk, but the Oceana approach is likely to be more accurate. It is not clear whether the Oceana approach would tend to underestimate or overestimate revenue at risk, as fishing could be concentrated in, or avoid, the area proposed for closure.

The SSC notes that the research and monitoring alternatives deal primarily with collection of new data on spatially-explicit fishing impacts. Notwithstanding previous SSC criticism of particular fishing impact models, the SSC encourages further work on developing spatial models for fishing impacts, as these issues are ongoing, and a suitable modeling tool would be extremely valuable.

The SSC highlights its previous recommendation for a logbook program for nontrawl fisheries. The SSC suggests the alternatives for research and monitoring should include increased observer coverage. Research reserves would be needed to determine the effects of fishing gear on habitat. However, establishment of such reserves would be a major undertaking and would require that areas be left open for several years to establish a baseline. The SSC's white paper on marine reserves discusses design considerations for research reserves.

PFMC
11/04/04