

Minority Views of Groundfish Advisory Subpanel Members on Groundfish Essential Fish Habitat EIS

The following recommendations for preferred alternatives under the Groundfish Preliminary Draft EFH EIS (Agenda item E.7.b - NMFS Report - EFH EIS) are forwarded by a minority of the members of the Groundfish Advisory Subpanel (GAP):

Alternatives for EFH Designation

Adopt a new alternative #7A which would designate the upper 50% of the area where HSP for all groundfish species is greater than zero.

If you assume that habitat suitability probability (HSP) is a good proxy for habitat, then you need to consider how much is truly essential. Using 100% leaves you in approximately the same situation as the status quo, where almost all water is considered essential. Given the wide range of groundfish, we believe that 30% is too conservative, yet 70% likely encompasses more area than is truly essential. We are thus suggesting a median figure.

Alternatives for HAPC Designation

Include a streamlined process for consideration of HAPC designation proposals as new information becomes available (Alternative 9), but include areas 100 yards around oil production platforms (Alternative 8).

In September, discussion in the GAP centered around these two alternatives. Rather than trying to immediately include a class of area (estuaries, grass beds, etc.), it makes more sense to establish a process for quickly identifying HAPCs so that all potential types of habitat can be covered if appropriate. We have included Alternative 8 for immediate coverage based on the data presented to the Council on numerous occasions showing the high correlation between mature rockfish and oil production platforms. These areas would meet HAPC criteria under Alternative 9 and so ought to be included now.

Alternatives to Minimize Adverse Impacts

Establish impact-reducing fishing gear requirements based on Alternative 10 with the following changes:

Option 1 - change "15" to "24"

Option 3 - delete

Option 4 - delete

Option 5 - delete

Option 6 - delete "assess potential to"

Option 9 - Prohibit set gillnets in waters deeper than 80 fathoms.

All other options in Alternative 10 would remain as shown.

As with the case of HAPC designation, we believe that the Council would be better served to have a variety of tools available to address EFH issues. This option was also the center of GAP discussion in September and the changes we are suggesting here reflect changes that individual GAP members had recommended in the alternative.

The change in option 1 was recommended because there appeared to be no discernable difference in environmental impacts on using roller gear larger than 8". Since the alternative contemplates that large footrope gear will be safe to use in some areas, we have included the size known to have been used on the west coast.

We recommend deletion of options 3 and 4 because the data used to support these options came from the Gulf of Mexico and involved shrimp trawl studies. There is no evidence that aluminum or cambered trawl doors provide any less impact on the environment than the various door configurations currently used on the west coast.

We recommend deleting option 5 because it can have a greater adverse impact on essential fish habitat. Longline groundlines on the west coast can be up to 9 miles long. Limiting them to 3 miles will simply mean that a longline vessel will make three 3-mile sets - which means using 3 times as many anchors.

Option 6 was changed because we assume that any of these management measures will have to be analyzed before being used. The deleted wording is confusing and superfluous.

Option 9 uses the deeper depth that was recommended by the GAP in September, based on information provided by gillnet fishermen.

Alternatives for Research and Monitoring

Expand current research and monitoring programs to ensure precise delineation of HSPs and HAPCs (modified Alternative 1).

Our current research and monitoring system - given proper funding - is more than adequate to keep track of fishing impacts on EFH and the social and economic cost/benefits of addressing those impacts in order to judge practicalability. What we are lacking is adequate capability to delineate HSPs and HAPCs, which are the areas that are essential fish habitat.