

GROUND FISH MANAGEMENT TEAM STATEMENT ON
CORDELL BANK, GULF OF THE FARALLONES, AND MONTEREY BAY
NATIONAL MARINE SANCTUARIES

The Groundfish Management Team (GMT) focused its comments on requests relating to proposed fishing regulations in the Cordell Bank National Marine Sanctuary (CBNMS) and the Monterey Bay National Marine Sanctuary (MBNMS). The GMT reiterates its support for the goals and objectives of these sanctuaries, and maintains that these goals and objectives can be achieved through the authority of the Magnuson-Stevens Fishery Conservation and Management Act and state fishery regulations. As recommended in our March 2005 statement, the GMT believes the goals and objectives can best be met through the Groundfish Essential Fish Habitat (EFH) process, where a proposal for gear restrictions at Cordell Bank and Davidson Seamount is included. The GMT recommends the final EFH option includes these areas, and staff be mindful of proposed fishery management options for each NMS.

Marine Protected Area (MPA) Proposals and EFH Environmental Impact Statement (EIS)

The GMT recommends that, if the Council decides to take the lead in drafting the proposed regulations, it be done in conjunction with the Council's groundfish EFH EIS initiative. We support dovetailing these two ongoing processes for the following reasons:

1. To review the alternatives in the two processes (i.e., the proposed closures from the NMSs could be overlaid with the proposed alternatives, specifically the Oceana trawl closure proposal, in the EFH EIS) to determine where there are areas of overlap, as well as areas that would be covered under only one initiative. This would increase efficiency and avoid having two different suites of regulations with potential differences in areas covered. Also, the action taken relative to the NMSs proposals will likely affect the analyses of the EFH and habitat areas of particular concern (HAPC) alternatives.
2. To not preclude the public comment process on the EFH EIS (i.e., if action were taken to adopt one or more of the NMS proposals, it could potentially preclude public comment through the EFH EIS process, which is on a slightly longer track and would result in an approximate six-month delay for implementation of the NMS proposals).
3. To reduce confusion on the part of the public about when and how to provide comments on the NMS proposals (i.e., with two different, but concurrent public processes occurring, there are individuals who may provide comments during the course of one process who do not realize their concerns won't be considered during the course of the other process).

To accomplish this, the GMT has previously provided a proposed course of action and timeline (Agenda Items H.1.c; H.2.c; and H.3.c; Supplemental GMT Report, March 2005).

Cordell Bank National Marine Sanctuary (CBNMS)

Under 2005-2006 groundfish regulations, commercial and recreational fishing for groundfish is prohibited in waters less than 100 fm around Cordell Bank as defined by specific latitude and longitude coordinates. This applies to all bottom-tending gear (the only exception is for vertical hook-and-line fishing for sanddabs). Because the timeline for implementation of the EFH options is May 2006, these regulations would provide the necessary protection to achieve the goals of the CBNMS until EFH measures can be implemented.

MBNMS inclusion of Davidson Seamount

The Davidson Seamount currently does not have fishing at the depths identified as of concern to the MBNMS. Therefore, similar to the Cordell Bank, the timeline for EFH implementation should not pose a risk to the goals and objectives of the MBNMS.

The GMT notes that in the Council's letter of comment to the sanctuaries, it would be helpful to include a description of how the NMS goals and objectives can be achieved through the EFH process.

Research and Management Needs

The GMT notes the value of maintaining scientific research, such as cooperative research projects and surveys conducted by NMFS NOAA Fisheries, in areas otherwise closed to fishing. This may also provide additional information for the NMSs to use in evaluating the effectiveness of the closures. For example, not only are groundfish stock assessments heavily reliant on NMFS survey data, but also the GMT routinely uses these data in consideration of groundfish stock distribution and catch projection estimates.

GMT Recommendations

As noted above, the GMT suggests that any proposed fishing regulations be considered in conjunction with the Council's groundfish EFH EIS initiative. However, if the Council decides to draft fishing regulations for either of these NMSs outside of the EFH EIS process, then the GMT suggests the regulations for the CBNMS be revised to only pertain to bottom tending gear within the 50-fm isobath surrounding Cordell Bank, as approximated by specific latitudinal and longitudinal coordinates, and that the regulations for the MBNMS be rewritten to be consistent with recommendations from the Enforcement Consultants.

PFMC
04/07/05