

GROUND FISH MANAGEMENT TEAM REPORT ON AMENDMENT TO MODIFY  
GROUND FISH ESSENTIAL FISH HABITAT AND TO ADJUST ROCK FISH  
CONSERVATION AREAS

The Groundfish Management Team (GMT) reviewed the briefing book materials on the Essential Fish Habitat (EFH) and Rockfish Conservation Areas (RCA) modifications and received an overview from Mr. Kerry Griffin, Council Staff, Dr. John Stadler and Mr. Colby Brady, National Marine Fisheries Service (NMFS). The GMT provides the following with the intent of helping the Council narrow the range of alternatives for analysis over the winter. The GMT reviewed the Range of Alternatives for Groundfish EFH in [Agenda Item H.8, Attachment 1](#), Appendix A, and provides the following for Council consideration.

### **Purpose and Need**

The original purpose of the Rockfish Conservation Areas (RCAs) was used to ensure overfished species impacts stay within allowable limits and contribute to the rebuilding of these stocks. In recent years we expanded the purpose to consider inclusion of other species.

Throughout this EFH review, the GMT has made many suggestions that we think would have improved the efficiency of the current review. Specifically, the GMT believes the lack of a scientifically guided problem statement, and clearly defined goals with regard to habitat protections have hampered the current review. Further, this review could have also benefited from scientific review. We have spoken in detail to these issues in November 2013 ([Agenda Item H.7.c, Supplemental GMT Report](#)), March 2014 ([Agenda Item D.2.c, Supplemental GMT Report](#)), and in April 2015 ([Agenda Item E.5.a, Supplemental GMT Report](#)).

While the GMT acknowledges the difficulty of a purely scientific approach when considering groundfish habitat, the team sees merit in utilizing these suggestions to establish criteria prior to future reviews. Through a multi-meeting process, criteria could be developed prior to each review (i.e. not pre-specified in the fishery management plan [FMP] or Council Operating Procedure [COP]) to inform a scientifically guided problem statement, which in turn, may help the Council refine its goals for groundfish habitat.

The GMT provides the following recommendation with the intent to improve the efficiency of future EFH review processes understanding we've moved beyond this point in the current process.

**As such, the GMT recommends revising Purpose #5 to state:**

**Develop a more detailed description of the process to review and revise EFH components of the groundfish FMP that include the development of criteria to help inform EFH considerations prior to initiating the review process.**

## EFH Range of Alternatives

### EFH Alternatives

**The GMT recommends that the Project Team narrow the scope of EFH Alternatives 1-3 by considering a combination of sub-alternatives in a way that creates a total of three alternatives that represent (1) net loss, (2) no net change, and (3) net gain to groundfish EFH.** The GMT believes the EFH Project Team has the resources to evaluate the three Groundfish EFH Alternatives that include; 1) essential fish habitat closed areas (EFHCAs; benthic habitat protection); 2) Public Proposals; and 3) RCA Habitats in a manner that will narrow a combination of the 12 sub-alternatives down to three distinct alternatives that includes a range of groundfish EFH protection from the least protective to the most protective, including a neutral impact alternative. We think this more narrow range of alternatives will simplify the analysis while still providing the Council, and the public, a robust range of alternatives for review and discussion.

While the GMT is in favor of giving the Project Team the latitude to consider the information to recommend three alternatives, we highlight the following for consideration.

#### *Alternative 2: Public EFH RFP Proposals*

Relative to Alternative 2c, the GMT suggests that a modified version of the Alternative 2c language may provide the EFH project team with additional flexibility. The Council could consider that Alternative 2c be described as (changes in strikethrough and underlined text):

*No net change: This sub-alternative is similar to the No Action sub-alternative, in that it would not completely adopt any of the proposed closed or open areas exactly as described in the public proposals, but could combine or modify recommendations. It would aim to result in no net change in the amount of benthic habitat protected from bottom trawling.”*

The GMT Alternative 2c may enable the Council to customize a Council recommended preferred alternative that might be highly informed by the RFP proposals, while enabling the Council to pick and choose among the best ideas in each of the proposals.

#### *Alternative 3: Consider new EFHCAs in the Trawl RCA*

The GMT agrees with the EFH Project Team’s characterization of this alternative that “there may be priority habitats within the trawl RCA that could be considered for new protections, regardless of whether they are considered to be recovered,” but notes as was probably intended by the Project Team that the habitats within the trawl RCA may be more accurately characterized as *has begun recovery* from trawl impacts.

While the Northwest Fisheries Science Center (NWFSC) effort maps based on observer trips are useful, the GMT imagines that a more comprehensive approach to understanding the actual fishery footprint may be to investigate and develop fishery footprints that resolve uncertainties regarding the potential for an observer effect. The GMT notes that the groundfish bottom trawl fishery has been under 100 percent observer coverage since 2011. Table 1 and Table 2 below outline the observer coverage rates for limited entry fixed gear, open access fixed gear, and pink shrimp trawl since 2011.

Table 1. Observer coverage rates for the limited entry fixed gear, open access fixed gear, and pink shrimp fisheries since 2011.

Year	Coverage Rate, % Groundfish landings observed, LE sablefish primary	Coverage Rate, % Groundfish landings observed, LE sablefish DTL	Coverage Rate, % Groundfish landings observed, OA fixed gear
2011	25%	10%	6%
2012	24%	5%	4%
2013	20%	6%	3%

Year	Coverage Rate, % Groundfish landings observed, WA Pink Shrimp Trawl	Coverage Rate, % Groundfish landings observed, OR Pink Shrimp Trawl	Coverage Rate, % Groundfish landings observed, CA Pink Shrimp Trawl
2011	17%	14%	13%
2012	15%	14%	12%
2013	10%	11%	9%

The GMT appreciates the NMFS investigation into the pink shrimp vessel monitoring system (VMS) footprint ([Informational report #6, April 2015](#)), which along with state logbook data, suggests a larger pink shrimp fishery footprint than the observed fishery footprint. NMFS staff have notified the GMT that a preliminary analysis of 2011-2013 VMS footprints for IFQ bottom trawl (100 percent observed, as a comparative exercise), limited entry fixed gear (pot *and* longline), open access (OA) longline, and OA pot is near completion, and could be available as an informational report for the November 2015 Council meeting, and subsequently to the Project Team responsible for conducting the over-the-winter analysis. While this analysis may help to compare the differences between observed and unobserved fishery footprints, this analysis may be further reconciled by investigating logbook data. Logbook data could be displayed and summarized in table format to compare with the VMS data results. **Therefore, the GMT recommends that VMS data be used to improve the understanding of actual fishery footprint, instead of just observed trips.**

The GMT believes that both the NWFSC effort maps based on observer trips *and* the NMFS West Coast Region (WCR) VMS maps could be valuable to help inform the over-the-winter analysis. Ideally, both products could be reconciled by the NWFSC and WCR to create one fishery footprint for each gear type, which could be equally informative to inform both EFH and RCA modification decisions, but may be a moderate work-load.

The GMT is supportive of the thorough work that the EFH Project Team conducted over the summer, and is confident that the subsequent over-the-winter analysis will continue to be developed in a manner that is equally thorough and well thought out. The GMT can imagine where a check-in over the winter between the GMT and the EFH team may be beneficial. For example, some state logbook analysis, or other supporting analysis products that have already been

completed may improve the understanding of the current state of the ecosystem and fishery footprint. There may be some benefit from input from the state GMT representatives to the EFH team during their over-the-winter analysis. However, the GMT notes that state representatives will be busy developing harvest specifications and management measures analysis, and as such we envision this more of an informal check-in opportunity (that doesn't include specific recommendations) to provide feedback to the EFH team.

## **RCA Range of Alternatives**

### **RCA Alternatives**

The GMT identified an error in the catch data for bocaccio rockfish in Agenda Item H.8, Attachment 2, Appendix 2 Table 9. Appendix 1 to our current report provides corrected values.

**Alternative 4b:** Of the Alternative 4b options, the GMT recommends option 3 as we believe it conserves a larger amount of potentially high bycatch areas for overfished species compared to option 2 (only core RCA is maintained) but provides increased fishing opportunity for the fleet for target species in those areas where pink shrimp trawling already occurs. The resulting "has begun recovery" GIS shape file may provide a useful metric to inform comparative analysis between the various EFH alternatives.

**Alternative 4c/4d/4e:** Alternative 4c and 4d propose to remove the current RCA framework and replace it with discrete area closures designed to protect several stocks of interest. Five of these stocks are classified as overfished and the rest are stocks that may warrant special attention for various reasons. The GMT recommends that future alternatives should only consider currently overfished stocks and canary rockfish, and recommends the Council consider removing Alternative 4c and 4d. Canary rockfish was deemed rebuilt in July 2015. However, the GMT believes that the Council may want to be slightly more precautionary regarding this stock in the near future given the recent declaration that this stock is rebuilt. In addition, since canary rockfish stock conservation was a major impetus for implementing the RCAs, it may be worthwhile to analyze the effects that different RCA configurations may have on the stock. Therefore, EFH team should continue to analyze the impact of various RCA configurations relative to this stock in spite of its newly rebuilt status.

However, the GMT believes that the Council does not need to consider the recently rebuilt petrale sole stock since its migratory behaviors makes it a poor target for spatial conservation. Additionally, the original purpose of the RCA did not consider for petrale sole (i.e., it was designed for rockfish conservation). Blackgill rockfish should not be considered despite the stock being in the precautionary zone since effort is already underway to manage the stock independently from the southern slope rockfish complex (62 percent of the complex OFL in 2013). Rougheye rockfish and shortraker rockfish have consistently exceeded their component OFL in recent years (rougheye last exceeded its OFL in 2012 at 156 percent; shortraker last exceeded its OFL in 2013 at 188 percent). However, fishing activities within the Council's jurisdiction generally have little impact on the overall health of the shortraker stock, and the 2013 rougheye stock assessment suggests the stock is currently stable. Spiny dogfish and longnose skate have not come close to attaining their annual catch limit (ACLs) in recent years (30 percent and 49 percent of the ACL in 2013, respectively), and further RCA analysis is not necessary. **Therefore, the GMT recommends**

**adding Alternative 4c and 4d to the list of “considered but rejected,” and only analyzing Alternative 4e, minus petrale sole.**

**Alternative 4f:** This alternative completely removes all trawl RCAs. The GMT believes that Alternative 4f deserves consideration based on the success of the trawl rationalization program in reducing overfished species encounters since the January 2011 IFQ rationalization implementation. In addition, similar to Alternative 4b option 3, the GMT believes Alternative 4f would be very useful for comparative analysis. The GMT notes that under this alternative, priority habitats within the existing RCA may be considered under the EFH range of alternatives. **Therefore, the GMT recommends further consideration and analysis of Alternative 4f.**

## **Other Considerations**

**Separate Ranges of Alternatives (ROA) for RCA closure areas based on latitude:** The GMT recommends that the Council consider including the area from 48°10' N. latitude (Cape Alava) to the Canadian border in its analysis of RCA Alternatives, but notes that much of this area is within the Tribal Usual and Accustomed Areas (U&A) and that further feedback from, or government to government consultation with the Tribes may be required.

The GMT also suggests that the Council and NMFS take into consideration several factors influencing where the trawl fishery operates when determining the RCA alternatives for different regions (latitudes). For instance, the areas south of 36° N. latitude has seen very limited bottom trawl effort. The GMT further notes that 34°27' N. latitude is a more relevant biological latitude break than 36° N. latitude, while 36° N. lat. is a more convenient management break for sablefish allocation. The GMT also notes that 40°10' N. latitude is a relevant break for trawl fishery management, due to its role in the management of various fisheries, such as pink shrimp and groundfish bottom trawl fisheries.

Other bottom trawl fisheries south of 40°10' N. latitude such as ridgeback prawn and California halibut are not allowed within the groundfish bottom trawl status quo RCAs, as pink shrimp bottom trawl is to the north, and therefore, further investigations of bottom trawl fisheries within the RCA south of 40° 10' N. latitude are not needed to accurately characterize the current environmental baseline for evaluating and comparing between RCA alternatives in this area. Furthermore, there are different available data products north and south of 40°10' N. latitude, so the Council may want to consider a different RCA ROA south of 40°10', but at this time the GMT is of the opinion that one coastwide RCA ROA may be sufficient. **Therefore, the GMT recommends a coastwide (Canadian border to the Mexican border) consideration for the RCA ROA, and that the Council consider whether different RCA alternatives may be appropriate for different latitudinal regions after reviewing the over-the-winter analysis in April of 2016.**

**Rotating RCA Closures:** Rotating RCAs might have the potential to provide a streamlined National Environmental Policy Act (NEPA) analysis if the Council considers changes to RCAs down the road. However, we acknowledge that it may slightly complicate the analysis at this point. It is important to note that rotating marine protected areas (MPAs) have been in place in Hawaii for years, and both NMFS and the Council could look further into how these areas are working in in the Western Pacific in the future. Therefore, the Council could consider whether

rotating RCA closures might be a useful way to implement Alternatives 4c-4e, depending on which of those alternatives the Council decides to forward for further analysis.

**Vessel Monitoring:** Consideration of data-logging capabilities, or improved VMS, might be important if the Council goes with small discrete RCA polygons. The GMT further notes that some electronic monitoring (EM) systems currently in use in the 2015 EM EFPs may be compatible with data-logging technologies. Furthermore, the groundfish trawl fleet may be willing to accept the cost of increased ping rates in order to allow for more finite RCA closure areas, or if the RCAs are eliminated under RCA Alternative 4f, to assist with the accountable enforcement of EFH closure areas.

**Habitat Experimental Design Protocol (Habitat EDP):** The GMT recognizes the potential cooperative research value of creating habitat EDPs within the current trawl RCAs, but believes this is better addressed by the Habitat Committee.

**Ecosystem-Based Fisheries Management (EBFM) closure areas:** While the GMT appreciates the idea of EBFM closure areas, the GMT believes that such considerations may be outside the scope of this agenda item, and may better be considered in the ecosystem initiatives process, if at all.

**GMT Recommendations:**

1. **Revise Purpose #5: Develop a more detailed description of the process to review and revise EFH components of the groundfish fishery management plan (FMP), that include the development of criteria to help inform EFH considerations prior to initiating the review process. These criteria would be developed in a two or three meeting process prior to commencing the review and would not be pre-specified in the FMP or in a COP.**
2. **Narrow the scope of EFH Alternatives 1-3 by considering a combination of sub-alternatives in a way that creates a total of three alternatives that represent (1) net loss, (2) no net change, and (3) net gain to groundfish EFH.**
3. **Use VMS data to improve the understanding of actual fishery footprint, instead of just observed trips.**
4. **That of the Alternative 4b options, the GMT recommends option 3 as we believe it conserves a larger amount of potentially high bycatch areas for overfished species compared to option 2 (only core RCA is maintained) but provides increased fishing opportunity for the fleet for target species in those areas where pink shrimp already occurs.**
5. **Add Alternative 4c and 4d to the list of alternatives “considered but rejected,” and only analyze Alternative 4e, minus petrale sole.**
6. **Further consideration and analysis of Alternative 4f.**
7. **A coastwide (Canadian border to the Mexican border) consideration for the RCA ROA, and that the Council consider whether different RCA alternatives may be appropriate for different latitudinal regions after reviewing the over-the-winter analysis in April of 2016.**

**Appendix 1: Revisions to Agenda Item H.8, Attachment 2, Appendix 2, Table 9**

		2009	2010	2011	2012	2013	2015 ACL (or comp. OFL)	2016 ACL (or comp. OFL)
Bocaccio S	Total Mortality	22.26	14.55	7.7	12.45	16.18	349	362
	ACL	288	288	263	274	320		
	Percent Attained	8%	5%	3%	5%	5%		

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