# Increasing habitat protection and economic opportunity through collaborative efforts to reconfigure groundfish Essential Fish Habitat Conservation Areas and the Trawl Rockfish Conservation Area

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Note: Participation in a working group does not necessarily reflect organizational or institutional endorsement of the outcomes indicated in this document.

Table of Contents

## I. Introduction

This document contains a description of potential changes to area regulations for the regions both north and south of 40°10'. The potential changes are listed in tables at the end of this document, and labeled with a type and status. This document is a summary, and a more complete description will follow in the supplemental briefing book, with maps, coordinates, quantitative analyses, and rationales and explanations for each area.

A number of the potential changes listed here are classified as recommendations in progress. As conversations among stakeholders continue through the fall, many of the areas classified as in progress are expected to become full recommendations. We will update the Council on this progress in advance of the April meeting.

## II. Background

### *A. West Coast Groundfish Fishery*

The West Coast groundfish commercial fishery began in California in the early to mid-1800s. In the early 1900s, demand began to increase, and the fishery saw a fairly steady expansion over the next 50 years. This expansion increased rapidly though the 1970s and 80s, with the Sebastes complex driving revenues. By the 1990s, the fishery was overcapitalized and catch per unit effort was dropping. In an effort to address this problem, the National Marine Fisheries Service (NMFS) implemented a limited entry program for the domestic groundfish fleet in 1994, and switched to a catch share program in 2011.

Today, the majority of the bottom trawl fleet is located in Oregon, and sablefish and petrale sole have become primary economic drivers, as well as whiting. Landings in the trawl fishery have decreased from the 1980s, stabilizing around 2001 at approximately 20,000mt per year.

The current West Coast Groundfish Fishery Management Plan (FMP) includes over 90 species of fish, spread across a large and ecologically diverse area. These species include more than 60 rockfish, including all genera and species from the family Scorpaenidae (Sebastes, Scorpaena, Sebastolobus, and Scorpaenodes), 12 flatfish species, 6 roundfish species, and 6 miscellaneous fish species such as sharks, skates, grenadiers, rattails, and morids.

### *B. Groundfish Habitat*

Habitat protection is fundamental to maintaining the health and function of fish stocks, fisheries, ecosystems, and communities. Off the West Coast, groundfish use a wide variety of areas as habitat during their various life stages. For example, almost all rockfish species have one or more life history stage associated with hard or mixed substrate on the continental shelf. Flatfish, shark, and skate species, by contrast, are generally found in soft sediment areas on the continental shelf, varying in depth distribution depending on the species and life history stage. Usage of different habitat types occurs on the continental slope and in nearshore regions as well. Because groundfish rely on a wide range of habitat types for spawning, breeding, feeding, and growth to maturity, it is important to ensure these areas are healthy and intact.

### *C. Magnuson-Stevens Act*

The Magnuson-Stevens Act defines Essential Fish Habitat (EFH) as those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity. 16 U.S.C. § 1802(10). The Act requires managers to describe and identify EFH for all managed species, and to minimize to the extent practicable adverse effects on EFH. 16 U.S.C. § 1853(a)(7).

### *D. Amendment 19*

In 2006, the Council adopted Amendment 19 to the Groundfish FMP as a comprehensive effort to identify and protect EFH for managed groundfish species. In Amendment 19, groundfish EFH is defined as: (1) all ocean and estuarine waters and substrates from depths less than or equal to 3500m to the upriver extent of saltwater intrusions, and (2) areas associated with seamounts in depths greater than 3500m. Off the West Coast, the groundfish EFH designation covers 59.2 percent of the Exclusive Economic Zone, but the EFH designation alone does not provide any fishing restrictions. Rather, federal agencies are required to consult with NMFS when any proposed activity may have adverse impacts on EFH.

In addition to identifying and designating groundfish EFH, Amendment 19 established a network of EFH Conservation Areas in which certain types of bottom contact gear where prohibited. Amendment 19 also prohibited bottom trawl fishing seaward of 700fm as a precautionary measure. These regulations were designed to protect groundfish EFH and mitigate the impacts of Council-managed fishing. Amendment 19 also provided a periodic review process, to ensure that groundfish EFH regulations are updated regularly.

### *E. The Council's 5-Year EFH Review*

Pursuant to the review process outlined in Amendment 19, the Council initiated its first groundfish EFH 5-year review in 2010. In Phase 1 of the review, the Council's EFH Review Committee, in conjunction with NMFS, gathered and synthesized all newly available data about groundfish habitat and fishing effort off the West Coast. The review included evaluating published scientific literature and unpublished reports, soliciting input from interested parties, and searching for previously unavailable information on groundfish stocks identified in the FMP.

The EFH Review Committee and NMFS then compared the new data to data previously used in the 2006 process. Major differences included improved acoustic and bathymetric mapping, more detailed habitat mapping, new data on biogenic habitats, and the spatial distribution of fishing activities. The new data was then made available for Phase 2, in which individuals and groups used the new data to submit proposals for modification to EFH regulations.

The Council entered Phase 3 of the EFH review process by making the determination that the new information, combined with the submitted proposals, constituted sufficient basis to consider changes to groundfish EFH regulations. Having so decided, the Council then was faced with initial decisions on the scope, subject areas, and management measures to be included in a potential action. These issues were dealt with in a preliminary manner in April 2015, when the Council established a scope of action that includes further evaluation of potential effects of fishing activities, and minimization of those effects to the extent practicable. The Council also made clear that changes to the Trawl Rockfish Conservation Area would be included in the scope, in order to resolve spatial management issues in an integrated way.

### *F. The Trawl RCA*

The Trawl Rockfish Conservation Area (RCA) was established in 2002 along the West Coast to reduce the catch of overfished rockfish. Originally the RCA was intended to reduce mortality on darkblotched rockfish, but over time it was expanded to account for other overfished rockfish species. Since October 2004, a portion of the RCA has been closed year-round to bottom trawling. While this may have provided some de facto habitat protection, the RCA was never intended to be a habitat protection measure; it was designed and implemented to reduce mortality on certain rockfish species.

Under the catch share system instituted by Amendments 20 and 21, mortality of many species is managed on an individual quota basis. By providing individual quotas for species, and full accountability for all catch, there is a strong incentive for fishermen to avoid overfished rockfish species. This in turn has led to a dramatic reduction in catch of rebuilding rockfish. Recognizing that input controls like the RCA are less relevant under a catch share system, the Council has discussed in recent years the need to revisit the purpose and function of the Trawl RCA.

In order to move the RCA discussion along, the Council included modifications to the Trawl RCA in the scope of action for an EFH amendment. While EFH and RCA are based on different concerns, considering them together allows for an integrated evaluation of opening and closing fishing grounds.

### *G. Tribal Fishing Rights*

In addition to the federally-licensed commercial groundfish fleet, tribal fleets fish for groundfish off the northern West Coast. The Hoh, Quileute and Makah tribes, as well as the Quinault Indian Nation, all have federally-recognized treaty rights to fish in their usual and accustomed (U&A) fishing areas. The coastal treaty tribes are autonomous sovereigns and manage their own fishing activities. Coordination with federal management is conducted through the PFMC.

All recommendations for regulatory changes contained in this document, or provided more generally by the northern or southern collaboratives, are strictly limited to the non-tribal bottom trawl fishery. The collaborative groups are aware that the tribes are working with NMFS to classify habitats in the U&As, and the area modifications presented here are not intended to replace or alter that process. Furthermore, any recommendations from these working groups that ultimately are adopted by the PFMC will be subject to government-to-government consultation between the United States and the tribes, as underscored by the Council's June 2015 motion.

## III. Northern and Southern Working Groups

Two distinct working groups were involved in evaluating EFH and RCA areas off the West Coast—one focused on the region south of 40°10' and one focused on the region north of 40°10'. While both working groups were oriented around collaboration and dialogue, the two efforts grew out of different contexts, and had different individuals participating. So while the results from both groups are presented side by side here, they were developed under different processes.

The northern collaborative grew out of an intention to build bridges and find common ground between industry and environmental NGOs. It was a concerted effort to set a new course and focus on solutions, and to demonstrate that smarter management decisions can be made when both industry and conservation stakeholders are at the table.

The southern collaborative built on established working relationships between some NGOs and industry members in a number of California ports. These individuals were able to identify common goals and initiate a collaborative approach.

In both regions, the collaboratives used a port-by-port approach and compared scientific data with fishermen's knowledge of the local areas. Hundreds of hours and scores of conversations later, the separate collaboratives are submitting their work product to the Council. Before presenting the results, the following sections lay out each group's goal statement and the shared analytical approach.

### *A. Northern Working Group Vision and Goal*

Early in the process, the northern group set forth a vision statement for the groundfish fishery that it believed all stakeholders could share. That statement is below.

The West Coast groundfish trawl fishery has made remarkable progress in recent years. After a period of difficulty, the fishery is emerging as a model of "best practices" for trawl fishery management. By working together, we believe it is possible to couple the strong fisheries management regime currently in place with appropriate habitat protections to enhance the biodiversity, age structure, and resiliency of groundfish in the California Current Ecosystem, while also streamlining aspects of the regulatory process to foster a healthier, more durable fishing industry. In particular, we envision:

- A robust fishing industry that shows steady or improved profitability, for both fishing and processing sectors.
- Stable regulations, with minimal controversy and litigation, so as to allow for long-term planning and innovation by industry.
- Intact groundfish fishing communities along the West Coast, and enough new entrants to keep the industry viable into the next generation.
- Healthy population levels and age structures in both target and non-target species.
- Resilient benthic ocean ecosystems, with high biodiversity, functioning food webs, and minimal substrate disturbance or damage to sensitive organisms.

To bridge the gap between the high-level vision described above and the concrete details of the action before us, the northern collaborative prepared a (proposed) joint goal for the EFH review process. That goal, and objectives to implement the goal, are as follows:

Building on the measures in Amendment 19, we expect to be able to enhance the protection provided to biogenic and other sensitive habitats, thereby improving overall ecosystem function and resiliency, while also improving economic opportunity for fishermen, processors, and fishing communities.

### *B. Southern Working Group Framework*

The southern collaborative similarly drew up a conceptual framework discussing how to approach the EFH issue. The framework lays out the goal of the southern collaborative as follows.

The overall goal of the process was to protect sensitive habitats and reduce bycatch of overfished species, while improving fishing opportunities for the bottom trawl fleet relative to the current array of EFH Conservation Areas and trawl RCA. This was done by:

- Representing and protecting essential fish habitat, with a focus on high relief and hard-bottom areas on shelf and slope, biogenic (corals, sponges, anemones) and other sensitive habitat, and areas with overfished species.
- Improving access to fishing grounds and healthy stocks of target species.
- Reducing bycatch risk and supporting continued rebuilding of overfished populations.
- Developing a scientifically-based design that incorporates local knowledge and the best available data in the design of effective habitat protection areas that can be monitored and evaluated.

In the course of meetings and discussions, the southern working group used the framework and its goal statement as a guide.

## IV. Approach

The information collected by the EFH Review Committee and NMFS during Phase 1 of the EFH review process was used extensively while examining areas off the West Cost. Data layers from the EFH Data Catalog (http://efh-catalog.coas.oregonstate.edu/overview/) were consulted and discussed frequently. Specific types of data that were informative included fishing effort layers, such as the bottom trawl intensity "before" and "after" layers, the substrate layers and confidence rasters, bathymetry data layers, and the coral-sponge observation records and West Coast Groundfish Observer Program bycatch data layer.

Fishermen's knowledge of the seafloor also was a critical source of information in this process. Trawlers have an extremely detailed understanding of the seafloor, both in their heads and recorded on their plotters. Specific types of information provided by fishermen included areas towed and with what gear type (shrimp gear vs. roller gear), movement of fish across areas and seasons, the types of fish available when fishing out of a given port, the nature of the seafloor in different areas, and comments about bathymetry and benthic features. By integrating

information from fishermen with the scientific data, we arrived at what we called "best available knowledge" about each area.

For the southern region, a geodatabase of overfished species observations also was used, from a variety of scientific/research data sources and a compilation of electronic logbook ("eCatch" application) data on overfished species interactions of the California Groundfish Collective. eCatch is an online database developed by The Nature Conservancy that provides a simple way for fishermen to collect, map and share their fishing information. Fishermen from the ports between Morro Bay and Fort Bragg contribute data to eCatch on a voluntary basis, recording spatial catch information in order to assist in future bycatch avoidance and risk pooling operations. The catch information collected through eCatch is protected with confidentiality agreements, but fishermen allow catch information stored within eCatch to be used during closed sessions to view the distribution of overfished species encounters in areas proposed for EFH modification.

In addition, for the area between Bodega Bay and Cambria, The Nature Conservancy of California has compiled a geodatabase of overfished species observational data from a variety of visual and fishing surveys conducted as part of scientific research and monitoring. Over 30 datasets from a variety of federal, academic, and non-profit organizations were compiled and include thousands of spatially-explicit observations of the handful of overfished species. One example dataset is from the recently completed study of the RCA using visual and fishing surveys conducted as part of an Exempted Fishing Permit in a collaborative effort by The Nature Conservancy of California, Environmental Defense Fund, Moss Landing Marine Labs, NMFS, and local fishermen.

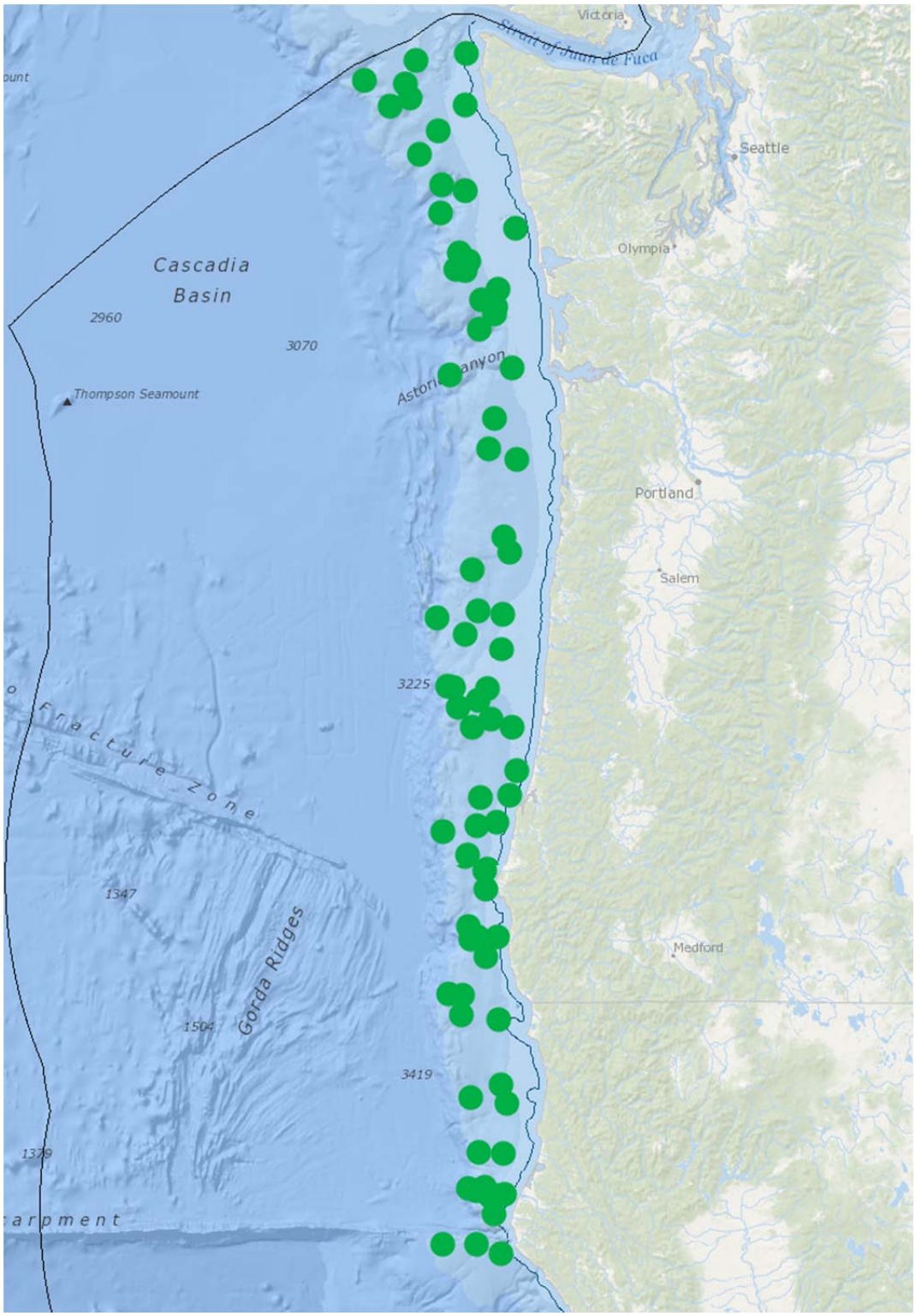
## V. Results

In this section, we summarize the proposed modifications in each region. These modifications discussed below include closing some areas to trawling to increase the protection of sensitive habitats, particularly those with complex structures, hard substrate, or observed biogenic species. They also include opening some areas that were historically valuable fishing grounds, or areas that will improve access to existing fishing grounds, or areas that have been shown to be soft bottom after new analysis of data in this EFH 5-year review.

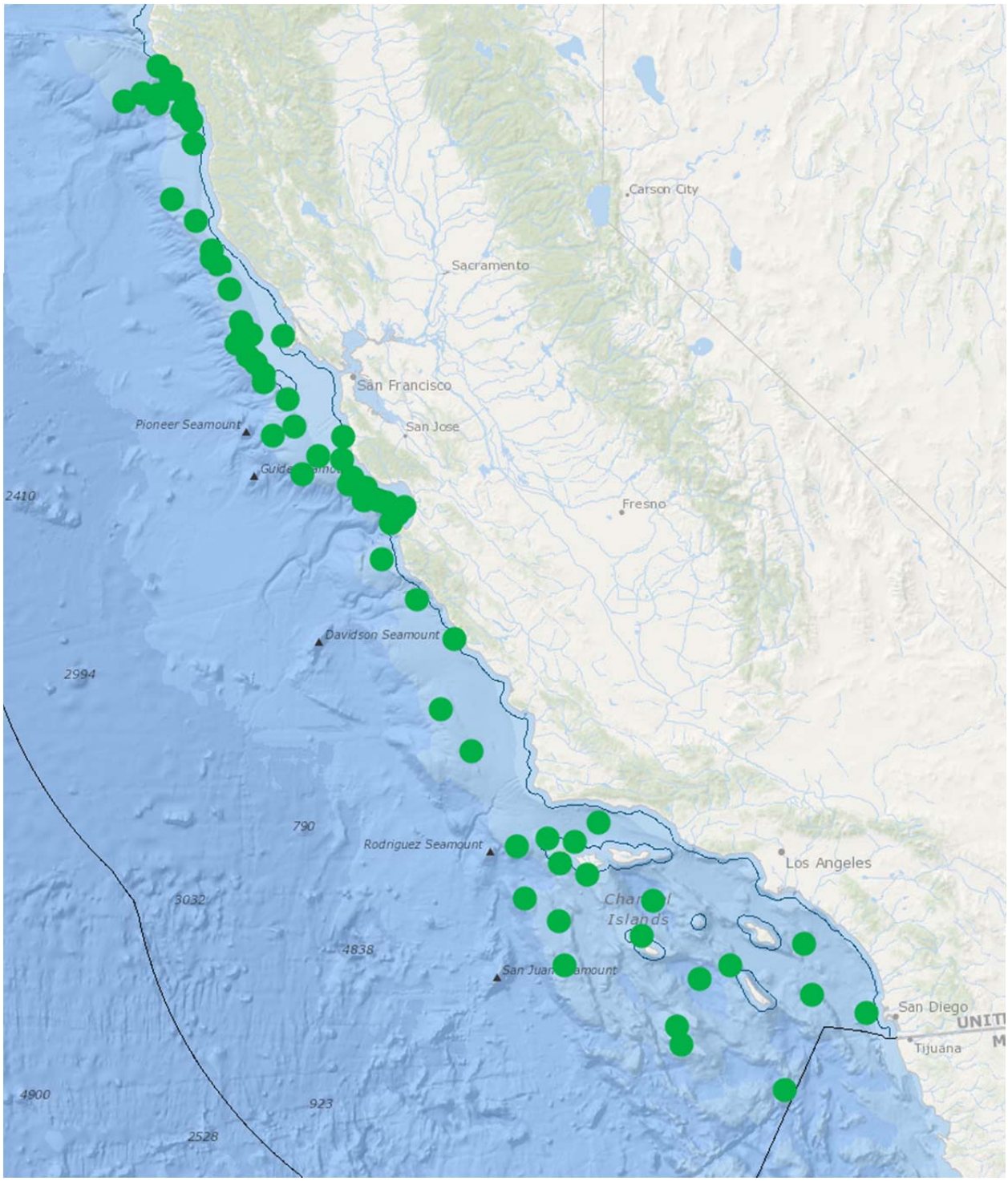
The northern and southern packages below each should be considered as stand-alone alternatives, rather than as the raw material for the creation of different alternatives. This is important in terms of achieving the goals of each collaborative team, and is consistent with the April Council action which instructed the Project Team to leave a placeholder for the collaborative package in its draft range of alternatives.

### *A. Areas Discussed*

In the northern region, 76 discrete areas were discussed in the course of port meetings. Areas discussed are indicated as green dots in the map below:



In the southern region, 69 discrete areas were discussed in the course of port meetings. Those areas are represented by green dots below:



Note that these green dots simply represent areas that were discussed, and not necessarily areas that proceeded to the point of sketching lines, or to an actual recommendation. As is visible from these maps, however, both the northern and southern collaboratives were able to discuss their respective regions of the coast in a thorough and detailed manner.

### *B. Types of Recommendations*

Areas that proceeded to the stage of drawing lines are classified as:

- potential EFH Conservation Area re-openings
- potential EFH Conservation Area closures; and
- potential Trawl RCA re-openings.

Some re-openings would eliminate an entire EFH Conservation Area (or section of the Trawl RCA), whereas some simply would modify boundaries. The same is true for new closures.

### *C. Status of Recommendations*

The modifications proposed in each region are the product of months of intensive discussions among stakeholders in pursuit of consensus. While we made tremendous progress, it was not possible to achieve complete consensus on all areas discussed. In the sections below we indicate the status of each recommendation as "Full Recommendation," "Recommendation in Progress," and "No Recommendation."

"Full Recommendation" means an area was discussed thoroughly, and acknowledged as a useful and acceptable change. Areas that are fully recommended have few if any outstanding issues to be resolved, and we believe can be supported by a wide range of stakeholders.

"Recommendation in Progress" indicates that an area was discussed and we believe consensus is reachable, but there are still some conversations in progress and some loose ends remaining. Both the northern and southern collaborative will continue to work over the upcoming months as needed to resolve outstanding issues with respect to these areas, and will report to the Council prior to the April meeting on the final status of these areas.

"No Recommendation" indicates an area that was discussed, but which may not be amenable to consensus. In these situations, we simply show the area as a way of cataloging the conversations that happened, and showing the Council how the concepts and shapes evolved.

### *D. Geographic Regions*

Within the general division of North of 40 10' and South of 40 10', we further divided the coast into six spatial units that reflect both the interconnectivity between fishing ports, the ecologically

relevant bio-physical regions, and the areas in which the NGO partners work. The six regions are as follows.

North of 40°10':

- Canadian Border to Cape Falcon
- Cape Falcon to Cape Blanco
- Cape Blanco to 40°10'

South of 40°10'

- 40°10' to Ano Nuevo
- Ano Nuevo to Point Conception
- Point Conception to Mexican Border

Each subregion has distinct considerations and its own context, including the history of bottom trawling in the region, the amount of habitat protection established in Amendment 19 for the region, and the number of participants involved in the collaborative process. The number, type, and status of recommendations for each region reflects the varying contexts.

### *E. Recommendations from the Northern Collaborative*

The following tables set forth area modifications north of 40°10', divided by subregion.

Table 1. Areas from Canadian Border to Cape Falcon.

| **Area Name** | **Type** | **Status** |
|---|---|---|
| Canada to 48°00' Trawl RCA | RCA Opening | Recommendation in Progress |
| 48°00' to 45°46' Trawl RCA | RCA Opening | Full Recommendation |
| Astoria Deep | EFH Closure | Full Recommendation |
| Biogenic 1 Eastern Modification | EFH Opening | Recommendation in Progress |
| Biogenic 1 Southern Modification | EFH Closure | Recommendation in Progress |
| Biogenic 2 Eastern Modification | EFH Opening | Recommendation in Progress |
| Biogenic 2 Northern Modification | EFH Closure | Recommendation in Progress |
| Grays Canyon Eastern Modification | EFH Opening | Recommendation in Progress |
| Grays Canyon Northern Modification | EFH Closure | Recommendation in Progress |
| Grays Canyon Southern Modification | EFH Closure | Recommendation in Progress |
| Grays Canyon Western Modification | EFH Opening | Recommendation in Progress |

| | | |
|---|---|---|
| Nitinat Canyon | EFH Closure | Full Recommendation |
| Olympic 2 Northeastern Modification | EFH Closure | Recommendation in Progress |
| Olympic 2 Southeastern Modification | EFH Closure | Recommendation in Progress |
| Olympic 2 Western Modification | EFH Closure | Recommendation in Progress |
| Willapa Deep | EFH Closure | Full Recommendation |
| Willapa Shelf | EFH Closure | Recommendation in Progress |

Table 2. Areas from Cape Falcon to Cape Blanco.

| **Area Name** | **Type** | **Status** |
|---|---|---|
| 45°46’ to 43°57’ Trawl RCA | RCA Opening | No Recommendation |
| 43°57’ to 42°50’ Trawl RCA | RCA Opening | Full Recommendation |
| Arago Reef | EFH Closure | Full Recommendation |
| Bandon High Spot Northern Modification | EFH Opening | Recommendation in Progress |
| Bandon High Spot Southern Modification | EFH Opening | Recommendation in Progress |
| Daisy Bank Northern Modification | EFH Closure | No Recommendation |
| Daisy Bank Southern Modification | EFH Closure | No Recommendation |
| Daisy Bank Western Modification | EFH Opening | No Recommendation |
| Garibaldi Reef | EFH Closure | Recommendation in Progress |
| Heceta Bank Modification | EFH Closure | No Recommendation |
| Stonewall Bank | EFH Closure | No Recommendation |

Table 3. Areas from Cape Blanco to 40°10’.

| **Area Name** | **Type** | **Status** |
|---|---|---|
| 42°50’ to 40°10’ Trawl RCA | RCA Opening | Full Recommendation |
| Blanco Reef | EFH Closure | Full Recommendation |
| Blunts Reef Modification | EFH Closure | Full Recommendation |
| Brush Patch | EFH Closure | Full Recommendation |
| Eel River Canyon Modification 1 | EFH Opening | Full Recommendation |
| Eel River Canyon Modification 2 | EFH Closure | Full Recommendation |
| Eel River Canyon Modification 3 | EFH Opening | Full Recommendation |

| | | |
|---|---|---|
| Eel River Canyon Modification 4 | EFH Closure | Recommendation in Progress |
| Mad River Rough Patch | EFH Closure | Recommendation in Progress |
| Mendocino Ridge Modification 1 | EFH Closure | Full Recommendation |
| Mendocino Ridge Modification 2 | EFH Opening | Full Recommendation |
| Mendocino Ridge Modification 3 | EFH Closure | Full Recommendation |
| Reading Rock Reef | EFH Closure | Recommendation in Progress |
| Reading Rock Shelf-Slope Break | EFH Closure | Recommendation in Progress |
| Rogue River Reef | EFH Closure | Full Recommendation |
| Saint George Reef | EFH Closure | Full Recommendation |
| Trinidad Canyon | EFH Closure | Full Recommendation |

### *F. Recommendations from the Southern Collaborative*

The following tables set forth area modifications south of 40°10', divided by subregion.

Table 4. Areas from 40°10' to Ano Nuevo.

| **Area Name** | **Type** | **Status** |
|---|---|---|
| 40°10' to 37°07' Trawl RCA | RCA Opening | Recommendation in Progress |
| Cordell Bank Modification 1 | EFH Closure | Full Recommendation |
| Cordell Bank Modification 2 | EFH Closure | Full Recommendation |
| Cordell Bank Modification 3 | EFH Opening | Full Recommendation |
| Cordell Bank Modification 4 | EFH Opening | Recommendation in Progress |
| Delgada Canyon | EFH Opening | Full Recommendation |
| Farallon Escarpment | EFH Closure | Full Recommendation |
| Farallon Islands Modification | EFH Closure | Full Recommendation |
| Gobbler's Knob | EFH Closure | Full Recommendation |
| Navarro Canon | EFH Closure | Full Recommendation |
| Pescadero Reef | EFH Closure | Recommendation in Progress |
| Pigeon Point Reef | EFH Closure | Recommendation in Progress |
| Point Arena South Modification 1 | EFH Opening | Full Recommendation |
| Point Arena South Modification 2 | EFH Closure | Full Recommendation |

| | | |
|---|---|---|
| Point Arena South Modification 3 | EFH Closure | Full Recommendation |
| Point Arena South Modification 4 | EFH Opening | Full Recommendation |
| Point Reyes Reef | EFH Closure | Full Recommendation |
| Rittenburg Bank | EFH Closure | Recommendation in Progress |
| Spanish Canyon Line Adjustment 1 | EFH Opening | Full Recommendation |
| Spanish Canyon Line Adjustment 2 | EFH Closure | Full Recommendation |
| The Football | EFH Closure | Recommendation in Progress |

For the subregion between Ano Nuevo and Point Conception, the southern collaborative incorporated the full package of changes proposed by Monterey Bay National Marine Sanctuary, and built on that foundation by considering the RCA and other areas of interest.

Table 5. Areas from Ano Nuevo to Point Conception.

| **Area Name** | **Type** | **Status** |
|---|---|---|
| 37°07’ to 34°27’ Trawl RCA | RCA Opening | Recommendation in Progress |
| Ascension Canyonhead | EFH Closure | Recommendation in Progress |
| Big Sur Coast Modification | EFH Closure | Full Recommendation |
| Cambria Rough Patch | EFH Closure | Full Recommendation |
| MBNMS Ascension and Ano Nuevo Canyon Complex | EFH Closure | Full Recommendation |
| MBNMS Between Partington Point and Lopez point | EFH Closure | Full Recommendation |
| MBNMS East of Sur Ridge | EFH Opening | Full Recommendation |
| MBNMS La Cruz Canyon | EFH Closure | Full Recommendation |
| MBNMS Lower Portion of Cabrillo Canyon | EFH Opening | Full Recommendation |
| MBNMS Outer Soquel Canyon | EFH Closure | Full Recommendation |
| MBNMS Point Sur Platform | EFH Closure | Full Recommendation |
| MBNMS South of Davenport | EFH Closure | Full Recommendation |
| MBNMS South of Mars Cable | EFH Opening | Full Recommendation |
| MBNMS Southwest of Smooth Ridge | EFH Closure | Full Recommendation |
| MBNMS Sur Canyon Slot Canyons | EFH Opening | Full Recommendation |
| MBNMS Triangle South of Surveyors Knoll | EFH Closure | Full Recommendation |

| | | |
|---|---|---|
| MBNMS West of Carmel Canyon | EFH Opening | Full Recommendation |
| MBNMS West of Piedras Blancas SCMA | EFH Closure | Full Recommendation |
| MBNMS West of Sobranes Point | EFH Closure | Full Recommendation |
| Monterey Bay Modification | EFH Closure | Recommendation in Progress |

While the area south of Point Conception is classified here as part of the southern working group, this subregion did not undergo the same collaborative process and receive the same amount of vetting as the other two southern subregions. This was in part due to the lack of current fishing activity in the area, and the differences in networks and individuals with information about fishing in the area. The preliminary areas noted below should be treated very cautiously, and regarded as representing no consensus and needing substantial further work in order to reach a fully supported set of recommendations.

Table 6. Areas from Point Conception to Mexican Border.

| **Area Name** | **Type** | **Status** |
|---|---|---|
| 34°27’ to Mexico Trawl RCA | RCA Opening | Recommendation in Progress |
| Trawl RCA around Lasuen Knoll | RCA Opening | Recommendation in Progress |
| Trawl RCA around San Clemente Island | RCA Opening | Recommendation in Progress |
| Trawl RCA around Santa Catalina Island | RCA Opening | Recommendation in Progress |
| Begg Ridge | EFH Closure | Recommendation in Progress |
| Coronado Shelf | EFH Closure | Recommendation in Progress |
| Eastern San Clemente Ridge | EFH Closure | Recommendation in Progress |
| Northern Channel Islands | EFH Closure | Recommendation in Progress |
| Outer Bank | EFH Closure | Recommendation in Progress |
| San Clemente Ridge | EFH Closure | Recommendation in Progress |
| Santa Barbara Plateau | EFH Closure | Recommendation in Progress |
| Sixty-Mile Bank | EFH Closure | Recommendation in Progress |
| Tanner and Cortes Banks | EFH Closure | Recommendation in Progress |
| Western Line Adjustment | EFH Closure | Recommendation in Progress |

Dear Chair Lowman and Council Members,

Thank you for your past work to protect ocean habitat, including the recently concluded five-year review of Essential Fish Habitat for groundfish. The Council is now well positioned to find many win-win possibilities for habitat protection and the fishing economy, thanks to a stakeholder-driven process in the five-year review along with ongoing collaborative discussions between fishermen and conservation advocates.

In considering the upcoming amendment to the management plan for groundfish, I urge the Council to advance the following:

- Closure to bottom trawling of the deepwater areas (beyond 3,500 meters) off California south of the Mendocino Ridge.

- A coastwide scope for potential changes to the groundfish management plan.
- Potential designation of new Essential Fish Habitat (EFH).

- Potential creation of new EFH Conservation Areas or adjustment of current EFH Conservation Areas.

- Inclusion of all remaining stakeholder proposals as potential alternatives.

- Adjustment of area-based management measures such as the Rockfish Conservation Area to improve fishing while also protecting habitat.

- Measures to address bottom contact by midwater trawl fishing gear.

- Designation of key prey species of groundfish.

Healthy marine habitats ensure a sustainable supply of fish for commercial and recreational fisheries. But these essential places—which contain deep-sea corals, sponges, and seamounts—can be damaged by fishing gear such as bottom trawls. I urge the Council to move habitat protection forward and seek a broad set of solutions for fishing communities and a healthy ocean.

Thank you for your time,

Vincent Rusch
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