GROUNDFISH MANAGEMENT TEAM REPORT ON GROUNDFISH ESSENTIAL FISH HABITAT AND ROCKFISH CONSERVATION AREA AMENDMENT

The Groundfish Management Team (GMT) appreciated receiving a briefing from Mr. Kerry Griffin and Ms. Kelly Ames of Council staff and Dr. John Stadler of National Marine Fisheries Service (NMFS) during our April 4 webinar regarding the work which has been done to date on this Agenda Item. The GMT also reviewed the Project Team Report and has the following thoughts and recommendations for Council consideration.

An overriding issue that has been made clear is that the current range of alternatives (ROA) is too large and complicated, and likely cannot be adequately analyzed given the available resources and the current timeline. Therefore, it would behoove the Council to refine (reduce) the ROA, as recommended below, to allow for proper analyses within the current resources and timeline, and allow for efficient consideration and discussion as the Council moves forward.

Purpose and Need and Corollary Considerations

The GMT would like to reemphasize the Project Team's Report (Agenda Item F.5.a, EFH and RCA Project Team Report, April 2016) that "The salient tests from the purpose and need are 1) Minimizing Adverse Effects, and 2) Practicability". In minimizing adverse effects of a fishery, the Council should consider whether or not a fishery will or is likely to occur, as well as the short and long term costs and benefits.

Essential Fish Habitat (EFH)

As the GMT previously indicated in our statement on workload planning in March (Agenda Item I.3.a. Supplemental GMT Report 1, March 2016), we focused our discussion on the rockfish conservation area (RCA) alternatives, particularly Alternative 3d, and considered the EFH issues as time and workload allowed.

Range of Alternatives

Alternative 1. Essential Fish Habitat Conservation Areas (EFHCAs) changes contained within the public proposals (re-openings and closures)

These alternatives will open some or all of the EFHCA (1.b), as well as those changes contained within the public proposals (1.b through 1.i), which include both re-openings and closures. In addition, there are five sub-alternatives which excluded those areas within the Treaty Tribal Usual and Accustomed areas (U & As).

The GMT recognizes the difficulty given the large ROA and while we attempted to provide a path to narrow the current scope of alternatives currently under consideration we were unable to do so in a detailed manner. **The GMT suggests, to the extent it can, the Council combine and/or eliminate some of the sub-alternatives under Alternative 1**.

Alternative 2. New EFHRCAs within the current trawl rockfish conservation area (RCA)

These alternatives would establish new EFHCAs within the current trawl RCA, largely based upon the presence of priority habitats. Alternative 2.b would rely solely on verification of priority habitat, while Alternative 2.c would be based on verification or on predictive modeling which indicates a likelihood of priority habitat. Both alternatives have sub-alternatives exclusive of the U & As based on the same criteria 2.b.i and 2.c.i., respectively.

The GMT believes the use of modeling should not be the sole reason for exclusion, which is the structure proposed under Alternative 2b. There are varying degrees of information available to inform habitat types, with some portions of the coast having relatively more habitat type information than others. Therefore, **the GMT recommends removal of Alternatives 2.b and 2.b.i.** The GMT suggests that under Alternative 2.c and 2.c.i, the Project Team should note what information was used to inform the habitat type (i.e. ROV or other visual survey, trawl bycatch, grab sample, or predictive modeling and whether that model has been peer reviewed).

Analysis of the EFHCAs proposals

The GMT understands that the analysis completed to date for EFHCAs was done independently of the trawl RCA. That is, the summary metrics for Alternative 1 in the Project Team Report were calculated without taking into account to the areas currently closed by trawl RCA closure. **The GMT recommends that the impacts of the EFH action alternatives (Alternatives 1 and 2) be presented for consideration both with and without the 2015 trawl RCA structure, to encompass the entire range of habitat impacts of both the EFH and RCA alternatives.** The GMT defers to the Project Team on the best way to display such information.

Methodology

The GMT would like to note that it is important to apply proper methods to develop the evaluation matrices and in order to produce robust analysis of these alternatives. The GMT offers the following comments.

Spatial extent of closures and openings

Currently, the Project Team uses hectares (ha) as the unit of measurement to assess changes in spatial extent under each proposal. The GMT discussed the use of this measurement unit within the analysis and whether or not another unit may be more appropriate. **The GMT recommends using a more familiar unit of measurement such as square miles or displaying both units**.

Bottom trawl effort displaced by the closures and restored by the openings

The Project Team defines "trawl effort" as the sum of kilometers trawled within the proposed closures or openings, calculated by the minimum straight line tow length from the coordinates in logbooks from the selected years. However, it is generally known that trawl tows typically do not run in a straight line and therefore, the start and end points recorded in the logbook might not accurately capture the extent of the effort that may be displaced or restored. There are methods available to the Project Team to compensate for irregular tow tracks that include using a simple buffer, bathymetric lines, or an ellipse method such as was used by Washington Department of Fish and Wildlife (WDFW) during their marine spatial planning process. By using these methods, the Project Team's analysis could provide a more accurate estimation of actual effort that would be displaced or restored. In other words, currently a straight line might not intersect a polygon in a proposal. However, with a buffered approach of some kind, the actual possible extent of the

trawl effort may intersect a polygon it did not under the straight line approach, and therefore help provide the Council with a better picture of the effects of opening or closing a space.

The GMT would also like to note that there have been significant changes to the trawl fleet since Amendment 19 was put into place in 2006. Specifically, the fleet is much smaller and fishing behavior has changed since the individual fishing quota (IFQ) program began in 2011. As a result, the estimates of restored fishing effort in the analyses may not accurately capture the level of actualized effort for the proposed re-opened areas. The analysis conducted by the project team uses logbook data from 2002-2006 to assess the impacts of restored effort with openings of the EFH area (in contrast to using 2011-2014 to analyze the potential effort reduction). The GMT discussed how these years (2002-2006) may not provide a realistic picture of the effort restored or gained, as canary rockfish (declared overfished in 2000) and widow rockfish (declared overfished in 2001) have been declared rebuilt in recent years (2015 and 2011, respectively) and therefore there will be greater access to both midwater and bottom trawl species. Furthermore, with the potential removal of the trawl RCA, there could be additional increased effort in areas to access other trawl dominant species (e.g. darkblotched rockfish). **The GMT recommends the Project Team explore the availability of additional data (e.g. older logbooks) to better assess potential impacts of opening previously closed areas.**

Rockfish Conservation Areas

Range of Alternatives

Alternative 3. Adjustments to the Trawl RCA

The Project Team presented a range of action sub-alternatives for RCAs. Among the range of action sub-alternatives are the complete removal of the trawl RCA (3.b), discrete area closures for overfished species (3.c) and block area closures for overfished and non-overfished species (3.d). These sub-alternatives consider this approach for both inside and outside the tribal U & As areas off of Washington. The Council would still have the primary catch controls available to them under each of these alternatives, including quota for IFQ species, trip limits for non-IFQ species, and retains NMFS' authority to close the fishery upon attainment or projected attainment of the trawl allocation or allowable harvest limit. The GMT focused our discussion and recommendation on Alternative 3.d.

Alternative 3.d. Closures for overfished species and/or as a catch control for non-overfished species

Alternative 3.d. was developed by the Project Team in response to Council guidance and to provide an alternative to the initial Council motion to examine potential discrete area (i.e. hot spot) closures for non-overfished species (similar to 3.c. for overfished species). The Council initially asked the GMT to develop recommendations for potential species that would be appropriate for management by discrete area closures; however, we were unable to come to any conclusions at our October 2015 meeting due to lack of available information and time. The Project Team considered whether additional catch controls (as no discrete areas were determined) were actually needed for stocks managed in complexes with IFQ (blackgill, rougheye, shortraker rockfishes) or trip limit species (longnose and spiny dogfish). Alternative 3.d. provides a process for developing block area closures, which is a similar process developed for ocean salmon conservation zones, and could be

implemented either pre-season (proactive approach) or inseason (reactive approach). The block areas closures would allow the Council to cordon off areas of high catch for a species of concern.

Methodology

Due to the time constraints at this meeting, the GMT focused a majority of our discussions on the methodology used to evaluate Alternative 3d. The GMT discussed using the latitudinal and bathymetric breaks found in regulation, and identified in the Project Team Report, and offers the following recommendations: **The detailed analysis be done on a large scale but provide the summary metrics in an Appendix for the finer scale locations. If the need arises to use a block closure, analyses could be done inseason and at a finer scale to address particular needs which would complement the analysis provided under this action.**

Use biogeographic and bathymetric breaks

While the Council has several latitudinal lines defined in regulation that have been used for management in the recent past, the GMT supports the use of the primary biogeographical breaks (Point Chehalis, Cape Blanco, Cape Mendocino and Point Conception) to narrow the scope of latitudinal breaks.

The Project Team suggests using three bathymetric breaks: nearshore (0-30 fathoms), shelf (30-150 fathoms) and slope (150-300 fathoms). The GMT notes that some of the current bathymetric bins are too wide based on the common depth distributions of many groundfish species. **The GMT recommends the Project Team refine the bathymetric depth bins to nearshore (0-30 fathoms), 30 to 100 fathoms, 100 to 150 fathoms, and 150 to 300 fathoms.**

The GMT recommends retaining the nearshore bin, even though it is relatively unused by trawlers. California prohibits trawling in state waters, except, south of Point Conception trawling for California halibut is permitted within state waters in a finite regulatory defined area. Oregon allows trawling within state waters (although it rarely occurs), and the Oregon state process would be more responsive to regulating catch within state waters if inseason issues arose than the Council process. Trawling is not permitted in Washington state waters, other than in tribal U & As by tribal fishermen.

The GMT discussed whether there were any specific candidate non-overfished species that would benefit from small area closures (i.e. hotspots; as directed in the original motion); however, we were unable to identify any at this time. The GMT notes that the analysis of the block closures can move forward without this piece. Completion of the GIS analysis may help facilitate GMT discussion of potential candidate non-overfished species for small area closures.

Overarching Essential Fish Habitat Process

Throughout the Essential Fish Habitat (EFH) review and the development of the amendment, the GMT has repeatedly stated that we believe a lack of a scientifically guided problem statement, and clearly defined goals with regard to habitat protections have hampered this review and process (Agenda Item H.7.c. Supplemental GMT Report, November 2013; Agenda Item D.2.c. Supplemental GMT Report, March 2014; Agenda Item E.5.a., Supplemental GMT Report, April 2015; and Agenda Item H.8.a. Supplemental GMT Report, September 2015). While the GMT acknowledges the difficulty of a purely scientific approach when considering groundfish habitat impacts, the team sees merit in utilizing the suggestions in our previous reports to establish criteria prior to future reviews.

GMT recommendations:

For EFH:

- **The Council attempt to combine and/or eliminate some of the sub-alternatives under Alternative 1.**
- **Removal of Alternatives 2.b and 2.b.i.**
- **The impacts of the EFH action alternatives (Alternatives 1 and 2) be considered both with the 2016 RCA structure in place and without the 2015 trawl RCA to bookend the analysis of habitat impacts.**
- **The Project Team use a more familiar unit of measurement such as square miles or displaying both units.**
- **The project team explore if there are additional trawl effort data available (e.g. older logbooks) that can be used to better assess potential impacts of opening previously closed areas.**

For RCAs:

- **The initial analysis for Alternative 3.d. be done on a large scale, and if the need arises to use a block closure, analyses could be done inseason and at a finer scale to address particular needs.**
- **The Project Team refine the bathymetric depth bins to nearshore (0-30 fathoms), 30 to 100 fathoms, 100 to 150 fathoms, and 150 to 300 fathoms.**

PFMC
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