

GROUND FISH MANAGEMENT TEAM REPORT ON GROUND FISH ESSENTIAL FISH
HABITAT AND ROCK FISH CONSERVATION AREA AMENDMENT 28 ALTERNATIVES
(PART 1)

The Groundfish Management Team (GMT) appreciated receiving a presentation from Mr. Kerry Griffin and Ms. Kelly Ames of Council staff on the information presented in the analytical report and supplemental reports for this Agenda Item. The GMT has the following thoughts and recommendations for Council consideration. The primary focus of our discussions and recommendations is on Subject Area 3, Rockfish Conservation Area (RCA) Modifications, although we do provide limited comment on Essential Fish Habitat (EFH) Subject Areas 1 and 2, as well as Subject Areas 5- 10 Administrative Items.

Subject Areas 1 and 2- Essential Fish Habitat Closure Areas in the Public Proposals and within the Trawl RCA based upon the Presence of Priority Habitats

While the GMT does not provide comment on the individual polygons under consideration, we do note that should the Council wish to move forward with modifying the trawl RCA, consideration should be given to habitat impacts such that the legal requirement of ‘mitigat[ing] those impacts to the extent practicable’ is met. Further, if the Council removes the RCA and recommends new Essential Fish Habitat Closure Areas (EFHCA’s) within the RCA based solely on the presence of priority habitat (Subject Area 2- Option 2b); this would essentially eliminate the benefits resulting from removing the trawl RCA in various places along the coast, as the priority habitat encompasses the current trawl RCA footprint. However, this is dependent on the extent of priority habitats chosen; particularly off of central Oregon and southern Washington. This seems to be the result of the analysis aggregating all priority habitats (i.e. hard substrate, seamounts, submarine canyons, etc.) together.

The GMT also notes that the Midwater Trawlers Cooperative (MTC) submitted their proposal for the central Oregon coast ([Agenda Item F.4.c, Supplemental Public Comment 2](#)) at this meeting through public comment on this agenda item. It is the GMT’s understanding that this proposal was originally submitted to the group working on the Collaborative Proposal in April. At that time, the Collaborative group decided not to include it in their proposal. While we appreciate that there is an attempt to address areas that the Collaborative Proposal was unable to reach consensus on in the area around Newport, Oregon, we think it’s important to point out that because the proposal is just being introduced now, there has been no associated analysis. Therefore **the GMT recommends that if the Council wishes to add this proposal to the range of alternatives in the PPA, there be consideration to the associated workload and potential for further delay of final action.**

Subject Area 3- Adjustments to the trawl RCA:

All three action alternatives under this Subject Area include removing the entire trawl RCA, but Alternatives 3.c and 3.d would also provide National Marine Fishery Service (NMFS) and the Council the option of closing fishing areas to reduce catch if it is projected to attain or exceed the harvest specifications or allocations. Specifically, Alternative 3.c would allow for the implementation of Discrete Area Closures (DACs), which were developed based on the presence

of currently overfished stocks (boccacio, darkblotched rockfish, Pacific ocean perch (POP), cowcod, and yelloweye rockfish). Alternative 3.d would allow NMFS and the Council the option to implement Block Area Closures (BACs), which are based upon existing management lines in regulation (e.g. fathom waypoints and geographical latitude/longitude coordinates). Additionally, it is the GMT's understanding that under all three action alternatives, the core trawl RCA (between 100 fathoms and 150-200 fathoms) could be re-implemented by the Council in the future, if needed. The GMT understands that both Alternatives 3.c and 3.d would be available for use pre-season and/or inseason as would the core RCA.

In regards to the DACs, the GMT notes that, while this may provide a more 'surgical tool', these closures would be limited in scope to the aforementioned species. Additionally, the data used in developing the DACs may not be reflective of the future groundfish trawl fishery, especially with the re-emergence of a midwater rockfish fishery. Therefore, future adjustments may be needed to ensure that these "hotspots" remain reflective of the fishery, and the latest data. If any adjustment to the DACs are needed, whether to modify locations and/or size based on new data, or due to species being declared rebuilt/overfished, these modifications are likely to be associated with substantial workload. **Therefore the GMT recommends that DACs be removed from further analysis and consideration.**

Conversely, BACs as currently analyzed would be available for use based on catch of groundfish species. To simplify the analysis, the Project Team analyzed only 20 BACs. However, the GMT notes that implementation of BACs whether pre-season or inseason, can utilize any management line already in federal regulations. Therefore, any combination of BACs or subset of a BAC would be available to the Council and NMFS to address specific inseason issues as necessary and could potentially address a diverse range of management needs. However, as currently analyzed, BACs would not be applicable to non-groundfish species. **The GMT therefore recommends that the Council select Alternative 3.d, BACs as the PPA. Additionally, the GMT recommends that BACs be analyzed and considered specifically for salmon in addition to groundfish.** This is especially pertinent given the ongoing salmon re-consultation and the high uncertainty associated with analyzing such impacts given the available data.

Subject Areas 5 through 10- Administrative Items

The GMT notes that no further action on these items is needed, at this time. However, the GMT supports establishing a timeline for when these items will be brought forward for Council review; and would also appreciate the opportunity to have sufficient time for review and to provide input.

PFMC
11/17/16