

GROUND FISH ADVISORY SUBPANEL REPORT ON SALMON ENDANGERED SPECIES ACT (ESA) CONSULTATION RECOMMENDATIONS

The Groundfish Advisory Subpanel (GAP), in joint session with the Salmon Advisory Subpanel (SAS) and Groundfish Management Team (GMT), received an overview from Ms. Susan Bishop, National Marine Fisheries Service (NMFS). Mr. Patrick Mirick and Ms. Jessi Doerpinghaus (GMT) presented information developed by the GMT in response to Pacific Fishery Management Council (Council) direction at the March 2017 meeting.

The GAP greatly appreciates the diligent efforts put forth by the GMT to broaden and improve the information and analyses that the Council will use in developing its recommendations to NMFS. The GAP urges the Council to strongly recommend that NMFS not only consider, but actually include the GMT information and analyses in the re-consultation process and new Biological Opinion (BiOp). Analyses developed by NMFS have been informative, however, the GAP firmly believes that the new BiOp, including its management measures, would be improved by GMT participation in the process.

As noted in previous GAP reports, the current BiOp indicates that an overall threshold of 20,000 Chinook (a combination of 11,000 for the whiting fishery and 9,000 for the non-whiting fishery) has been effective at ensuring that the incidental take of salmonids in the groundfish fishery does not cause jeopardy to any population listed under the ESA. Information provided by NMFS at previous Council meetings indicated that the groundfish fishery, as a whole, has stayed below 20,000 Chinook in most years. Moreover, in previous reports, NMFS noted that actual impacts to ESA-listed salmonids are low. Therefore, the GAP thinks it is evident that the current groundfish fishery is performing well relative to impacts on listed salmonids.

In previous reports, the GAP has stated its opinion that the whiting fishery is relatively stable and, therefore, potential impacts analyzed in the current BiOp should be consistent with any new analysis performed under the re-consultation. This conclusion appears to be supported by the new analyses developed by the GMT for this meeting.

Relative to non-whiting trawl, the GMT analyses indicate that several factors appear to influence salmon bycatch in this segment of the groundfish fishery, including (1) type of trawl gear used (e.g., selective flatfish trawl [SFFT] versus traditional “hooded” bottom trawl), (2) areas fished (e.g., shelf versus slope), and (3) overall levels of participation in the fishery. Using data from 2002-2004, the GMT analyses show that if there is a significant shift away from use of the SFFT, more fishing on the shelf, and high levels of participation, then it is possible that salmon impacts could be higher than experienced in more recent years. The GAP views these projected and potential levels of salmon bycatch as a “worst-case scenario.” While data from the early 2000s indicate that non-whiting trawl salmon bycatch was higher than the contemporary period, it seems important to note that 2002-2004 were years of very high salmon returns. While empirical evidence of a linkage between strong salmon years and higher occurrence of trawl fishery bycatch is lacking, it seems to the GAP that there might be a correlation. Therefore, the GAP recommends

the use of some caution in drawing conclusions about projected future impacts when using fishery information from the past.

In general, the Pacific coast groundfish fishery has made a collaborative effort to ensure each segment of the fishery has fair access to their respective fisheries. Each sector takes seriously the charge to minimize our impacts on other fishery sectors and the ocean environment. As the non-whiting trawl fishery evolves such that it can take greater advantage of renewed fishing opportunities, the GAP firmly believes that the trawl industry's demonstrated ability to reduce impacts on species of concern (including salmon) will continue. Use of SFFT will continue because it requires less sorting of catch and has greater fuel efficiency. Effort on the shelf will increase, but will be tempered, because fishery participants will spread fishing effort across a broad area to catch the various species in their portfolio. In sum, the fleet will use the most efficient gear (in the cleanest area with the lowest bycatch impacts) to get their fish out of the water.

With all that in mind, the GAP repeats our recommendation that the new BiOp use an overall Chinook threshold of 20,000 (11,000 for whiting and 9,000 for non-whiting). The current BiOp indicates these are appropriate thresholds. The GMT analyses appear to indicate that these amounts are within the projections developed by the GMT. Finally, the GAP repeats our recommendation that the Council urge NMFS to include the GMT in the re-consultation process.

PFMC
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