



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
West Coast Region
650 Capitol Mall Suite 5-100
Sacramento, California 95814

Agenda Item C.1

Supplemental NMFS Report 2

June 2020

June 9, 2020

Phil Anderson, Chairman
Pacific Fisheries management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

RE: April inseason non-trawl RCA boundary change recommendations

Dear Mr. Anderson,

This letter is in response to the Council's inseason transmittal letter dated April 16, 2020. The Council recommended increases to a number of groundfish trip limits, as well as changes to the non-trawl rockfish conservation area (RCA) boundaries to increase access to groundfish stocks (Table 1). After extensive review, we implemented all of the Council's requested trip limit increases, but did not implement the Council's requested changes to the non-trawl RCA boundaries in this inseason. .

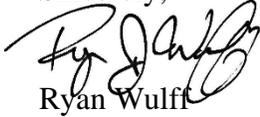
There is considerable uncertainty in the expected harvest of both target and non-target species with the recommended adjustments to non-trawl RCA boundaries, as well as uncertainty about the potential habitat impacts of allowing groundfish vessels to use bottom contact non-trawl gear in areas that have not been fished for close to 20 years. Re-opening areas that had been closed to fixed gear fishing since 2003 may have an adverse effect to groundfish essential fish habitat (EFH). More uncertainty is added due to unprecedented disruptions in commercial markets and recreational charter fishing closures to comply with social distancing orders. Effort is low and less predictable, and observer coverage during at least part of the year may be lower than normal. We acknowledge the Council's recommended adjustments to the non-trawl RCA boundaries to maximize the benefits of increased trip limits. However, before NMFS can implement those recommendations inseason as a routine management measure, more information is needed. The Pacific Coast Groundfish Fishery Management Plan requires that in order to modify a routine management measure via a single Council meeting process, the modification must have the same purpose as the original measure and the impacts of the modification must be within the scope of the impacts analyzed for the original management measure.

We are prepared to discuss this at the upcoming June meeting, and will advise the Council to identify where relevant changes of this scope have been analyzed in previously approved actions, confirm that the scope of the potential impacts have been identified and disclosed, and explain how the recommended adjustments to the boundaries are consistent with those analyses. For example, relevant analyses may be included in the biennial harvest specifications, EFH 5-year review, analysis for Amendment 28, etc. If applicable, the prior analyses may be incorporated by reference to demonstrate that the impacts of the non-trawl RCA adjustments have been previously described and disclosed. We may then be able to implement the changes as part of an inseason action after the June or September Council meetings.



If there are any questions regarding implementation of the April inseason recommendations, please contact Aja Szumylo at Aja.Szumylo@noaa.gov.

Sincerely,



Ryan Wulff
Assistant Regional Administrator

Table 1 -- Non-trawl RCA boundary modifications south of 46°16' N. lat.

Area	Boundary
46°16' N. lat. - 42°00' N. lat.	Old: "30 fm (55 m) line - 100 fm (183 m) line"
	New: "40 fm (73 m) line - 100 fm (183 m) line"
42°00' N. lat. - 40°10' N. lat.	Old: "30 fm (55 m) line - 100 fm (183 m) line"
	New: "40 fm (73 m) line - 100 fm (183 m) line"
40°10' N. lat. - 38°57.50' N. lat.	Old: "40 fm (73 m) line - 125 fm (229 m) line"
	New: "40 fm (73 m) line - 100 fm (183 m) line"
38°57.50' N. lat. - 34°27' N. lat.	Old: "40 fm (73 m) line - 125 fm (229 m) line"
	New: "50 fm (91 m) line - 100 fm (183 m) line"
South of 34°27' N. lat.	Old: "75 fm (137 m) line - 150 fm (274 m) line"
	New: "75 fm (137 m) line - 100 fm (183 m) line"

