

C1 Central Gulf of Alaska Rockfish Program Adjustments

The SSC received a presentation on the Draft for Final Review of the Environmental Assessment (EA) from Sarah Rheinsmith (NPFMC) and Jon McCracken (NPFMC). Public testimony was received by Julie Bonney (Alaska Groundfish Data Bank; written and oral), Jon Warrenchuck (Oceana; oral), and Marissa Wilson (Alaska Marine Conservation Council; written). The purpose of this proposed action is to respond to changes in the fishery with measures that increase flexibility and efficiency for rockfish program participants and better enable participants to fully harvest the TACs for the primary rockfish species and land in Kodiak, as intended. The alternatives considered included an option for an earlier season start as well as several options related to relaxing use and processing caps.

SSC review of the RIR in April 2022 recommended that analysts consider whether additional environmental analysis beyond a Categorical Exclusion was needed. In response, analysts concluded an EA was necessary and **this review only encompasses the EA because the SSC in April found the RIR sufficient for Council decision making at final action, subject to minor modifications. As discussed in detail below, the SSC also finds the EA to be sufficient for Council decision making.**

During the SSC review in April 2022, most SSC recommendations were specific to the RIR and thus are not considered in this review. However, the analysts addressed two SSC recommendations from the RIR review that are pertinent to the EA:

1. *The SSC requested the analysts draw more extensively from monthly PSC data, in particular for the April 2021 fishery, to demonstrate the effect of the earlier start date on Chinook salmon and halibut.* The SSC appreciates the additional information provided in the analysis on monthly PSC (Tables 3-4 and 3-5) and notes the EA discussion on PSC relative to historical monthly patterns of catch, PSC limits, and monitoring requirements.
2. *The SSC recommended that the analysts consult with stock assessment authors of dusky and northern rockfish and Pacific ocean perch, and/or other relevant experts to consider the timing of parturition and exploitation relative to Alternative 2 in making a final determination about the appropriate analytic document.* The SSC appreciates the analysts reaching out to stock assessment authors and incorporating their expertise in the presentation.

Related to point 2, above, Alternative 2, Option 1, would amend the Rockfish Program (RP) start date to April 1st, which is the same date used for the emergency rule in 2021. The EA indicates that during the 2021 season, CVs utilized the flexibility of an April 1 start date: two vessels participated in the first and second week of April followed by nine and ten vessels during the third and fourth weeks of April, respectively. No CPs participated in April 2021. The key question that the EA and staff presentation addressed was whether additional effort in April is anticipated to sufficiently increase the harvest of primary rockfish species such that it significantly interacts with the stock dynamics and biology for these species. Principally, fishing during the months of April and May likely overlaps with the parturition period for the primary rockfish species.

Council staff presented information not in the EA on monthly removals of POP and noted that exploitation has historically been distributed over the fishing season. Staff also noted that, based on industry input, the flexibility afforded by the emergency rule allowed some harvest that would have otherwise occurred in May to be shifted to April. For POP, the fishery mortality projections assume roughly a third of the mortality has occurred prior to May 1, which is likely conservative relative to observed removals during the first part of the year and the timing of parturition (larval release). The utilization of TAC for northern and dusky rockfish has been low in recent years, anecdotally due to the species being difficult to catch and tradeoffs with more valuable species.

The SSC also notes that total catch for primary rockfish species remains constrained by harvest limits set through the annual harvest specification process and RP regulations governing quota allocations, and these have been evaluated in previous NEPA analyses.

Therefore, the SSC concurs with the conclusion of the EA that the Alternatives being considered are likely to have minimal effects on the groundfish species caught. **However, the SSC recommends that the Secretarial review version of the EA clearly indicate that market conditions and/or fishing behavior could change from those observed in 2021 given the unusual events of COVID-19 and the loss of flatfish markets. Changes in fishing patterns are naturally expected to occur over time as well and the SSC recommends harvest patterns for primary rockfish species continue to be monitored and, if important changes occur, that they be considered in future assessments and/or the five-year RP review, as appropriate.** The SSC also encourages cooperative research on the reproductive biology of primary rockfish species, including the collection of biological information that may inform the assessment of maturity and the timing of parturition.

The SSC also recommends that the information provided in the staff presentation on historical monthly harvest of POP, primary rockfish species biology, and stock author input be incorporated into the Secretarial review version of the EA.

The EA also identified that PSC, habitat, and social and economic resources could potentially be impacted by the action. **The SSC concurs with the EA conclusion that these resources would likely not be significantly affected by the action.** Based on the information provided in the EA, the additional month and changes to use caps under Alternative 2 are not anticipated to change the amount or seasonal distribution of PSC by large amounts. The analysis also notes that full observer coverage is required on RP trips and that PSC amounts are closely monitored given the regulatory limits in place. The EA notes that moving the fishery start date to April is not anticipated to result in significant changes to habitat impacts. Public testimony indicated that the additional month is unlikely to result in large changes in the spatial footprint of the fishery and fishing intensity would likely remain distributed across the fishing season. **The SSC recommends that these impacts continue to be monitored, and that important changes be included in the 5-year RP Review and/or next EFH review cycle.**