

GULF OF ALASKA GROUND FISH
PAAG MEETING REPORT

January 4-5, 1988

The Plan Amendment Advisory Group (PAAG) for the Gulf of Alaska Groundfish FMP and Bering Sea/Aleutian Islands Groundfish FMP held a joint meeting during January 4-5, 1988 in Seattle, to review 1988 groundfish amendment proposals and prepare recommendations to the Council. PAAG members in attendance were Henry Mitchell, Larry Cotter (for John Winther), William Clark, Rich Marasco, Loh-lee Low, Terry Quinn, Terry Baker, Al Burch, Bob Alverson, John Woodruff, and Jim Balsiger. Henry Mitchell served as chairman. Council member John Peterson was also present. Support staff were Steve Davis and Denby Lloyd (NPFMC), and Dale Evans (NMFS). There were 23 members of the public in attendance.

The PAAG reviewed 17 amendment proposals submitted for the Gulf of Alaska FMP and 26 proposals for the Bering Sea/Aleutian Islands FMP. The PAAG strongly recommends that proposers improve their proposals in the future by more clearly stating the problem and providing more background information/analysis. The PAAG found it difficult to review and rank many of this year's proposals due to unclear problem statements and inadequate supporting information.

The PAAG reviewed each proposal and plan team evaluation, following the guidelines in the Council's Policy on Annual Amendment Cycles. Proposals that would require a plan amendment were prioritized high or low. Proposals identified as being of high priority were subsequently discussed with regard to time and analysis requirements. Following this discussion the PAAG developed their current or extended cycle recommendations. Proposals identified as not requiring plan amendment were dropped from further consideration by the PAAG. A summary of the PAAG's high priority amendment recommendations are provided in Table 1. A presentation of all the PAAG's recommendations and findings are in Table 2. Additional comments on several proposals are also provided.

Table 1.--1988 PAAG High Priority Amendment Recommendations for the Gulf of Alaska Groundfish FMP.

<u>Proposal Number</u>	<u>Title</u>	<u>Priority</u>	<u>Cycle</u>
GOA (BSAI)			
1	Sablefish season	high	current
11 (11)	Permit/reporting loophole	high	current
4,5,6	Rockfish management	high	extended
14 (17)	Directed fishing definition	high	extended

Table 2.--1988 PAAG Recommendations and Findings for the Gulf of Alaska.

Proposals unique to the GOA

<u>Proposal Number</u>	<u>Title</u>	<u>Priority</u>	<u>Cycle</u>	<u>Other</u>
AP-SSC 1	Sablefish season	high	current	Add two alternatives
2	Trawl trip limits	low		
4,5,6	Rockfish management	high	extended	Add 4th alternative
7	Cod allocation to longline gear	low		
10	Incorporate non-species specific reserve system into FMP	low		

Proposals submitted to both the GOA and BS/AI FMPs

<u>Proposal Number</u>	<u>Title</u>	<u>Priority</u>	<u>Cycle</u>	<u>Other</u>
<u>GOA (BSAI)</u>				
3	(8) Pollock mesh size	high		S-K Project
8	(10) Reporting system			Appoint workgroup
9	(12) DAP advisory group			No amendment necessary
11	(11) Permit/reporting loophole	high	current	
12	(15) RAD deadline	high ^{1/}	current	Not necessary in GOA
13	(16) Allow non-retainable PSC	low ^{1/}		Not necessary in GOA
14	(17) Directed fishing def.	high	extended	
15	(18) DAP to JVP roll-over	low		
16	(23) Support industry pref.	high ^{2/}		Permit condition
17	(25) Multispecies longline FMP	high		Bycatch Committee/FOG

^{1/} Action required only for the BS/AI FMP.

^{2/} High priority only if determined legal under MFCMA.

M E M O R A N D U M

TO: Council, SSC, and AP members

FROM: Jim H. Branson
Executive Director

DATE: January 13, 1988

SUBJECT: Gulf of Alaska Groundfish FMP

ACTION REQUIRED

- ✓ A. Consider emergency action to delay sablefish season to coincide with halibut fishery in 1988.
- ✓ B. Review and decide which proposals to include in Amendment 17.
- C. Consider limitations on bycatch of sablefish prior to the opening of the directed longline season.

BACKGROUND

A. Emergency action request.

In October the Interim Action Committee teleconferenced to discuss an emergency action request to delay the April 1 opening of the longline and pot sablefish fishery to coincide with the first opening of the halibut fishery (usually in May). The justification for the request is that a conservation problem exists because of the high incidental catch of halibut in the sablefish fishery when it opens in April. The Committee decided to put this proposal on this meeting's agenda for a decision. Additional background information and estimates of halibut savings were presented to you at the December meeting and extra copies are available upon request.

B. Review and decide which proposals to include in Amendment 17.

In May 1987 the Council adopted a revised cycle for amending the groundfish FMPs that provides specific deadlines for proposals, preparation of amendments, and final decisions. The cycle began in September with a call for proposals.

Scheduled for this meeting is a Council review of the 1988 proposal package and selection of proposals to be included in this year's (i.e., current) or extended amendment cycles. The Gulf of Alaska and Bering Sea/Aleutian Islands groundfish plan teams met jointly on November 17 to review the proposal and prioritize those falling within their purview. Their review and comments were sent to you in the December 23 Council mailing. The Plan Amendment Advisory Group (PAAG) for the Gulf of Alaska Groundfish FMP and Bering Sea/Aleutian Islands Groundfish FMP met jointly on January 4-5 to review the proposals and plan team comments and develop their recommendations. A report from the PAAG

is provided as item D-1(a). The PAAG is recommending that two proposals be developed further on the current cycle as Amendment 17 (sablefish season, permit/reporting loophole) and four proposals (three rockfish management options, directed fishing definition) be placed on an extended cycle.

Proposals selected by the Council will be developed by the plan team as amendments. Under the current cycle a draft amendment with the accompanying environmental and economic analysis will be available for Council and public review at the April Council meeting. The Council is scheduled to take final action at its June meeting with Secretarial implementation scheduled for November.

Proposals placed on an extended cycle will be similarly prepared as amendments and presented to the Council by the April 1989 meeting or earlier if possible. Status reports on these amendments will be made to the Council during the year.

C. Retention of sablefish bycatch prior to opening of the directed longline season.

Another problem with the "directed fishing" definition has recently come to our attention. Apparently, under current regulations longline and pot fishermen targeting on groundfish other than sablefish can retain their bycatch of sablefish as long as it comprises 20% or less of the total groundfish catch on board the vessel. The directed sablefish fishery utilizing longline and pot gear currently begins on April 1. Catches of sablefish in excess of 20% are considered "directed" or targeted and retention is not allowed until after the opening of the sablefish longline/pot season.

NMFS has requested that the Council discuss this problem at this meeting and consider several solutions ranging from maintaining the status quo, to plan amendment, or adoption of an emergency rule. Representatives of NMFS and NOAA-General Counsel are prepared to review this problem further and present possible courses of action.

PAAG Comments on Specific GOA Proposals

Proposal No.

GOA (BSAI)

- 1 Sablefish season - recommend two additional alternatives.
Alternative 5 - Prohibit sablefish fishing shallower than 500 mt.
Alternative 6 - Change the April opening date to July 1.
- 3 (8) Pollock mesh size - The PAAG recognizes the importance of examining this issue in the future but notes that gear selectivity experiments will be very expensive. Mesh size is an issue worthy of examination in both a biological and economic context. The PAAG recommends that AFDF, NWAFC, and Council staff meet to develop an S-K proposal to examine this issue. Recommend that the September meeting serve as a deadline for a report of a research plan to the Council.
- 4,5,6 Rockfish management - This amendment topic presents two issues: (1) the question of state versus federal management; and (2) gear allocation. Both of these issues will require extensive analysis and therefore given its high priority should be placed on the extended cycle. The PAAG notes that ADF&G is seeking funding to support a study of rockfish management alternatives. Results from this study may prove useful in any future amendment.
- PAAG recommends the addition of a fourth alternative: Defer shelf demersal rockfish management to the state (i.e., clarify the ambiguity in the current role of ADFG and the Council).
- 15 (18) Allow transfer of unused DAP to JVP in the following year - The PAAG recognizes that inflated estimates of DAP reduces opportunities by joint ventures and that this is an important issue. The PAAG notes that improvements to the NMFS industry survey can be made without plan amendment. This proposal was given a low priority only because of NMFS's quarterly assessment and release plan for 1988.
- 16 (23) Support industry FMP - There is some question as to whether this proposal is legal under the MFCMA. If it is determined legal, the PAAG recommends a high priority ranking. An existing alternative to a plan amendment is that the Council consider using its permit authority to recommend a reduction in the number of foreign support vessels receiving permits to operate in the EEZ. Reducing the number of vessels available to support joint venture and foreign fishing operations might lead to increased use of shoreside support services.
- 17 (25) Multispecies longline FMP - The PAAG gives this proposal a high priority ranking. However, given ongoing work by the Council's Bycatch and Future of Groundfish committee's, and that both of these groups will be considering similar concepts, the PAAG recommends that this proposal be developed further outside the formal cycle process.



Pelican Seafoods Inc.

P.O. Box 601
Pelican, Alaska 99832-0601 U.S.A.
(907) 735-2204 or 735-2205
WHX 958 - Channel 16 VHF
4125 0 SSB

January 13, 1988

Mr. Jim H. Branson
Executive Director
North Pacific Fishery Mgmt. Council
P. O. Box 103136
Anchorage, Alaska 99510

Dear Jim:

per the North Pacific Fisheries Management Council newsletter dated December 31, 1987, under groundfish issues on the first page, I note that the council has interest in and is considering a delay in the opening date for the longline sablefish season in the Gulf of Alaska. The indication in the newsletter was to have the sablefish and halibut fishery dates coincide.

I would propose to the council that a change in the opening date in the Gulf of Alaska sablefish longline fishery is needed so as to eliminate the chaotic process of attempting to handle two different major poundage fisheries at the processing plants during the same fishing period. The two fisheries presently conflicting are of course Southeast area sac-roe herring and the Gulf of Alaska sablefish fishery. My feelings of having coinciding dates for the halibut and sablefish fishery aren't quite as strong here but again this is similar to adding insult to injury because once again we would be faced with one major poundage fishery held at the same time of another.

In regard to recommending time frames for the fisheries, I would suggest that the sablefish fishery would be best scheduled in late mid-May. The May 17th to May 19th time frame would allow adequate plant processing and boat re-gearing time between the sablefish and proposed halibut fishing periods. Doing so would resolve the delayed unloading problems that the sablefish fishermen face in attempting to unload their product at the processing plants and return to their gear still fishing when the processing plants are trying to run both roe herring and sablefish through the plant during the same periods. Also a change from April 1st of the sablefish fishing period to a later date will be more likely to provide for weather being increasingly favorable to safer fishing conditions resulting in hopefully less loss of lives and injury to the boat owners and their crews when fishing outside waters. Problems faced by the processor are quite naturally lower quality seafood when we

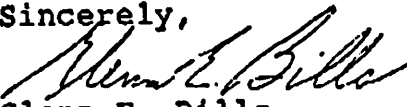
Mr. Jim H. Branson
Page Two
January 13, 1988

again are forced to handle two high poundage production products simultaneously. This theory of course extends to the past Kah-Shakes/Sitka roe herring and the April 1st black cod fishery and to some extent a simultaneous black cod/halibut fishery if they were to be so scheduled. Additional problems we face might be having to hire out-of-state floating processors to process the roe herring we purchase while our own land based plants are processing full production with black cod deliveries.

This collision of simultaneous high production fisheries (i.e. roe herring during black cod or proposed black cod during halibut) is a reckless, irrational, and preconceived destitute fisheries plan that can quite easily and responsibly be rescheduled for after the middle of May as I mentioned previously in this letter. This also would enable the processing plants to make better utilization of employees. Especially our Alaskan resident employees because of spreading the varied specie processing work over a wider period of presently unfilled time than having both fisheries commence approximately April 1st with nothing for those employees to do prior to salmon season in late June with exception to one or two halibut openings in May and possibly June.

I bring this information to your attention solely to help make all more responsible when establishing our fisheries programs. I apologize for not being able to attend the Management Council meetings on January 20th to present and discuss these views in person. I'm afraid our Southeast crab fishery must take precedence. If I may be of any further assistance on these issues please feel free to contact me.

Sincerely,


Glenn E. Bills
Resident Manager

cc: Robert W. McVey
Andrew Kalinowski
Don W. Collinsworth

A PROPOSAL FOR AN EMERGENCY REGULATION TO CHANGE THE SABLEFISH LONGLINE
SEASON.

This proposal for an emergency request to change the sablefish season is my own. I am unpaid and do not represent any individual group. The proposal is now supported by the Kodiak Longliners Association and members of the Sitka and Petersburg longline fleet.

Problem

The incidental catch of halibut during the April sablefish fishery is much larger than previously thought or estimated. An October 6, 1987 NPFMC document estimated the incidental catch of halibut during the sablefish season at 1.2% of the total sablefish catch--192 mt of halibut; less than half of a million pounds (423,168 lbs.).

The truth is there are no data available to estimate accurately the incidental catch of halibut in April except the data I collected. It is the only pertinent data available. ADF&G has the next best data.

Month/Year ^{1/}	Halibut Incidence ^{1/} (no. per m/t)	DAP Fishery ^{2/} (ave. size)
Sept-March (86-87)	20.6	42 lbs.

^{1/} ADF&G Newsrelease 5/27/87

^{2/} From IPHC 11/5/87

My original survey and estimate was that between 10,500,000 lbs. and 36,000,000 lbs. of halibut were caught incidental to the sablefish longline fishery. I have modified my equation to incorporate the new ADF&G data and NMFS fishery statistics.

42 lbs/skate $\frac{1}{}$ x 50 skates/day x 730 boats $\frac{2}{}$ x 10 days $\frac{3}{}$ = 15,330,000 lbs
or 365,000 halibut

365,000 halibut/19,118 mt (total catch of sablefish in mt) = 19.09 halibut/mt
sablefish

1/ halibut/skate

2/ actual number of boats

3/ 1805 fish tickets/952 boats = 1.9 trips/boat

1 trip = 5 days

My estimate of 15.3 million lbs. is less than the ADF&G estimate of bycatch. In other words if you apply the ADF&G estimate the incidental catch of halibut is greater than my estimate of 15.3 million lbs.

Gentlemen the catch is large. The first 8 boats interviewed had peak catches in the 20,000 lb/day category. There were others (4) with catches as large that did not want their data published.

There are 3 reasons for the high catch and kill of halibut.

- 1) Most importantly, halibut and sablefish are found co-mingling through April. As water temperatures warm the halibut migrate into shallower waters.
- 2) The fleet is a relatively young fleet and the season is relatively short; less than 2 deliveries per boat per area. Therefore little prospecting was done, the 250 - 300 Fathom edge was crowded and gear was dumped both shallower and deeper.
- 3) The weather contributed greatly to the mortality of halibut caught as I will explain.

The only difference in all the calculations are mortality estimates. IPHC uses 25% as their mortality estimate. During the period of time "J" hooks were used halibut mortality was assumed to be 50% because of how the hook caught the fish. With the advent of circle hooks virtually all halibut are caught in the mouth. Therefore, 25% was used as an arbitrary number, because all mortality was assumed associated with releasing the fish. However, it can be argued that the circle hook is hard to quickly extract from a halibut and mortality results from horning off the halibut at the roller (loss of mouth parts) and/or gaffing halibut at the roller.

In the sablefish fishery hooks are spaced 40-42" apart. Gangions are shorter than 10". Two things happen in April to compound the mortality estimates, both are related to weather.

First, NWS estimates a storm in April with heavy seas every 3 days. That means for a large portion of the fleet and in some cases all the fleet (in 50-70 knot gales) gear is not overhauled everyday. Most of the halibut we caught were dead or in poor condition at those times. Second, constant rough weather means you can't stop the gurdy to unhook each halibut because of (1) time and (2) the fact that you drift off the gear. Therefore you expedite the release of halibut and usually inflict a wound. For those reasons I suggest a range of 25-50% is more accurate. If it were not for the weather and the number of halibut that must be handled, the mortality might be around 25%.

Halibut Savings

This is the hard question. There will always be some killed. The question has 2 parts:

- (1) What can be done to reduce the incidental catch and
- (2) What halibut savings can be realized?

Seasons

Almost all the literature I could find is old, but does support at least a May 1 opener or later: because of the following reasons. (1) sablefish flesh has not recovered from the Jan-March spawning condition totally (2) and halibut seasonally migrate shallower from the 250 F depths where they co-mingle with sablefish in the early spring.

The May 1 opener was first placed into effect as a regulation in 1947 for 3 reasons; "better sablefish quality, more protection of late spawners and to reduce the incidental catch of halibut". Kollen went on to report that the incidental catch of halibut did decline significantly (Kollen, 1949). In 1972 more liberal seasons were established, followed in 1976 by a year round opening for 1977 (by emergency order). "In order to allow U.S. fishermen to harvest sablefish off the coast of Alaska (S.E.) in competition with foreign effort".

At that time the sablefish longliner fleet was small (37 boats); 5% of today's fleet. In 1976 the U.S. sablefish longline harvest was less than 1½ million lbs. or 3% of last years (1987) catch. Shortly thereafter an April 1 opener was established for all outside water in the Gulf for the longline fishery. Bycatch was not considered a problem because of the relatively small fleet and the foreign observer data.

Savings and Mortality

IPHC estimated halibut savings in their Nov. 5, 87 letter to the NPFMC. Their logic was good but if you reexamine two of their figures the calculated savings of halibut could be 4.9 million pounds (2,223 mt).

The catch they assumed would have been caught prior to May 1 did not include unused quota which was caught in September but would have been caught in April. That number should have been 12,926 mt instead of 11,010 mt. Their percentage mortality estimate for April is low and should be viewed as a range. If you use a mortality factor range of 25-50% (untended gear and rough weather handling) for the April and May estimates there could be a savings of up to 2,223 mt. (The calculations are attached.)

But the actual amount of savings is not the most important point; what is important is that a significant savings could be realized by delaying the opening to a more historic and traditional and appropriate date...May 1 or later when the halibut and sablefish stocks are more separated, sablefish are more recovered from spawning and weather related halibut mortalities are reduced and/or minimized.

The issue is strictly a conservation issue; an emergency conservation issue. If you fail to act the consequences are grave...(1) more halibut will be taken and killed in the sablefish longline fishery than are legally allowed in the gulf trawl fishery and (2) almost 5 million pounds of halibut killed must be wasted and subtracted from the gulf wide halibut equations. A mortality heretofore not accounted for.

It is an emergency because the fishery is in a derby phase where the number of participants has increased 50-100% in each area in each of the last 3 years. This year (1988) the price will be good, the markets strong and the stocks healthy; a tremendous U.S. effort will occur. If left alone possibly more halibut will be caught and killed than even the estimates suggest.

The change in season will not affect the ability of the U.S. fleet to again harvest the quota. It doesn't cause a major controversy with the early salmon fisheries. The industry will have to work around annoying scheduling problems--because without strict conservation measures we could be biting the hand that feeds us.

Some may testify their halibut catch wasn't large. Others will not testify because it really opens a can of worms. Others will say a delay benefits those Sitka herring seiners who would otherwise miss the sablefish opener more than half the time.

The longtime professional longliners probably do not catch as many halibut as the new entrants. But they are in a minority as the demographics of the fleet have dramatically changed. Also unless your crew pays attention to the catch, one halibut/skate will go unnoticed.

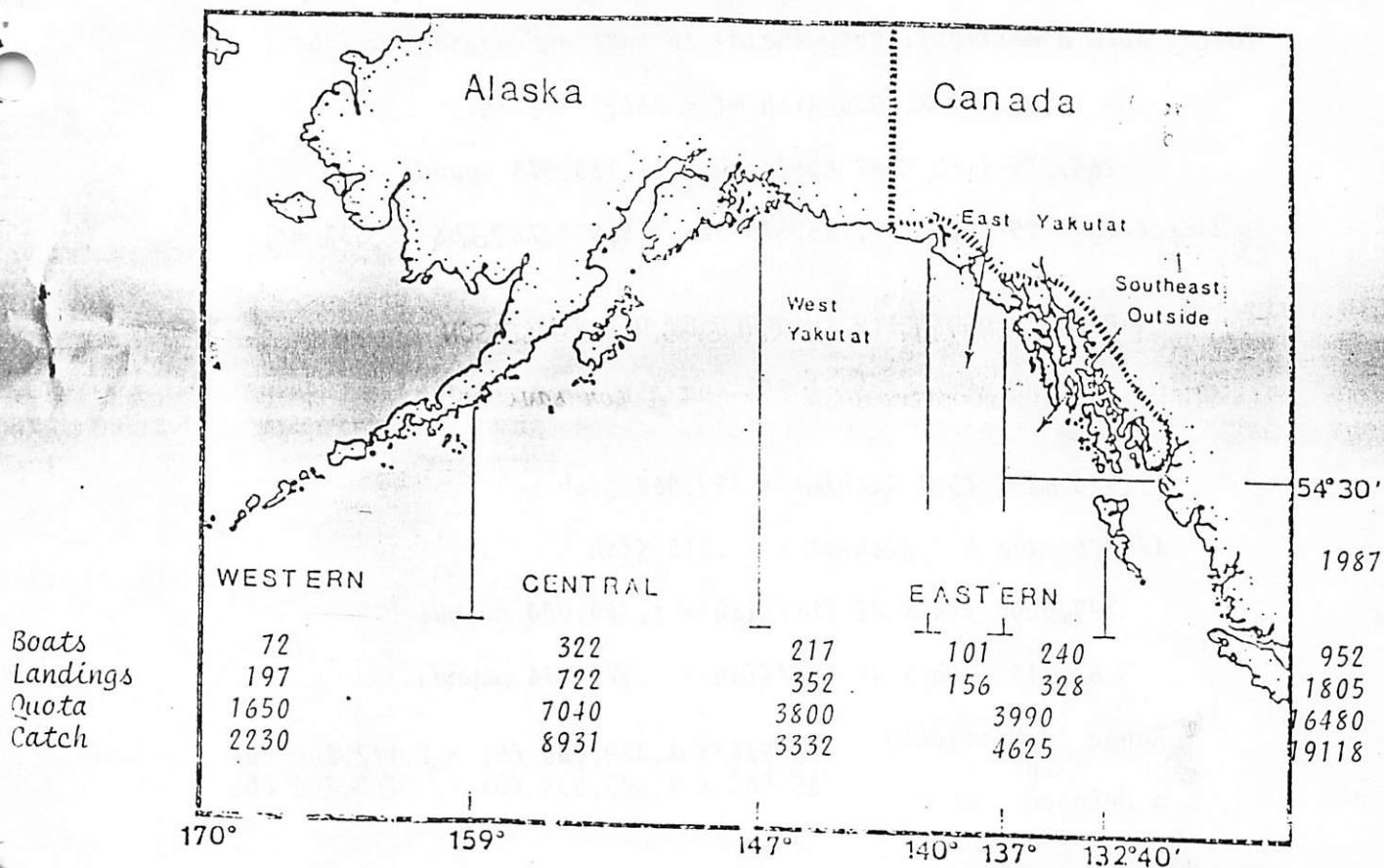
Moderndaylongliners have lived a charmed life with their discarded bycatches ignored and unreported. Not many want to see that changed and I believe are reluctant to confront it. This angers me because of what I have seen and what has been learned through my surveys. The point is 10 years ago the U.S. sablefish fishery was at the point the U.S. cod fishery is today. And ADF&G estimates for every pound of cod you catch you also catch a pound of halibut. My point is this;

1. Act this year to reduce the take of halibut in the sablefish fishery.
2. Act this year to gather data to deal with the horrible waste of a longline fishery that catches three valuable species and can only keep one at a time.

About the Sitka herring conflict. About 3% of the U.S. longline fleet fishes the Sitka herring fishery and would be able to participate 100% of the time in the sablefish opening instead of the current situation when they can only make it less than half the time. A delay does advantage this group...but it is an advantage by default rather than by design. It disappoints me that anyone would use that as an argument to speak against a conservation emergency.

I along with the longliners from Kodiak and members of the Sitka and Petersburg longline fleet, including Gordon Jensen, urge you to act now to delay the opening until May 1 or later.

Registration, landings, catch (mt) and quota (mt) for the U.S. sablefish longline fishery in the Gulf of Alaska. 1987.



Number of U.S. Sablefish longline boats making landing in 1967, 1985, 1986 and 1987.

AREA	1967	1985	1986	1987
SE & E/Y	-	115	243	353
W/Y	-	80	131	216
CENTRAL	-	121	218	391
WESTERN	-	53	63	94
TOTALS	37	369	655	1054

From NMFS January 1988.

STATUS QUO BYCATCH MORTALITY

(Using ADFG domestic fishery incidence rate and average weights)

$$12,926 \text{ mt} \times 20.6 \text{ fish/mt} = 266,275 \text{ fish}$$

$$266,275 \text{ fish} \times 42 \text{ lbs/fish} = 11,183,575 \text{ pounds}$$

$$\text{Mortality} = 25-50\% \times 11,183,575 \text{ obs} = 5,591,787 \text{ lbs (2,537 mt)}$$

BYCATCH MORTALITY INCURRED BY DELAYING SEASON

(Using IPHC estimates of 25% and 75% for savings)

$$12,926 \text{ mt} \times 15.4 \text{ fish/mt} = 199,060 \text{ fish}$$

$$12,926 \text{ mt} \times 5.2 \text{ fish/mt} = 67,215 \text{ fish}$$

$$199,060 \text{ fish} \times 42 \text{ lbs/fish} = 8,469,000 \text{ pounds}$$

$$67,215 \text{ fish} \times 42 \text{ lbs/fish} = 2,823,038 \text{ pounds}$$

Range of Mortality	$25-50\% \times 8,469,000 \text{ lbs} = 2,117,250 \text{ lbs}$
in	$25-50\% \times 2,823,038 \text{ lbs} = 705,750 \text{ lbs}$
a delayed season	

CALCULATION OF ESTIMATED SAVINGS

Estimated savings = Status Quo - Mortality from Delayed Season

$$\text{low} = 5,591,787 \text{ lbs} - 2,117,038 \text{ lbs} = 3,474,749 \text{ pounds}$$

$$\text{high} = 5,591,787 \text{ lbs} - 705,750 \text{ lbs} = 4,886,037 \text{ lbs}$$

The estimated range of savings would be between 3.5 and 4.9 million pounds.