



C5 Bering Sea Greenland Turbot Longline Pots

April 2023 Council Meeting

Action Memo

Council Staff: Sam Cunningham
Other Presenters: Dr. Mason Smith (NMFS AKRO SF)
Action Required: 1. Final Review of EA/RIR
2. Select Preferred Alternative

Background

The Council will consider final action on alternatives that could authorize longline pots as a legal gear in the directed fishery for Bering Sea (BS) Greenland turbot. The Council's stated purpose and need for action is to address the killer whale depredation on hook-and-line (HAL) gear that caused the non-trawl sector of the BS Greenland turbot fishery to stop targeting turbot from 2021 to the present. Stated objectives include "allow[ing] the fishery to resume" and minimizing disruption to "historic and current participants" in the HAL CP and Amendment 80 (non-pollock trawl) sectors.

The alternatives before the Council include (Alt. 1) No Action; (Alt. 2) allow longline pot gear in the turbot fishery for any non-trawl vessel with an LLP license that allows it to directed fish for BS Greenland turbot; and (Alt. 3) allow longline pot gear in the turbot fishery *only* for vessels that are – by virtue of their LLP license – part of the "HAL CP sector". In this context, the HAL CP sector is based on the regulatory definition: the set of LLP licenses (and associated vessels) that are endorsed to fish BSAI Pacific cod as a CP using HAL gear. The alternatives include an Option that could be selected alongside either Alt. 2 or Alt. 3: exempt pots used to fish for BS Greenland turbot from the 9-inch maximum tunnel opening restriction.

The Council most recently reviewed this issue in October 2022. At that meeting, the Council amended its purpose and need with the statement about disruption to historical and current participants, added Alternative 3, and designated 'Alternative 3 plus the pot-tunnel Option' as its preliminary preferred alternative.

The BS Greenland turbot fishery is historically prosecuted by both non-trawl (HAL) gear trawl gear. The non-trawl component has mostly – though not exclusively – been harvested by members of the "HAL CP sector". The trawl component has been harvested by vessels that primarily prosecute a combination of turbot, arrowtooth, and Kamchatka flounder during the time and place this fishery occurs. All participants share an interest in having the fishery open to directed fishing so that the harvest opportunity justifies the effort to operate in the western Bering Sea and so turbot can be retained in amounts above the maximum retainable amount (MRA) limits for non-target catch. With a relatively low non-CDQ TAC that is traditionally prosecuted by multiple gear sectors, NMFS's ability to keep the directed fishery open has been challenging under certain circumstances that may vary from one year to another. The BS non-CDQ initial TAC declined from 4,709 mt in 2022 to 2,837 mt in 2023 (40% reduction).

The EA/RIR assists the public in weighing the potential benefit of reviving the non-trawl component of the turbot fishery (either Alt. 2 or Alt. 3) with respect to other indirect effects that are not fully known prior to this gear being implemented for the first time. Those factors include the profile of non-target

species that might be encountered with a different gear, the frequency of interactions with marine mammals and seabirds, any possibility of spatial/temporal overlap or conflict between gear types on the fishing grounds, and potential benefits to Greenland turbot stock assessment in the medium-to-long term. For comparing the two action alternatives, the document assesses the possible and likely number of participants that would be able to participate in a longline pot fishery under Alt. 2 but not under Alt. 3, and discusses factors that might make a return to the “recent” size of the fishery (i.e., 3-5 non-trawl vessels from the HAL CP sector from 2013-2020) more or less sensitive to additional entry by other non-trawl participants. The document discusses factors that make the fishery more or less manageable (inseason) under the current TAC condition, factors that might make licensed participants interested in the BS Greenland turbot fishery at the present moment (in the context of other fishery statuses), and how those considerations are reflected in the Council’s purpose and need statement.