


MEMORANDUM

TO: Council, SSC and AP Members
FROM: Chris Oliver 
Executive Director
DATE: January 28, 2004
SUBJECT: Groundfish Management

ESTIMATED TIME 2 HOURS (for all D-1 items)
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ACTION REQUIRED

Review Exempted Fishing Permit (EFP) request for rockfish fishery

BACKGROUND

The Alaska Fishery Development Foundation has submitted a request for an EFP to investigate and develop hook-and-line techniques for the harvest of rockfish species in the Southeast Outside Area. The experiment would target species historically harvested with trawl gear in the area, including Pacific ocean perch, pelagic shelf rockfish, and other rockfish. Fishing would occur in the spring and fall of 2004 and 2005, with an expected catch of 50 mt each of POP, other rockfish, and pelagic shelf rockfish, 15 mt of RE/SR, and 2 mt each of thornyheads and DSR. Halibut and sablefish bycatch are estimated at 10 mt each, with retention covered by IFQ held by the participants. Alaska Longline Fishermen's Association (ALFA) is the primary contractor working with AFDF on this project. Mr Cip Treinen is the project manager and is available to provide additional detail to the Council.

The process for approving EFPs includes consultation with the Council prior to approval by NMFS. The AFSC has reviewed the proposed EFP and determined that it includes all necessary information upon which to judge approval of the EFP.



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
P.O. Box 21668
Juneau, Alaska 99802-1668

D-16

January 21, 2004

RECEIVED
JAN 26 2004
N.P.F.M.C.

Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, Alaska 99501

Dear Madam Chair:

We have received an application from the Alaska Fisheries Development Foundation for an Exempted Fishing Permit (EFP) to investigate and develop hook-and-line techniques for the harvest of rockfish species in the Southeast Outside District (SEO) of the Gulf of Alaska that historically had been harvested with trawl gear. Trawl gear has been prohibited in the SEO since 1998. The goal of the experiment is to improve utilization of the rockfish resources in the SEO. The project has two phases: (1) development of two hook-and-line gear types that can be effectively handled on typical Southeast Alaska fishing vessels and that successfully target rockfish species, and (2) comparative testing of the gear types developed in Phase 1.

Approximately 180 mt of groundfish is anticipated to be taken in the project with the majority of the harvest being Pacific ocean perch, pelagic shelf rockfish, and other rockfish. Ten mt each of halibut and sablefish may be taken incidentally during the project that would be retained under individual fishing quota (IFQ) available to those working on the vessel; no exemptions would be given from the IFQ regulations or undersize halibut discard requirements. Issuance of EFPs is authorized by the Fishery Management Plan for Groundfish of the Gulf of Alaska and its implementing regulations at 50 CFR part 679.6, Exempted Fisheries.


Under regulations at § 679.6, we have consulted with the Alaska Fisheries Science Center (AFSC), and have determined that the application contains all the information necessary to judge whether the proposal constitutes a valid fishing experiment appropriate for further consideration. Because the activities in Phase 2 are dependent on the results of Phase 1, the applicant would be required under the permit to provide an experimental design for Phase 2 to NMFS for approval before implementing Phase 2.

We are initiating consultation with the North Pacific Fishery Management Council (Council) by forwarding the application to you, as required by regulations. We understand that you have tentatively scheduled Council review of the attached application on the Council's February 2004 agenda in anticipation of our review and determination that the application warrants further consideration by and consultation with the Council.



Please notify Mr. Charles Treinen of the Alaska Fisheries Development Foundation of your receipt of the application and invite the applicant to appear before the Council in February in support of the application, if the applicant desires. We will publish a notice of the application in the Federal Register with a brief description of the proposal. Enclosed is a copy of EFP application, as well as the AFSC's comments on the application.

Sincerely,


For James W. Balsiger
Administrator, Alaska Region


Enclosures



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE

Alaska Fisheries Science Center
7600 Sand Point Way NE, Bldg. 4
Seattle, WA 98115

MEMORANDUM FOR: James W. Balsiger
Administrator, Alaska Region

FROM: Douglas P. DeMaster 
Science & Research Director, Alaska Region

SUBJECT: Review of Exempted Fishing Permit entitled "Southeast Alaska
Outside District Experimental Hook-and-Line Fishery for
Underutilized Rockfish Species"

Charles Treinen from Alaska Fisheries Development Foundation submitted a draft application for an Exempted Fishing Permit (EFP) to evaluate the feasibility of a hook-and-line fishery for the underutilized offshore rockfish stocks in Southeast Alaska to the Alaska Fisheries Science Center for our review. The draft was reviewed by scientists in the RACE and REFM Divisions and comments were provided to the applicant to clarify a number of our concerns with the proposed work. We have received a revised draft which addresses our concerns. The project is consistent with the original intent of the EFP process. The application addresses all the EFP information items listed in the EFP guidelines from NOAA Fisheries except for the vessel identification data. The applicant will provide those data to the Regional Office once they have selected the vessels. At this stage we recommend that Region proceed with the process for approving the application.

The project is divided into 2 phases. The first phase will focus on the development of the gears and fishing operations that are not currently used in Alaskan waters. Given that local fishers have little to no experience with the proposed gear types, the catchability of target species or potential bycatch species is unknown. So the work will involve a lot of trial and errors before they have the on-deck handling figured out and have some idea which species can be caught and at what rates. The success of the first phase will depend on the ingenuity of the vessel crew and the project person directing the effort aboard the two vessels. Considerable thought will need to be given to laying out a logical operation plan for each vessel prior to departure to ensure that all the actual operations and modifications are documented and the necessary data are recorded for later analysis. The actual comparison of the gear and potential catch rates under normal fishing conditions will be addressed in the second phase. The experimental design for the second phase will be critical to establishing the feasibility of the project. AFDF staff and ALPA personnel will need to consult with the scientists on their Steering Committee to develop a design and the data requirements that will give them the best chance of ensuring that their results provide a good test of the feasibility. The initial estimates of the quantity of fish by species to be harvested during the EFP appears to be insignificant relative to the established ABC and the annual landings. Given the initial uncertainty, you may want to make the EFP for the second phase contingent on the results of the first phase.

Cc: R. Marasco
G. Stauffer
S. Salvesson
M. Brown





Charles W. Treinen
Project Manager

January 14, 2004

Melanie Brown
National Marine Fisheries Service
PO Box 21668
709 W. 9th St., Rm. 420
Juneau, Alaska 99802-1668

Melanie:

A revised EFP application for the Southeast Hook-and-Line Rockfish project is enclosed. I hope it will adequately cover the issues of concern expressed in the communications I had with you and Gary Stauffer.

Please contact me or Marc Jones, the Executive Director of AFDF, for additional information or questions you have about the project and the attached EFP application.

Sincerely,



Chip Treinen

Exempted Fishing Permit Application

(Revised January 14, 2004)

***Southeast Alaska Outside District Experimental Hook-
and-Line Fishery for Underutilized Rockfish Species***

Submitted to:

Dr. James W. Balsiger
Regional Administrator
Alaska Region Headquarters Office
National Marine Fisheries Service
PO Box 21668
709 W. 9th St., Rm. 420
Juneau, Alaska 99802-1668
PH: (907) 586-7221
FX: (907) 586-7249
Email: alaska.webmaster@noaa.gov

Submitted by:

Alaska Fisheries Development Foundation

900 West 5th Avenue ♦ Anchorage, AK 99501
PH: (907) 276-7315 ♦ FX: (907) 271-3450
E-mail: info@afdf.org

Exempted Fisheries Permit Application

50CFR Section 696.6

Southeast Alaska Outside District Experimental Hook-and-Line Fishery for Underutilized Rockfish Species

1. **Date of Application:** December 8, 2003 (Revised January 14, 2004)

2. **Applicant:**

Alaska Fisheries Development Foundation
900 West 5th Ave.
Suite 400
Anchorage, Alaska 99501

3. **Statement of Purpose and Goal of Project:**

The Alaska Fisheries Development Foundation (AFDF) is requesting an Exempted Fisheries Permit (EFP) for an experimental hook-and-line fishery project in Southeast outside (SEO) District of the Eastern Gulf of Alaska (GOA). In keeping with National Standards set forth in the Magnusson Stevens Fishery Conservation and Management Act (MSFCMA), AFDF has chosen to fund this project as a way to achieve fuller utilization of available fishery resources in waters off of Southeast Alaska for the benefit of fishing communities and the nation as a whole. Target species for the study are Pacific Ocean perch (POP), pelagic shelf rockfish (PSR), and the other rockfish complex (OR). Total Allowable Catches (TAC) for the target species are left mostly un-harvested or artificially lowered from the Acceptable Biologic Catch (ABC) due to a combination of factors that include: the continued prohibition on use of trawl gear in the SEO District; unproven alternate catching methods for many of the underutilized rockfish species; an underdeveloped market for hook-and-line caught rockfish; Maximum Retainable Bycatch (MRB) regulations; and halibut Prohibited Species Cap (PSC) restrictions. Given a 6,640 mt combined POP, PSR, and OR complex ABC and assuming a \$0.15 to \$0.25 per pound ex-vessel price the, the potential dock-side value range between \$2.2 and \$3.6 million.

The main purpose of this project is to investigate and develop hook-and-line harvest techniques for the underutilized SEO rockfish ABCs and to determine the economic feasibility of developing a targeted hook-and-line rockfish fishery. The study is also designed purposely to determine bycatch rates of other species such as halibut, sablefish, and other rockfish assemblages when using the experimentally

developed hook-and-line gear types. Since an investigation of the catch marketability is an integral part of the experiment, the analysis will be most useful if the entire mix of fish harvested can be brought in for processing and evaluation.

AFDF's Board of Directors approved this project as a means to reach an ultimate goal of developing an economically viable fishery that can harvest available SEO District rockfish TAC in keeping with MSFCMA National Standard 1 for "achieving, on a continuous basis, Optimal Yield from each fishery". The immediate goal of the project is to develop gear and fishing techniques that can efficiently harvest POP, PSR, and OR using typical Southeast Alaska fishing vessels, crews, compatible gear and local shore-based processing facilities. The project's goals are also consistent with National Standard 8 of the MCSFMA dealing with community protection since communities of Southeast Alaska are highly dependent on fishery resources. The majority of SE Alaska based fishing vessels are less than 60 feet long with skippers, crews, and processors highly dependant on seasonal harvests of multiple species. Stated alternatively, the goal is to develop a rockfish fishery that will help sustain Southeast Alaska communities and that will more fully utilize available resources in a way that can compliment the present harvest mix of species and seasons.

An Exempted Fishery Permit (EFP) is necessary for this project's required test fishing charters because of regulatory constraints that are likely to preclude directed rockfish fishing during the available time frame. Halibut PSC closures or MRB restrictions are the primary impediments to undertaking the study without obtaining an EFP. Expected windows of opportunity for the project's required test fishing charters that match vessel, personnel, and processor availability are: Spring of 2004 prior to May 15, the fall of 2004 after Sept 1, and/or similar dates in 2005. Directed hook-and-line closures in the SEO district due to GOA-wide halibut PSCs have occurred on 4/24/99, 3/9/00, 2/26/01, and 8/1/03. Consequently, in four of the past five years, test fishing during the windows of opportunity would not have been possible without an EFP. Additionally, the other rockfish complex TAC is designated as bycatch only for the entire year and set at a level well below the ABC to allow only for the expected bycatch needs of other fisheries. The requested EFP will provide an assurance that a test fishery targeting POP, PSR, and OR complex with hook-and-line gear can be undertaken independent of PSC status and/or MRB restrictions.

4. Technical Details/Experimental Design:

The overall project is designed to be undertaken in two phases. Phase I is essentially an "engineering" test whose purpose is to develop two separate hook-and-line gear types that can be effectively handled on typical SE fishing vessels and that will successfully catch the target rockfish species. Phase I EFP requirements will be for one or two vessels and up to 21 days of charter time at sea.

Phase II of the project is set up to test the commercial feasibility of the gear developed in Phase I, the primary purpose being to gather information relating to the

economic feasibility of a hook-and-line fishery for underutilized rockfish TAC in the SEO District. Critical information required for this study is primarily related to cost accounting. And, while data relating to catch-per-unit-effort (CPUE), size, species composition, depth, etc. will be collected, statistical reliability of scientific results are by design a secondary concern. Success of the project will primarily be measured through financial parameters that transcend some of the inherent biological uncertainty. Phase II EFP(s) will be needed for two vessels for one or more three to five day commercial test fishing charters.

i. *Amounts to be taken and disposition arrangements.*

The following EFP requests reflect the estimated catch and bycatch amounts needed for proceeding with the project. Since there is no reliable data on the performance of the proposed hook-and-line gear for the target species, the amounts are based on anecdotal information and experience of local Southeast Alaska hook-and-line fishermen. In addition, the amounts requested are also based on the volume needs for economically viable processing activities. Both Phase I and Phase II will require the requested EFP amounts, however Phase II requirements may need to be modified as determined by Phase I results. Additional species specific information relating to the requests is furnished in section 9 of this application.

1. Amounts:

i)	Pacific Ocean Perch	50 mt
ii)	Other Rockfish	50 mt
iii)	Pelagic Shelf Rockfish	50 mt
iv)	Rougheye/Shortraker Assemblage	15 mt
v)	Thornyhead Rockfish	2 mt
vi)	Demersal Shelf Rockfish	2 mt
vii)	Halibut	10 mt
viii)	Sablefish	10 mt

2. Disposition Arrangements:

All rockfish and groundfish bycatch will be retained and sold to local Southeast Alaska processors to document and evaluate the potential ex-vessel value of the entire catch. Retention of the bycatch is also consistent with MSFCMA National Standard 5 that promotes efficiency in utilization of fishery resources. Ex-vessel round pound value for hook-and-line caught rockfish processed into fillets expected to be approximately \$0.15 to \$0.25, while sablefish and halibut may bring in more than \$2.00/lb. (round wt.) depending on size and

market timing. As required by the Office of NOAA Grants, all programmatic income must be used by AFDF for furtherance of the particular project from which it was derived.

ii. *Area and timing of the experiment.*

Both Phase I and Phase II of the project will take place in the SEO District of the Eastern GOA. Phase I charters are scheduled to take place in the spring prior to May 15, 2004 and/or in the fall after Sept. 1, 2004. Phase I will require one or two vessels chartered for up to 21 days. The EFP(s) will need to be issued by early April of 2004 in anticipation of spring, 2004 test charters. Two vessels for one or more three to five day charters will be needed for Phase II. Timing of the Phase II charters is dependent on Phase I timing and results. Under the expected time frame, Phase I would occur in the spring of 2004 and Phase II in the fall. Fishing is expected to take place out of Sitka, Alaska.

iii. *Vessels and gear to be used.*

1. Vessels

Vessels for testing the developed gear will be chosen through a competitive bid process with selections made based on cost per day while also accounting for technical and other factors, including vessel location and size, equipment employed, platform suitability, and experience of the crew (including crew involvement in other scientific collaborations). Additional requirements for the vessels charters may be determined when the gear is more fully researched and developed. Due to the published lead times and uncertainties of the approval process, the application is being submitted prior to identification of any particular vessel for a charter. Compliance with special EFP provisions or safety concerns will be incorporated into the vessel charter contract.

2. Gear

As approved by NOAA Grants, Phase I of this project will "Research, construct and test two or more types of semi-pelagic longline gear for underutilized species compatible with existing vessels and fishing practices in Southeast Alaska". Refinement of the gear into standardized and comparable gear units; including hook size, bait/attractant, hook spacing, length, depth, and other characteristics; will be determined in Phase I.

Presently, gear research for this project suggests two preferred options. The first, "Stone and Buoy" gear, can be characterized as a longline system fished above the bottom with alternating weights and floats so that the longline and series of hooks loops into the mid water. The following diagram shows the characteristics and operation of the gear type.

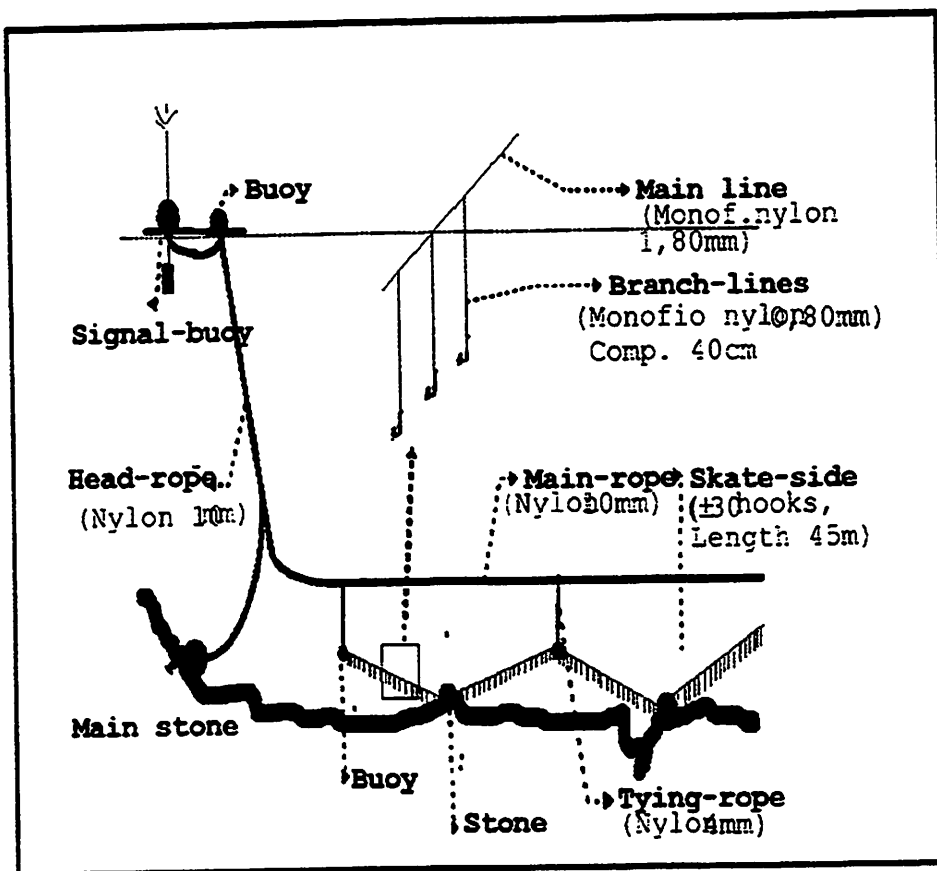


Figure 1.2. Bottom longline gear used in the Azorean surveys.

A second option deemed viable in preliminary research is known as "Shrimp Fly Troll Gear". The following diagram illustrates its characteristics and operation.

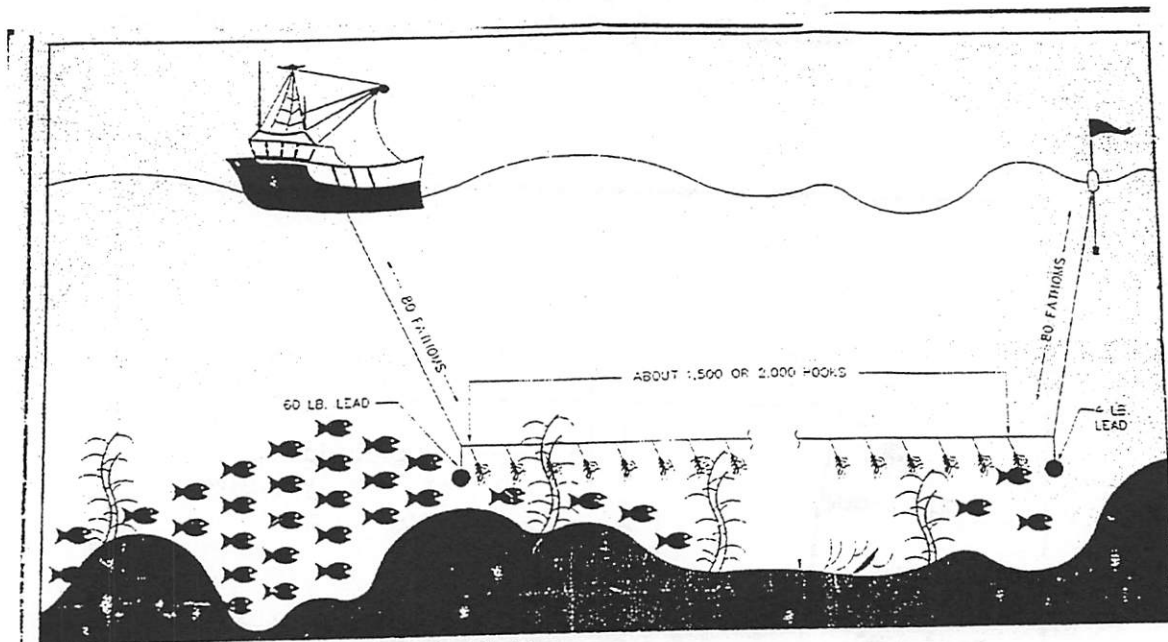


Diagram: Shrimp Fly Troll Gear

iv. *Experimental design.*

Since overall goal of this project is to determine the cost-effectiveness of targeting underutilized rockfish species with hook-and-line gear, cost accounting data is the critical information desired. Other stock and catch data will be collected, but is secondary and relevant for this study only to the extent it is related to economic feasibility.

The initial stages of Phase I entail research, development, and construction of hook-and-line gear systems that are designed to be fished at a water depth and in a manner that specifically targets the stocks of underutilized SEO rockfish as identified in section 4.i.1 above. In addition to being compatible with vessels and fishing practices common to Southeast Alaska, the gear will be set up to fish off the bottom and to use an appropriate hook sizes and bait/attractant characteristics for the targeted rockfish species.

Phase I charters for which EFP(s) are requested, are specifically set up to be "engineering" tests of the previously built for hook-and-line

gear types. Information critical for successful completion Phase I is primarily qualitative and will be gathered as a means of determining fishing characteristics, develop effective gear handling techniques, and to make appropriate modifications. Additional information available through catch and bycatch sampling will be collected on board by appropriately trained, supervised, and contracted personnel. Other quantitative information such as CPUE will be collected on board as required operational information. On board project management will be undertaken by Dan Falvey (ALFA project manager) or other ALFA contracted personnel. Additional quantitative off load information; relating to operational costs and other economic parameters such as recovery, species, and weights; will be collected in conjunction with processing of the catch by appropriately trained, supervised, and contracted shore-side personnel.

Once refined to a standardized gear unit, the Phase II testing can be undertaken. As noted in the NOAA Grant application, the intent is to "Document the fishing characteristics, bycatch and operational costs associated with each gear type." The Phase II experiment will be set up as a side by side comparative fishing test of the two separate gear types in respective configurations as determined by the Phase I work.

Phase II charters for which EFP(s) are needed will require two vessels for one or more three to five day duration to simulate standard commercial fishing trips. Relevant qualitative information to be collected on board will include gear performance and fishing characteristics. Relevant quantitative information relating to species composition, size, and CPUE based on the number of hooks deployed will also be collected through on board sampling. On board information gathering requirements will be fulfilled by appropriately trained, supervised, and contracted personnel. Off load information; relating to operational costs and other economic parameters such as recovery, species, and weights; will be collected in conjunction with processing of the catch by appropriately trained, supervised, and contracted shore-side personnel.

As stated previously, onboard program management, for both Phase I and Phase II, will be undertaken by Dan Falvey, ALFA program manager, or other trained ALFA personnel. Information related to biological and management data such as species composition, size, sex, and the condition of halibut bycatch will be gathered by appropriately supervised, trained, and qualified contract personnel. Information relating to operational parameters such as

gear design, deployment methods, fishing depth, soak time, deployment/retrieval methods, area and other conditions will be overseen by and recorded by the onboard project manager. CPUE information will be an integral part of the analysis and will be based on pounds per hook. Additional assistance in data gathering will be provided by the fishing crew as coordinated by the onboard project manager.

v. *Provisions for public release of all obtained information, and submission of interim and final reports.*

As specified in the previously referenced NOAA grant application, a project requirement is to "Summarize and distribute findings from this project to Southeast fishermen, processors, and communities". Also, in compliance with rules for NOAA funded research, the project report will be a publicly available document and can be presented to the NPFMC or NMFS as requested. Analysis and reporting of the experimental project will be done by qualified ALFA with oversight by AFDF. The report; summarizing the projects design and analysis of tested hook-and-line gear along with suggestions for use and an economic feasibility analysis; will be produced and be made available to Southeast Alaska fishermen, organizations affiliated with hook-and-line gear, communities, processors, and any other interested individuals or organizations.

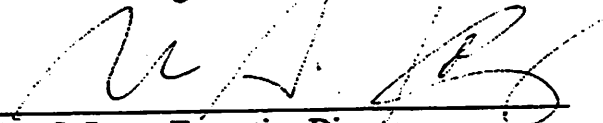
5. **Accommodations for an observer if required by the Regional Administrator:**

As an integral part of the vessel contracting process, appropriate accommodations will be provided for any required observers.

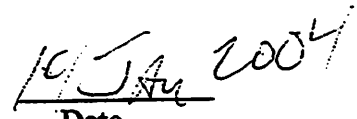
6. **Details for all coordinating parties engaged in the experiment and signatures of all representatives of all principal parties:**

- a. *Alaska Fisheries Development Foundation*
900 West 5th Avenue
Anchorage, AK 99501
Phone: (907) 276-7315 Fax: (907) 271-3450
E-mail: info@afdf.org

AFDF, a private non-profit corporation (501 3C), is the funding organization for the project. The 13 member Board of Directors is composed of fishing industry participants from processing, harvesting, marketing, financial, and other support sectors. This project was approved by the board and is funded through a NOAA Grant for 2003.




Marc S. Jones, Executive Director



Date

- b. *Charles W. Treinen*
Alaska Fisheries Development Foundation
900 West 5th, Suite 400
Anchorage, AK 99517
Phone: (907) 276-7315 ext. 104
E-mail: ctreinen@afdf.org

Charles Treinen (dba Golden View Fisheries, Inc.) is contracted by AFDF to manage this experimental hook-and-line fishery development project.



Charles W. Treinen



Date

c. *Alaska Longline Fishermen's Association*
403 Lincoln Street, Suite 237
Sitka, AK 99835
Phone: (907) 747-3400
E-mail: *alfafish@ptialaska.net*

ALFA, a Sitka based fishermen's association, is the primary contractor with AFDF for undertaking this project. ALFA personnel managing the project include Linda Behnken, Executive Director and Dan Falvey, ALFA Project Manager. ALFA Steering Committee includes members of the Southeast Alaska fishing community as well as personnel from NMFS and ADF&G.

Previously Submitted _____ Date _____
Linda Behnken, Executive Director

Previously Submitted _____ Date _____
Dan Falvey, ALFA Project Coordinator

7. **Information about each vessel to be covered by the exempted fishing permit:**

Vessel information required for the EFP will be provided as follows in accordance with application procedures listed in 50CFR679.A.6.

- i. Vessel Name:
- ii. Name address and telephone number of:
 1. Vessel Master :
 2. Owner:
- iii. USCG Documentation:
- iv. Home Port:
- v. Length of vessel:
- vi. Net Tonnage:
- vii. Gross Tonnage:

8. **Signature of Applicant: See Page 13**

9. **Additional Information for the Regional Administrator:**

The following additional information about the environmental effects of this project is furnished in realization that NMFS may need to prepare an Environmental Assessment (EA) for this project. Overall, the NPFMC has taken a conservative approach to rockfish management and none of the identified species are considered over fished in the waters of Alaska¹. Table I, compiled from NMFS website data extracted on 10/18/03, shows TACs, Catch, % of TAC taken and date of bycatch status for the target and expected bycatch species for 1999 to October 2003. Table II shows relative size and life history characteristics for the various rockfish species that are subject of this EFP request.²

a. *Direct Environmental effects of gear:*

Since this project will use hook-and-line fishing gear (longline, troll, or dinglebar) that is similar to commonly used gear in SEO waters, environmental effects are not likely to be more severe than the present situation. Given that the gear is to be semi-pelagic, meaning that it fishes in mid-water near, and sometimes anchored to the bottom, it can be surmised that the risk of gear loss due to snagging and physical damage to bottom dwelling organisms would be more limited than with conventional bottom

tending longline gear. Ghost fishing by lost gear would be limited to the minimal time that bait could be expected to stay on the hook and older lost gear that is at least partially floating would be expected to eventually sink due to the accumulation and growth of attached benthic marine organisms. Although there may be a prospect of entanglement of mobile marine life or a hazard to navigation, the gear will be near the bottom in water depths over 100 meters so the risks are anticipated to be minimal and similar to the types of longline and troll gear presently used in the SEO District or in waters controlled by the State of Alaska.

Detrimental effects of the gear on marine birds are anticipated to be minimal. The sinking nature of the gear design along with weighted ends and, with mid-line weights on the "stone and buoy" gear, the hooks will quickly become unavailable to marine birds. In addition, the chartered vessels will utilize a 45 meter single streamer line during setting. If any problem is evident, a full 90 meter streamer will also be available for deployment.

b. *Effects on target species:*

Given that the target species (POP, PSR, and OR) are not subject to directed fishing and have minimal bycatch harvest, this experiment is unlikely to have any noticeable effect on the target species populations. Only a 28 mt catch out of the 2700 mt combined POP, PSR, and OR TAC was recorded as of October 2003. Assuming a \$0.15/ lb to \$0.25 average price and 2003 ABC of 6640 mt, there is potential \$2.2 to \$3.6 million increase in ex-vessel value for SEO fishermen. In addition, with a more developed market for these target species, the cost structure and bycatch value associated with the entire Southeast hook-and-line fishery can be improved.

c. Information specific to each of the following target rockfish is summarized as follows:

- 1) POP (*Sebastes Alutus*). In the last five years, SEO District TACs have ranged from a low of 1580 mt in 2002 to a high of 3160 mt in 1999. The 2003 TAC was set at 1640 mt. The highest recorded catch in the last 5 years is only 2 tons.³ POP stocks in SEO are underutilized and could easily sustain a much greater harvest level. According to *The Rockfishes of the Northeast Pacific*, "In the Gulf of Alaska, POP is the overwhelmingly abundant rockfish species, in some years forming almost three-quarters of the biomass of all rockfishes". The minimal catch rates, in spite of longline fisheries prosecuted on sablefish and halibut in areas where POP are likely to be present, are probably associated with the semi-pelagic habitat occupied by POP along with feeding habits that are apparently not conducive for harvest by conventional bottom tending longlines, hook size, and the bait.

The Rockfishes of the Northeast Pacific reports that larval stages feed on crustaceans, while mature adults feed on midwater fishes such as deep-sea smelts and lantern fishes. The 2002 NPFMC Stock Assessment and Fishery Evaluation (SAFE) document reports that “adult slope rockfish such as POP and northern rockfish feed on euphausiids”. In the GOA, age at 50% maturity for females is reported as 10.5 years. During the summer months, mixed (male and female) schools of POP are generally found from 200 to 400 m while in the winter, females segregate out to depths from 500 to 700 m. The 50 mt take as requested for this EFP, is not likely to have a noticeable impact on POP populations.

- 2) Pelagic Shelf Rockfish (*Sebastes ciliatus*—dusky, *S. entomelas*—widow, and *S. flavidus*—yellowtail). Pelagic shelf rockfish are defined in the October 2002 NPFMC SAFE document as “those species of *Sebastes* that inhabit the continental shelf of the GOA, and that typically exhibit a midwater, schooling behavior”. Dusky rockfish can be found in either a dark and light color phase. The dark phase is generally found in near shore waters and is unlikely to be caught in this study. The light phase is found most commonly in waters from 100 to 300 meters. Widow rockfish are said to be somewhat spotty and less common in the GOA than further south and are most abundant between 140 and 210 m. Yellowtail rockfish are generally found in shallower water from 90 to 180 fathoms.⁴

PSR TACs have been set at 240, 770, 770, 860, and 860 mts with harvests at 22, 22, 12, 9, and 10 mts for years 1999 through 2003 respectively. According to blended data base information from NMFS, most of the SEO PSR catch occurs in directed rockfish fisheries. A small amount of bycatch is also attributed to the sablefish fishery. Given that so little of the PSR TAC is taken, harvesting the 50 mt EFP amount request for this study is not likely to have a noticeable impact on the populations.

- 3) Other Slope Rockfish (*Sebastes aurora*—aurora, *S. melanostomus*—blackgill, *S. paucispinus*—bocaccio, *S. goodii*—chilipepper, *S. crameri*—darkblotch, *S. elongates*—greenstripe, *S. variegates*—harlequin, *S. wilsoni*—pygmy, *S. babcocki*—redbanded, *S. proriger*—redstripe, *S. zacentrus*—sharpchin, *S. jordani*—shortbelly, *S. brevispinus*—silvergrey, *S. diploproa*—splitnose, *S. saxicola*—stripetail, *S. miniatus*—vermilion, *S. reedi*—yellowmouth, and, in the Eastern GOA only, *S. polyispinus*—northern). Slope rockfish are defined in the November 2002 SAFE document as “those species of *Sebastes* that, as adults, inhabit waters of the outer continental shelf and

continental slope of the GOA, generally in depths greater than 150-200 m". Other rockfish TACS have been set at a level that is deemed sufficient to meet the bycatch needs of other hook-and-line directed fisheries and set well below the 4,140 mt ABC.⁵ Development of gear that would specifically target this underutilized resource would allow a TAC that more closely reflects ABC. However, the marketability of some of the OR species is questionable due to smaller size characteristics. Table II lists the different rockfish species with size and life history characteristics for reference. Taking the 50 mt EFP request amount is unlikely to have any significant effect on the OR species complex.

d. *Effects on expected bycatch species:*

Bycatch species with requests for EFP amounts include rougheye/shortraker at 15 mt, thornyhead at 2 mt, DSR at 2 mt, halibut at 10 mt, and sablefish at 10 mt. While not the target species for this EFP request, these bycatch species are expected to contribute to the marketable mix of fish retained for sale in this project. In addition to the project's goal of fuller utilization of the target species, there may be benefits that will allow for improved methods of harvesting and handling and economies of scale for all of the SEO hook-and-line fisheries. Bycatch species that have EFP amount requests are summarized as follows:

- 1) Rougheye/shortraker assemblage (*Sebastes borealis*—rougheye, and *S. aleutianus*—shortraker) Both species are listed as some of the longest lived fishes in the world with reported maximum ages of 205 years for rougheye and 156 years for shortraker. Rougheye are listed in *The Rockfishes of the North Pacific* as being most common from 150 to 450 m and shortraker from 300 to 500 m. TACs for the assemblage are set as aggregate for the entire Eastern GOA and not specified for the SEO District. NMFS regulations designate the two species as bycatch only for the entire year with a 1/1 bycatch status date. TACs and harvests reported by NMFS for the aggregated Eastern GOA, 1999 through 2003 respectively are: 460/537 mt, 590/721 mt, 590/852 mt, 560/429 mt, and 560/378 mt. Although TACS in 1999 through 2001 are shown to be exceeded, catches from Southeast inside waters were also included. Revisions of NMFS data to remove the inside (State) water harvests from the outside (federal) waters are being undertaken and are reported to show that TACs have not been exceeded. Most of the harvest of these two species appears to be taken as bycatch in the sablefish fishery with 10/23/03 NMFS blended database information showing roughly one-third of total aggregated catch as bycatch in the SEO District sablefish fishery.

A 15 mt EFP is requested to allow for possible harvest of the roughey/shorthead complex. Although revised figures that discount Southeast inside water harvests are not yet available, in 2003 and 2002 NMFS data from 10/18/03 shows that 182 mts and 131 mts respectively remained available for harvest. If apparent roughly one third of the remaining harvest can be considered as the usual SEO catch ratio, the 15 mt request is still well below the available roughey/shorthead stocks.

- 2) Thornyhead *Sebastes alascamus*—shortspine, *S. altivelas*—longspine, and *S. macrochir*—broadfin. Of the three species of thornyhead or “idiot” rockfish, the largest, shortspines, are most valuable, however, in contrast to some of the other rockfishes, all sizes are said to be marketable.⁶ TACs are specified as Eastern GOA aggregate and not broken out into a separate amount for SEO just as with the roughey/shorthead complex. 1999 through 2003 TACs and catches respectively are 1030/560, 940/416, 920/540, 790/262, and 800/96 mt. Since there has not been an overharvest of thornyheads in the last five years, the 2 mt EFP request is not likely to have an adverse or detectable impact on the Thornyhead stock. Thornyheads are also adapted to demersal life and predominantly bottom dwelling. They are not expected to comprise a large portion of the bycatch on semi-pelagic gear. The minimal EFP is being requested as a precaution to assure that the project will not be compromised by an unforeseen catch limitation.

- 3) DSR (*Sebastes pinniger*—canary, *S. nebulosa*—china, *S. caurimus*—copper, *S. maliger*—quillback, *S. helvomaculatus*—rosethorn, *S. nigrocinctus*—tiger, and *S. ruberrimus*—yelloweye). In the SEO, DSR are managed jointly by the State of Alaska and NMFS. By definition the DSR category encompasses the above-listed seven species of near shore, bottom-dwelling rockfishes, however according to the October 2002 SAFE document, 90% of the harvest is made up of yelloweye and 8% quillback. The State managed directed DSR fishery is broken into a seasonal allocation with 67% target quota available between Jan 1 and March 15 and the remaining TAC, after accounting for bycatch in other hook-and-line fisheries, available between November 16 and December 31. Approximately 90% (by weight) of the total DSR harvest is yelloweye with fishing that takes place between the 90 m and 200 m contours.⁷ The 2 mt EFP is needed in order to comply with regulations for full retention, but the request is purposely small and is indicative of the project’s intent to target species that are not already fully utilized.

- 4) Halibut (*Hippoglossus stenolepis*). The 10 mt halibut EFP request is being submitted as a precaution to assure that the experimental fishery will not be terminated by unforeseen restrictions. With the small hook size required for catching the target rockfish species, the bait/lure to be used, and the semi-pelagic nature of the hook-and-line gear to be used, actual halibut catch is expected to be small. Also, in keeping with minimum size regulations, undersized halibut will be released. Survival of undersized halibut associated with the test fishing the gear is expected to approach 100 % given the gear characteristics, fishing techniques, and short soak times anticipated for harvesting the target rockfish species.

Since halibut PSCs are set on a Gulf-wide basis, regulations often preclude directed POP, PSR, or OR fisheries because of halibut bycatch in West and Central GOA directed cod hook-and-line fisheries. Gulf-wide halibut PSC closures have occurred on 4/24/99, 3/9/00, 2/26/01, none in 2002, and 8/1/03. Thus in four out of five years, an EFP would have been required in order to target the underutilized SEO rockfish during the specified windows of opportunity for this project.

Further complications for the project can occur without a halibut EFP because of NMFS sablefish regulations that require "legal-size halibut to be retained by vessels using hook-and-line gear if a halibut IFQ permit holder is aboard and is holding unused halibut IFQ". A halibut EFP will allow participation in the project by experienced and qualified personnel who also happen to be sablefish and halibut IFQ holders. In addition, a halibut EFP will allow for a more accurate analysis of harvest structure, selectivity, and economic viability of the experimental hook-and-line gear.

Given that the 10 mt ton PSC allocation for the SEO DSR fishery is based on historical precedent and that the halibut bycatch in the DSR fishery is assumed to be low⁸, the EFP request and potential take of halibut is already partially accounted for as a removal from the fishery. (Note: 10 mt represents a less than one quarter of a percent of the 3,854.9 mt IPHC area 2C catch limit).

While every attempt will be made to minimize halibut bycatch, the halibut EFP request is precautionary and necessary for the project. An initial part of the project is research into gear that will be effective in catching the target species. Halibut vulnerability to a given experimental gear will not be known with any certainty or reliability until it is tested under the conditions and circumstances likely to be encountered in commercial fishing

endeavors. Although the international nature of halibut management may complicate acquisition of the 10 mt EFP halibut request, a procedure that can accommodate limited taking of halibut for a NOAA/NMFS approved and funded fishery development projects is warranted in general and specifically for this project.

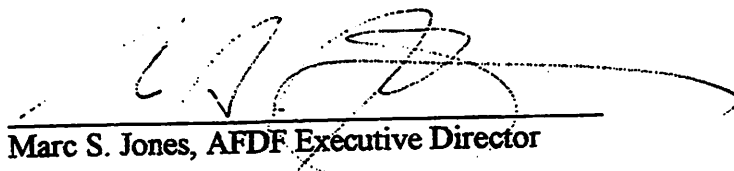
Overall, the halibut EFP request is necessary because of the significant regulatory structure, specific to the halibut fishery, which does not allow for flexibility in experimental fishery development. In this case, the actual halibut catch is expected to be very limited, but, because of retention requirements and PSC restrictions as noted above, a halibut EFP is compulsory.

- 5) Sablefish (*Anoplopoma fimbria*). The sablefish TAC is fully allocated to the IFQ program hook-and-line fishery and requires discarding when taken as bycatch in any other fishery. TACs and catches for 1999 through 10/18/03 are respectively; 3200/3158 mt, 3553/3952 mt, 3380/3283 mt, 3210/2891 mt, and 3560/3035* mt. Since 1995, when the sablefish IFQ system was initiated, the TAC has been exceeded only in 2000 with an average under harvest for the eight years from 1995 to 2002 at 75 mt. A 10 mt take would represent 0.28 % of the 3560 mt 2003 SEO TAC.

* 2003 catch does not include end of season catches.

- e. ***Overall EFP Requirements for this AFDF Project:*** AFDF is undertaking this project with full realization that it is a speculative venture but with significant potential to develop new opportunities for utilization of available fishery resources. The project will allow for a better understanding of bycatch and market impacts of hook-and-line fishing for POP, PSR and other rockfish complexes in the SEO District. Acquisition of an EFP is necessary because it will allow the investigation to take place in a reasonably efficient way independent of halibut PSC closures and MRB status of targeted species. Data gathered through this project will also be available to assist in management of other hook-and-line fisheries in waters off of Alaska.

Without experimentation allowed through the EFP process and rationale, commercial fishing adaptations to market and environmental imperatives are more likely to be difficult and disruptive.



Marc S. Jones, AFDF Executive Director

Endnotes:

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- ¹ *Management of Pacific Rockfish*; American Fisheries Society, AFS Policy Statement #31d
² *The Rockfishes of the Northeast Pacific*; Love, Yoklovich, and Thorsteinson;
³ National Marine Fisheries catch reports 1999-2003, extracted from NMFS website, 10/18/03
⁴ *The Rockfishes of the Northeast Pacific*; Love, Yoklovich, and Thorsteinson; Species accounts
⁵ 50 CFR Part 679, Federal Register Vo. 68, No. 41, 3/3/03; Table I, p. 9927
⁶ *The Rockfishes of the Northeast Pacific*; Love, Yoklovich, and Thorsteinson; p. 116
⁷ *Demersal Shelf Rockfish Stock Assessment for 2003*, ADF&G 2002
⁸ 50 CFR Part 679, Federal Register Vo. 68, No. 41, 3/3/03, p. 9931

SEO Hook-and-Line Rockfish Project

EFP Analysis Table 1

Yr.	Parameter	Target Species			Bycatch Species			
		POP	PSR	OSR ¹	S/R ²	TH ²	DSR ³	Sblf
2003	ABC	1640	860	4140	560	800	390	3560
	TAC	1640	860	200	560	800	390	3560
	Catch	0	10	18	378	96	226	3035
	% Taken	0%	1%	9%	68%	12%	58%	85%
	Bycatch Dt	8/1	8/1	1/1	1/1	1/1	ADF&G	N/A
2002	TAC	1580	860	200	560	790	350	3210
	Catch	1	9	32	429	262	244	2891
	% Taken	0%	1%	16%	77%	33%	70%	90%
	Bycatch Dt	Open	Open	1/1	1/1	1/1	ADF&G	N/A
2001	TAC	1750	770	100	590	920	390	3560
	Catch	1	12	134	852	540	226	3035
	% Taken	0%	2%	134%	144%	59%	58%	85%
	Bycatch Dt	2/26	2/26	1/18	1/1	1/1	ADF&G	N/A
2000	TAC	1700	770	3890	590	940	340	3553
	Catch	2	22	48	721	416	287	3952
	% Taken	0%	3%	1%	122%	44%	84%	111%
	Bycatch Dt	3/9	3/9	3/9	1/1	1/1	ADF&G	N/A
1999	TAC	3160	240	4130	460	1030	560	3200
	Catch	0	22	13	537	417	297	3158
	% Taken	0%	9%	0%	117%	40%	53%	99%
	Bycatch Dt	4/24	4/24	4/24	10/1	1/1	ADF&G	N/A

¹ Other Slope Rockfish TACs are set at a small fraction of the ABC and only meant to cover bycatch for other directed fisheries.

² Shortraker/Rougheye and Thomyhead TACs are for the Eastern GOA and subject to trawl exploitation in West Yakutat. Catch figures include State waters DSR fishery take. (Data revisions indicate Eastern GOA harvest level below TACs)

³ Demersal Shelf Rockfish are managed by ADF&G.

SEO Hook-and-Line Rockfish Project

EFP Analysis Table II

SEO Rockfish Characteristics

from: *The Rockfishes of the North Pacific* (Love, Yoklavich, Thorsteinson)

	Species	Maximum Length (cm)	Age 50% Mature	Age Maximum	Common Depth Range
	POP	53 cm	10.5	100	200-700 m
PSR	Dusky	53 cm	11	59	100-300 m
	Widow	59 cm		60	140-210 m
	Yellowtail	66 cm		64	90-180 m
OSR	Aurora*	41 cm		75	300-500 m
	Blackgill*	61 cm	20	87	250-600 m
	Bocaccio*	91 cm			50-250 m
	Chilipepper*	59 cm	3	35	75-325 m
	Darkblotch*	58 cm	8	105	140-21 m
	Greenstripe*	43 cm	7	54	100-250 m
	Harlequin	39 cm		47	100-300 m
	Pygmy	23 cm		26	60-150 m
	Redbanded	65 cm	19	106	150-350 m
	Redstripe	51 cm	7	55	150-275 m
	Sharpchin	45 cm		58	100-300 m
	Shortbelly*	35 cm	2	32	150-200 m
	Silvergrey	73 cm		82	100-300 m
	Splitnose*	43 cm		86	100-300 m
	Stripetail	41 cm		38	100-200 m
	Vermilion*	76 cm		60	50-150 m
Yellowtail	58 cm		99	180-275 m	
Northern	48 cm		57	100-200 m	
DSR	Yelloweye	91 cm	22	118	91-180 m
	Canary	76 cm		84	80-200 m
	China	66 cm		50	0-90 m
	Quillback	61 cm	11	95	0-274 m
	Rosethorn	41 cm		87	100-350 m
S/R	Tiger	61 cm		116	18-298 m
	Shortraker	120 cm		116	300-500 m
T-head	Rougheye	97 cm	20	205	150-450 m
	Shortspine	80 cm	12	100	150-450 m
	Longspine	39 cm		45	500-1300 m
	Broadfin	38 cm			400-800 m

* More common from British Columbia South

**PUBLIC TESTIMONY SIGN-UP SHEET FOR
AGENDA ITEM D-1 (b) BSAI Specs**

	NAME (PLEASE PRINT)	AFFILIATION
1	Whit Sheard	The Ocean Conservancy
2	Dave Green	Mini Melade
3	ED HILTON	PUBLIC CONSERVATION COOPERATIVE
4	CLEM TILLION	ALEUT CORPORATION
5	SANDRA MALLER	ALEUT ENTERPRISE CORP.
6	TERRY LEITZEL	ICICLF
7	Bob Alkerson	Fruit Seattle
8	Jeff Stephan	UFMA
9	GLORY MERZIGIN	PROWLER FISHERIES
10	JOHN WINTHER	" "
11	Trevor McLeche / Paul MacGree	APA
12	GLENN RABIN	PSPA
13	DAVE LITTLE	CLIPPER SFOS
14	ED LUTRELL / LOUISE WILSON	G F F
15	BILL ORR	INQUIRY US
16	SUSAN ROBINSON	FISHING WITH FISHES
17	Bob Storr	Alaska Native Fishermen's Assoc.
18	THOMAS SMITH	NPCA
19	Paul MacGree	APA
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Reverse Order

NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person "to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act.