

MEMORANDUM

TO: Council, SSC and AP Members  
FROM: Chris Oliver *Chris*  
Acting Executive Director  
DATE: April 5, 2001  
SUBJECT: Staff Tasking

ESTIMATED TIME 2 HOURS
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**ACTION REQUIRED**

Review status of tasking and Committees and provide direction as appropriate.

**BACKGROUND**

At the February meeting the Council initiated some new amendment analyses, but with the provision that they would be pursued as staff and contracting resources became available. At that meeting you requested that in April we once again review staff tasking, with a more definitive assessment of existing projects, potential new projects, and available staff resources. You also wanted to have some further discussions of Council Committees at this meeting.

Committees

Item D-1(a) is an updated summary of Council Committees, and I suggest we walk through these, and assess where each Committee is in our process and whether adjustments or direction need to be provided by the Council.

The BSAI Crab Rationalization Committee was scheduled to make their recommendations by June, then disband unless extended by the Council. We probably need to assess, under C-6, whether they have completed their task for the Council. The CDQ Committee has not met for some time, and you have recently appointed a CDQ Policy Committee which is scheduled to meet April 26-27. While there is an existing CDQ Committee, there seems to be a desire to keep that as a separate Committee from the Policy Committee, but that may be something for the Council to consider. The Ecosystem Committee has not met for some time and perhaps the Council could discuss current direction to that Committee. I believe the Enforcement Committee, like the Finance Committee, would continue to meet on an as-needed basis.

The GOA Rationalization Committee is scheduled to report under C-6 and will be seeking any necessary Council direction. Further need for a Halibut Charter IFQ Committee will likely be determined by action under C-1. The Halibut Subsistence Committee may need to remain active, pending recommendations from the Board of Fish in June. The IFQ Cost Recovery Committee has not met in some time, though they are scheduled to meet annually to review the fee projections and associated issues. It may make sense to consider melding this Committee with the IFQ Implementation Team given the closely overlapping roles.

I am unsure where we stand with the Magnuson-Stevens Act Reauthorization Committee. Council members Benton and Behnken are the only two members listed for this Committee - as I mentioned under the ED report, reauthorization issues will be discussed at the upcoming meeting of Council Chairmen and EDs in late May. Perhaps at the June meeting we could report to you on that meeting and the Council can then determine how to proceed on this Committee. There is also listed a Russian (International) Committee whose status needs to be resolved (whether it is still necessary and updating the membership). The Observer Committee is running along smoothly I believe - as I reported earlier in the meeting we have not progressed as rapidly as anticipated, but we are resolving some intermediate issues that should pave the way for development of more comprehensive program adjustments.

The Socioeconomic Data Committee is still in place, but we determined earlier that this Committee would remain inactive until this fall. The SSL RPA Committee has also been appointed and of course has been very active coming into this meeting, and will be through this fall. From our discussions in February, it appears that a potential Research Funding Committee may be unnecessary at this time, given Council membership on the NPRB.

A general issue which has arisen in several Committee forums is that of substitutes sitting in when specified members are unavailable. In some cases the Council has named alternates, while in others that decision has been made by the individual Committee Chairs. In most cases there needs to be a continuity, which makes substitutes less than optimal. The Council could make a global policy in this regard, or continue to deal with it on a committee-by-committee basis, and/or defer to the Committee Chairs.

#### Staff Tasking

Item D-1(b) is a slightly reorganized summary of existing and potential new projects. There are the items already tasked by the Council, some of which absolutely have to be done, and these are denoted as 'Existing Priority Projects'. A trade-off situation exists among some of the previously tasked projects and potential new projects. And, some of the previously tasked projects may no longer be necessary, or may no longer be priority items. Therefore, I have lumped these together (in the 'Pending Projects' category), with some notations of staff (or contract) resources available and projected completion dates. I need the Council to help me prioritize these projects, recognizing we can't get them all done on the timelines we ideally would like. Item D-1(c) is a summary of each staff members' projected tasking, and availability, through October. In the 'work weeks already committed' column, I have included only those items from the 'Existing Priority Projects' section of D-1(b).

So, we do have some staff availability, though it is limited to specific staff members. For example, David Witherell and Cathy Coon are fully assigned to the SSL package between now and October - I am hoping their involvement in the EFH revisions will largely come after October. Maria Tsu has several weeks available, which I anticipate would be largely devoted to the Crab Rationalization initiative, which would also include some outside contract help. Jane DiCosimo and Nicole Kimball may have additional tasking after June related to the subsistence/LAMP process and a report from the Board of Fish scheduled for June. We do have substantial funding outside of our baseline budget for SSL and AFA related projects, and I already have budgeted some of our SSL money for outside assistance on the socio-economic portions of the RPA analysis. By assigning some of our staff payroll to SSL activities, and using SSL funds to cover their time, I may also be able to free up some of our baseline budget to contract help on other projects as well (noting some limitations in this regard).

We have some good applications for the economist position(s) on staff, and I will be interviewing in early May - the reason for the delay in closing this loop is because I want to include Dr. Marasco in that interview process, and he is on leave and unavailable until early May. I hope to have that additional staff on board by early to mid-summer.



## NPFMC COMMITTEES AND WORKGROUPS

Committee/Workgroup	Council	SSC	AP	Others**
CDQ Policy Committee Appointed 2/16/01  Staff: Nicole Kimball				R.Alstrom E.Asicksik G.Baker J.Bundy J.Bush M.Crow R.Lauber* P.Lestenkoff J.Moller R.Samuelsen J.Moller.
Council/Board of Fish Consultation Committee Last Update: 12/15/00 Staff: Clarence Pautzke/Chris Oliver	<u>Council:</u> Austin Penney Samuelsen	<u>Board:</u> Dersham Miller Nelson		
Crab Interim Action Committee	Austin Balsiger Duffy			
Ecosystems Committee Last update: May 26, 2000  Staff: Dave Witherell	Fluharty* Behnken O'Leary Alcorn (Expert Advisor) Balsiger (Expert Advisor)			Blackburn Childers Kruse (Expert Advisor) Loh-lee Low (Expert Advisor)
Enforcement Committee Last update: 2/22/01  Staff: Jane DiCosimo	Hanson* O'Shea			A.Cain, AFWP J.Gavitt, USFW D. Ito, AFSC J.Passer, NMFS-Enf. S.Salveson, NMFS-AKR G.Walker, NOAA-GC

\*Denotes Chairman

Agency staff will attend meetings as necessary.

NPFMC COMMITTEES AND WORKGROUPS																													
Committee/Workgroup	Council		SSC	AP	Others**																								
<b>Finance</b> Staff: Gail Bendixen/Chris Oliver	Hanson Benton* Balsiger	Austin Duffy	Marasco																										
<b>GOA Rationalization Committee</b> Last update: 1/09/01  Staff: Jane DiCosimo	Hanson*				S.Aspelund C.Blackburn P.Brogdan D.Childers J.Childers C.Cochran D.Fields A.Fuglvog J.Henderschedt D.Jacobsen M.Martin K.Norosz J.Plesha K.Roemhildt D.Schwarzmilller J.Stephan T.Suryan																								
<del>Halibut Charter IFQ</del> Appointed 3/6/2000  Last update: 2/2/01  Staff: Jane DiCosimo	Dave Hanson*				<table border="0"> <tr> <td><u>Cmtee</u></td> <td><u>Advisors</u></td> </tr> <tr> <td>S.Bone</td> <td>D.Brindle</td> </tr> <tr> <td>S.Campbell</td> <td>D.Fields</td> </tr> <tr> <td>J.Daniels</td> <td>A.Fuglvog</td> </tr> <tr> <td>T.Evers</td> <td>G.Merrigan</td> </tr> <tr> <td>J.Goodhand</td> <td>T.Hinkel</td> </tr> <tr> <td>B.Huber</td> <td>D.Lane</td> </tr> <tr> <td>D.Kubiak</td> <td>B.Lukaitis</td> </tr> <tr> <td>A.Mezirow</td> <td>M.Lundston</td> </tr> <tr> <td>L.McQuarrie</td> <td></td> </tr> <tr> <td>J.Preston</td> <td></td> </tr> <tr> <td>R. Ward</td> <td></td> </tr> </table>	<u>Cmtee</u>	<u>Advisors</u>	S.Bone	D.Brindle	S.Campbell	D.Fields	J.Daniels	A.Fuglvog	T.Evers	G.Merrigan	J.Goodhand	T.Hinkel	B.Huber	D.Lane	D.Kubiak	B.Lukaitis	A.Mezirow	M.Lundston	L.McQuarrie		J.Preston		R. Ward	
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\*Denotes Chairman

Agency staff will attend meetings as necessary.

NPFMC COMMITTEES AND WORKGROUPS				
Committee/Workgroup	Council	SSC	AP	Others**
Halibut Subsistence Last update: 2/2/01  <i>2</i>  Staff: Jane DiCosimo	Samuelsen*			D.Bill T.Borbridge J.Henzler M.Kookesh F.Lekanof H.Martin
IFQ Implementation Workgroup (Industry) Last update: 2/2/01  Staff: Jane DiCosimo				J.Bruce N.Cohen D.Iverson J.Knutsen A.Fuglvog D.Hicks D.Lane J.Stephan* J.Woodruff
IFQ/CDQ Cost Recovery Committee Last update: 7/29/99  Staff: Jane DiCosimo/Chris Oliver	O'Leary*			B.Alverson J.Kyle J.Merrigan K.Norosz P.Peyton J.Sevier
Magnuson-Stevens Act Reauthorization Committee	Behnken Benton* <i>Re-constitute</i>			

\*Denotes Chairman  
 Agency s' will attend meetings as necessary.

NPFMC COMMITTEES AND WORKGROUPS				
Committee/Workgroup	Council	SSC	AP	Others**
Observer Advisory Committee (Industry) Last update: 3/23/01  Staff: Chris Oliver/Nicole Kimball				J.Bonney P.Cullenberg K.Dietrich (Alt: M.Merklein) J.Gauvin J.Iani J.Kyle* T.McCabe B. Mikol K.Robinson S.Robinson J.Stephan A.Thomson
Pacific Northwest Crab Industry Advisory Committee Last update: 12/14/99  Staff: David Witherell				D.Benson L.Farr P. Hanson K.Kaldestad G.Loncon* G.Painter R.Rogers C.Sterling G.Stewart A.Thomson (non-voting)
Russian (International) Committee (Pending Reconstitution)  Staff: Clarence Pautzke/Chris Oliver	Austin Benton Fluharty Lauber* O'Shea Penmoyer Pereyra			



*Membership*

*?*

\*Denotes Chairman

Agency staff will attend meetings as necessary.

**NPFMC COMMITTEES AND WORKGROUPS**

Committee/Workgroup	Council	SSC	AP	Others**
<p>Socioeconomic Data Committee Last update: 2/2/01</p> <p>Staff:</p>	<p>Austin*</p>	<p>Criddle Hartman Macinko Marasco</p>		<p>C.Blackburn J.Gauvin J.Iani E.Richardson</p>
<p>SSL RPA Committee Appointed 2/10/01</p> <p>Staff: David Witherell</p>	<p>DeGange</p>	<p>Hills Tagart</p>	<p>D.Benson</p>	<p>L.Cotter* J.Bongen S.Capron D.Cline D.DeMaster S.Drage J.Gauven J.Iani W.Donaldson G.Leape T.Leitzell M.Moir A.Parks FredRobison B.Small B.Stewart J.Winther</p>
<p>SSL Steering Committee Appointed 12/13/00</p> <p>Staff: Chris Oliver</p>	<p>Benton* Austin Balsiger Duffy</p>			

\*Denotes Chairman  
Agency s will attend meetings as necessary.



<b>NPFMC COMMITTEES AND WORKGROUPS</b>				
<b>Committee/Workgroup</b>	<b>Council</b>	<b>SSC</b>	<b>AP</b>	<b>Others**</b>
<b>Advisory Panel Nominating INACTIVE</b>	<b>Mace* Council Committee of the Whole</b>			
<b>Council Interim Action Committee INACTIVE</b>	<b>Poll all Council Members</b>			

\*Denotes Chairman  
Agency staff will attend meetings as necessary.

RECEIVED

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MAR 30 2001

Date: March 29, 2001

From: F/V Blue Fin

To: Mr. Chairman (North Pacific Management Counsel)

N.P.F.M.C

I understand that the issue regarding a split between Pot Catcher/Processors and Pot Catcher boats once again has been Delayed due to additional studies that is needed. As a Catcher/Processor with a history far greater than the average Catcher boat I am getting very disturbed not to be able to do my fishery as we did during the qualifying years. I did some substantial investments to be able to operate my salt cod business and counted on my catch history to be protected by the Management Counsel, as I understood this was what the job of the management was to be. Even though the Counsel has proposed a big reduction in boats that can participate (around 53 vessels as I understand) this amount of boats is still way too many for the amount of quota that has been allocated to Pot boats. Therefore I need the Counsel to take a stand and be consistent in the protection of long time participants, which has been done with longliners and trawlers. PLEASE VOTE YES ON A SPLIT BETWEEN POT C/P AND POT C/V SO THAT I CAN CONTINUE TO GET MY PAST CATCH HISTORY ON P-COD, WHICH I FEEL WE DESERVE HAVING BUILT A BIG PORTION OF THE POT-COD CATCH HISTORY. Thank you for your cooperation.

Sincerely,



Kurt Vedoy (owner operator of the Blue Fin)

### Council Staff Tasking Summary (April 2001)

Existing Priority Projects	Projected		Comments
	Weeks	A/E%	
FMP Updates	2	100/0	Requires Council staff work in Spring 2001
AFA EIS/Proposed Rule	1	70/30	Requires Council staff work (Darrell)
AFA Report to Congress (final)	5	60/40	Draft in June (Darrell and contracts)
HAPC Stakeholder Process	2	90/10	Stakeholder process through summer
Halibut Charter IFQ/Community Set-Aside	0	60/40	April Decision
BSAI pot cod split	1	35/65	Final Action in June (T)
Halibut Subsistence/LAMPs (BOF Process)	2	100/0	BOF Process in April/May - Council review and direction in June
Develop RFP's/SOWs for AFA funds	2	30/70	Requires interaction with ADFG, NMFS, and SSC in April/May (Chris/Darrell)
Observer Program (short-term changes)	2	50/50	Report in October
<b>SSL Measures (Committee &amp; Analysis)</b>	<b>26</b>	<b>50/50</b>	<b>Major project - through September</b>
GHL Amendment	0	50/50	Finalized for SOC review.
Other AFA related Measures - MTC proposal	0	80/20	Review in April
Shark/Skate FMP amendments	1	65/35	On hold pending tasking priorities. *Final Action June - Need Council Guidance <i>OCT 3</i>
Break out 'other species' (GOA)	2	80/20	Council/NMFS Staff - Oct/Dec timeline - Need Council Guidance
GOA Salmon bycatch reduction measures (Discussion Paper)	2	50/50	Review in June <i>DEC ? DATA N DEC - Decide then</i>
TAC Setting Process	1	20/80	Review in June (T)
Community based QS (GCCC buy in proposal)	2	40/60	Discussion Paper in June -further direction?

#### Pending Projects

CDQ Regulatory Amendment (Administrative)	1	30/70	Discuss in June - Policy Committee Report
Three separate sideboard pools	4	35/65	Not started - Pending Council direction
P.cod reg. Amendments (2)	4	35/65	Not started - Pending Council direction - may depend on SSL measures
SR/RE retention	2.5	65/35	Not started
<b>BSAI P. Cod Trawl LLP recency in BSAI</b>	<b>10</b>	<b>30/70</b>	<b>Tasked in February - Not started - Possible Contract</b>
<b>P. Cod sideboards (Prichett proposal)</b>	<b>6</b>	<b>30/70</b>	<b>Tasked in February - Not started - Possible Contract</b>
Groundfish processing s/b, IR/IU, HMAP	8	40/60	Tasked in February - Begin work after October 2001
Opilio VIP	2	50/50	Tasked in February - Not started
<b>BSAI Crab Rationalization (Committee &amp; Analysis)</b>	<b>12</b>	<b>30/70</b>	<b>Major project - pending Council direction (Maria Tsu + contract help)</b>
Catch/bycatch disclosure (vessel level)	1	90/10	Discussion paper in June
IFQ amendments	?	50/50	Pending Council direction
<b>EFH EIS</b>	<b>?</b>	<b>70/30</b>	<b>Potential major project - Discuss in April/June</b>
Halibut Subsistence/LAMPs (new reg amendments)	?	50/50	Pending direction in June after BOF report
CDQ Reg amendments (omnibus)	?	30/70	On hold pending tasking priorities
GOA rationalization (Committee & Analysis)	?	30/70	Pending Council direction & committee appt - Discuss in Feb/April

### Staff Scheduling Through the October 2001 Meeting

Analytical Staff	Calendar Weeks to October 15	Work Weeks Already Committed	Leave Time	Committee & Other Meetings	Council Meetings & Preparation	"Administrative" Overhead*	Total Committed	Available for new projects
<b>David Witherell</b> SSL RPA's EFH	25 weeks	7 weeks	3 weeks	6 weeks RPA Plan Teams	6 weeks (Includes Sept)	4 weeks (16%)	26 weeks	0
<b>Jane DiCosimo</b> Charter IFQ Subsistence LAMP's FMP Updates GOA Rationalization	25 weeks	5 weeks	3 weeks	4 weeks Plan Teams NEPA GOA Rationalization BOF	4 weeks	4 weeks (16%)	20 weeks	5 weeks
<b>Cathy Coon</b> SSL RPA's EFH HAPC Salmon Bycatch	25 weeks	10 weeks	2.5 weeks	5 weeks RPA & Support HAPC	6 weeks (Includes Sept)	2 weeks (8%)	25.5 weeks	0
<b>Nicole Kimball</b> Community Set-Aside CDQ LAMP Observer Program P.cod Split	25 weeks	6 weeks	2.5 weeks	3 weeks CDQ Observer BOF	4 weeks	2 weeks (8%)	17.5 weeks	7.5 weeks
<b>Maria Tsu</b> Charter IFQ Community Set-Aside Crab Rationalization	25 weeks	3 weeks	2.5 weeks	2 weeks NEPA Crab Rationalization	4 weeks	2 weeks (8%)	13.5 weeks	11.5 weeks
<b>Elaine Dinneford</b> (Primarily data support for staff and contract analysts, RPAs AFA, and others)	25 weeks	7 weeks (through May)	3 weeks	3 weeks AKFIN, RPA	3 weeks	2 weeks (8%)	18 weeks	7 weeks (after May)
<b>New Economist</b> (Starting in July)	15 weeks	4 weeks (Training Period)	1 week	2 weeks	3 weeks	1 week (4%)	11 weeks	4 weeks

Darrell Brannan will be working through June, primarily on the AFA report to Congress

\* "Administrative" overhead = approximate % of time for phone calls, staff meeting, teleconferences, letters, etc. (conservative estimate)

STAFF DISCUSSION OF 'OTHER SPECIES' MANAGEMENT IN THE BSAI AND GOA

The Council is currently scheduled to take final action on BSAI and GOA Plan Amendments 63/63 to: (1) separate sharks and skates from the "other species" category, (2) prohibit directed fishing on sharks and skates, and (3) prohibit finning on sharks at its June Council meeting. This proposed action responds to a BOF request to mirror action it took in State waters in 1998.

Separate ABC and TACs for the groups in the "other species" category are currently determined in the Bering Sea/Aleutian Islands area and then summed for an "other species" total. The BSAI Groundfish Plan Team recommended a 2001 ABC for BSAI other species equal to the average catch from 1977-99 (Tier 6), or 26,500 mt. The Team has expressed continued concern over raising the overall ABC based primarily on the abundance of only one of the components (i.e. sculpins). But the Council adopted the SSC recommendation of a higher ABC of 33,600 (Tier 5) with a TAC of 26,500 mt, where maximum ABC is computed from the product of species-specific natural mortality rates, individual species estimated biomass and a discount factor (0.75). The SSC step process is based on a 10 year stair step, begun in 1999. We are in the 3rd year of the step process.

The GOA FMP does not authorize an ABC for 'other species' and mandates that the other species TAC be set equal to 5% of the combined TACs for all other GOA species/assemblages). Species have been removed from the other species category over time (Atka mackerel, forage fish species), but the TAC formula has not changed. In December 2000, the GOA Groundfish Plan Team recommended that the Council revise the FMP to prevent the potential for targeting species groups within this category. The Team noted that Atka mackerel became such a target and ultimately was broken out of the other species category. The BSAI Team raised similar concerns for BSAI "other species."

In December 2000, the Council initiated an analysis, but did not set a timeline, for amending only the GOA FMP to allow for the determination of an ABC for GOA "other species" and separate the complex into its 'group' components. The ultimate goal would be to develop stock assessments to determine ABCs and TACs for each group (e.g., shark, skate, octopus, sculpins, and squid). Sarah Gaichas, NMFS AFSC, has been tasked by NMFS to assist in the preparation of the analyses related to these issues and to develop stock assessment approaches for those species groups beginning this summer.

Industry has informed staff of the possibility of a "skate" box in the CDQ fisheries. The analyses should also explain the impact on the CDQ fisheries of separating sharks and skates, as well as the other groups, from the "other species" category in the BSAI. This action would create more, smaller CDQ reserves for bycatch species. These smaller quotas increase the possibility that the CDQ groups will reach a quota for a bycatch species before they fully harvest their target species quotas.

Staff recommends that the proposed analysis be expanded to include a discussion of whether to also separate the BSAI complex into its component groups. Jane DiCosimo and possibly Tom Pearson, NMFS-SF, would prepare the EA/RIR/IRFA for review by the Plan Teams this fall. Initial review could be scheduled for October and final action in December 2001.

To streamline the above actions, staff recommends the following. NMFS staff has expressed a preference for combining all related actions into one analytical and rulemaking package.

- A. Proceed with two separate amendments to address:
  - (1) management of BSAI and GOA sharks and skates
    - a. separate sharks and skates from "other species" complex;
    - b. prohibit directed fishing of sharks and skates;
    - c. prohibit shark finning;
  - (2) management of remaining BSAI and GOA "other species"
    - a. separate remaining groups from BSAI and GOA "other species"
    - b. allow determination of ABCs for GOA "other species" groups

OR:

- B. Combine all of the proposed actions into one plan amendment package to amend the BSAI and GOA FMPs for Fall 2001 to:
  - A. separate BSAI and GOA "other species" into groups;
  - B. allow determination of ABCs for GOA groups;
  - C. prohibit directed fishing of sharks and skates;
  - D. prohibit shark finning;

**ALASKAN  
LEADER FISHERIES****4215 21ST AVE WEST, SUITE 210 SEATTLE, WA 98199  
(206) 285-6150 FAX (206) 284-5984**

Mr. Robin Samuelson  
Chairman  
Bristol Bay Economic Development Corp.  
Dillingham, Alaska

April 12, 2001

Dear Robin,

Thank you very much for listening to our concerns regarding the constraints placed upon the BRISTOL LEADER harvesting BBEDC Pacific Cod due to the significantly reduced amount of OTHER SPECIES allotted to BBEDC by NMFS in the year 2001.

Presently the BRISTOL LEADER is having to fish Pacific Cod in BS areas where the catch is largely comprised of juvenile year classes. These are the only areas where OTHER SPECIES, (sculpins and skates), are of an abundance low enough to allow the vessel any chance to catch BBEDC's CDQ Pacific Cod BS quota without going over the OTHER SPECIES cap. Presently the average cod harvested is 5-6 lb. round weight, whereas areas that the BRISTOL LEADER would normally fish would produce average fish in the 12-15 lb. range. Over twice the number of individual fish are being harvested to reach our CDQ allowable harvest, if it is reachable at all.

As we discussed earlier, the OTHER SPECIES quota has been severely reduced in 2001 far below both the documented longline fleet average by-catch in harvesting Pacific Cod and previous year's CDQ by-catch amounts. BBEDC's reduction in OTHER SPECIES allocation (including non-specific reserves) was over 45% from 832 M/T to 452 M/T between 2000 and 2001. This reduction effectively precludes any reasonable longline Pacific Cod fishery.

It is estimated that the BRISTOL LEADER'S daily fishing revenue has been reduced by over 50%, that the royalty amount received by BBEDC will be reduced by over 20% and that there is a very real likelihood that some of the BBEDC Pacific Cod CDQ quota may not be harvested due to these by-catch restraints. The entire financial cost to BBEDC from this situation, through both vessel ownership and as CDQ holder, may amount to over \$500,000.

Since OTHER SPECIES is composed of species with little or no commercial value, whose harvesting raises no known biological concerns, it seems totally unreasonable that this valuable Pacific Cod CDQ fishery be driven by these OTHER SPECIES limits. It is certainly contrary to the merits and intent of the overall CDQ program to economically handicap these fisheries and the communities, which benefit from this program, without a clear and rational purpose. Our vessels have always done everything possible to lower unnecessary by-catch and promote marine conservation practices. However this severe reduction of by-catch allowance of OTHER SPECIES has effectively produced a situation where there is no practical harvesting strategy for the vessels participating in the fishery.

I would hope that the North Pacific Fisheries Management Council has the opportunity to find a quick and sensible solution to this problem that returned the OTHER SPECIES CDQ allotments to the levels set in 1999 and 2000. These amounts enabled all groups to harvest their primary fisheries without unreasonable constraints. The 2001 CDQ cod fishery began in the BSAI in early April. If the Council acts swiftly, the CDQ fisheries for Pacific Cod can still be successfully conducted. Without some relief, the probability of success will be severely curtailed as the majority of these quotas are planned to be harvested prior to early June when lower target catch rates, higher halibut by-catch rates, and even higher OTHER SPECIES rates effectively shut this fishery down.

Sincerely,

Nick Delaney

cc: F/V Bristol Leader  
F/V Alaskan Leader

BBEDC, Harvesting Vessel  
CVRF, Harvesting Vessel

**BARANOF FISHERIES COURAGEOUS SEAFOODS**

3510 FIRST AVE. N.W.  
SEATTLE, WASHINGTON 98107  
PHONE: (206) 545-9501  
FAX: (206) 545-9536



April 13, 2001

David Benton — Chairman  
North Pacific Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501-2252

Re: OTHER SPECIES bycatch

Dear Mr. Chairman:


I am the General Manager of two freezer longliners currently attempting to prosecute the CDQ Pacific Cod fishery in the Bering Sea for two different CDQ groups.

We are finding it very difficult to catch this quota given the very small amounts of OTHER SPECIES bycatch which has been allotted to us due to the overall cutbacks in this bycatch category. We are currently catching OTHER SPECIES at a rate 1.5 times that of the target specie relative to the allotment and are finding that a realistic harvest plan may be impossible given the restrictions.

In addition we are finding that more than 40% of eastern cut fish are weighing out at less than 3 lbs. finished weight which is smaller than normal and due mostly to the areas we are being forced into by the reduced bycatch limits. It seems to be extremely shortsighted and wasteful to force the CDQ longline fleet into these areas of smaller fish.

We hope that the North Pacific Council and NMFS can find some means by which we can mitigate the effects of this artificial cap enabling the CDQ longline fleet to harvest its quota in a responsible and profitable manner.

Sincerely,

  
Chuck Hosmer  
General Manager  
Baranof Fisheries  
Courageous Seafoods



April 13, 2001

D-1  
Presented by John  
Henderschett

David Benton, Chairman  
North Pacific Fishery Management Council  
605 W. 4<sup>th</sup> Ave, Suite 306  
Anchorage Alaska 99501-2252

**RE: CDQ Other Species Quotas and 2001 Fisheries**

Dear Mr. Chairman,

**Problem Statement**

When the Council and NMFS set up the Multi-Species CDQ program, allocations were established as hard caps. CDQ groups immediately identified this as a problem for at least 'other species' and squid. The Council and NMFS made an exception to the hard caps for these species and arrowtooth. Fifteen percent of each complex goes into the Non-Specific Reserve (NSR)<sup>1</sup>. Squid was recently removed from the CDQ program.

CDQ allocations are significantly less than projected demand for 2001. This is due primarily to reduction in the arrowtooth TAC this year<sup>2</sup>. The large arrowtooth TACs that prevailed prior to 2001 provided sufficient NSR to avoid a severe shortage.

This is an immediate problem for this year for all groups' flatfish and sablefish/turbot fisheries, and also the p. cod fishery for most groups. It is unlikely the Council intended this when it reduced the arrowtooth TAC.

**Fisheries Foregone**

All groups will be forced to forego many major target fisheries. The specific fisheries will vary depending on each group's actual allocations. Groups will allocate o. species internally based primarily on the royalties each fishery generates.

Projected O. Species Demand by CDQ Fishery	Total CDQ Allocation, mt.	O. Species Bycatch Rate	Best Case <sup>3</sup> Projected O. Species Demand	O. Species Declining Balance
Pollock	140,000	0.13%	182.391	2,053.259
Longline cod	14,100	15.36%	2,165.548	(112.29)
Longline sablefish	106	5.03%	5.328	(117.62)
Longline turbot	630	3.38%	<u>21.321</u>	(138.94)
			2,374.589	

The pollock fishery will be first priority. Next will be cod, then sablefish and turbot, then perhaps Atka mackerel. Lowest priority is expected to go to flatfish fisheries,

<sup>1</sup> The 'o. species' category is made up of skates, sculpins, sharks, and octopus. Practically speaking, the o species quantities available to CDQ groups are their o. species allocation plus 15% of their arrowtooth.

<sup>2</sup> to keep the total of BSAI TACs below 2 M mt. The o. species ABC and TAC were also reduced slightly based on survey results.

<sup>3</sup> The large majority of o. species demand is in longline cod. Last year's bycatch rates are likely the best that can be achieved without major costs. These are somewhat lower than LLP rates, but managing the quotas exactly is impossible, such that LLP rates are probably the best that can be achieved overall.



which have a relatively high o. species bycatch and generate relatively low royalties. Thus the priority goes to pollock and longline fisheries (hereafter Priority Fisheries).

One group has high flatfish allocations along with high o. species and arrowtooth allocations and, relatively speaking, less cod. They could possibly target Atka mackerel. The other five are almost certain to forego all non-pollock trawl fisheries.

There are two CDQ groups with very low o. species and arrowtooth allocations relative to their cod allocations. These groups will probably be forced to forego all of their sablefish / turbot and a significant portion of their cod quotas unless they can dramatically reduce o. species bycatch with attendant costs to their longline operations. Either option will deal a serious blow to their royalties and operations for the year.

The last three groups will curtail their sablefish/ turbot fisheries unless they can further reduce o. species bycatch in the cod fishery at greatly increased cost.

### CDQ Group Cod Strategies

The CDQ groups and their partners have been working to reduce skate bycatch in the longline cod fishery over the past two years. The costs of further reduction far outweigh the benefits. This is especially true of the groups with the lowest o. species allocations.

CDQ cod fisheries occur primarily in late spring following the LLP fishery. This is after the cod have spawned and started to disperse and skates have started to move up onto the shelf. Bycatch would be higher than the LLP fishery without the reduction efforts. SSL RPAs will probably force more of the fishery into the summer with yet higher rates.

CDQ longline partners report two strategies identified so far for reducing skate bycatch, by far the dominant o. species bycatch. Some areas in the Aleutian Islands have lower rates, though cod production is often lower as well and the o. species rates are highly variable. These limited grounds are likely to be foreclosed under SSL RPAs.

Bering Sea areas of lower skate bycatch seem to be cod nursery areas with very small fish. Again, rates are highly variable, and seem to be getting worse as the season progresses. The consequences of fishing these areas are removal of a much larger number of individual fish and loss of biomass downstream. Avoiding o. species to the extent necessary this year will require vessels to ignore halibut bycatch, suffer greatly reduced cod catch rates and values, and appear to be impossible to attain.

### Bycatch Reduction Objectives

We believe it is appropriate for the Council to address its bycatch reduction objectives for the CDQ program. There does not seem to be a biological problem with skates (see discussion below). CDQ bycatch is a small fraction of the total TAC available. Significant negative impacts from the CDQ skate bycatch appear very unlikely.

Several groups process their skate bycatch into skate wings, and others are looking into doing so. Developing this market has been costly, and this bycatch is not wasted.

Alternatives to hard caps exist that could further reduce the impacts to the skate resource with fewer side effects should the Council find that this is necessary. It's highly unlikely that mortality is the 100% assumed now, and mortality could be reduced if the gangions are cut or the skates are carefully released similar to halibut.

**Amendment 63/63**

Splitting out sharks and skates would leave sculpins and octopus as BSAI o. species. Sculpins will probably be separated, with octopus having to go to PSC status.

The SSC has started moving o. species toward Tier 5 management based on the strength of the sculpin and skate biomass estimates. Tier 5 criteria result in the following :

	Sculpins	Skates	Sharks	Octopus	Total <sup>4</sup>	2000 Spec's
Biomass	181,417	379,167	4,300	2,133	567,017	
2000 AI + 3 yr Ave BS						
F <sub>M</sub> (from GOA SAFE)	0.15	0.10	0.09	0.30		
BSAI OFL Est. at F <sub>M</sub>	27,213	37,917	??	??	65,129	69,000
ABC Est. at 75% of OFL	20,409	28,438	??	??	48,847	33,600
TAC Est. = ABC	20,409	28,438	??	??	48,847	26,500
CDQ @ 7.5%	1,531	2,133	??	??	3,664	2,520
Best Case Est. of Bycatch in Priority CDQ fisheries						
Est % of o. species in priority fisheries	12.12%	84.81%	2.82%	0.26%		
Est. CDQ Demand	287.85	2,014.24	66.98	6.18	2,375	
Est. Over/ (Under)	1,242.85	118.58	??	??	1,346	

If the NSR remains and is applied to arrowtooth, sculpins and skates, there would probably be enough skates available for all groups to fully prosecute their cod fisheries at reasonable bycatch avoidance costs. Trawl fisheries would probably be limited.

**Request**

1. That the Council state its intent that the Non-Specific Reserve was intended, in part, to provide adequate o. species to allow reasonable CDQ fisheries, and that the reduction in arrowtooth TAC had a large and unintended impact on o. species quotas available to the CDQ groups.
2. That the impacts of Amendment 63/63 on the CDQ program be analyzed expeditiously. The likely ABC and TAC levels and their impacts and the future of the NSR need to be analyzed.
3. That the Council add to the analysis the option of removing o. species from the CDQ program and doing away with the Non-Specific Reserve.

Thank you for your consideration.

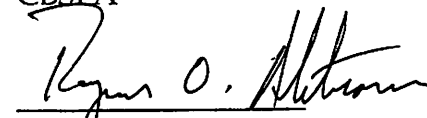
  
APICDA

  
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<sup>4</sup> Tier 5 criteria are not appropriate for sharks and octopus using the trawl surveys, as they are poorly sampled by that assessment technique. The totals are for sculpins and skates only

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