

MEMORANDUM

TO: Council, SSC, and AP

FROM: Chris Oliver 
Executive Director

ESTIMATED TIME
2 HOURS

DATE: March 26, 2003

SUBJECT: Staff Tasking

A summary of the status of Council projects and a three-meeting outlook is attached a Item D-2(a). In addition to reviewing the list of projects and timelines, I would like to briefly review what the various staff currently have on their plates relative to tasking. A significant portion my time after this meeting will be devoted to the organization and development of materials for the Council conference in Washington D.C. in November, along with standard administrative, budget, and contract monitoring issues. I have also taken over for Jon McCracken as the Council staff lead on IR/IU issues (at the end of February, Jon McCracken was called up for active duty with the U.S. Air Force, for up to one year). David Witherell has assumed many of the office administrative duties, including personnel issues, meeting preparation, and overall planning and coordination for various Council projects. He is also assisting with the EFH analysis.

Dr. Mark Fina has been working full-time on the Crab EIS and related trailing amendments, and will soon begin to focus on the Gulf rationalization project, as well as provide guidance on other Council analyses. Jane DiCosimo is the Council's project leader for the Gulf rationalization project, which could easily be a full-time project for the foreseeable future, though she will be working on other issues as they become priority projects, including halibut subsistence, rockfish and other species, and IFQ amendments. Nicole Kimball has been working on the Amendment 77 analysis (BSAI fixed gear P. cod allocations), as well as redevelopment of funding options for the Observer Program which will be a major project this year. She will also be working on social and community impacts relative to Gulf rationalization and other projects.

Dr. Diana Stram has spent much of her time since joining the staff writing portions of the Programmatic Groundfish SEIS. In the coming months, she will be working on the Pribilof Islands blue king crab rebuilding plan, the scallop FMP update, and environmental impacts portion of the Gulf rationalization EIS. Bill Wilson got quickly up to speed in his first month on staff, working to assist with the addendum to the Steller sea lion BiOp, per the judges remand. In the future, he will be working with seabird bycatch and other protected resource issues related to the Gulf rationalization EIS and other projects. Diana Evans has been working full time on the Programmatic Groundfish SEIS, and is expected to remain primarily devoted to that project until completion. She will be assisting with other projects to insure NEPA compliance. Cathy Coon has been working full time on the EFH project with data analysis, and will continue to work on the EFH project until it is completed. Elaine Dinneford has been fulfilling data requests relative to Amendment 77, EFH, and a number of other short and long-term data projects, including assisting with AKFIN development.

Given the number and magnitude of existing projects, I believe it is apparent that any additional projects will have to be initiated via outside contract assistance, or be considered at the expense of existing priorities. Over the past few meetings I carried forward several proposals related to the halibut/sablefish IFQ program, though in February you decided not to initiate work on those pending other priorities, and recognizing there are already IFQ amendments previously tasked and awaiting staff availability. Since then we did receive another new proposal (attached as Item D-2(b)), from the Alaska Longline Fishermen's Association, to change the product recovery rate for bled sablefish from the current 0.98 to 1.0. This change would apparently require a regulatory amendment.

This is also a good opportunity to inform you of some changes I have initiated with regards to our approach to completing analytical documents. In the past, each project was typically assigned to one staff person who had the responsibility for coordinating and completing all sections of the analysis. Because we now face more stringent analytical and regulatory streamlining requirements, I am working to develop a more team-oriented approach for completing analyses, where each staff contributes in their area of expertise to several of the ongoing projects and analyses. Our staff currently includes expertise in a broad range of fields, including resource economics, social/community considerations, fishery biology, protected resources, GIS, and oceanography. By applying the expertise of different people on the staff, my hope is that we can be more efficient with our time and provide better documents in the future. We have always done this to varying degrees, but now we are developing project workplans to more explicitly apply this approach.

Council Project Summary Updated March 26, 2003

Mandated Actions	Projected Weeks	Council/ NMFS %	Comments
1 Programmatic Groundfish SEIS (revision)	16	20/80	Identify draft preferred alternatives in June 03 (Diana E/ Diana S.)
2 FMP Updates (groundfish and scallop)	6	90/10	Concurrent with DPSEIS (Diana S./Jane)
3 EFH EIS	20	20/80	Major project through late 2003 (David/Cathy)
4 Crab FMP EIS	8	50/50	Initial review in June (Jane, Mark, Chris)
5 Pribilof Blue King Crab Rebuilding	3	30/70	Initial review in June (Diana S./ADF&G)

Council Priorities *Bold =Highest priority

6 GOA Rationalization*	?	90/10	Discuss in April - Council direction (Jane,Mark+contract help) Major Project
7 BSAI Crab Rationalization Trailing Amendments*	5	90/10	Remaining action in April. (Mark/Darrell)
8 Halibut Subsistence (new reg amendments/BOF mtgs)*	2	95/5	Review eligible communities in April (Jane).
9 IR/IU flatfish adjustments	0	80/20	Final action was taken in October to delay implementation until June 2004
10 IR/IU flatfish trailing amendments* (includes H&G coop)	6	50/50	Review analyses in April (Chris/Contract)
11 AI Pollock	2	20/80	Discussion in April
12 SR/RE retention*	2.5	80/20	Not started. (Jane/NMFS)
13 Halibut Charter IFQ/GHL	3	100/0	Preparing for SOC submittal (Jane)
14 Other Species (non-target, CDQ aspects, sharks/skates)	8	40/60	Further analysis required (NMFS/Council Staff) Review spring of 2003. (Jane)
15 Observer Program (long-term)	10	50/50	Discussion in April (Nicole/Chris)
16 Community based QS (GCCC buy in proposal)	1	90/10	Requires finalizing for SOC submittal. (Nicole)
17 CDQ Amendment (policy committee)	2	50/50	Further work required for SOC submittal. (Nicole)
18 Discussion paper on BSAI rockfish management	1	10/90	Report in April

Other Projects Previously Tasked

19	BSAI Amendment 77 - P.cod fixed gear allocations	3	90/10	Initial review in April (Nicole)
20	GOA Salmon Bycatch Caps	8	80/20	Tasked but on hold pending GOA rationalization progress.
21	TAC Setting Process	2	10/90	Discuss alternatives in April (Jane)
22	Opilio VIP	2	50/50	Not started
23	Catch/bycatch disclosure (vessel level)	2	70/30	Discussion paper - Postponed
24	Scoping paper on fee/loan program for IFQ Charter (NMFS?)	1	10/90	Pending SOC review of program
25	Independent Legal Review	2	100/0	Clarification pending (Chris).
26	Groundfish overfishing definitions	1	10/90	MSST status still under review; Comments on National Standard 1 due 4/16.

Potential New Projects or Lower Priority Projects

27	AFA s/b caps to quotas and trawl LLP recency	10	80/20	Pending further Council direction and staff availability
28	IFQ amendments (1999)	4	90/10	Pending Staff availability
29	Charter IFQ Community Set-Aside	4	90/10	Pending Council Direction
30	Industry proposal for pollock bycatch	?	90/10	Pending proposal and Council Direction
31	Other SSL Trailing Amendments	?	50/50	Pending Council Direction
32	NAS Steller sea lion report	?	50/50	Discuss next steps in April (T)
33	Response to F ₄₀ Independent Review	?	90/10	Discuss next steps in April (T)
34	CDQ review process	?	50/50	Pending Council Direction

DRAFT NPFMC THREE-MEETING OUTLOOK

March 31, 2003 Anchorage	June 9, 2003 Kodiak	October 6, 2003 Anchorage
*Tue., April 1-Joint Protocol Mtg NPFMC/BOF		
DC Conference in November: <i>Update</i>	DC Conference in November: <i>Update</i>	
Halibut Subsistence Program: <i>Review eligible communities</i>		
Crab Trailing Amendments: <i>Action as necessary</i> Crab EIS: <i>Progress Report</i>	Crab EIS: <i>Initial Review</i>	
	Pribilof Blue King Crab Rebuilding: <i>Initial Review</i>	Pribilof Blue King Crab Rebuilding: <i>Final Action</i>
GOA Rationalization: <i>Review Outline</i>	GOA Rationalization: <i>Review alternatives, elements, options</i>	GOA Rationalization: <i>Review preliminary analyses (T)</i>
EFH: <i>Report and Action as necessary</i>	EFH: <i>Preliminary review (T)</i>	EFH: <i>Action as necessary</i>
SSL BiOp Remand: <i>Review/Comment</i>		
P. cod allocation (Am 77): <i>Initial Review</i>	P. cod allocation (Am 77): <i>Final Action</i>	AI Pollock Closure: <i>Report</i>
DPSEIS: <i>Progress report/Review draft analysis</i>	DPSEIS: <i>Select draft Preferred Alternative</i>	DPSEIS: <i>Progress Report</i>
Flatfish IRIU Trailing Amendment (D): <i>Final Action</i>		Groundfish Specifications: <i>Initial Action</i>
Flatfish IRIU Trailing Amendment (C): <i>Initial Review</i>	Flatfish IRIU Trailing Amendment (C): <i>Final Action (T)</i>	
Flatfish IRIU Trailing Amend. (A): <i>Review proposal for Co-ops</i>	Flatfish IRIU Trailing Amendment (A): <i>Initial Review (T)</i>	
Observer Program: <i>Outline/Timeline</i>	Observer Program: <i>Progress Report</i>	Observer Program: <i>Initial Review (T)</i>
Rockfish Non-Target Species Management: <i>Report</i>	Non-Target Species Management: <i>Report</i>	Non-Target Species Management: <i>Final Action (T)</i>
F40 Report: <i>Discuss future actions (T)</i>		
Overfishing guidelines: <i>SSC review</i>		
TAC-setting Process: <i>Progress Report</i>	TAC-setting Process: <i>Initial Review (T)</i>	TAC-setting Process: <i>Final Action (T)</i>
Research Priorities: <i>Review</i>		
CDQ 'Other Species': <i>Final Action</i>		NAS SSL Report: <i>Discuss future actions</i>

TAC - Total Allowable Catch
BSAI - Bering Sea and Aleutian Islands
IFQ - Individual Fishing Quota
AFA - American Fisheries Act
HAPC - Habitat Areas of Particular Concern
LLP - License Limitation Program
PSC - Prohibited Species Catch

MSA - Magnuson Stevens Act
GOA - Gulf of Alaska
SSL - Steller Sea Lion
GHL - Guideline Harvest Level
SEIS - Supplemental Environmental Impact Statement
CDQ - Community Development Quota
IRIU - Improved Retention/Improved Utilization

SAFE - Stock assessment and fishery evaluation
VMS - Vessel Monitoring System
CV - Catcher Vessel CP- Catcher Processor
MSST - Minimum Stock Size Threshold
FMP - Fishery Management Plan
PGSEIS - Programmatic Groundfish SEIS
(T) Tentatively scheduled

ALASKA LONGLINE FISHERMEN'S ASSOCIATION
403 Lincoln Street, Ste. 237
Sitka, AK 99835

March 10, 2003

Dave Benton, Chairman
NPFMC
605 W. 4th Ave. Suite 306
Anchorage AK 99501

RECEIVED
MAR 21 2003
N.P.F.M.C

Dear Chairman Benton and Members of the Council,

On behalf of the members of the Alaska Longline Fishermen's Association (ALFA) I am requesting the Council initiate a Regulatory Amendment to change the Product Recovery Rate (PRR) for bled sablefish from the current 0.98 to 1.

What's the Problem?

Fishermen bleed sablefish to improve product quality. Early last year, NMFS began applying a 0.98 PRR for bled sablefish. The effect of the 0.98 PRR is that for every 10,000 lbs of bled sablefish delivered, 10,200 lbs. is deducted from that person's IFQ. This 2% deduction for blood loss has caused many fishermen to stop bleeding their fish, thus reducing product quality (see figure below).

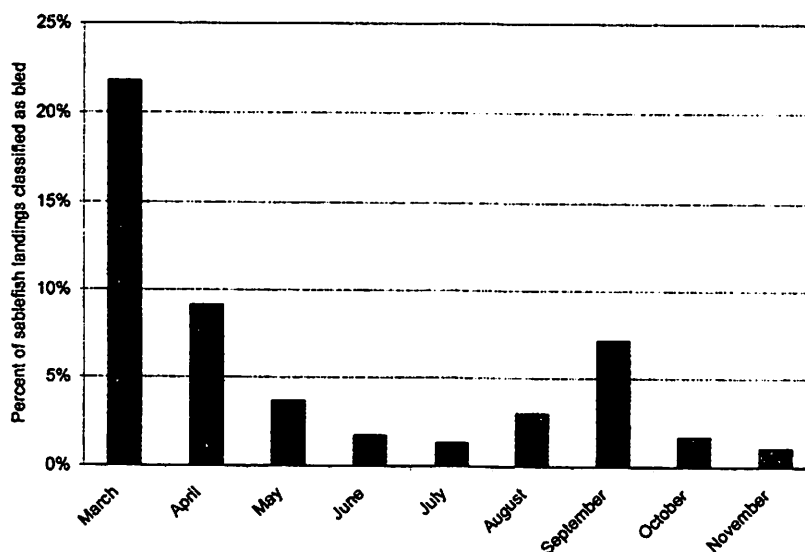


Figure 1.—Percent of sablefish landings classified as bled (product code 03) in the Alaska EEZ during 2002 (NMFS Alaska Regional Office).

ALFA contacted NMFS in May to ascertain the basis for the 0.98 PRR. We were told that the PRR dates back to the early 1980s and it is uncertain if the amount was ever verified for sablefish. It is also unclear what the 0.98 number represents. Fish landed as unbled, or round (product code 01) generally have some blood loss due to handling practices such as gaffing. The 0.98 PRR for bled fish (product code 03) should reflect the additional amount of blood loss due to actively bleeding the fish. It is unclear if this distinction was ever considered when setting the 0.98 PRR.

What's the Solution?

In July, ALFA participated in a joint study with NMFS Auke Bay Laboratory on board the survey vessel *Alaskan Leader* to determine the **maximum amount of blood loss in sablefish bled under ideal conditions** (I know this

sounds a bit gruesome, but hang in there). Maximum blood loss was chosen over estimating an appropriate PRR because of the short time available and the difficulty in taking into consideration variables such as soak time and handling practices.

While the study was able to achieve a 2% maximum blood loss using short soak times, netting rather than gaffing the fish to avoid injury, and bleeding them dry rather than in a RSW tank, study authors noted that these methods are not consistent with normal fishing practices. This in addition to the fact that an appropriate PRR should account for variability in soak times, and the background blood loss due to handling practices (gaffing) led the draft report (in review) to conclude that:

- “The current PRR for bled sablefish appears too high because of these factors.”
- “The blood loss in bled fish may differ little from unbled fish which lose blood due to being gaffed aboard then removed from the hook with a crucifier.”
- “The overall PRR for bled fish for the fleet is difficult to estimate because of the several factors that affect the PRR for a commercial fishing trip and because the blood loss is small and variable.”

ALFA’s proposal to change the PRR for bled sablefish to 1 is also predicated on the fact that the current PRR of 0.98 is more an exercise in accounting than a measure necessary to conserve the resource. Blood loss from handling practices is not considered in the stock assessment model, during the survey, or in the abundance estimates used for sablefish. The draft report on the bleeding experiment further concludes:

- “Whether or not blood loss is accounted for in catch estimation has minimal effect on abundance estimation in stock assessment models and the recommended quota, and does not serve to prevent over harvest.” (emphasis added)

What can the Council do?

In closing, the current PRR of 0.98 is too high and needs to be changed. It is not necessary for conservation of the resource, and it is having a detrimental effect on product quality. Given the threat of farmed fish, management practices should provide incentives, not disincentives to product quality. ALFA respectfully requests the Council initiate a regulatory amendment to address this issue.

Sincerely,



Linda Behnken
(Executive Director, ALFA)

PUBLIC TESTIMONY SIGN-UP SHEET FOR

AGENDA ITEM D-2 Staff Tasking

PLEASE SIGN ON THE NEXT BLANK LINE.
LINES LEFT BLANK WILL BE DELETED.

	NAME	AFFILIATION
1.	Julia Bonny	AGPB
2.	Hallie McLain / Ron Clavin	MCA
3.	Frank Kelly	City of Ull Alaska
4.	THOMAS SMITH	MPCA
5.		
6.		
7.		
8.		
9.		
10.		
11.		
12.		
13.		
14.		
15.		
16.		
17.		
18.		
19.		
20.		
21.		
22.		
23.		
24.		
25.		