



## C4 Bering Sea Greenland Turbot Longline Pots

October 2022 Council Meeting

### Action Memo

Council Staff: Sam Cunningham  
Other Presenters: Dr. Kelly Cates (NMFS AKRO SF)  
Action Required: 1. Initial Review of EA/RIR  
2. Consider selection of preliminary preferred alternative

### Background

In February 2022 the Council developed an action alternative (Alternative 2) that would authorize longline pot gear as a legal gear in the directed fishery for Bering Sea (BS) Greenland turbot. The Council included an Option under Alternative 2 that would remove the 9-inch maximum pot tunnel opening restriction for longline pot gear when used in the BS turbot directed fishery. The Council is considering the action alternative in response to increasing depredation on hook-and-line (HAL) gear by killer whales that has resulted in a complete halt to non-trawl activity in the BS Greenland turbot fishery dating back to 2021. The Council will weigh the likely benefits of reviving the non-trawl component of the turbot fishery against potential changes in participation and the profile of non-target species that might be encountered with a different gear. Other considerations include – but are not limited to – the frequency of interactions with marine mammals, any possibility of spatial/temporal overlap or conflict between gear types on the fishing grounds, and potential benefits to Greenland turbot stock assessment in the medium-to-long term.

The Greenland turbot fishery is prosecuted by trawl and non-trawl gear. The non-trawl component has historically been harvested by HAL catcher/processor vessels (CP) that comprise a subset of the Freezer Longline Coalition (FLC) cooperative, which is a voluntary cooperative recognized by NMFS that is primarily organized around harvest of the BSAI Pacific cod HAL CP fishery. The action alternative, as written, would not restrict the ability to use longline pot gear in the BS turbot fishery to members of the FLC cooperative. Any vessel (CP or catcher vessel) with License Limitation Program (LLP) license endorsements for the Bering Sea area and non-trawl gear would be authorized. This EA/RIR considers the distinction between the number of vessels that *could* participate in a longline pot fishery and the number that are *likely* to participate, among other things.

The fishery description (Section 3) describes current management of the BS Greenland turbot fishery for both non-trawl and trawl gear, and notes the existence of a non-regulatory agreement between those gear groups through which annual TAC is voluntarily and privately suballocated in an effort to keep directed fishing open longer. The section highlights that – absent additional regulatory amendment – all non-turbot, non-IFQ species caught in longline pot gear would be considered prohibited species and would have to be discarded (e.g., Pacific cod, arrowtooth flounder, Kamchatka flounder). Section 3 also accounts for the number of LLP licenses that could conceivably utilize longline pot gear and the other fisheries in which those licenses have historically been utilized, and describes historical participation, catch, and value from the fishery – with a focus on HAL CPs as the potentially regulated sector that has the most fishing history in the non-trawl component. Section 3.3.4 and the Appendix to the EA/RIR is

responsive to the Council's request to describe historical temporal and spatial overlap between the trawl and non-trawl sectors as they targeted BS Greenland turbot. Section 3.3.5 uses data from target fisheries that are comparable in location and fishing depth to gauge likely encounters with non-target FMP species and prohibited catch species (e.g., halibut, crab) to the extent possible. Section 3.4 provides the best available estimates on the scale of killer whale depredation on turbot, using data from the Alaska Fisheries Science Center longline survey and from at-sea fishery observers. Section 4 provides the narrative comparison of potential impacts under the action alternative relative to No Action.

Section 5 fulfills the requirements of the Environmental Assessment (EA). The resource components addressed in the analysis include Greenland turbot, non-target species, marine mammals, seabirds, and habitat. Section 6 describes monitoring in the BS non-trawl fisheries, monitoring enhancements that might be implemented by NMFS independent of this action, draft regulation changes related to Alternative 2, and safety considerations relevant to CPs that might utilized longline pot gear in the future.