

4241 21st Avenue West, Suite 302
Anchorage, AK 99515
Phone: 206-213-5270 Fax 206-213-5272
www.groundfishforum.org

September 28, 2010

Mr. Eric Olson, Chairman
North Pacific Fishery Management Council
605 W 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Re: Agenda Item C-6: Arrowtooth Flounder MRAs

Dear Chairman Olson,

Groundfish Forum represents six companies and 20 vessels and/or LLPs in the Amendment 80 sector which fish in the Bering Sea/Aleutian Islands and Gulf of Alaska. Our members include the primary participants in the BSAI arrowtooth flounder fishery. We are writing to comment on the proposed action to establish new maximum retainable allowances (MRAs) for arrowtooth flounder.

As you know, until recently there was little market for arrowtooth flounder. The Council chose very low MRAs (0% in most cases) for the directed arrowtooth fishery to prevent vessels from using arrowtooth as a basis for more valuable secondary species and then discarding or sending it to fishmeal. However, in recent years a viable market has developed and there is now a legitimate arrowtooth target fishery. The existing MRAs prevent retention of most of the incidental catch in that fishery, and result in unnecessary discards. While discarding is a concern for all sectors, it is particularly important to the Amendment 80 sector because of the 'groundfish retention standard,' or GRS, imposed by Amendment 79.

MRAs only apply to species for which directed fishing is prohibited. Under cooperative management, all Amendment 80 species (except Atka mackerel in 541 and 542) are open to coop vessels year-round, so for those species (yellowfin sole, flathead sole, rock sole, Pacific cod and POP) MRAs are not a concern. The issue arises for species which are closed to directed fishing (i.e., on MRA status) but are still caught incidental to arrowtooth flounder. The current 0% MRAs force vessel to discard these species.

The analysis does a good job of illustrating the actual incidental catch in the fishery, and provides the Council with information on appropriate MRA levels for each species. The numbers should be chosen to minimize discards, recognizing that an 'average' number is exceeded about half the time. We will have more detailed comments on specific MRA numbers during public testimony.

The Council should also consider a new complication which will occur if Kamchatka flounder is separated out from the arrowtooth complex, as is recommended by the Groundfish Plan Team. The two species are caught together in varying proportions, and have been managed as one group for reporting and MRA purposes. We believe it would make sense to apply the new MRA amounts for arrowtooth flounder to Kamchatka flounder, should it be placed in a separate category; however, there may be some regulatory issues which will need to be addressed. Again, we hope to have more detailed comments during public testimony after further discussions with NMFS.

Thank you for the opportunity to comment.

Sincerely,

Lori Swanson
Executive Director

PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: C-6 Arrowtooth Flounder MRA

NAME (PLEASE PRINT)	TESTIFYING ON BEHALF OF:
1 Lori Swanson	GROUND FISH FORUM
2 Todd Loomis	Coastal Fishing
3 MARK GLEASON	OCEAN PEACE
4 Kenny Down	FLC
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	

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.

October 10, 2010

NPFMC October 2010

Agenda Item C-6

“Revise the Maximum Retainable Amounts of Groundfish in the
Arrowtooth Flounder Fishery”



Freezer Longline Coalition

Attachments to Public Comments

Agenda Item C-6

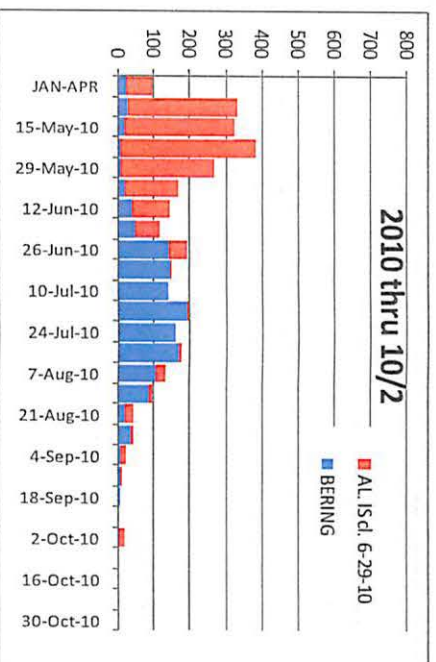
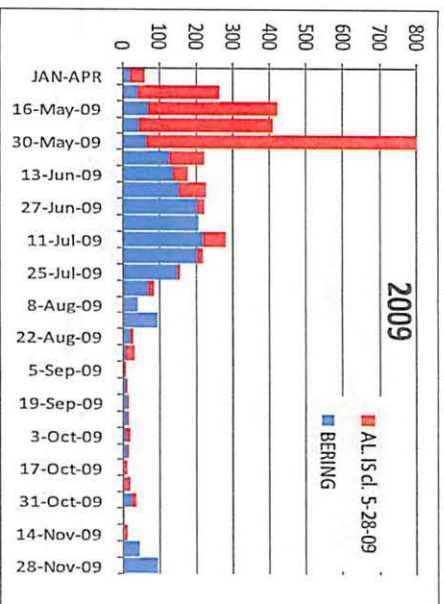
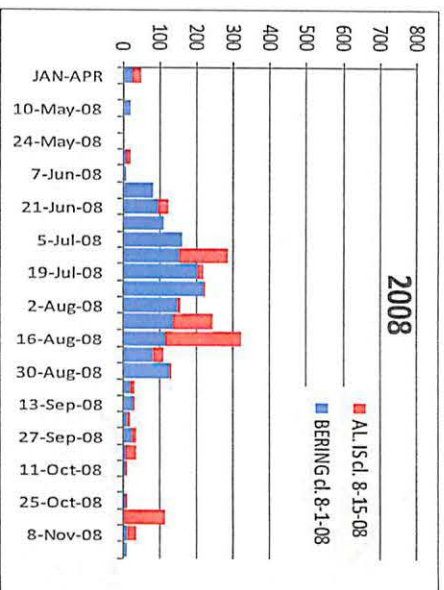
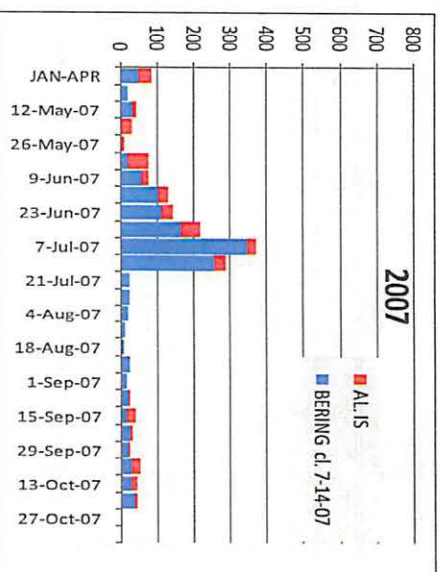
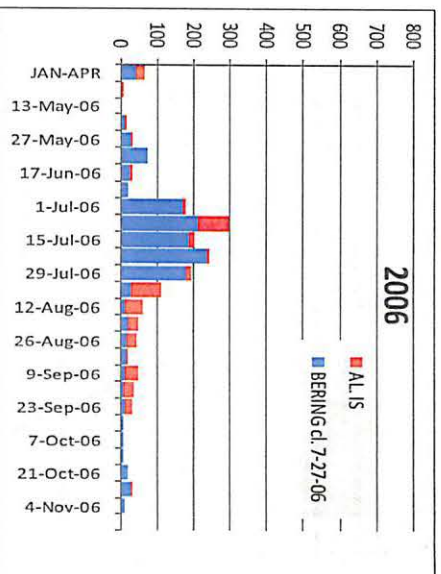
Bering Sea and Aleutian Islands Turbot fishery Closures to Directed Fishing

Opens May 1st each year

Year	Aleutian Islands	Bering Sea
2003	No Closure	Closed 8-02-03
2004	No Closure	No Closure
2005	No Closure	No Closure
2006	No Closure	7-27-06*
2007	No Closure	Closed 7-14-07
2008	Closed 8-15-08	Closed 8-1-08
2009	Closed 5-28-09	No Closure
2010	Closed 6-29-10	Remains Open

* Reopened 11-29-06

WEEKLY CATCH OF GREENLAND TURBOT (mt), ALL GEARS, 2006-2010

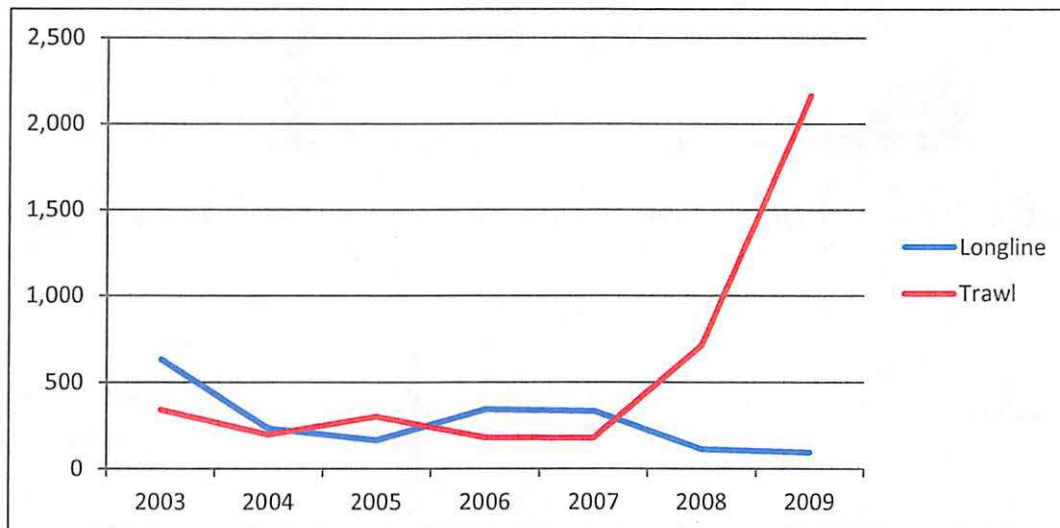


2.1

Aleutian Islands Greenland Turbot

	2003	2004	2005	2006	2007	2008	2009
Longline	631	232	164	343	333	111	93
Trawl	340	196	301	179	178	712	2,164
Total	971	428	465	521	511	824	2,257

Source: Catch Accounting



Bering Sea Greenland Turbot

	2003	2004	2005	2006	2007	2008	2009
Longline	1,890	1,313	1,699	1,250	1,181	692	1,315
Trawl	591	479	427	183	280	1,223	916
Total	2,481	1,793	2,126	1,433	1,461	1,915	2,231

Source: Catch Accounting

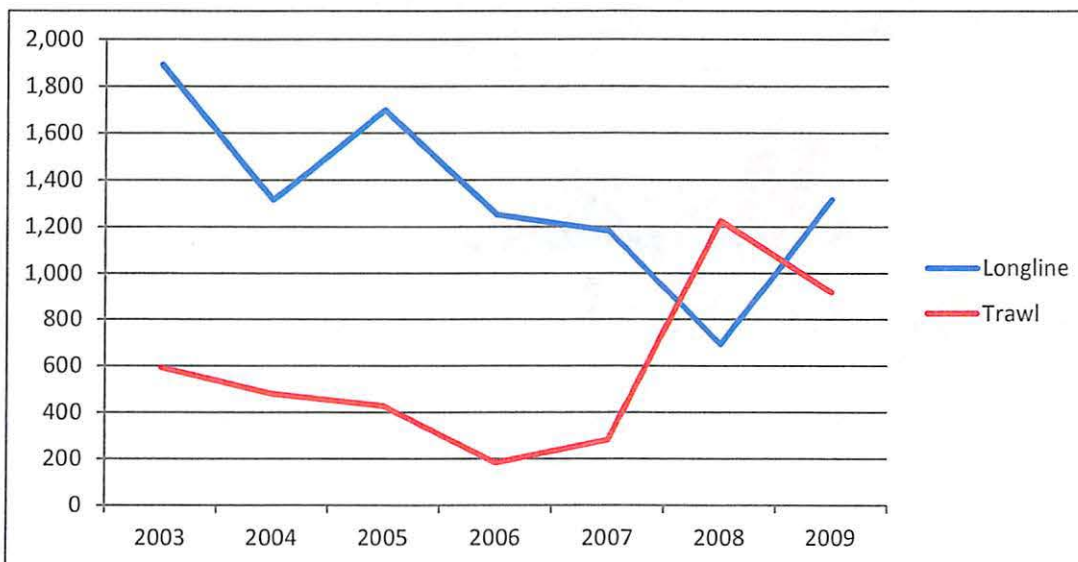


Table 5.2. Estimates of discarded and retained (t) Greenland turbot based on NMFS estimates by "target" fishery, 1992-2009 (the "arrowtooth" fishery was combined with the Greenland turbot fishery from 2003-2009).

Fishery:	Greenland turbot		Sablefish		Pacific cod		Rockfish		Flatfish		Others		Combined	
	Retain	Discard	Retain	Discard	Retain	Discard	Retain	Discard	Retain	Discard	Retain	Discard	Retain	Discard
1992	62	13	196	2,121	135	557	180	103	13	3	107	261	693	3,058
1993	5,685	332	235	880	160	108	572	87	19	185	10	194	6,681	1,786
1994	6,316	368	194	2,305	149	211	316	37	27	235	38	76	7,040	3,232
1995	5,093	327	157	1,546	145	284	362	25	5	102	28	121	5,790	2,405
1996	3,451	173	200	1,026	170	307	598	113	171	63	143	140	4,733	1,822
1997	4,709	521	129	619	270	283	202	19	212	92	18	125	5,540	1,659
1998	6,905	301	125	171	278	154	42	2	628	249	123	171	8,101	1,048
1999	4,009	227	179	120	180	50	25	2	600	269	134	61	5,127	729
2000	4,798	177	192	253	130	108	39	1	838	176	186	75	6,183	790
2001	2,727	89	171	325	203	92	431	30	764	337	95	47	4,391	920
2002	1,979	73	144	207	210	139	175	18	301	217	124	49	2,933	703
2003	1,842	95	98	534	165	95	198	5	114	176	79	55	2,497	961
2004	1,244	37	78	24	221	79	72	3	154	158	99	50	1,868	352
2005	1,677	28	63	19	156	30	134	5	179	69	149	49	2,359	200
2006	1,340	33	62	52	65	31	69	8	107	19	135	46	1,778	188
2007	1,091	28	59	71	127	91	36	13	30	35	198	50	1,541	288
2008	1,537	417	42	82	17	70	142	1	96	30	203	103	2,038	703
2009	3,436	334	64	50	34	18	64	5	51	12	115	14	3,764	432

Table 5.3. Estimates of Greenland turbot catch by gear and area based on NMFS Regional Office estimates, 2003-2009.

Area	Gear	2003	2004	2005	2006	2007	2008	2009
Aleutian Islands	Fixed	650	218	138	346	338	111	90
	Trawl	315	196	301	179	178	712	2,083
Aleutian Islands Total		965	414	439	525	516	824	2,173
EBS	Fixed	1,918	1,326	1,693	1,259	1,061	694	1,175
	Trawl	575	479	427	181	251	1,222	849
EBS Total		2,493	1,805	2,120	1,440	1,313	1,917	2,024
Grand Total		3,458	2,220	2,559	1,965	1,829	2,741	4,196

(7)