Rockfish Retention

Public Review

Introduction

Document analyzes proposed management to amend the groundfish FMPs for the BSAI and GOA

Require full retention of all rockfish species for fixed gear CVs in the BSAI and GOA

Includes an option to require full retention when on PSC status (PSC retained species would be restricted from enter commerce)



The purpose of the proposed action as noted in the P & N statement:

Improve identification of species when CVs subject to EM

Improve data collection by providing accurate estimates of catch

Reduce incentives to discard rockfish

Reduce waste

Reduce enforcement burden

Increase management consistence between State and federal rockfish fisheries

June 2018 Initial Review

- Council completed an initial review at the June 2018 meeting in Kodiak
- Released the document for public review
- Modified purpose & need statement to better reflect Council intent

Selected a PPA

Alternative 2: require full retention of all rockfish species by all fixed gear CVs in the BSAI and GOA

Option 1: Require full retention of rockfish even if on PSC status, but prohibit the rockfish from entering commerce

Option 2: Establish a maximum commerce allowance of 10% or 15%

 PPA would change the MCA and retention requirement when on PSC status for DSR in SEO, but the PPA would not directly impact blue, black, and dark rockfish since these were removed from the FMP

Section 2.6.1

Describe
management of
rockfish species
(Table 2-1 on page 14
summarizes that
management)

Sections 2.6.2- 2.6.3

Provide an overview of the different rockfish species in the BSAI and GOA (pages 14-20)

Section 2.6.4

Provides information on incidental catch management (page 20-23)

MRA Management

- Table 2-6 provides rockfish MRAs for fixed gear fisheries in federal waters (page 21)
 - For DSR in SEO, the MCA is 10% for halibut IFQ and groundfish fisheries, and for sablefish its 1%
- As noted in Tables 2-7 and 2-8 on pages 22 and 23, the MRAs for the rockfish species in State waters varies a lot across the different species and subareas
 - In Table 2-8, the percent for DSR in SEO is an MCA while DSR in other areas is MRA
 - For black, blue, and dark rockfish, Council removed from FMP so State has retention authority

Section 2.6.5

- Provides an overview of the full retention requirement for DSR in SEO for CVs using H&L and jig gear (pages 23-24)
 - FMP delegates to the State some management responsibility for DSR in SEO
 - Council and NMFS establish the TAC, impose MRA, and put DSR in SEO on PSC status
 - State establish fishing seasons, gear restrictions, set GHL for directed DSR, and limits amount of DSR retained for bait
 - Only when DSR in SEO are on PSC status is DSR discarded. Option 2 would change that requirement.

Section 2.6.6

- Provides State rockfish retention requirements (pages 24-26)
 - Table 2-9 (page 25) provides rockfish retention requirements by area in federal and State managed waters
 - Figure 2-1 (page 26) provides a visual of retention requirements in Southeast Alaska and Yakutat

Alternative 1 Section 2.7.1.1

- Provides a description of fixed gear CVs directed fisheries (pages 26-32)
 - Provides fishery seasons for jig, hook-and-line, and pot gear
 - Provides information on the directed fisheries by gear and area
 - Table 2-10 (page 28) shows count and total catch of combined cod, IFQ halibut, and IFQ sablefish by vessel length in the BSAI for 2017
 - Table 2-11 (page 29) shows same thing but for the GOA in 2017

Tables 2-10 & 2-11 provide vessel count and catch (mt) of Pacific cod, IFQ halibut, and IFQ sablefish combined for fixed gear CVs for 2017

BSAI

Vessel length	H/	HAL		G	PC	OT .
Vessei length	Vessel count	Catch (mt)	Vessel count	Catch (mt)	Vessel count	Catch (mt)
Less than 30 feet	34	122				
30 feet - 40 feet	33	283				
40 feet - 50 feet	14	292	1	С	1	С
50 feet - 60 feet	30	956			21	11,372
60 feet - 100 feet	17	470			6	1,300
Greater than 100 feet	3	128			32	12,908

Source: CAS; May, 2018

c = confidential data

GOA

Vessel length	HA	HAL		G	РОТ	
vesseriengui	Vessel count	Catch (mt)	Vessel count	Catch (mt)	Vessel count	Catch (mt)
Less than 30 feet	91	184	3	< 1		
30 feet - 40 feet	234	2,282	38	49	3	39
40 feet - 50 feet	201	4,615	43	14	10	380
50 feet - 60 feet	224	8,749	13	13	69	8,051
60 feet - 100 feet	48	3,376			14	3,370
Greater than 100 feet	5	128			10	2,405

Source: CAS; May, 2018

Tables 2-12 and 2-13 (pages 29-30) provide vessel count, catch (mt), and exvessel value for hook-and-line CVs by target species from 2013 – 2017

	IFQ Halibut				IFQ Sablefish			Pacific cod		
Year	Vessels count	Catch (mt)	Exvessel value	Vessels count	Catch (mt)	Exvessel value	Vessels count	Catch (mt)	Exvessel value	
2013	220	2,214	\$21,131,256	40	570	\$4,873,280	41	1,033	\$644,731	
2014	154	1,750	\$20,755,347	37	515	\$5,969,879	27	2,167	\$1,436,829	
2015	129	1,821	\$23,277,704	39	355	\$4,152,942	34	756	\$472,095	
2016	127	1,975	\$25,884,084	38	221	\$2,399,821	29	20	\$12,974	
2017	130	1,999	NPD	27	161	NPD	38	92	NPD	

Source: Vessel count and retained catch from NMFS Sustainable Fisheries & price data from AKFIN

NPD = Exvessel prices have not been released

GOA

IFQ Halibut			IFQ Sablefish			Pacific cod			
Year	Vessels count	Catch (mt)	Exvessel value	Vessels count	Catch (mt)	Exvessel value	Vessels count	Catch (mt)	Exvessel value
2013	872	10,955	\$121,472,775	311	9,854	\$71,535,238	341	7,714	\$4,728,524
2014	868	8,254	\$113,645,867	294	8,513	\$76,977,569	320	7,469	\$5,174,341
2015	817	8,652	\$119,612,535	287	8,200	\$79,745,507	304	7,038	\$4,900,545
2016	810	8,663	\$125,299,166	285	7,295	\$79,615,624	272	3,043	\$2,058,856
2017	787	9,213	NPD	271	7,154	NPD	242	2,965	NPD

Source: Vessel count and retained catch from NMFS Sustainable Fisheries & price data from AKFIN

NPD = Exvessel prices have not been released

Tables 2-14 and 2-15 (pages 30-31) provide vessel count, catch (mt), and exvessel value for <u>pot</u> CVs by <u>target</u> species from 2013 – 2017

BSAI

	IFQ Halibut			IFQ Sablefish			Pacific cod		
Year	Vessels count	Catch (mt)	Exvessel value	Vessels count	Catch (mt)	Exvessel value	Vessels count	Catch (mt)	Exvessel value
2013				4	438	\$3,744,738	53	23,367	\$14,576,939
2014				4	324	\$3,758,608	46	23,419	\$15,528,300
2015	NA	NA	NA	3	120	\$1,402,732	44	21,879	\$13,671,665
2016				4	177	\$1,921,044	46	23,333	\$15,051,215
2017				6	488	NPD	56	25,252	NPD

Source: Vessel count and retained catch from NMFS Sustainable Fisheries & price data from AKFIN

NPD = Exvessel prices have not been released

GOA

	IFQ Halibut				IFQ Sablefish			Pacific cod		
Year	Vessels count	Catch (mt)	Exvessel value	Vessels count	Catch (mt)	Exvessel value	Vessels count	Catch (mt)	Exvessel value	
2013							89	16,900	\$10,359,676	
2014	NA	NA	NA	NA	NA	NA	80	19,729	\$13,668,025	
2015	IVA	INA	INA	INA	INA	NA	92	20,427	\$14,222,665	
2016							98	19,132	\$12,943,970	
2017	14	16	NPD	22	883	NPD	91	13,346	NPD	

Source: Vessel count and retained catch from NMFS Sustainable Fisheries & price data from AKFIN

NPD = Exvessel prices have not been released

Tables 2-16 and 2-17 (pages 31-32) provide vessel count, catch (mt), and exvessel value for jig vessels by target species from 2013 – 2017

BSAI

	Halibut				Pacific cod			Rockfish		
Year	Vessels count	Catch (mt)	Exvessel value	Vessels count	Catch (mt)	Exvessel value	Vessels count	Catch (mt)	Exvessel value	
2013	98	25	\$236,763	16	15	\$9,358	0	0	\$0	
2014	4	2	\$18,464	2	*	*	1	*	*	
2015	0	0	\$0	4	28	\$17,496	1	*	*	
2016	0	0	\$0	2	*	*	2	*	*	
2017	0	0	NPD	1	*	NPD	0	0	NPD	

Source: Vessel count and retained catch from NMFS Sustainable Fisheries & price data from AKFIN

NPD = Exvessel prices have not been released

GOA

	Halibut				Pacific Cod			Rockfish		
Year	Vessels count	Catch (mt)	Exvessel value	Vessels count	Catch (mt)	Exvessel value	Vessels count	Catch (mt)	Exvessel value	
2013	65	6	\$72,015	55	476	\$291,518	55	21	\$22,222	
2014	65	11	\$155,443	77	1,046	\$724,757	49	17	\$16,490	
2015	61	14	\$189,939	49	408	\$284,138	45	17	\$20,988	
2016	66	10	\$144,656	74	346	\$234,060	66	43	\$51,191	
2017	69	10	NPD	29	67	NPD	69	30	NPD	

Source: Vessel count and retained catch from NMFS Sustainable Fisheries & price data from AKFIN

NPD = Exvessel prices have not been released

^{*} Confidential data

Tables 2-18 and 2-19 (pages 32-33) provide incidental catch of rockfish by species/complex for combined fix gear CVs in the BSAI & GOA

BSAI

		0-4	a la la a a /	-41					
Rockfish species/complex		Catch by year (mt)							
rtookiion opeoleo/complex	2013	2014	2015	2016	2017				
Pacific Ocean perch	0	3	1	0	0				
Northern rockfish	2	1	1	1	0				
Rougheye/blackspotted	5	7	2	4	11				
Shortraker rockfish	46	37	23	15	21				
Other rockfish	74	149	56	51	43				

thornyhead

Source: NMFS Sustainable Fisheries

GOA

Rockfish species/complex		C	Catch by year (n	nt)	
Rockiisii species/complex	2013	2014	2015	2016	2017
Pacific Ocean perch	2	1	1	10	1
Northern rockfish	8	5	3	9	9
Duskyrockfish	20	15	23	33	34
Shortraker rockfish	317	276	213	195	203
Rougheye/blackspotted	202	176	177	135	126
Other rockfish	273	151	186	209	181
Yelloweye rockfish 1	149	87	87	93	90
Thornyhead rockfish	842	601	632	601	543
Demersal shelf rockfish	92	73	71	78	90
Yelloweye rockfish²	87	70	67	72	86

Source: AKFIN, Sept 26, 2018

Table orginates from file Rock_Ret_Catch_(9-26-18)

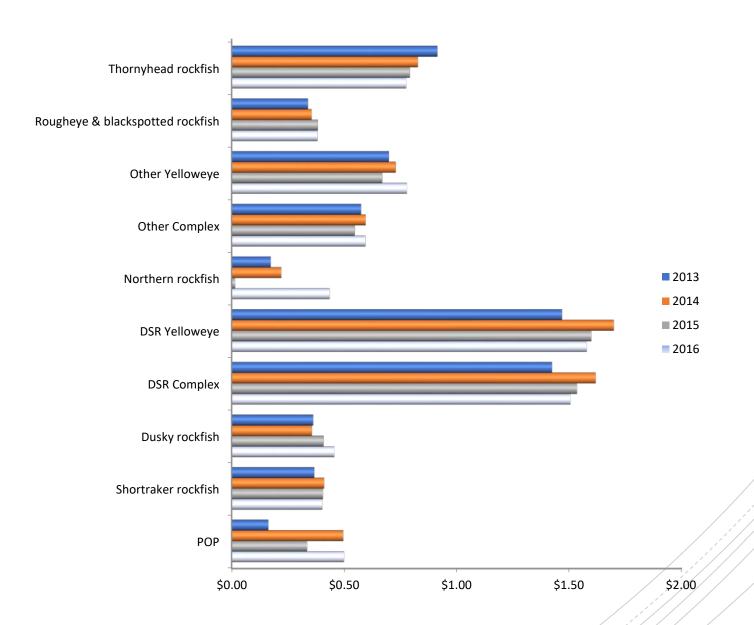
Yellow eye rockfish catch is a portion of the species complex

¹Except DSR w hich is managed in SEO, yellow eye rockfish is managed as part of "other rockfish" species group in the GOA.

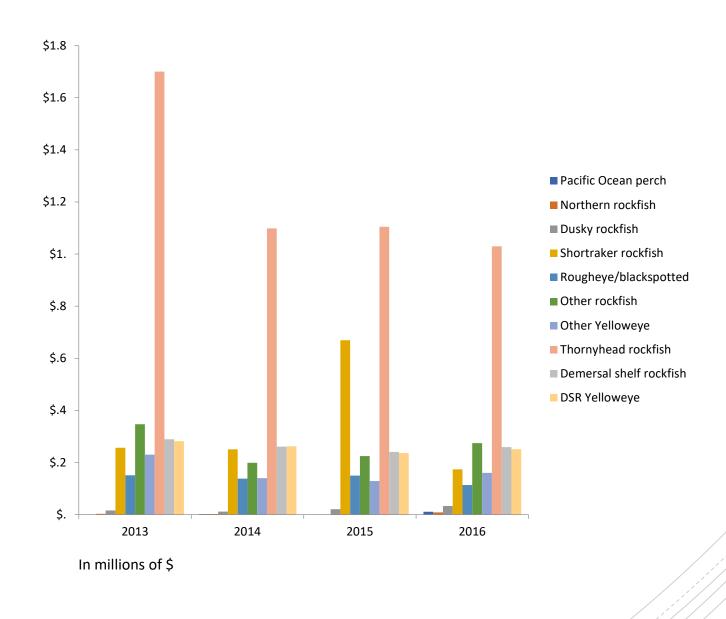
²The primary species of the DSR fishery is yellow eye rockfish, which is managed in the SEO.

Rockfish Exvessel Prices for GOA

(Table 2-21 page 33)



Rockfish Exvessel Value for GOA (Table 2-23 page 34)



Tables 2-24 and 2-25 (page 35) provides total rockfish incidental catch and catch rates by gear type in the BSAI and GOA from 2013-2017

BSAI

	Hook-	Pot			
Year	Incidental catch (mt)	Incidental catch rate (%)	Incidental catch (mt)	Incidental catch rate (%)	
2013	120	3.11	7	0.03	
2014	189	4.22	4	0.02	
2015	75	2.53	3	0.01	
2016	66	2.95	3	0.01	
2017	63	2.93	1	О	

Source: NMFS Sustainable Fisheries



	Hook-	and-line	Pot		
Year	Incidental catch (mt)	Incidental catch rate (%)	Incidental catch (mt)	Incidental catch rate (%)	
2013	1,792	6.03	8	0.04	
2014	1,313	5.2	9	0.05	
2015	1,337	5.53	9	0.04	
2016	1,270	6.49	19	0.1	
2017	1,051	5.9	49	0.39	

Source: NMFS Sustainable Fisheries

Rates are the total rockfish/total retained groundfish and halibut

Tables 2-26 and 2-27 (page 36) provides rockfish incidental catch and catch rates for hook-and-line gear by target in the BSAI and GOA from 2013-2017

BSAI



	IFQ/CDG) Halibut	IFQ/CDQ	Sablefish	Pacific cod		
Year	Incidental catch (mt)	Incidental catch rate (%)	Incidental catch (mt)	Incidental catch rate (%)	Incidental catch (mt)	Incidental catch rate (%)	
2013	73	3.14	47	9.16	<1	0.01	
2014	51	2.94	132	22.03	7	0.31	
2015	52	2.76	21	6.06	2	0.26	
2016	54	2.6	12	7.63	<1	О	
2017	54	2.73	8	10.82	<1	0.15	

Source: NMFS Sustainable Fisheries

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	IFQ Halibut		IFQ Sa	blefish	Pacific cod				
Year	Incidental catch (mt)	Incidental catch rate (%)	Incidental catch (mt)	Incidental catch rate (%)	Incidental catch (mt)	Incidental catch rate (%)			
2013	502	4.52	1,265	11.7	24	0.31			
2014	403	4.84	900	9.56	11	0.14			
2015	383	4.35	903	10.06	50	0.78			
2016	384	4.41	853	10.51	33	1.19			
2017	340	4.17	774	9.62	31	1.29			

Source: NMFS Sustainable Fisheries

Retention of Incidental Catch of Rockfish

- In hook-and-line fisheries more rockfish is retained then discarded
 - Vessels with FFP required to retain rockfish when IFQ halibut and IFQ sablefish are onboard
 - Retention rates vary depending on area likely due to existing retention regulations
 - For example in SEO (650) has a higher retention rate
 - Vessels may retain rockfish to prevent a violation resulting from misidentification
 - Discards are likely due to multiple reasons
 - Prevent exceeding MRA
 - When on PSC status
 - Lack of market for incidental rockfish
 - Lack of hold space for incidental rockfish

Table 2-28 (page 37) provides % retained of rockfish on observed trips for the hook-and-line gear in the GOA by reporting area from 2015-2018

Year	610	620	630	640	649	650	659	GOA Wide
2013	28%	29%	65%	81%	100%	71%	91%	64%
2014	52%	53%	69%	71%	58%	85%	93%	73%
2015	53%	36%	73%	79%	92%	86%	78%	75%
2016	54%	65%	75%	72%	71%	83%	95%	77%
2017	60%	53%	70%	77%	97%	83%	92%	700/
2013-2017	47%	47%	71%	76%	80%	83%	89%	73%

Table 2-29 (page 38) provides observed rockfish catch, retained rockfish catch, and percent of rockfish retained for hook-and-line in GOA by rockfish species from





Species	Total observed catch (mt)	Observed retained catch (mt)	Percentage retained
Thornyhead Rockfish	262,024	197,960	76%
Yelloweye Rockfish	51,463	38,806	75%
Redbanded Rockfish	23,887	14,878	62%
Unidentified Rockfish Species	22,458	10,559	47%
Quillback Rockfish	10,672	8,622	81%
Dusky Rockfish	4,840	857	18%
Silvergray rockfish	2,253	1,411	63%
Other Identified Rockfish Species	3,639	1,460	40%

Alternatives 2 and 3 Impacts

Impacts to Vessels

- Overall the impacts to vessels from full retention of rockfish would likely be small
 - Some operators may change where they fish to reduce incidental rockfish
 - Could increase fuel costs due to more trips or lower CPUE
 - Faced with higher costs associated with full retention, some operators may choose to violate full retention requirements

Impacts to Processors

- Processors may see higher production costs associated with full retention
 - Some of these additional costs:
 - Weighing, sorting, grading, and recording
 - Assistance to vessel operators to processing incidental rockfish for home packs
 - Increase cost for disposing incidental rockfish
 - Processing and coordinating delivery of incidental rockfish for donations

Impacts to Processors

- Could reduce waste since most of the incidental catch will be used for commerce, home packs, and donation programs
- Table 2-33 (page 41) provides incidental catch of rockfish sold to processors, used for personal use, overage, and discarded

	BSAI									
Year	Sold (mt)	Personal use (mt)	Overage (mt)	Discarded Onshore (mt)						
2013	37	2	n/a	1						
2014	46	2	С	3						
2015	32	3	n/a	2						
2016	26	1	n/a	2						
2017	18	2	n/a	1						
		GOA								
Year	Sold (mt)	Personal use (mt)	Overage (mt)	Discarded Onshore (mt)						
2013	1,024	65	58	2						
2014	857	57	50	1						
2015	934	53	51	1						
2016	895	53	59	3						
2017	793	53	56	2						

Source: eLandings; May, 2018; file located in community tables.

c = confidential data

Impacts to Communities

 Table 2-35 (page 43) provides top 10 communities by number of deliveries of all groundfish & halibut and those with rockfish for fixed gear CVs in 2017

Community/port	All groundfish and halibut			With rockfish		
Community/port	HAL	Pot	Jig	HAL	Pot	Jig
Kodiak	833	161	737	365	92	54
Sitka	737	788	С	665	555	С
Seward	522	28	С	479	27	С
Petersburg	411	26	С	284	С	С
Homer	366	27	234	185	19	3
Juneau	308	С	С	212	С	С
Yakutat	С	С	С	С	n/a	С
St Paul	С	n/a	n/a	С	n/a	n/a
Dutch Harbor/Unalaska	С	n/a	489	С	n/a	28
Wrangell	С	С	С	С	С	С

Source: eLandings

c = confidential data

Impacts to Communities

- Alt 2 & 3 could change some vessel's delivery pattern
 - Factors: perceived value of rockfish relative to target and distance to homeport relative to nearest port
- Table 2-36 (page 44) shows the percent of exvessel revenue relative to total exvessel revenue in 2017
- Impacts likely to be distributional in nature

			Vesse	el Length			Total	Averege deve	Percent of
City	<	30'	<	45'		<58'	Total vessel	Average days fished for all H&L	exvessel
•	Vessel count	Average trip length	Vessel count	Average trip length	Vessel count	Average trip length	count	vessels under 58'	revenue from H&L CV <58'
Wrangell					3	6	3	(6)	6
Douglas					6	5	6	5	21
Seldovia			4	5			4	5	15
Petersburg					5	4	5	4	3
Cordova			4	4	3	5	7	4	3
Sand Point			4	4	4	5	8	4	1
Haines			4	5	3	4	7	4	7
Juneau			3	4	10	4	13	4	12
Craig			4	4	5	4	9	4	7
Homer	3	2	50	4	20	5	73	4	20
Fritz Creek			3	4			3	4	39
Kodiak	8	2	22	3	17	4	47	3	5
Sitka	19	2	25	3	38	4	82	3	30
Ouzinkie	4	2					4	2	43
Yakutat	9	2	7	3			16	2	47

Source: AKFIN

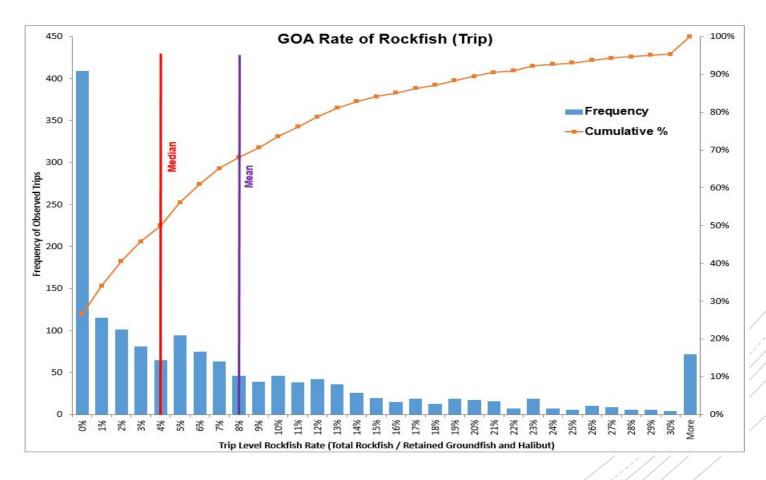
Table orginates from rockfish_ret_comm_days_fished(9-14-18) & Rockfish_Ret_Comm_Div(9-14-18)

Option 1: Full Retention when on PSC Status

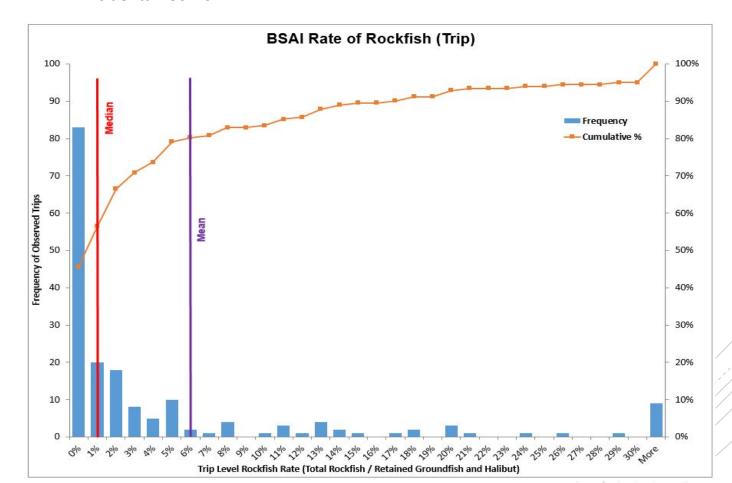
- Under full retention on PSC status, rockfish on PSC status would be prohibited from entering commerce
 - In other words, the MCA for rockfish species on PSC status would be zero
- Option will likely continue to maintain the management goals of PSC actions
 - Will remove financial incentives to catch more rockfish
 - Will still maintain regulation requiring a vessel operator to minimize catch of rockfish
 - Could reduce regulation complications by providing consistency with retention requirement
- If on PSC status in one area and vessel operates in multiple areas, the MCA for that species would zero for all catch of that species even if caught in multiple areas
 - Could change fishing behavior to avoid that species to extent possible
- PSC actions for rockfish are not necessary in most areas
- Impact of this option is expected to be small

- Options include 10% or 15% MCA
- Amount of rockfish that allowed to enter commerce
- Amount of rockfish over the MCA is prohibited from enter commerce; could be used for home packs, donations, or discarded at the shore processor
- The MCA for DSR in the halibut and groundfish fisheries is 10% & in the sablefish fishery it is 1%
 - In the halibut and groundfish fisheries, vessels are more likely to encounter rockfish, while less likely in the sablefish fishery
- The MRAs for rockfish in the GOA and BSAI is presented in Table 2-6 on page 21
 - Selecting one MCA would reduce confusion of multiple MCAs
- Rockfish are not considered to be a top off species for fixed gear CVs
 - Top offs usually more valuable than target species
 - In the case of these rockfish species, halibut and sablefish are more valuable
 - Financial incentives that drive top off fishing are less likely for halibut and sablefish

- Incidental catch rate of rockfish by H&L CVs in the GOA
 - Total observed trips 2014-2017: 1,541
 - Number of trips with rockfish 1,237
 - Median incidental rockfish rate 4% (50% of distribution)
 - Mean incidental rockfish rate 8% (70% of distribution)
 - At 11% MCA, 75% of observed trips would have been allowed to sell all incidental rockfish
 - At 16% MCA, 85% of observed trips would have been allowed to sell all incidental rockfish



- Incidental catch rate of rockfish by H&L CVs in the BSAI
 - Total observed trips 2014-2017: 182
 - Number of trips with rockfish 122
 - Median incidental rockfish rate 1% (50% of distribution)
 - Mean incidental rockfish rate 6% (70% of distribution)
 - At 5% MCA, 75% of observed trips would have been allowed to sell all incidental rockfish
 - At 11% MCA, 85% of observed trips would have been allowed to sell all incidental rockfish



- Trade offs on selection of MCA
- <u>Lower MCA</u> incentivize avoidance but increases the amount of potential waste
- <u>Higher</u> MCA reduces incentive to avoid rockfish and could result in top off behavior but reduces waste
- Overall:
 - At 10% MCA 72% of trips in GOA and 80% in BSAI would be able to sell all of their incidental rockfish
 - Largest impacts are more likely on vessels targeting sablefish since the average incidental catch rate of rockfish is between 10% and 20%
 - At 15% MCA over 85% of trips will be able to sell all of their incidental rockfish

Other Effects

- I highlighted the major areas of impacts from the proposed action
- Other areas that are discussed in the document but not presented include:
 - Improved inconsistences between State and Federal management (Section 2.7.2.5 on pages 50-51)
 - Limited impacts on recreational users (Section 2.7.2.7 on page 52)
 - No impacts on safety (Section 2.7.2.8 Page 52)
 - Improvements in rockfish stock assessments (Section 2.7.2.9 on page 53)
 - Minimal impacts on NMFS's Inseason Management of incidental catch of rockfish by fixed gear CVs (Section 2.7.2.10 on pages 53-56)
 - Improves enforcement of rockfish overages (Section 2.7.2.11 on pages 56-58)