

The background features a series of concentric circles, some solid and some dashed, in a light gray color. A large blue callout box with a downward-pointing arrow at the bottom center is overlaid on the circles. The text is centered within this box.

# Rockfish Retention

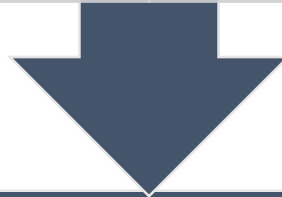
Public Review

# 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

## Feb 2019 Public Review

- Council completed a public review at the Feb 2019 meeting in Portland
- Added 20% MCA for Option 2
- Added a suboption that fishmeal is not considered commerce
- 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 (MCA = 0)

Option 2: Establish a maximum commerce allowance of 10%, 15%, or 20%

Suboption: Rockfish delivered above the MCA cannot enter commerce, with the exception of meal

## Updates since Feb 2019

- Expanded discussion on impacts to processors including estimates of additional rockfish delivered to processors (Section 2.7.2.2 on page 45)
- Discussion of processors ability to dispose of excess rockfish (Section 2.7.2.2 on page 45)
- Discussion on the ability for processors to dispose of excess rockfish as fish meal (Section 2.7.2.2 on page 45)
- Expansion of the MCA analysis to include 20% MCA (Section 2.7.2.4 on page 52)
- Discussion of alternative MCAs for yelloweye rockfish (Section 2.7.2.4 on 58)

## Section 2.6.1

Describe management of rockfish species (Table 2-1 on page 17 summarizes that management)

## Sections 2.6.2- 2.6.3

Provide an overview of the different rockfish species in the BSAI and GOA (pages 17-23)

## Section 2.6.4

Provides information on incidental catch management (page 23-25)

Background

# MRA Management

- Table 2-6 provides rockfish MRAs for fixed gear fisheries in federal waters (page 24)
- As noted in Tables 2-7 and 2-8 on pages 25, 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 26)
  - 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
- To prevent conservation and management issues for DSR in Southeast Outside, the council could choose to keep existing management measures.

## Section 2.6.6

- Provides State rockfish retention requirements (pages 27-29)
  - 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

- 2.7.1.1 provides a description of fixed gear CVs directed fisheries (pages 30-35)
- 2.7.1.2 provides incidental catch and value by rockfish species/complex (pages 35-38)
- 2.7.1.3 provides incidental catch of rockfish by gear (pages 38-4)
- 2.7.1.4 provides retention of incidental catch of rockfish (pages 41-41)

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# 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 is expected to be used for commerce, home packs, and donation programs
- The analysis anticipates that most rockfish landed are likely to be processed, however the decision to purchase, process, or discard rockfish is at the discretion of the processor.
- Table 2-34 (page 49) 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	<i>n/a</i>	1
2014	46	2	<i>c</i>	3
2015	32	3	<i>n/a</i>	2
2016	26	1	<i>n/a</i>	2
2017	18	2	<i>n/a</i>	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

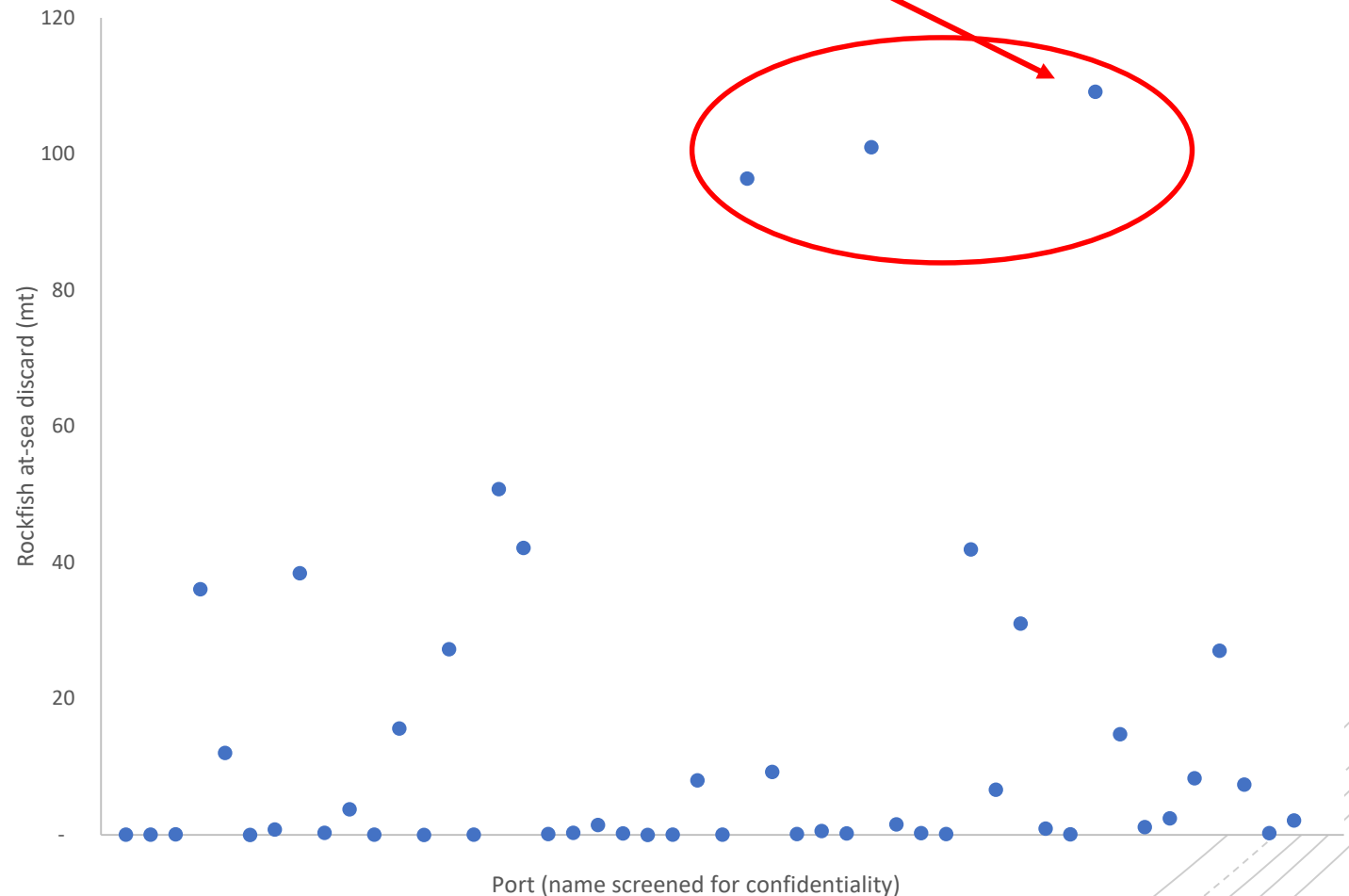
Source: eLandings; May, 2018; file located in community tables.

*c* = confidential data

# Impacts to Processors

How much additional rockfish will be delivered?

- Figure 2-2 (page 47) provides Average annual amount of rockfish that would be delivered under full retention by port from 2013-2018 derived from at-sea discard estimates
- Example: Seward highest port, an additional 113 mt (250,000 pounds) of rockfish may be delivered annually. Five processors; all year



# Impacts to Processors

How much additional rockfish will be delivered?

- What Species are likely to be delivered by region?
- Table 2-33 (page 46) provides average annual at-sea discards of rockfish (mt) by region of delivery and species group from 2013-2018

Species Group	Aleutian Islands	Bering Sea	Western GOA	Central GOA	West Yakutat / PWS	Southeast Alaska
Demersal Shelf Rockfish	*	*	*	*	*	11
Dusky Rockfish	*	*	2	6	1	0
Northern Rockfish	< 1	1	1	1	0	0
Other Rockfish	26	13	18	47	34	28
Pacific Ocean Perch	< 1	< 1	2	1	< 1	< 1
Rougheye Rockfish	3	2	8	18	8	47
Shortraker Rockfish	12	20	9	58	43	62
Thornyheads	*	*	80	85	24	43
<b>Total</b>	<b>42</b>	<b>37</b>	<b>120</b>	<b>216</b>	<b>111</b>	<b>192</b>

# Impacts to Communities

- In general, 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
- Impacts likely to be distributional in nature
- 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		
	HAL	Pot	Jig	HAL	Pot	Jig
Kodiak	833	161	737	365	92	54
Sitka	737	788	c	665	555	c
Seward	522	28	c	479	27	c
Petersburg	411	26	c	284	c	c
Homer	366	27	234	185	19	3
Juneau	308	c	c	212	c	c
Yakutat	c	c	c	c	n/a	c
St Paul	c	n/a	n/a	c	n/a	n/a
Dutch Harbor/Unalaska	c	n/a	489	c	n/a	28
Wrangell	c	c	c	c	c	c

Source: eLandings

c = confidential data



## 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

## Option 1: Full Retention when on PSC Status

- PSC actions for rockfish are not necessary in most areas
- Impact of this option is expected to be small
- PSC Actions by year, 2-3 per year
  - **2018 (2):** Shortraker in the Central GOA and “other rockfish in the AI.
  - **2017 (3):** Pacific ocean perch (POP) ICA in Central GOA, shortraker in the Western GOA, and “other rockfish” in the AI.
  - **2016 (3):** POP ICA in Central GOA and shortraker in the Central and Western GOA.
  - **2015 (2):** “Other rockfish” in Central and Western GOA
- In recent years, three species/area TACs are more likely to result in PSC closures under current management and fishing effort:
  - POP ICA in Central GOA: Trawl issue, fixed gear takes very little POP. ICA is set in specifications and is adaptive
  - Shortraker in Western GOA: Very small TAC. TAC in 2018/2019 is 44 mt. Both Trawl and HAL catch.
  - “Other rockfish” in Aleutian Islands: Trawl issue, Fixed gear takes small proportion compared to trawl.

## Option 2: Maximum Commerce Allowance (MCA)

- Options include 10%, 15% or 20% 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 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
  - Financial incentives that drive top off fishing are less likely for halibut and sablefish

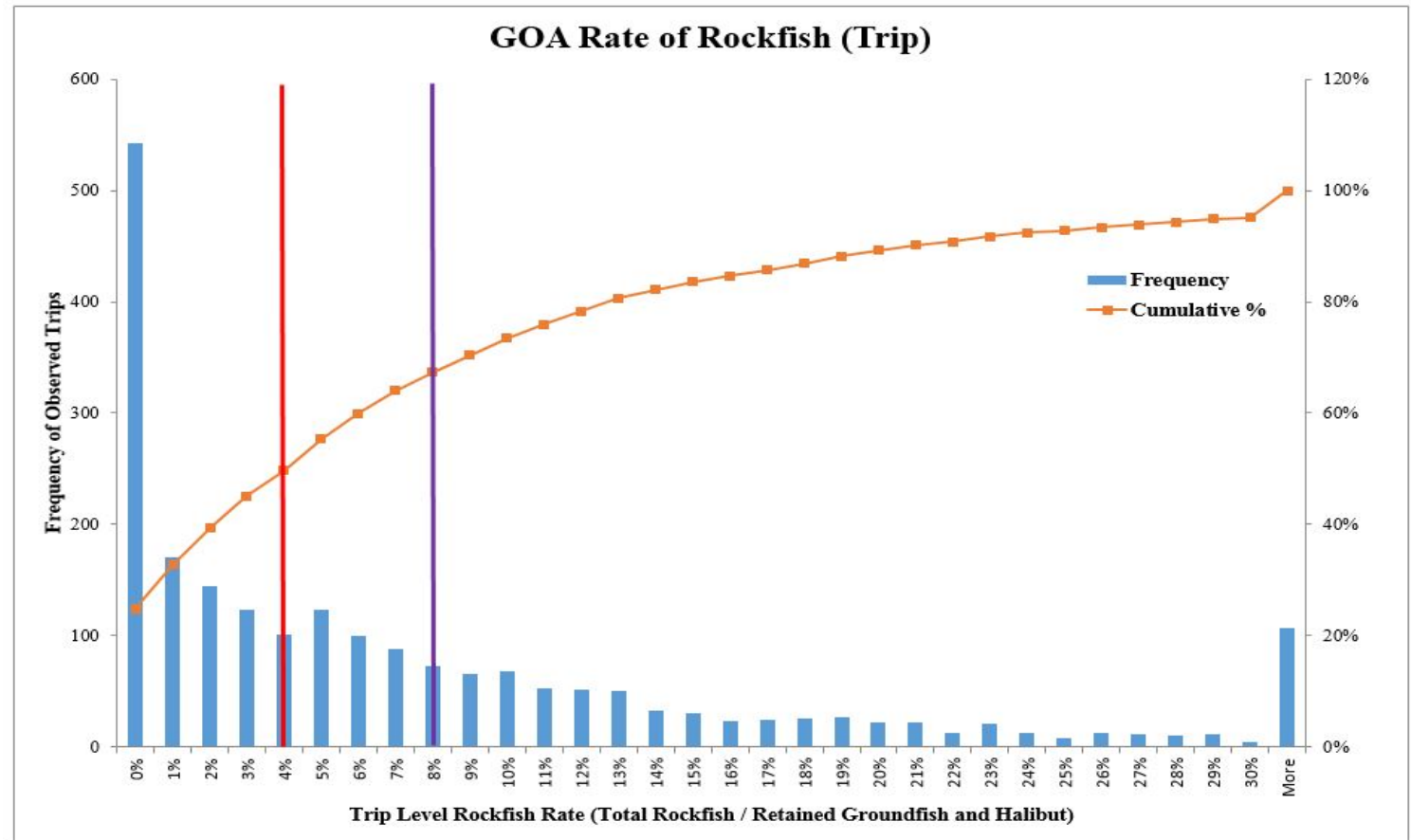
## Option 2: Maximum Commerce Allowance (MCA)

- **Trade offs on selection of MCA**
  - **Lower MCA:**
    - Incentivize avoidance of rockfish
    - Limits ability for vessels operators to “top-off”
    - Increases the amount of potential waste at processors
    - Higher risk of non-compliance
    - Effects Sablefish fisheries more than other fisheries
    - Effects Eastern GOA more than other areas
  - **Higher MCA:**
    - Reduced incentive to avoid rockfish
    - Higher risk that “top off” behavior could develop
    - Higher risk that additional management actions may result.
    - Reduces waste at processors
    - Lower risk of non-compliance

\*\* Added 2018 data and EM data

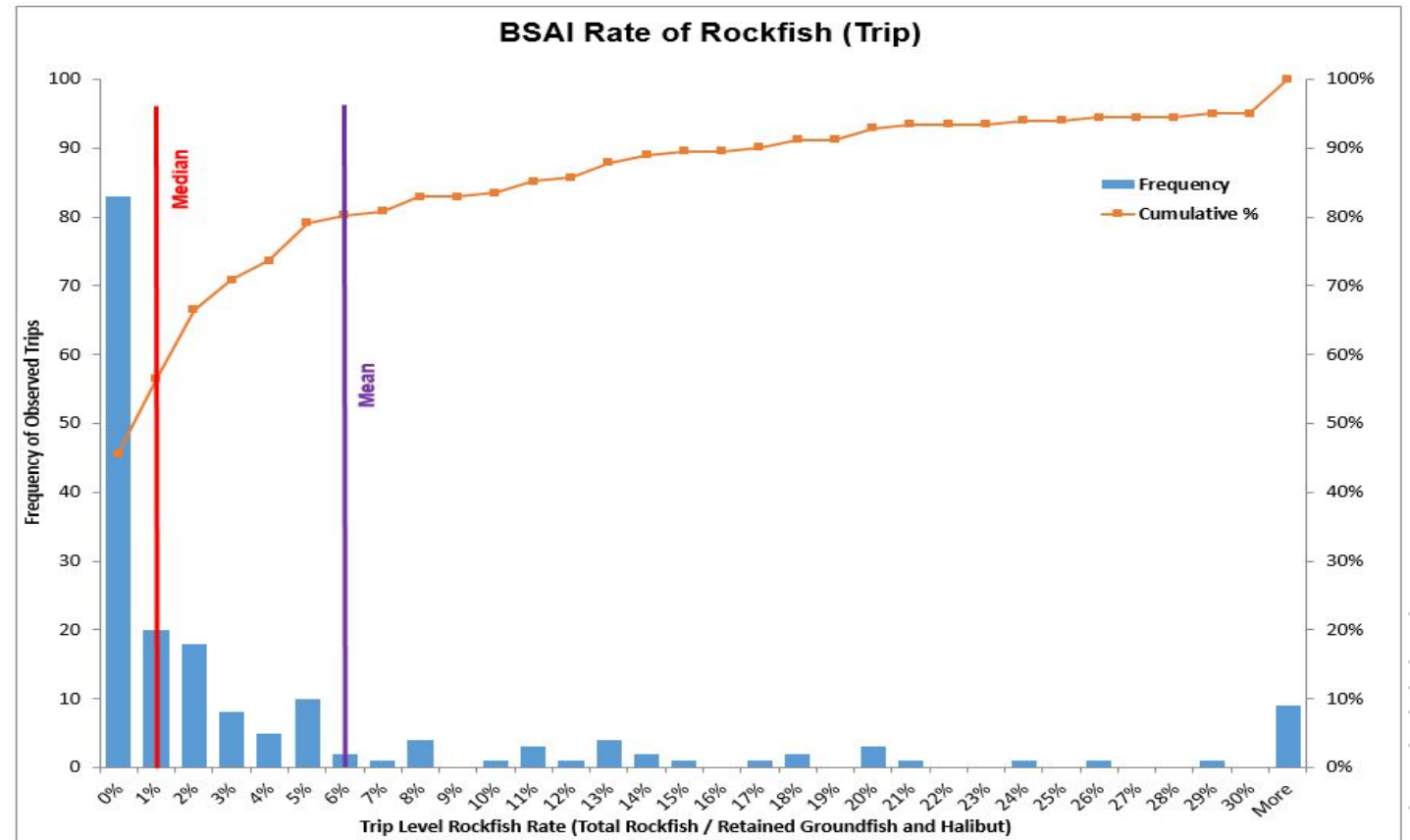
## Option 2: MCA

- **Incidental catch rate of rockfish by H&L CVs in the GOA** (Figure 2-3, pg. 55)
  - Total observed trips 2014-2018: 2,176
  - **Mean trip rockfish rate 8.3%**,
  - Median trip rockfish rate: 4.5%
  - Number of trips with no rockfish occurrence: 391 (18%)
  - MCA at 10%: 74% of observed trips would be allowed to sell all rockfish
  - MCA at 15%: 84% of observed trips would be allowed to sell all rockfish
  - MCA at 20%: 89% of observed trips would be allowed to sell all rockfish



## Option 2: MCA

- **Incidental catch rate of rockfish by H&L CVs in the BSAI** Figure 2-4, page 56
  - Total observed trips 2014-2018: 226
  - **Mean rockfish rate: 5.2%**
  - Median rockfish rate: 0.7%
  - Number of trips with no rockfish occurrence: 103 (46%)
  - MCA at 10%: 84% of observed trips would be able to sell all rockfish
  - MCA at 15%: 89% of observed trips would be able to sell all rockfish
  - MCA at 20%: 92% of observed trips would be able to sell all rockfish



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



Year	IFQ/CDQ Halibut		IFQ/CDQ Sablefish		Pacific cod	
	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	0
2017	54	2.73	8	10.82	<1	0.15

Source: NMFS Sustainable Fisheries

GOA

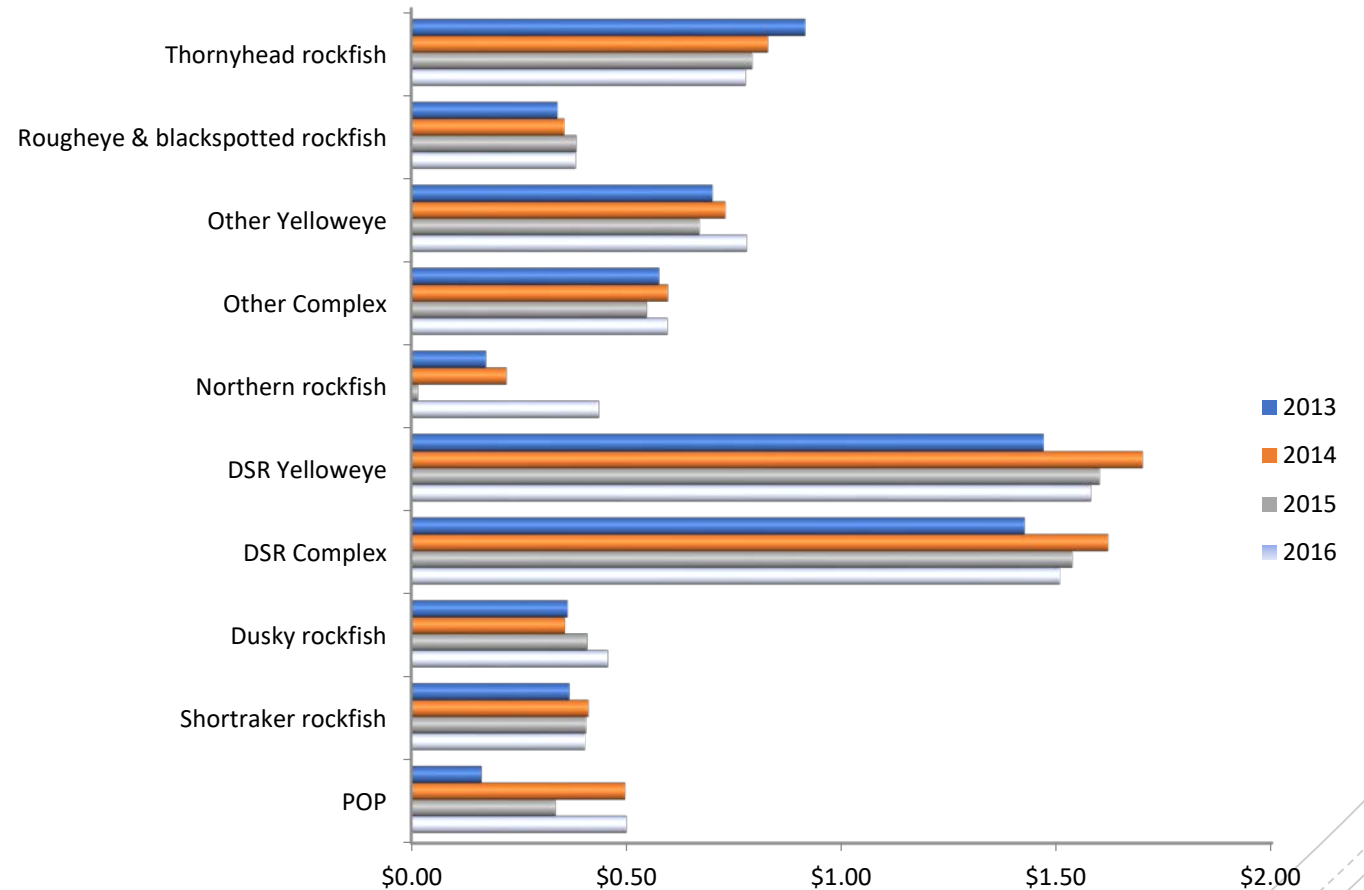


Year	IFQ Halibut		IFQ Sablefish		Pacific cod	
	Incidental catch (mt)	Incidental catch rate (%)	Incidental catch (mt)	Incidental catch rate (%)	Incidental catch (mt)	Incidental catch rate (%)
2013	502	4.52	1,265	11.7	24	0.31
2014	403	4.84	900	9.56	11	0.14
2015	383	4.35	903	10.06	50	0.78
2016	384	4.41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

Source: NMFS Sustainable Fisheries

## Option 2: MCA with Yelloweye breakout

- Concern raised that there could be potential for a tophoff fishery on yelloweye rockfish due to its value
- Table 2-21 (page 37) has ex-vessel prices per pound by GOA rockfish species/species groups





## Option 2: MCA with Yelloweye breakout

- The council could choose to leave current regulations for DSR in Southeast Outside unchanged
- For reference, the MCA for DSR in the halibut and groundfish fisheries is 10% & in the sablefish fishery it is 1%
- For other areas of the GOA, the Council could choose to set a separate MCA for Yelloweye Rockfish
- Table 2-39 (page 59) has average incidental catch rate of Yelloweye rockfish by area

		Percentage of observed trips that would be able to sell all yelloweye harvested			
Area	Average Rate	1% MCA	3% MCA	5% MCA	7% MCA
Eastern GOA	2.49%	77%	86%	89%	92%
Central GOA	0.58%	89%	95%	97%	98%
Western GOA	2.21%	73%	82%	88%	89%
ALL GOA	1.43%	82%	90%	93%	95%
BSAI	0.04%	99%	100%	100%	100%

Option 2:  
Calculation of MCA  
with Yelloweye  
breakout Scenario A

- Calculation is on total delivery amount, not basis species.
- Scenarios if the Council selects a MCA of 10% of which 5% can be yelloweye rockfish
- In the Western GOA, a sablefish trip has 1,000 pounds of sablefish and 100 pounds of rockfish of which 20 pounds is yelloweye.
- **Limit calculation**
- $1000 * .10 = 100$  (all rockfish MCA)
- $1000 * .05 = 50$  (yelloweye MCA)
- Vessel operator would be able to sell all non-yelloweye rockfish
- Vessel operator is able to sell all yelloweye rockfish harvested

Option 2:  
Calculation of MCA  
with Yelloweye  
breakout Scenario B

- Calculation is on total delivery amount, not basis species.
- Scenarios if the Council selects a MCA of 15% of which 5% can be yelloweye rockfish
- In the Central GOA, a mixed sablefish/halibut trip has 1,000 pounds of halibut and sablefish and 200 pounds of rockfish of which 100 pounds is yelloweye.
- **Limit calculation**
- $1000 * .15 = 150$  (all rockfish MCA)
- $1000 * .05 = 50$  (yelloweye MCA)
- Vessel operator would be able to sell 150 pounds of rockfish of which 50 pounds could be yelloweye.
- This means the vessel operator would not be able to sell all rockfish.
- He would sell 50 pounds of yelloweye and 100 pounds of other rockfish.
- Leaving 50 pounds of yelloweye that would be donated/discarded on shore.

Option 2:  
Calculation of MCA  
with Yelloweye  
breakout (SEO regs  
unchanged)

- Scenarios if the Council selects a MCA of 15% of which 5% can be yelloweye rockfish
- East of 144, a halibut trip has 800 pounds of halibut, 200 pounds of sablefish and 200 pounds of rockfish of which 100 pounds is yelloweye.
- **Limit calculation**
- $1000 * .15 = 150$  (all rockfish MCA)
- $800 * .1 = 80$  (DSR MCA halibut/groundfish except sablefish)
- $200 * .01 = 2$  (DSR MCA sablefish)
- Vessel operator would be able to sell 150 pounds of rockfish of which 82 pounds could be yelloweye.
- This means the vessel operator would not be able to sell all rockfish.
- They would sell 82 pounds of yelloweye and 68 pounds of other rockfish.
- Leaving 18 pounds of yelloweye and 32 pounds of other rockfish species that would be donated/discarded on shore.

## Option 2: Calculation of MCA with varying MCAs

- Scenarios if the Council selects a MCA of 15% of which 5% can be yelloweye rockfish
- ***MCA at 10% of halibut and groundfish and 15% of Sablefish of which 5% could be yelloweye.***
- A mixed trip has 500 pounds of halibut, 400 pounds of sablefish, 100 pounds of Pacific cod, and 300 pounds of rockfish of which 100 pounds is yelloweye.
- **Limit calculation**
- $600 (500 \text{ halibut} + 100 \text{ pacific Cod}) * .1 = 60$  (MCA halibut/groundfish except sablefish)
- $400 * .15 = 60$  ( MCA sablefish)
- Total 120 pounds of rockfish
- Yelloweye percentage (500 halibut + 100 Pacific cod + 400 sablefish = 1000 pounds)
- $1000 * .05 = 50$  pounds of yelloweye
- Vessel operator would be able to sell 120 pounds of rockfish of which 50 pounds could be yelloweye.
- This means the vessel operator would not be able to sell all rockfish. He would sell 50 pounds of yelloweye and 70 pounds of other rockfish.
- Leaving 50 pounds of yelloweye and 230 pounds of other rockfish that would be donated/discarded on shore.

## Suboption: Meal

- Discussed on Page 48
- With this suboption, fish in excess of the MCA would be allowed to be turned into meal.
- The goal of a MCA is to limit the financial incentives to change behavior and target rockfish and to incentivize avoidance of rockfish.
- Meal has low value to the fisherman. In some areas, nothing is paid to fisherman for shoreside discards that go to meal.
- Some communities, like Kodiak, rely on the meal plant to dispose of shoreside fish waste, including discards.
- Unlikely that a vessel would target any species, including rockfish, for meal production due to low value.

## 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 inconsistencies between State and Federal management (Section 2.7.2.5 on pages 59-60)
  - Limited impacts on recreational users (Section 2.7.2.7 on page 61)
  - No impacts on safety (Section 2.7.2.8 Page 61-62)
  - Improvements in rockfish stock assessments (Section 2.7.2.9 on page 62)
  - Minimal impacts on NMFS's Inseason Management of incidental catch of rockfish by fixed gear CVs (Section 2.7.2.10 on pages 62-65)
  - Improves enforcement of rockfish overages (Section 2.7.2.11 on pages 65-67)