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April 7, 2015

Eileen Sobeck
Assistant Administrator for Fisheries
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910

Dear Ms. Sobeck:

The Alaska Seafood Cooperative (AKSC) is a harvesting cooperative consisting of sixteen trawl catcher/processors and five companies. AKSC vessels operate in the Bering Sea and Aleutian Islands (BSAI) under Amendment 80, and are allocated several target and prohibited species catch limits.

As significant participants in the Bering Sea and Aleutian Islands trawl fisheries who greatly depend on halibut prohibited species catch apportionments, we are pleased that you are closely tracking the North Pacific Fishery Management Council's consideration of alternatives to modify those apportionments. We also appreciate the assistance that you and your staff have provided in the development of our experimental fishing permit to allow us to sort halibut on deck to reduce mortality. We are hopeful that those efforts will yield additional halibut mortality savings to the benefit of all sectors that rely on halibut to support their fisheries.

While your efforts are certainly aiding our halibut mortality reduction efforts, we fear that some confusion remains concerning the potential benefits of deck sorting halibut. Specifically, your correspondence of January 20, 2015 suggests that the results of our prior deck sorting experiment indicate that we should be able to achieve a 32 percent reduction in halibut mortality once deck sorting is available under regulation. The results of the prior experiment, however, suggest that the returns from any deck sorting regulation are likely to be more modest.

In fact, in the 2012 study the average mortality rate of halibut on deck sorted tows was approximately 60 percent, compared to the normal discard mortality rate for those fisheries of approximately 80 percent. This yields a mortality reduction of slightly less than 20 percent. The 32 percent reduction was probably the result of a comparison between the 60 percent mortality rate achieved on deck and the mortality rate of factory halibut (halibut that were not sorted on deck) during the experiment. That is not a valid comparison because the mortality rate for factory halibut in the 2012 EFP was significantly higher than normal procedures for halibut handling in the regular fishery. Halibut collected in the EFP were stored in a tote and assessed for viability after the entire haul was sorted—which sometimes took hours.

Several factors should be considered in attempting to surmise halibut mortality savings under deck sorting. Halibut mortality rates increase substantially after a halibut has been out of the water for approximately 20 to 30 minutes. As a result, for tows where the 2012 deck sorting experiment took an extended period of time (i.e., over 30 minutes) little halibut mortality savings were realized. In the 2015 EFP, AKSC participants will concentrate deck sorting efforts on the first 20 to 30 minutes that the net is on deck. AKSC will also focus efforts on relatively large halibut that are most likely to survive being deck sorted. Based on the previous studies, this approach may yield greater savings than a longer effort to return all halibut to the water from the deck.

Despite these potential gains, substantial challenges remain. The 2012 EFP was conducted during summer months, in ideal weather conditions, in the fisheries that fishermen felt were relatively good candidates for deck sorting. The rules of the EFP also required participants to conduct deck sorting in all tows once the EFP was initiated and to drop out of the EFP altogether once deck sorting was suspended. The design of the 2015 EFP purposely avoids this restriction allowing fishermen to choose which tows to deck sort and to enter and exit the EFP. We do not currently know which fisheries will yield the best savings through deck sorting. It is important to keep this in mind as one considers the potential for deck sorting looking forward. While we are optimistic, until we complete the current EFP, we will not know the benefits of deck sorting in the suite of AKSC target fisheries and seasons.

In addition to the general uncertainties concerning the benefits of deck sorting, results are likely to be tempered because we often use excluders (bycatch reduction devices) in our fisheries. During the 2012 EFP, vessels did not use excluders. Excluders typically remove larger halibut, which are also the most likely halibut to be saved by deck sorting. To the extent that excluders are currently reducing halibut mortality, that savings is already being achieved without deck sorting and cannot be added to by deck sorting. All of these factors are likely to affect the returns from halibut deck sorting.

Cooperative vessels are expected to begin deck sorting operations under the 2015 EFP at the end of April or beginning of May. Additionally, AKSC intends to work with NMFS and the Council to develop an EFP that would be implemented for the 2016 season, which would build upon the 2015 work. AKSC intends to engage with the Fisheries Monitoring and Analysis Division, NMFS Alaska Region Office, and the Council in hopes of answering any remaining questions needed to operationalize deck sorting as a regulatory tool for individual vessels to utilize to reduce halibut mortality. These include both the development of more specific monitoring protocols, as well as a catch accounting system to accommodate the different mortality rates for deck sorted halibut. The implementation of a regulatory structure for deck sorting is at least two years away and remains uncertain. In addition to resolving the management questions associated with deck sorting, neither the Council nor NMFS has begun any action that directly considers such a regulatory amendment. The dependence of our fleet on annual EFPs creates further uncertainty in the potential gains from deck sorting.

We appreciate the confidence you have expressed in our fleet's efforts to reduce halibut mortality. We also appreciate your willingness to consider the uncertainties surrounding the

issue, particularly the uncertainties concerning the potential gains that are likely to be yielded by our deck sorting efforts.

Please feel free to contact me or John Gauvin, our Fishery Science Project Director, at gauvin@seanet.com if you have any questions. Mr. Gauvin is the Principle Investigator for the 2015 deck sorting EFP, and has been integral to the development of deck sorting protocols.

Jason Anderson

A handwritten signature in blue ink that reads "Jason Anderson". The signature is written in a cursive style with a vertical line to its right.

Manager, Alaska Seafood Cooperative

Cc: Jim Balsiger
Glenn Merrill
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