

GROUND FISH ADVISORY PANEL REPORT ON FIXED GEAR MARKING AND ENTANGLEMENT RISK REDUCTION—PRELIMINARY PREFERRED ALTERNATIVE

The Groundfish Advisory Subpanel (GAP) notes the purpose and need statement for this action only identifies the purpose as positively attributing entanglements to gears, but a main benefit the GAP sees in this action is to have entanglements *not* attributed to the groundfish fishery. Currently, only 50 percent of the entanglements are identifiable to a gear type. With that, the GAP offers the following recommendations for Preliminary Preferred Alternative (PPA):

Buoy marking- Alternative 1, suboption 1b (gear-specific buoy marks using cattle ear tags)- modified to mark every buoy and include vessel identification information on tag.

Line marking- Alternative 1, gear-specific line marking

A1- Vertical line only

B2- At least top 20 fm

C1- Manufactured Line

D1- No transition- but subject to availability (see discussion below. No temporary methods in interim.)

Surface gear requirements- Alternative 1, allow vessels to utilize surface gear at only one terminal end

Surface line length restriction- Alternative 1, suboption b, no more than 10 fm of surface line

Escape Panel Requirements- Alternative 1, clarify regulations for escape panel, in addition to Enforcement Consultant (EC) recommendation on twine size

Buoy/Line Marking

The GAP had a robust discussion as to the correct focus of gear marking. Currently, the action is proposed to be gear-specific for groundfish vessels only. While halibut is not part of the action, the GAP wants to be able to use the same longline gear for both halibut and groundfish fishing.

In our discussions, it quickly became apparent that as more gear types and species-specific target groups were identified, the complication of requiring a vessel operation to carry twice as many buoys or lines would also become necessary. For example, a fixed gear vessel generally has one gear type on board such as pots or hook gear (see Table 3-1 in [Attachment 2](#)). However, for primary tier vessels catching incidental halibut fishery north of Point Chehalis, a number of vessels will target sablefish with pots and then use hook-and-line gear to target halibut on the same fishing trip- but will use the same surface gear for each of those sets.

Suboption 1b would require a color/shape coded cattle tag and could be used to distinguish between pot and bottom longline buoys. The GAP recommends modifying the option to include the documentation number and to require it on every buoy, not just the main buoy. Vessels could take the tags on and off the buoys for the different gear types – allowing for identification of the gear – but it would allow a vessel to need only one set of buoys.

Suboption 1a (gear-specific patch, shape, mark on main buoy) would force the vessel to have two sets of buoys if they fish multiple gear types. As an example, a typical limited entry fixed gear vessel may have three to four buoys per buoy line and eight buoy lines for a total of up to 32 buoys (four sets of gear). The GAP would like to avoid a situation where a vessel would have to double or triple their number of buoys. Cost and the area required on the vessel to store multiple sets of buoys are prohibitive for some vessels.

With the modification of Alternative 1b to require every buoy to have a tag, the GAP recommends the Council adopt A1- vertical line only- as the PPA for line marking. Entanglements would still be able to be identified via the buoy tags, but vessels would not need to change out the surface line. As described above, this would be costly to have duplicate surface lines as well as buoys.

The GAP recommends the Council adopt B1, at least 20 fm of marking, be selected as the PPA as well as C1, manufactured line. The GAP recommends that the Council select a multiple color line for each gear type. With regards to transition time, the GAP recommends D1- no transition- but it's dependent on the availability of the line. The GAP would like some transition time, but without the need for temporary markings, for the fleet to work with gear manufacturers for developing dual-colored line. This would result in extra work and costs for the fleet. We would ask that National Marine Fisheries Service (NMFS) help the industry procure funding, line, and aid in organizing the specific ordering, etc. This would help facilitate the fleet's acceptance and use of new gear. Furthermore, the GAP would appreciate help organizing discussions with manufacturers to develop and order the new line.

With all of these recommendations, the GAP continues to ask NMFS for guidance on the adequacy of the gear-marking.

Entanglement Risk Reduction

The GAP continues to support Alternative 1 for Surface Gear Limitation, which would allow vessels to utilize surface gear at only one terminal end of their gear. Additionally, the GAP recommends a PPA of Alternative 1b for Surface Line Limitation, which would be no more than 10 fm. This would minimize the risk of potential whale entanglements, and also cover current operational needs in cases where the ocean conditions result in a large portion of the surface gear being underwater.

Escape Panel

The GAP recommends Alternative 1 as the PPA and recommends the Council include the EC recommendation of changing the natural, untreated thread count of the twine from No. 21 to No. 30 or smaller to match Alaska regulations. This would allow fishers who fish in both Alaska and West Coast pot fisheries to use the same gear without having to change the biodegradable twine used to close the escape panel.

Best Practices Guide

The GAP continues to support that NMFS develop a Best Practices Guide.