

Brief Statement of Proposal –

Proposal to open portions of CH in the Aleutian Island management area for pollock trawling:

Pollock trawling would be allowed within portions of CH based on the same distances that currently apply to cod trawl fisheries in the AI (generally 10 miles from rookeries and 3 miles from haulouts.) The pollock TAC would be sub-divided into smaller area apportionments. (see “Offsetting Proposals” for mitigation components)

Objectives of Proposal -

Currently all CH in the Aleutian Islands is closed to pollock trawling. While the fishery has been opened for the last two years, no vessels have been willing or able to harvest commercial quantities of pollock outside CH.

The objective of the proposal is to meet the intent of Section 803 of the Consolidated Appropriations Act of 2004 which allocated pollock to the Aleut Corporation for purposes of economic development of Adak.

Justification for Council Action -

Adjustments to Sea lion mitigation measures require council action.

Foreseeable Impacts of Proposal –

This proposal will provide reasonable opportunity for vessels to harvest the Aleut Corporation’s pollock allocation, which in turn will assist economic development in Adak.

Possible Alternative Solutions –

Consider the proposal submitted to the SSMLC for consideration in September of 2004 (see attachment below) as an alternative proposal to be measured against this proposal. Also, consider the proposal to the Board of Fish for a AI state water pollock fishery.

Supporting Data and Other Information –

See AFSC report on 2006 EFP AI pollock survey. See also, September 2004 letter to SSLMC.

Off-setting Proposals –

Absent winter hydro-acoustic surveys, the AI pollock TAC would be sub-divided in the sub-areas (541/542/543) pro-rata to the summer bottom trawl survey. Harvests outside CH would accrue against the sub-area AI pollock TACs.

The AI pollock ABC would be divided into 9 regions of two degrees of latitude each. The allowable harvest inside any one of the 9 regions CH would capped at 1/9th of 50% of the ABC in the A and also the B seasons up to the aggregate sub-area seasonal TAC.

Aleut Enterprise Corporation would work with NMFS to develop protocols for conducting hydro-acoustic surveys prior to fishing inside CH. In any of the 9 regional 2 degree block in which AEC arranged to conduct such a survey, the harvest cap would be modified based on the results of the survey biomass estimate. The cap per survey region would be calculated as a percentage (20%) of the survey biomass. The aggregate of all harvests across regions, inside and outside CH, would still be subject to the TAC limits.

Submitted by:

Aleut Enterprise Corporation and Adak Fisheries

September 1, 2004

Larry Cotter
Chair, SSLMC
North Pacific Fishery Management Council
605 W 4th Ave Suite 306
Anchorage, Alaska 99501

Re: Aleutian Island Pollock Fishery Proposal

Dear Larry,

At its July 19th meeting the SSLMC asked the Aleut Corporation to review the NMFS analysis document and address the concerns outlined therein, and bring to the next SSLMC meeting their response and any alternatives the Aleut Corporation wishes the SSLMC to consider. This letter outlines our current proposal.

We wish to re-submit the previous proposal without major changes to the boundaries identified in the original proposal. However, we have developed a number of mitigating elements in response to identified agency concerns, some combination of which can be integrated with the original proposal. In response to some agency concerns we have identified areas where we believe further analysis should reduce the level of concern expressed in the agency's preliminary review of the original proposal.

Geographic Boundaries

The one significant modification of the geographic boundaries excludes the southern portion of the 20 mile circle around Atka North Cape, to the south of latitude 52 degrees 13 minutes on the west side of Atka Island and to the south of latitude 52 degrees 21 minutes on the east side of Atka Island.

We also wish to clarify a discrepancy between the graphic for the original proposal and the text. There is a portion of the Ship Rock 20 miles circle south of the 'box' in Kanaga Sound and on the south side of the Kanaga/Tanaga islands that is not overlapped by Tanaga Bumpy/Point or Adak/Lake Point 20 mile buffers. The graphic for the original proposal shows that this area is to remain close to pollock fishing, which accurately reflects the intent of the proposal for that area.

Trade Offs

The Aleut Corporation has no allocation of any species other than pollock. 100% of AI CH is closed to directed pollock fishing, thus the Aleut Corporation has nothing to offer in "trade".

Donations from the AI Atka Mackerel fishery or EBS pollock fishery will be gratefully accepted.

The original proposal contained an element which would increase the cod buffer around Atka North Cape from 3 to 10 miles. That element remains a part of this proposal.

Trade Off Analysis

The evaluation of the Aleutian Island Pollock Proposal needs to be placed in context.

According to table 9.1 of the 2000 BiOP, the total AI CH is 100,100 sq km.

Open Areas as % of Total AI CH:

- the Kanaga Sound "box" is approximately 0.4% of the AI CH (@ 420 sq km)
- the area north of the "box" is an additional 1.6% of the AI CH (@ 1640 sq km)
- the area around Atka North Cape is approximately 2.8% of the AI CH (@ 2775 sq km)
- the sum of the areas proposed to be open represent approximately 4.8% of the AI CH, out of a total of 100,100 sq. km of CH.

When defining the appropriate fraction of CH site for TOT analysis the agency made "eyeball" adjustment for the Adak/Lake Point rookery and the Tanaga/Bumpy Point haulout. The preliminary analysis substantially miss-estimated those fractions. Additionally, it failed to make adjustments to the three haulouts in Kanaga Sound.

None of the proposed open areas are "rookery CH" with the exception of the portion of the Adak/Lake Point rookery that falls on the north side of Kanaga Is. The segment of the Adak/Lake Point rookery buffer in the Kanaga Sound open area is approximately 0.1% (110 sq km) the total AI CH. However, there is not a 20 mile straight line that reaches the area because it would be necessary to swim up and around the north end of Kanaga Is. It is a minimum of 25 miles as the sea lion swims to reach the portion of rookery CH in Kanaga Sound, so the fraction could be argued to be 'zero'. In any case the 110 sq km segment of the Adak/Lake Point rookery buffer to be opened under the proposal is closer to 3.5% than the 10% eyeball estimate used in the TOT.

Similarly, the portion of the Tanaga/Bumpy Pt. 20 mile buffer opened by the box is closer to 5% than to the 20% used in the TOT.

'Eyeballing' it the open portions of the Bobrof, Ship Rock, and Kanaga 20 mile buffers, they are all closer to 25% than the 100% assumed in the TOT.

Mitigation of Effects on Critical Habitat

In its section 7.3 of the NMFS July 16th preliminary analysis, the agency identified a variety of concerns about the effects on critical habitat. We believe that there are a variety of mitigation components which could be incorporated, individually or in some combination to address those concerns. In some instances we believe a more in depth analysis would dispel some of the concerns. This section of our proposal identifies those mitigation elements and areas for additional analysis.

A-1 Agency Concern:

"The net result will be substantially more pollock (up to 19,000 mt) taken from critical habitat during the winter."

A-2 Mitigation:

An element could be incorporated to place a seasonal limit the amount taken in each of the open areas to X% of the TAC.

B-1 Agency Concern:

“Given the roe value in A season pollock, the fishery will probably try to use substantial effort to catch the pollock in a relatively short time-period.”

B-2 Mitigation:

An element could be incorporated to limit the amount take within the CH open areas on a weekly basis to X tons.

C-1 Agency Concern:

“Due to a lack of data on the distribution of pollock biomass, movements, and spawning aggregations in the AI it is difficult to predict local effects of the pollock fishery on the prey field ...Removal of 19,000 mt...in this small area on a limited biomass ... would likely diminish the value of the prey field for Steller sea lions.”

C-2 Mitigation:

Effort in the fishery could be spatially dispersed by capping the harvest in any of the 3 AI districts (541, 542, & 543) at no more than 20% of the ABC or 50% of the TAC.

C-3 Supplemental Analysis:

Qualitative analysis needs to be incorporated about based on readily available quantitative data regarding the depth of fishing for pollock in the proposed areas (which directly reflects the vertical distribution of the winter pollock aggregations). This should be contrasted with our knowledge of the foraging dive patterns of SSL and the winter scat collections to qualitatively evaluate the likelihood of competitive overlap for pollock. Histograms of pollock haul depths will be prepared from AI pollock observer data for presentation to the SSLMC.

D-1 Agency Concern:

“We would expect that the harvest rates on the pollock biomass in these two areas would be relatively high...”

D-2 Mitigation:

An element could be incorporated to cooperative research to conduct hydro-acoustic surveys before, during and after the fishing season. The data from the surveys could be utilized either in near real time, or on a one year lag basis, to set harvest limits as a fraction of the survey biomass based on a cooperative agreement between the Aleut Corporation or its agency and the NMFS. The cooperative research project could be part of a broader scientific effort to collect improved genetic data on pollock stock structure.

E-1 Agency Concern:

“There is little information available on the foraging requirements of Steller sea lions... The ratio in the Aleutian Islands was only 11 times the amount consumed annually by Steller sea lions which is relatively low and represents a similar fraction to the amount taken by fisheries...”

E-2 Mitigation:

Under amendment 82 as passed by the Council, the TAC is limited to 19,000 mt, a level that is less than half the current ABC.

E-3 Supplemental Analysis:

An examination of the bathymetry in the AI covered by the summer trawl survey shows that the portion of bathymetry under 100 meters is much more “near shore” in the AI is within 10 miles of land than in the BS or even the GOA. This is also true of the bathymetry between 100-200 meters and between 200-300 meters. (see Appendix Fig. B1-4 of NOAA Tech. Mem. NMFS/AFSC-143 for depiction of AI bathymetry)

Given the hierarchy of telemetry ‘hits’ within 0-3, 3-10, 10-20 and >20 miles from land, the comparison of the ratio of biomass available to biomass consumed should consider how that biomass is distributed relative to land.

It is likely that the AI biomass within 10 miles of land is much more comparable to the BS biomass when viewed in this way. When examined based on the area between 0-3 miles from land, the forage ratio in the AI may well be superior to the BS for SSL prey species, with the exception of pollock. Survey data such as the 2002 AI NOAA Tech. Mem. NMFS/AFSC-143 provides data on the Kg/ha of biomass of various prey species, this could be contrasted with similar data from the EBS.

Graphics:

Attached to this letter are a series of figures showing:

- 1- an overview of total AI CH closed area and observed pollock hauls,
- 2- the area within 100 miles of Adak with CH closure constraints and pollock haul data,
- 3- the Atka to Kanaga area with proposed open areas bordered in green,
- 4- the Atka open area proposal with the modification excluding the southern area (bordered in green) and showing the expanded cod closed area (bordered in yellow)
- 5- the Kanaga Sound open area proposal
- 6- a close up of the Kanaga Sound Box, with the Adak rookery segment bordered in yellow

Conclusion:

We ask the SSLMC and NMFS to reconsider the original Aleutian Island Pollock Fishery Proposal, as modified with the boundary changes and some combination of the mitigation measures identified in this letter.

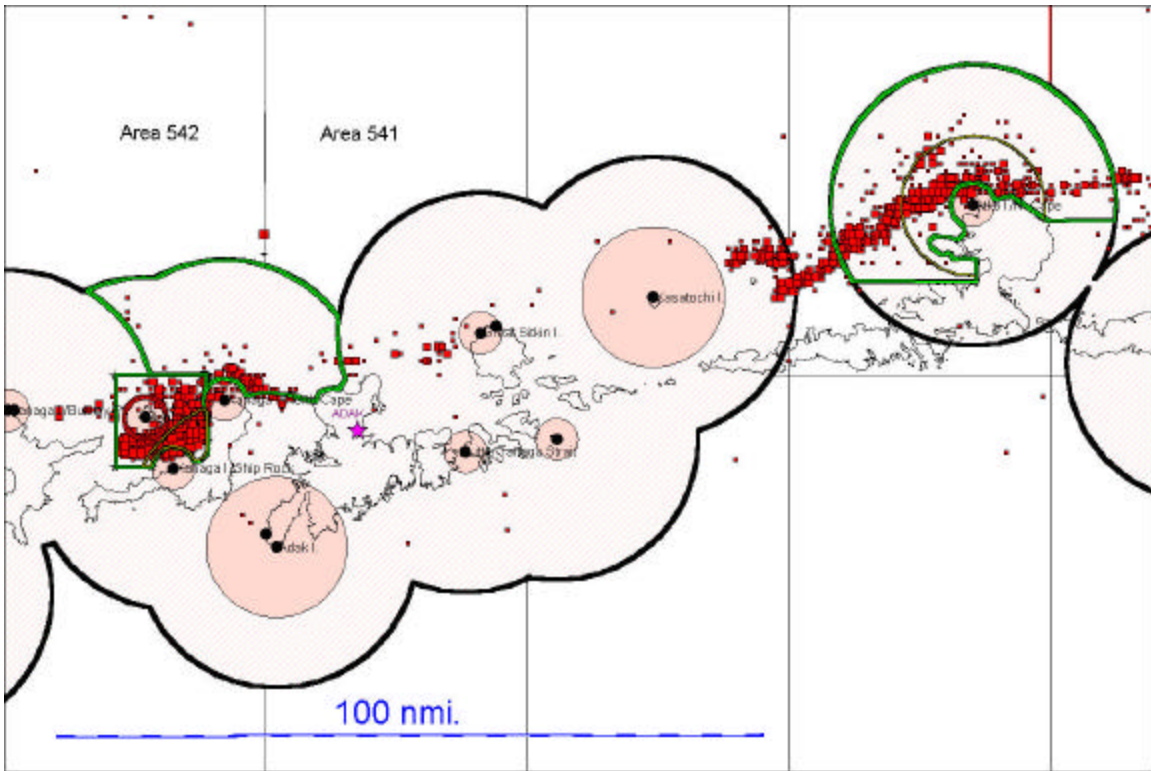
We will be submitting a separate letter responding to the NMFS informal opinion presented at the July meeting.

Thank you.

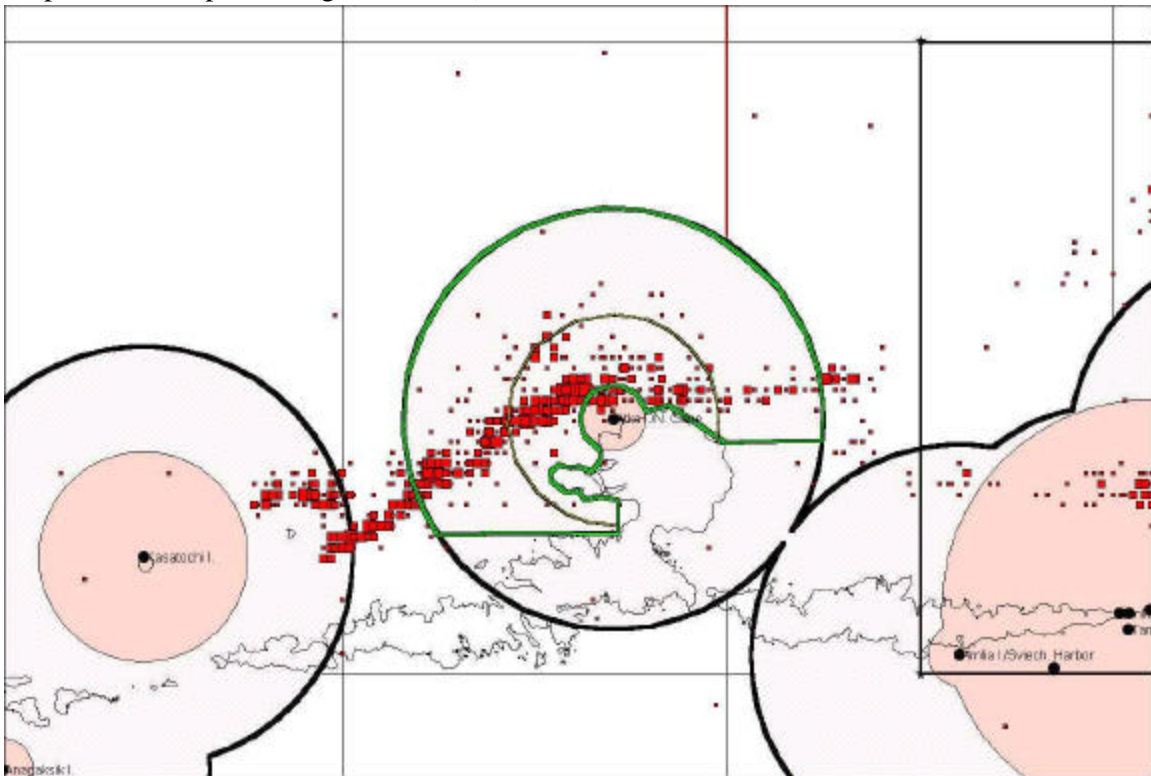
Sincerely,

Sandra Moller

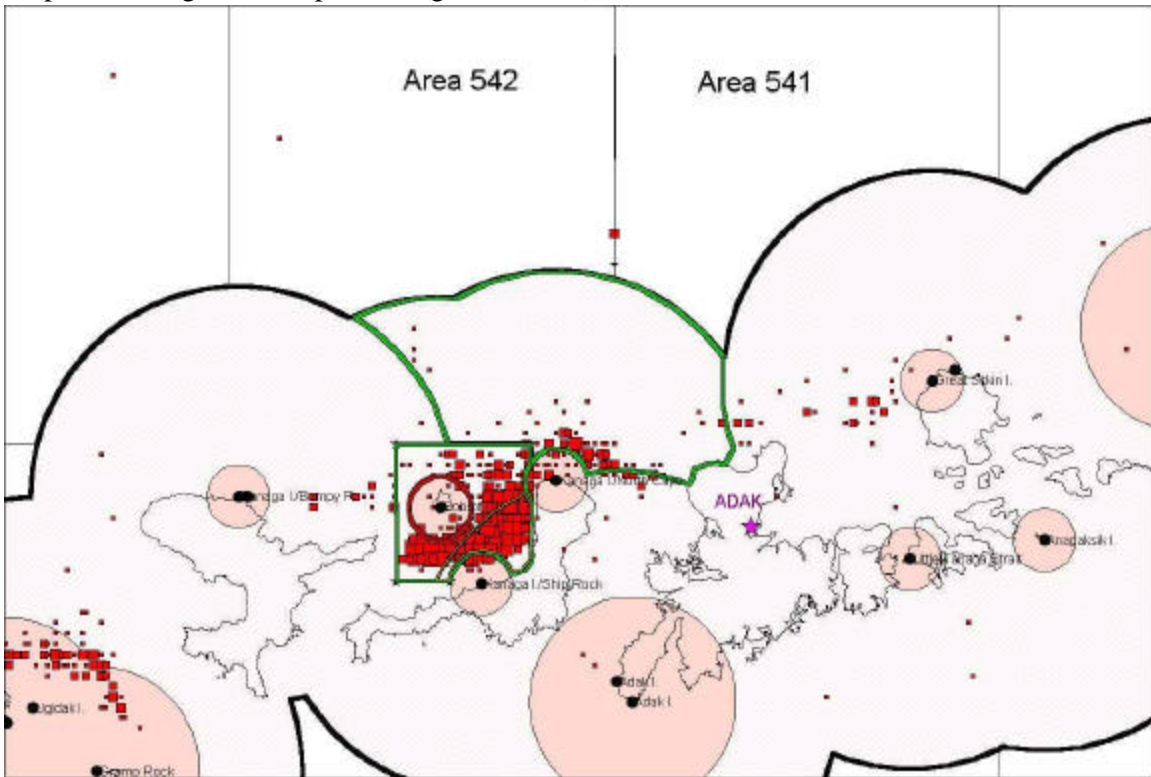
Maps for September 2004 Proposal to SSLMC



Proposed Atka Open area (green outline)



Proposed Kanaga Sound open area (green outline)



Close up of Kanaga Sound "Box"

