

# PRIBILOF ISLAND ALEUT COMMUNITY

of

## St. George Island / Traditional Council

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March 27, 2007

Bill Wilson and Kristin Mabry  
Steller Sea Lion Mitigation Committee  
North Pacific Fishery Management Council  
605 West 4th, Suite 306  
Anchorage, Alaska 99501-2252

Dear Bill and Kristin,

As a part of our preparation for the April SSLMC meeting, the St. George Traditional Council (SGTC) has made a preliminary assessment of the proposal ranking variables that we think may be appropriate in ranking the SGTC proposal using the PRT. These draft values are listed in Table 1 below. In the course of this process, we have identified several areas where we may need some clarification prior to presenting our proposal to the SSLMC. These questions and points of clarification are discussed following the table. We have also provided some areas where we believe some “outside the model” data sets may be relevant to our proposal. Our hope in providing this draft analysis to you prior to the meeting is that you will work with us to run these scenarios through the current version of the PRT software so that we may gain some insight as to the potential ranking of our proposal.

Thank you in advance for your assistance.

Sincerely,

Max Malavansky Jr.

**Table 1.** St. George Traditional Council draft PRT ranking values.

Variable	Sub-units	
	Pribilof Region Status Quo	SGTC Dalnoi Point Proposal
1. Target fish species	a. Pacific cod, and b. Pollock; to a lesser extent Atka mackerel and d. Other prey items	a. Pacific cod, and b. Pollock; to a lesser extent Atka mackerel and d. Other prey items
2. Target species removals	Currently a very high harvest rate within Dalnoi Point CH relative to the EBS overall.	d. a decrease in amount harvested
3. Fishing duration	Summer and winter pollock fishery; Winter cod fishery; limited Atka mackerel catch near the Pribilofs	c. a fishing season of the same duration as status quo (no change)
4. Geographic sub-regions	g. Pribilof Islands	g. Pribilof Islands
5. Seasons	a. Winter (non-breeding season, October-April)	a. Winter (non-breeding season, October-April)
6. SSL site types	b. Haulout	b. Haulout
7. Proximity zones to a SSL site	b. 3-10 nm	Trawl closure from b. 3-10 nm and c. 10-20 nm
8. The percentage of SSL sites affected in a region	c. 26-50% or d. 51-75%	a. 1-10%

Explanation of Variable 2 Assessment:

In our determination of the value for variable 2, we rely on the catch analysis presented in the 2003 Supplement to the 2001 BiOp<sup>1</sup> that we cite in our proposal. This section documents that pollock catch in St. George Island CH (0-20 nm) increased nearly tenfold between 1999 and 2002, from 0.39% to 2.07% of the EBS pollock fishery total (Table III-9C, p. 107). Pollock catch in 2002 in the 0-10 nautical mile zone of St. George Island CH amounted to 0.2% of the EBS pollock total catch. In this analysis, the NMFS summarized the existing protection measures by stating on page 56 of the 2001 BiOp Supplement that “[i]nside 10 nm conservation measures are very conservative except for catch off St. George Island.” Based on this analysis, we determine that implementation of the SGTC proposal will dramatically reduce the target species removals in St. George CH and in the Pribilof Region as a whole.

As we point out in our proposal, although a disproportionate level of fishing occurs in proximity to St. George Island, if current catch rates resemble those of 2002, only a relatively low level of fishing relative to the overall EBS catch needs to be displaced in order to dramatically improve the protection of critical habitat in the Pribilof Islands and establish SSL protection measures comparable to those established for the rest of the Western DPS. To better assess the validity of our assumption, we are requesting that the SSLMC ask the AFSC update to this analysis prior to the May meeting (see below).

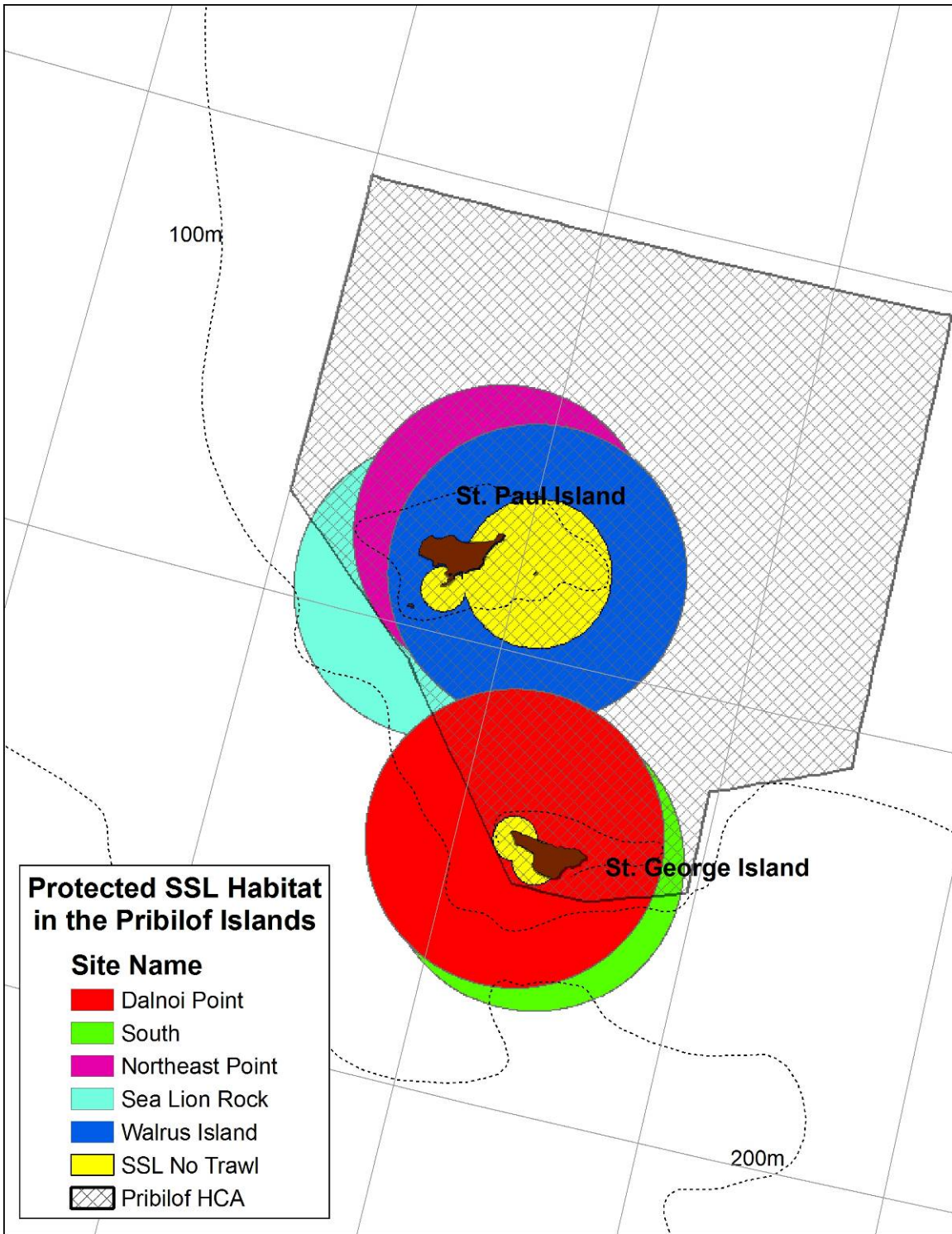
<sup>1</sup> NMFS. 2003. Supplement to the 2001 Endangered Species Act, Section 7 Consultation, Biological Opinion and Incidental Take Statement on the authorization of the Bering Sea/Aleutian Islands and Gulf of Alaska Groundfish Fishery Management Plan Amendments 61 and 70. NMFS Alaska Region, Protected Resources Division, Juneau, AK.

#### Explanation of Variable 8 Assessment:

We found Variable 8, the percentage of SSL sites affected in a region, difficult to assess for the Pribilof region, in part because in keeping with the structure of the PRT as a whole, it appears to be directed at negative impacts of proposals on SSL sites in a region, whereas the STGC proposal will provide further increased CH protection. In the Pribilof Region SSL use a number of haulout sites; there is one active rookery (Walrus Island) and four haulout sites (South Rookery and Dalnoi Point on St. George Island, and Northeast Point and Sea Lion Rock on St. Paul Island) listed in the Critical Habitat Regulations (50 CFR 226.202). Although for all these areas the marine zone of CH is designated as 20 nm around the site, the four Pribilof haulout areas have Pollock and Cod No-fishing Zones for Trawl Gear out to 3 nm and Walrus Island has a 10 nm no-trawl zone. It should be noted that cod fishing with hook and line gear and pot gear is allowed to within 3 nm of Walrus Island as well (Federal Register / Vol. 69, No. 243).

Of these SSL CH areas, the entirety of Walrus Island and Northeast Point CH is completely enclosed within the Pribilof Habitat Conservation Area (PHCA) no-trawl zone (Figure 1). The 20 nm CH areas for Sea Lion Rock, South and Dalnoi Point all extend beyond the westward boundary of the PHCA, however the 3 nm no-trawl zones for all three are completely enclosed within the PHCA (Figure 1). Based on the GIS analysis provided in Figure 1, we have determined that 3 of the 5 (60%) SSL CH areas in the Pribilof Region are potentially affected by fishing under the current SSL protection measures (the status quo), resulting in a ranking of “d” (51-75%). However, since we lack the spatially explicit fisheries data to determine the extent of fishing in the Sea Lion Rock CH area, it is possible that a more conservative ranking for the status quo may be “c” (26-50%).

In biological terms, the SGTC proposal for increased CH protection at Dalnoi Point will likely have a positive impact (i.e. diminished negative impact) on all sites in the Pribilof Islands because SSL from the Pribilof Islands and other SSL foraging in the SE Bering Sea are highly likely to utilize this site in winter. However, based on a similar methodology to that applied above for the status quo determination, the percentage of SSL sites that are still **negatively** affected in the Pribilof region under the SGTC proposal for increased protection to 20 nm at Dalnoi Point is likely “a” (1-10%). This is primarily due to the high degree of spatial overlap between the Dalnoi Point and South Rookery CH areas which leaves both areas better protected under the SGTC proposal. Therefore the categorization of this variable depends on the same determination that is necessary for the status quo regarding the extent of fishing in the 20 nm CH area around Sea Lion Rock.



**Figure 1.** Matrix of protected Steller sea lion habitat in the Pribilof Islands Region.

Additional Data Set Questions:

When the SSLMC meets to evaluate proposals with data sets that have been assembled for evaluating proposals “outside the model”, we request that the following issues to be addressed.

- a) To better assess the validity of our assumption that the target species removals in St. George CH are similar to those presented in the 2003 BiOp supplement (See Note 1), we request that the SSLMC ask the AFSC update to this analysis. It would also be useful to enhance this analysis to include additional harvest rate data by gear and target species St. George Critical habitat (e.g. Cod, Pollock and Atka mackerel).
- b) As a part of our presentation, the SGTC will present current data on Dalnoi Point haulout site counts and trends in order to provide more insight into how the STGTC proposal will affect this important site for Steller sea lions foraging and breeding in the Bering Sea. We will present both brand resight information and census data to demonstrate that this site may be “uniquely sensitive” to high winter exploitation rates.
- c) The Gaichas and Hiatt data table on fishery bycatch shows that squid bycatch is high in area 517 during both winter and summer. The potential bycatch effects may be significant in the Pribilof Canyon and we would like to request spatially explicit data on squid bycatch in the Pribilof Canyon and shelf-break areas adjacent to Pribilof Region CH areas.

