

AKSC Proposal 5 to SSL Committee to Change 2011 RPAs: Modifications to Atka mackerel fishing regulations in the Aleutian Islands based on NPFMC Alt. 4

- Introduction materials – (Provide name of proposer or institution, address and telephone number of proposer, email address for primary contact)

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- Brief Statement of Proposal – (Provide a single, brief paragraph that concisely describes the action to be taken. Details will be specified in additional sections.)

Modify the current RPAs for Atka mackerel in Areas 542 and 543 to those proposed by the North Pacific Fishery Management Council (NPFMC) in August 2010. The Council proposed to allow mackerel fishing in a limited portion of AI 543 outside of SSL Critical Habitat (CH) and east of the 174 degrees 30 minutes East longitude line. Mackerel catch in AI 543 was limited to 65% of the Allowable Biological Catch (ABC). For AI 542, the NPFMC proposed TAC not to exceed 65% of ABC, and to allow some inside CH fishing at Tanaga and Kiska, with no mackerel directed fishing inside CH from 178 East to 180 degrees (~74 nm area swath Amchitka). Mackerel fishing inside CH in AI 542 was limited to 50% of the TAC in that area in the portion of CH remaining open. This was designed to keep exploitation rates in Tanaga and Kiska to approximately 5% of biomass in those areas, based on the FIT mackerel tagging study that looked at mackerel movement and estimated mackerel biomass at specific fishing areas in AI 542. Season cut off dates and no roll over provisions between A and B seasons are included in the Council RPA, and we feel these could potentially force fishing to occur at sub-optimal times. If this proposal is adopted by the SSL Committee, we would recommend minor changes to the seasons in the NPFMC Alt 4 original proposal.

- Objectives of Proposal – (Begin with a concise statement of the problem to be addressed in the proposal, and the remedy for the problem. Provide detailed description of the proposed changes to regulations, and justification for each).

The 2011 RPAs were based on data and analysis that the CIE review, the States Independent Review later found to have significant bias and scientific deficiencies. In its review of the August 2010 draft Bi-op, the NPFMC proposed a set of measures (referred to as Alternative 4 in the 2010 Bi-op) for Atka mackerel and cod in the Aleutian Islands. This proposal requests that the Atka mackerel portion of the Council's Alternative 4 be reconsidered since it was not, in our opinion, given adequate consideration in the rush to finalize the 2010 Bi-op. The Council's Alternative 4 mackerel RPAs employed finer-scale information from published research by AFSC's Fisheries Interaction Team (FIT) regarding mackerel biomass at the scale of actual mackerel fishing grounds. The CIE review and States Independent Review point out in several places that the 2010 Bi-op attempted to look at harvest rates at a spatial scale that potentially too broad to be relevant to fishery effects on SSL. Using data that were available on a more local scale, as was done by the Council, is a way of address one of the recognized deficiencies of the 2010 Bi-op. Further, given the low levels of movement of mackerel identified in the FIT studies, it is arguably more appropriate to use biomass estimates for

mackerel at the scale of the FIT work. The Council's intent, in AI 542 was to allow fisheries to occur in a manner that would result in a low level of harvest in multiple locations relative to the estimated local biomass where mackerel fishing occurs. Under the Council's RPA this would occur in inside SSL CH at Tanaga and Kiska in AI 542. Where the FIT data showed that the local mackerel biomass was relatively low and harvest rates were high in the existing fishery (Amchitka), the Council RPA did not allow any mackerel harvest inside CH. In 543, there was no FIT research to use as a basis for inside CH fisheries. For that reason, the Council's RPA only included fishing outside of CH in AI 543 and further closed a portion of AI 543 to mackerel fishing both inside and outside of CH (west of 174 degrees 30 minutes East Longitude which is near Aggatu in western part of 543). The Council's rationale for allowing fishing outside of CH in 543 was that available telemetry/Platform of Opportunity (POP) data showed a relatively low usage of outside of CH in 543 in winter and summer SSL locations used by SSL were deep water trenches not the offshore banks and rises where Atka mackerel fishing occurs.

- Impacts of Proposal – (Briefly outline the effects that you think the proposed changes to management will have, including effects on Steller sea lions, other sectors of the fishery, and Aleutian Island communities).

As outlined above, the AKSC believes that the 2010 Bi-op's restrictions on fishing for mackerel in AI 543 are not warranted. AKSC has submitted another more extensive proposal to roll back restrictions on mackerel to the 2001 Bi-op level in AI 542 and 543. This proposal proposes less extensive changes to the 2011 RPAs and is therefore an intermediate step. If this proposal is implemented, the changes would allow some limited mackerel fishing inside of CH in AI 542 and restore outside of CH fishing grounds to the Atka mackerel fishery in part of AI 543.

- Supporting data and other documentation – (Provide any relevant data or other information to support your proposal).

For evaluating effects of outside of CH fishing in 543, telemetry data for tagged SSL that were tracked in the western and central Aleutians in Fadely, 2010b, and from the Boor 2010 paper as referenced in 2010 Bi-op. Also, comments on 2012 draft and final Bi-op by Alaska Seafood Cooperative and Adak overlaying bathymetry on SSL locations in Fadely 2010 and Boor 2010 to show that offshore SSL locations do not overlap with Atka mackerel fishing grounds outside of SSL CH in AI 543. For AI 542 inside CH harvest as percentage of localized abundance, see: McDermott, S.F., L.W. Fritz, V. Haist. 2005. Estimating movement and abundance of Atka mackerel (*Pleurogrammus monopterygius*) with tag-release-recapture data. Fish.Oceanogr. 14 (Suppl.1) 113-130, and see FIT mackerel movement and local abundance report available at <http://www.afsc.noaa.gov/Quarterly/amj2002/feature3.htm>. See also the NPFMC's rationale for Alternative 4 and public comment on August 2010 draft Bi-op by AKSC, which further details how the harvesting plan inside CH in 542 in Alternative 4 amounts to harvest rates of approximately 5% of local biomass of mackerel as estimated by FIT studies.

- Alternative solutions – (Provide other potential solutions to the problem, if any, that the Council could consider to address the problem).

AKSC's other proposal for large scale changes to the current RPAs are outlined in separate proposals. This proposal is for a more moderate change to the current RPAs in AI 543 and AI 542.

- Justification for Council action – (Provide an explanation of why Council action is required, and the consequences should the Council not take action).

We would prefer the Council to adopt our other proposal for more sweeping changes to the SSL RPAs in place, but make this proposal as an intermediate step. We could propose this change to NMFS independent of the suite of proposals that the Council is preparing for the SSL EIS. We understand, however, that the Council is in a better position to evaluate and put together a suite of proposals that balances all the different interests looking for changes in the SSL RPAs in the Aleutian Islands.