

AKSC Proposal 3 to SSL Committee to Modify Rules on Retention rules for Bering Sea Atka mackerel

- 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)

This proposal requests a change to Maximum Retainable Allowance (MRA) regulations for Atka mackerel in the Eastern Aleutian Islands (Area 541) and Bering Sea wherein retention percentages would be measured on an offload to offload basis instead of the current instantaneous basis.

- 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).

Atka mackerel in the eastern Aleutian Islands (AI 541) and Bering Sea are managed as one stock. SSL numbers at sites in the Bering Sea have been increasing faster than other areas of the wDPS. The 2011 RPAs closed the Bering Sea to directed fishing for mackerel to allow for retention of mackerel against sole and cod at the 20% MRA level in that area. The 2011 Bi-op's RPA objective was in effect two-fold, 1) to shift more of the AI 541/Bering Sea harvest to the Bering Sea where SSL are doing better, and 2) to have a Bering Sea mackerel fishery that would be in a 20% MRA mode hence relatively slow harvest rates. To date, however, mackerel catch in Bering Sea has not increased much because fishermen have not been able to make full use of the MRA allowance there. The problem has been that mackerel fishing in the Bering Sea is extremely dependent on tide conditions and other factors that create small windows when mackerel fishing is productive and an instantaneous 20% MRA creates only a very limited opportunity to fish. With an offload to offload MRA, the limited number of Amendment 80 vessels and small number of catcher vessels with permits to participate in this fishery will have a somewhat expanded time window to fish Bering Sea mackerel on each trip. With this change, we expect to achieve the original intent of the 2011 RPA for Bering Sea mackerel. Measuring retention from offload to offload is already in place for Amendment 80 vessels to retain pollock so we know it is an effective way of managing retention.

- 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).

The effects of this proposal are expected to be positive for sea lions using the criteria and performance standards of the 2010 Bi-op and earlier Bi-ops. It will spread mackerel harvests out over time, allow a "low and slow" mackerel fishery, and will also shift more of the mackerel fishery to the Bering Sea where SSL numbers are steadily increasing. This proposal

will not open up the door to a large scale fishery because it does not allow for a directed mackerel fishery in the BS. In addition, the Amendment 80 sector vessels with AI 541/BS mackerel quota are still bound by their available AI541/BS quota and few catcher vessels have historically participated in directed fishing for mackerel. This proposal will simply more effectively allow eligible quota holders to harvest more of their mackerel quota in the Bering Sea.

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

Data to evaluate the need for this proposal are the catch of Atka mackerel in the Bering Sea by qualified vessels from 2011 through 2012. These data are needed to evaluate the degree to which the 2011 RPAs have resulted in more of the AI 541/Bering Sea mackerel TAC to be harvested in the Bering Sea in 2011 and 2012.

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

Another approach could be to allow directed mackerel fishing in the Bering Sea. This would require modifying the current trawl exclusion zones to 10 miles at some or all of the following SSL sites: Unalaska/Bishop Point and Akutan Island /Reef Lava, Unimak Island, Akun Island./Billings Head and Unimak I./Cape Sarichef. Changing the rules to allow directed fishing would likely achieve the increase in Bering Sea mackerel catch but would also involve a lot more regulatory changes and complexities associated with mackerel and possibly cod/pollock directed fishing in the 10 to 20 nm zones where mackerel are found in the Bering Sea. Additionally, opening the Bering Sea to directed mackerel fishing would potentially lead to a greater increase in mackerel harvest rates than will occur with this proposal. The resulting fishery might not be a “low and slow” mackerel fishery in the Bering Sea as was the intent of the 2011RPAs.

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

If the Council does not adopt this proposal or if NMFS does not eventually approve it, mackerel fishing in AI541/BS will be less spread out in the Bering Sea and the opportunity to further reduce potential for competition with SSL will be forfeited based on the criteria and performance standards of the 2010 Bi-op. 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.