

MEMORANDUM

TO: Council, SSC and AP Members

FROM: Chris Oliver *Chris*  
Executive Director

DATE: May 20, 2002

SUBJECT: Steller Sea Lion Measures

|                           |
|---------------------------|
| ESTIMATED TIME<br>4 HOURS |
|---------------------------|

**ACTION REQUIRED**

Final review of analysis for two trailing amendments.

**BACKGROUND**

In October 2001, the Council adopted alternative 4 of the draft Supplemental Environmental Impact Statement (SEIS) as its final preferred alternative to protect Steller sea lions, with only minor modifications and clarifications. The Council also identified eight items to be analyzed in a trailing amendment, for possible implementation in the 2003 season (Item C-6(a)).

At the February meeting, the Council voted to move ahead with analysis of two trailing amendments, items #7 and #9 (the AI pollock fishery allowance, and the Board of Fisheries exemptions). All of the other items, with the exception of item # 4 (exemption for all vessels < 60') would be sent to the sea lion committee for their review and recommendations. In April, the Council requested that the sea lion committee also consider possible season date changes for the GOA pollock and cod fisheries. The sea lion committee has not yet met to discuss possible tradeoffs that may be required to implement any of these options and still avoid jeopardy and adverse modification of Steller sea lion habitat.

At this meeting, the Council will make a final review of the analysis (executive summary attached as Item C-6(b)). The analysis examined five alternatives. Alternatives 1 to 3 are mutually exclusive and Alternatives 4 and 5 are mutually exclusive. However any of Alternatives 1 to 3 may be chosen in combination with either Alternative 4 or 5.

Aleutian Islands pollock

- Alternative 1: Allow an AI pollock fishery with split season outside of critical habitat, with 40% of the TAC from January 20-June 10, and 60% of the TAC from June 10-November 1.
- Alternative 2: Closure of the AI to pollock fishing.
- Alternative 3: Allow an AI pollock fishery with a single season outside of critical habitat.

Caton Island-Cape Barnabas Pacific cod pot

- Alternative 4: No exemption for vessels using pot gear.
- Alternative 5: Exempt pot fishing vessels from sea lion closures from 0-3 nm around Caton Island and Cape Barnabas.

Items for a trailing amendment:

1. Area 8 exemption: allow catcher vessels (of any LOA) using longline gear to fish 3-10 nm from haulouts of Reef-Lava and Bishop Point.
2. Area 4 exemption: allow vessels under 60 feet LOA using fixed gear to fish in waters of the Chignik area.
3. Stand down provisions between A/B and C/D seasons for pollock in the GOA
4. Exemption for all longline, pot, jig gear, and trawl catcher vessels and catcher processors under 60 ft. Identify as a preliminary preferred alternative that the exemption would only apply to catcher vessels.
5. Examine options for a Gulf of Alaska Pacific cod split other than the current 60/40 split.
6. For the BSAI Atka mackerel fishery, analyze options to change percentage inside/outside critical habitat of 50/50 and 70/30.
7. For the Aleutian Islands pollock fishery, examine three options:
  - a) closure;
  - b) a single season outside of critical habitat;
  - b) a split season (40/60 % of TAC).
8. In Area 9, analyze a range of caps for pot, longline and jig gear.
9. (December 2001 addition). The Board of Fisheries modifications.

Comparison of measures adopted by the Council and by the Board of Fisheries.

| <u>Area</u>   | <u>Council Action</u>   | <u>Board Action</u>                                |
|---------------|---|--|
| Cape Barnabas | 0-3 nm open to jig gear<br>0-3 nm closed to trawl & fixed gear                                    | 0-3 nm open to jig gear<br>0-3 nm open to pot gear |
| Caton Island  | 0-3 nm open to jig gear<br>0-3 nm closed to trawl & fixed gear                                    | 0-3 nm open to jig gear<br>0-3 nm open to pot gear |
| Chignik Area  | Open State waters cod fishery seven days after closure of directed Federal season in Central Gulf | open state fishery on March 1                      |

**Draft for Public Review**

ENVIRONMENTAL ASSESSMENT/  
REGULATORY IMPACT REVIEW/  
INITIAL REGULATORY FLEXIBILITY ANALYSIS

for a Proposed Amendment to Regulations Implementing the Fishery Management Plan for the  
Groundfish Fisheries of the Bering Sea and Aleutian Islands Area  
and the Fishery Management Plan for Groundfish of the Gulf of Alaska

**Proposed Trailing Steller Sea Lion Amendments  
to Change the Management of the Aleutian Islands pollock Fishery  
and to  
Exempt Pacific cod Vessels using Pot Gear From Two Haulout Protection Areas  
in the Gulf of Alaska**

**Date:** May 8, 2002

**Lead Agency:** National Marine Fisheries Service  
Alaska Regional Office  
Juneau, Alaska

**Responsible Official:** Jim Balsiger, Alaska Regional Administrator

**For More**

**Information contact:** Ben Muse, National Marine Fisheries Service  
Susan Salvesson, National Marine Fisheries Service  
Melanie Brown, National Marine Fisheries Service

**Abstract:** This Environmental Assessment/Regulatory Impact Review/Initial Regulatory Flexibility Analysis (EA/RIR/IRFA) considers two changes to Steller sea lion protection measures adopted by the North Pacific Fisheries Management Council in October 2001. Five alternatives are reviewed. Three of these are alternatives for the management of the Aleutian Islands pollock fishery, and two of these are alternatives for the management of Pacific cod pot fishing at two haulouts in the Gulf of Alaska. This EA/RIR/IRFA meets the requirements of the National Environmental Policy Act, Presidential Executive Order 12866, and the Regulatory Flexibility Act.

## EXECUTIVE SUMMARY

### *Introduction*

This EA/RIR/IRFA assesses the likely impacts of changing existing restrictions on the Aleutian Islands pollock fishery and modification of the Steller sea lion (SSL) protection measures around Caton Island and Cape Barnabas in the Gulf of Alaska (GOA) to mirror changes by the Alaska State Board of Fish (BOF). Without taking action for the Aleutian Islands pollock fishery, the current closure of this fishery would sunset on January 1, 2003, and the fishery would be authorized outside critical habitat with a 40/60 seasonal apportionment of total allowable catch (TAC). The Council intends to reconsider the allowance for an Aleutian Islands pollock fishery under a range of alternatives. Council response to the BOF action is important because federal and State regulations concerning Steller sea lion protection areas currently are in conflict.

### *Environmental Assessment*

The objectives of this action are to provide for access to fisheries while: (1) maintaining protection for the western distinct population segment (DPS) of Steller sea lions (i.e., avoid jeopardy to the western DPS of Steller sea lions or result in the destruction or adverse modification of its critical habitat), (2) avoid unnecessary burdens on the fishing industry, and (3) avoid confusion and regulatory compliance issues by facilitating consistency between federal and state regulations. Any changes to the pollock, Pacific cod, or Atka mackerel fisheries must not erode Steller sea lion protection measures in order to provide economic benefits to the fishing industry without having reasonable mitigation measures such as other closure areas.

Alternatives 1-3 deal with the Aleutian Islands pollock fishery, while Alternatives 4 and 5 deal with Pacific cod pot fishing in the Gulf of Alaska. Alternatives 1-3 are mutually exclusive, as are Alternatives 4 and 5. However, either one of Alternatives 1-3 may be chosen in combination with either Alternative 4 or 5.

Alternative 1. No action alternative for the Aleutian Islands pollock fishery. Under this alternative, the Council's October 2001 recommendation to allow a directed fishery for pollock outside SSL critical habitat in 2003 and beyond would be implemented. The Aleutian Island total allowable catch (TAC) would be apportioned as follows: 40% to the A season and 60% to the B season.

Alternative 2. Continue to prohibit a directed fishery for pollock in the Aleutian Islands Subarea in 2003 and beyond. A directed fishery for pollock in the Aleutian Islands subarea has been prohibited since 1999.

Alternative 3. Similar to the no action alternative, allow a directed fishery for Aleutian Islands area pollock outside critical habitat. However, the annual TAC would not be seasonally apportioned, thus allowing for the full TAC to be harvested at anytime during the fishing year (likely in the winter time period).

Alternative 4. No action alternative for GOA haulouts. Federally permitted vessels using pot gear for Pacific cod directed fishing would continue to be prohibited from fishing within 3 nm of the Caton Island and Cape Barnabas haulouts.

Alternative 5. Allow federally permitted vessels using pot gear in a directed fishery for Pacific cod to fish within 3 nm of the Caton Island and Cape Barnabas haulouts. This action would provide consistency between federal and state regulations governing fishing restrictions within Steller sea lion protection areas.

NMFS has determined through the Steller sea lion protection measures supplemental environmental impact statement (SSL SEIS) (NMFS 2001a), the associated draft and final biological opinions, and subsequent informal consultation on the BOF action that the implementation of Alternatives 1 or 2, and 4 or 5 would fall under the umbrella of actions that have already been analyzed and comport with both the ESA and NEPA. Further analyses are not warranted. With the exception of Alternative 3, the alternatives considered in this EA would have incremental effects that are sufficiently minor on the spatial and temporal harvest of pollock, Pacific cod, or other groundfish so as to not deviate from the conclusions of the cumulative impact assessment presented in the SSL SEIS.

However, Alternative 3 falls outside of the scope of both the SSL SEIS and the associated biological opinion. NMFS has initially determined that this action may result in adverse effects to Steller sea lions not previously considered and would trigger formal consultation under the ESA. Alternative 3 could increase the intensity of the impacts associated with an Aleutian Islands pollock fishery by not providing for a seasonal distribution of catch outside critical habitat. If consultation resulted in a jeopardy or adverse modification determination, a mitigating reasonable and prudent alternative (RPA) would be included as required under the ESA. Such an RPA could be a seasonal apportionment of TAC as already adopted under the no action alternative (Alternative 1). Assuming these mitigating measures, neither the state nor federal fisheries would be likely to cause cumulative effects beyond those described in the SSL SEIS.

### ***Regulatory Impact Review***

Alternative 1 is the status quo/no action/baseline alternative. This would allow pollock fishing outside of critical habitat in the Aleutian Islands area. Fishing would be subject to a seasonal restriction - 40% of the TAC could be taken from January 20 to June 10, and 60% of the TAC could be taken between June 10 and November 1. Since this is the baseline alternative, impacts on the resource, benefits, and costs were not estimated separately for this alternative. The impacts on the resource, benefits and costs of Alternatives 2 and 3 were measured as differences from Alternative 1. Alternative 1 would not jeopardize the continued existence of the Steller sea lions or adversely modify critical habitat. It would not reduce the burden on the industry. This alternative would not trigger E.O. 12866 significance criteria.

Alternative 2 would close the directed pollock fishery in the Aleutian Islands. This would reduce the pollock harvest in the Aleutians, although harvests of pollock in the Bering Sea, or of other species in the Bering Sea and Aleutian Islands, might increase. The reduction in the harvest in the Aleutians may benefit the Steller sea lions there, however the benefits, if any, are likely to be small. There is no jeopardy or adverse modification now under the status quo. Moreover, the reduction may be offset by an increase in the harvest of another species in the BSAI, and this may offset the benefits. Total costs of a shutdown could reach \$16 million - the value of the TAC if fully taken under Alternative 1. However, costs are unlikely to be this high since they may be offset by increased harvests of pollock or other species elsewhere, and because, given critical habitat and seasonal limits on harvests under Alternative 1, fishermen might have trouble harvesting the full TAC. This alternative would not meet the program

objectives of reducing the burden on the industry and may not bring about any change in protection to Steller sea lions. This Alternative would not trigger E.O. 12866 significance criteria since the maximum revenue impact is likely to be \$16 million at the outside.

Alternative 3 would permit fishing for pollock outside of critical habitat and would lift the seasonal constraint on this fishing. Under this alternative, harvest is likely to become concentrated in the first part of the year. This would have a benefit to the industry because pollock have more value at that time. This benefit may be as large as \$5.9 million. On the other hand, Alternative 3 could increase the intensity of the impacts associated with an Aleutian Islands pollock fishery by not providing for a temporal dispersion of catch outside critical habitat. Implementation of this action would likely result in a re-initiation of formal section 7 consultation under the ESA. If any re-initiation of consultation resulted in a jeopardy determination, a mitigating reasonable and prudent alternative would be included as required by the ESA. Alternative 3 would achieve the objective of relieving the burden on the fishermen, but as noted, it might contribute to jeopardy and adverse modification. This alternative would not trigger E.O. 12866 significance criteria since the maximum revenue impact is likely to be \$5.9 million at the outside.

Alternative 4 is the status quo/no action/baseline alternative for GOA haulout restrictions. Under this alternative, Pacific cod pot fishermen in the GOA could not fish within three nautical miles of haulouts at Caton Island and Cape Barnabas. Since this is the baseline alternative, impacts on the resource, benefits, and costs were not estimated separately for this alternative. The impacts on the resource, benefits and costs of Alternative 5 were measured as a difference from Alternative 4. This alternative would not jeopardize the continued existence of the Steller sea lions or adversely modify critical habitat. It would not reduce the burden on the industry. This alternative would not trigger E.O. 12866 significance criteria.

Alternative 5 would allow federally permitted vessels used to participate in the GOA Pacific cod pot fishery to fish within three nautical miles of the haulouts at Caton Island and Cape Barnabas. This would reduce the Pacific cod revenues placed "at risk" by the restrictions of Alternative 4 by up to \$63,000. This in fact overstates the likely size of the net benefits, because the areas in question are small parts of larger fishing areas, and fishermen may currently be making up a large part of the harvest foreclosed by the restrictions by fishing elsewhere. Alternative 5 is not believed to create jeopardy for the Steller sea lions or adversely modify its critical habitat. This alternative would not trigger E.O. 12866 significance criteria since the maximum revenue impact is likely to be \$63,000 at the outside.

### *Initial Regulatory Flexibility Analysis*

Alternatives 1 through 3 affect the Aleutian Islands pollock fishery. Many of the entities in this area have gross revenues large enough to make them large entities, or are affiliated with other entities (such as processors or AFA fishing cooperatives) that do. It was estimated that, of 140 entities, 12 were small. The small entities included one AFA catcher vessel delivering to a mothership only, five AFA catcher vessels delivering to catcher/processors, and six CDQ groups. Alternatives 4 and 5 affect Pacific cod pot vessels fishing within three miles of Caton Island and Cape Barnabas during the State's parallel groundfish fishery. It was estimated that there were six of these, and that they were all small for RFA purposes.

Aleutian Islands pollock Alternative 2 may adversely impact six catcher vessels and six CDQ groups in comparison with the "status quo/baseline/no action" Alternative 1. However, at its greatest, the Aleutian

TAC would be very small compared to the Eastern Bering Sea TAC, fishing operations precluded from fishing within critical habitat may not be able to harvest a large part of it if it is available, and closure of directed fishing may be offset by increased pollock TACs elsewhere. However, without more information on how the TAC freed up by eliminating directed pollock fishing in the Aleutians would be used under the BSAI optimal yield (OY) ceiling, it is impossible to know for sure if Alternative 2 would have a significant impact on small entities. If an adverse impact results, it likely would be small.

Aleutian Islands pollock Alternative 3 has no adverse impacts on small entities in comparison with the "status quo/baseline/no action" Alternative 1. Alternative 3 lifts seasonal restrictions on trawl fishing for pollock in the Aleutian Islands and is expected to result in the pollock harvest being taken during the high valued winter fishery.

The Caton Island/Cape Barnabas Alternative 5 has no adverse impacts on small entities in comparison with "status quo/baseline/no action" Alternative 4. Alternative 5 lifts restrictions on fishing with pots for Pacific cod and provides small entities somewhat more flexibility. It is not clear if lifting the restrictions will increase revenues or reduce costs for these operations significantly. These operations have other inshore areas nearby - including within the same State of Alaska statistical reporting areas - within which they could fish. The volumes of fish taken from these areas in the past are modest compared to overall harvests from other Alaska inshore waters in those areas.

The EA/RIR/IRFA analyzed two options that may be less burdensome for directly regulated small entities in the Aleutian Island pollock fishery. Under Alternative 3 the seasonal restriction on harvests from the pollock fishery would be lifted, and it is likely that almost all of the harvest would be taken in the first half of the year, and probably in February and March when the roe quality is highest. While this would increase the value of the TAC for the industry, it would increase the concentration of the fishery in time. This may impose important costs if it jeopardizes the continued survival of the western DPS of Steller sea lions. As noted in Section 2.8 of this EA/RIR/IRFA,

"Alternative 3 could increase the intensity of the impacts associated with an Aleutian Islands pollock fishery by not providing for a seasonal distribution of catch outside critical habitat. Implementation of this action would likely result in a re-initiation of formal section 7 consultation under the ESA ... if any re-initiation of consultation resulted in a jeopardy determination, a mitigating reasonable and prudent alternative would be included as required by the ESA "

Alternative 5 might be less burdensome for some small Pacific cod pot fishing vessels in the Gulf of Alaska. These would have somewhat more area to fish in during the State parallel fishery.



May 22, 2002

David Benton, Chairman  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501-2252

RECEIVED

MAY 22 2002

N.P.F.M.C

Dear Mr. Chairman:

I'm writing on behalf of the World Wildlife Fund (WWF) to urge that the North Pacific Fishery Management Council (NPFMC) support continued closure of the Aleutian Islands to pollock fishing as prescribed in Alternative 2 of the draft EA/RIR/IRFA on the Steller sea lion trailing amendments that were released for public review May 8, 2002.

As a member of the Council's SSL/RPA Committee, it was made quite obvious to me that the most serious declines in the western Steller sea lion population are in the Aleutian Islands. It was also made clear that pollock constitute a vital component of the natural prey field for this and other marine mammals. With pollock stock biomass in the Aleutian Islands ranging from only 20 to 50 percent of its levels in the early 1980's, and lacking thorough updated stock assessment data since 2000, NMFS has provided no scientifically sound evidence for reopening the Aleutian Islands to pollock fishing.

It must also be recognized that ongoing commercial fishing for Pacific cod and Atka mackerel, two other favored prey species for Steller sea lions, will have cumulative impact on this endangered marine mammal's food base. Can NMFS say with any degree of scientific certainty that the combined harvest of bottom fish from the Aleutian Islands is not reducing the carrying capacity of these waters for the endangered Steller sea lions and other marine wildlife? If not, then they should be cutting back on the fishing pressure not increasing it.

Another important consideration is the fact that sensitive coral and sponge communities have yet to be thoroughly mapped or given protection in the Aleutian Islands despite their importance as vital habitats for bottom fish and a host of other marine wildlife. Meanwhile, there is mounting evidence that these and other benthic communities are being seriously damaged by bottom trawling.

**World Wildlife Fund**

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*Affiliated with the World Wide Fund for Nature*





Additionally, we find no evidence to indicate that NMFS has evaluated the possible adverse impacts of foreign fishing on pollock stocks shared between the United States and Russia. As noted by Alexey Vaisman (2002) *Trawling in the Mist: Industrial Fisheries in the Russian Part of the Bering Sea*, regulation of the pollock fisheries in Russian waters is in disarray with poaching rampant and underreporting of catches commonplace. Meanwhile, legal and enforcement mechanisms in the Russian Federation are proving incapable of addressing such serious fishing problems.

Given the aforementioned factual information, NMFS has simply provided no scientific or ethical justification for reopening the Aleutian Islands to pollock fishing as requested by industry. We hope the NPFMC will agree.

Your consideration of this request is greatly appreciated.

Sincerely,



David R. Cline  
Director  
Alaska Field Office

Cc: James W. Balsiger, Administrator, Alaska Region  
National Marine Fisheries Service  
P.O. Box 21668  
Juneau, Alaska 99802-1668

RECEIVED

MAY 22 2002

TO: David Benton, Chairman  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501-2252

CC: James W. Balsiger, Administrator, Alaska Region  
National Marine Fisheries Service  
P.O. Box 21668  
Juneau, Alaska 99802-1668

N.P.F.M.C.  
The Ocean  
Conservancy

May 22, 2002

RE: Aleutian Islands Pollock

Mr. Chairman:

The Ocean Conservancy's mission is to protect ocean ecosystems and conserve the global abundance and diversity of marine wildlife through science-based advocacy, research, and public education. Headquartered in Washington, D.C., the Ocean Conservancy has regional offices in Alaska, California, Florida and Maine, field offices in Santa Barbara and Santa Cruz, California, and the Florida Keys, and the Office of Pollution Prevention and Monitoring in Virginia Beach, Virginia.

We are writing in response to the draft EA/RIR/IRFA on the Sea lion trailing amendments, released on May 8, 2002, for public review. Specifically, we wish to address the proposed Alternatives 1, 2, and 3 for the Aleutian Islands pollock fishery. The Council voted to close the Aleutian pollock fishery to directed fishing in 1998, citing declining stock trends, large uncertainties in the available information, and indications of serial stock depletion in the pattern of fishing from east to west during the 1990s. We support the continued closure of the Aleutian pollock fishery to directed fishing as proposed in Alternative 2, pending better information, clear indications of pollock stock rebuilding, and resolution of issues related to the ESA-required mitigation measures for Steller sea lions in the Aleutian Islands.

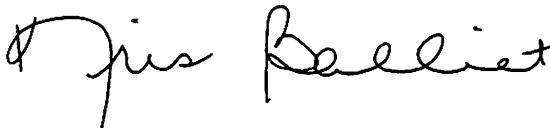
No new survey information on Aleutian Islands pollock was available for the 2002 stock assessment because there was no new survey information in 2001. Uncertainties about the discreteness of the Aleutian Islands pollock stock and its relation to the other pollock stocks abound. The stock assessment advice acknowledges that the status and dynamics of this stock are not well understood, that catch-age data is limited, and that reliable estimates of  $F_{MSY}$ ,  $B_{MSY}$ ,  $F_{40\%}$  or  $B_{40\%}$  do not exist for the Aleutian portion of the pollock stock.<sup>1</sup> Therefore Aleutian Islands pollock falls into Tier 5 of the FMP overfishing definition (Amendment 56) and a fishing mortality rate is set arbitrarily at  $F = .75$  of the estimated natural mortality rate ( $M$ ) as a "conservatism," even though the addition of the fishing mortality nearly doubles the estimated mortality rate for this stock.

<sup>1</sup> Ianelli et al., 1999. BSAI SAFE Report for 2000, November 1999, pp. 115-116.

Lacking new information and recognizing the uncertainties associated with this "stock," the Plan Team recommended no directed fishing in 2002 in keeping with the North Pacific Council moratorium on directed fishing that began in 1999 due to low stock size. The 2000 Aleutian triennial trawl survey pollock biomass estimate ranged from 20-50% of its value in the early 1980s, when systematic trawl surveys began. Results from the 2000 Aleutian Islands triennial groundfish survey indicated a 16% decline in revised Aleutian Islands/Unalaska-Umnak area (165W-170W longitude) biomass from 158,912 mt in 1997 to 133,366 mt in 2000, and an 11% increase in revised estimates for Aleutian Islands west of 170W long.<sup>2</sup> Even with the 11% increase in survey pollock biomass west of 170W longitude, however, the stock remained at only about 20% of its 1983 survey biomass.

Finally, the temporal and spatial concentration of the Aleutian pollock fishery in Steller sea lion critical habitat during the 1990s must be addressed. Although pollock is not the top-ranked sea lion prey in the Aleutians, it is an important component of prey diversity and has been a known food source not only of Steller sea lions but of large cetaceans in the past. NMFS has provided no clear scientific basis for concluding that the re-opening of the fishery as proposed will avoid jeopardy or adverse modification of critical habitat. The ongoing litigation over the efficacy and legality of the mitigation measures recommended by the Council-appointed Steller sea lion RPA Committee in 2001 (as adopted by NMFS in the 2001 RPA Biological Opinion) should be clearly resolved before a decision is made to re-open the fishery.

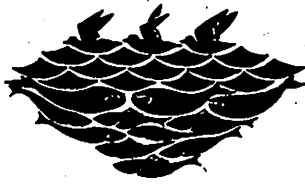
Sincerely,

A handwritten signature in cursive script that reads "Kris Balliet". The signature is written in black ink on a white background.

Kris Balliet, Esq.  
Alaska Region Director  
The Ocean Conservancy

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<sup>2</sup> Ianelli et al., 2000. Preliminary Draft BSAI Pollock Assessment for 2001 prepared for November Plan Team meeting, Table 1.19, p.87.



# Alaska Marine Conservation Council

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amcc@akmarine.org • www.akmarine.org

May 22, 2002

TO: David Benton, Chairman  
North Pacific Fishery Management Council  
605 W. 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501-2252

**RECEIVED**

MAY 22 2002

**N.P.F.M.C**

RE: Agenda Item: C-6 SSL Trailing Amendments/ Aleutian Islands Pollock

Dear Chairman Benton:

The Alaska Marine Conservation Council is writing in support of Alternative 2 in the Draft EA/RIR/IRFA for the proposed trailing Steller Sea Lion Amendments. Alternative 2 would continue the prohibition of directed pollock fishing in the Aleutians Islands region. In 1998 the Council voted to limit the catch of pollock in this region to bycatch only because of the low abundance of this stock and its importance to Steller sea lions.

“The pollock TAC for the Aleutian Islands area was set at bycatch amounts only (2,000mt) and 1,000 mt for the Bogoslof district. The Council recommended that no directed fishing for pollock occur in these areas given current low abundance and the importance of pollock as prey for Steller sea lions.” December 17, 1998. NPFMC Newsletter #6-98

To this date there is no clear indication that the Aleutian Island pollock stock has rebounded to a healthy and stable population. The 2000 triennial survey estimated the pollock biomass in the Aleutian Region at 105,554 tons, a 13% increase from the 1997 survey<sup>1</sup>. However, the 2000 stock biomass is comparatively low to previous years. The 2000 assessment represents a 58% to 79% decline from the pollock biomass in the early 1980's. The current stock estimates do not indicate that Aleutian pollock have recovered from levels of low abundance and it remains that the status of this stock is uncertain.

Additionally, AMCC has become increasingly concerned about the adverse effects of “pelagic” trawls on seafloor habitats. During a presentation to the National Research Council in Anchorage (June 2001) on the effects of trawling on seafloor habitats, a trawl net engineer presented that pelagic trawls make contact with the seafloor - with the net's footrope - up to 85% of the duration of the trawl tow. Some people claim that in the Aleutians (as opposed to the Eastern Bering Sea) there is no intentional contact by the footrope with the seafloor. Although this may be the case in the Aleutian region, the fact remains that there has been no scientific evaluation of the magnitude of impact induced

<sup>1</sup> NPFMC 2001. BSAI SAFE, November 2001 – see attached document.

by pelagic trawls on seafloor habitats. Although pelagic trawls do not contact the seafloor with the trawl doors, the gear still may damage the seafloor and associated biological communities in potentially significant ways. Regarding the effects of trawling and dredging, the National Research Council<sup>2</sup> states,

“Mobile fishing gears are a major cause for concern because of the size of the affected fishing grounds, the associated modification of the substrate, disturbance of benthic communities, and removal of non-target species. The long-term viability of some fish populations could be threatened if essential fish habitat is degraded.”

The impacts of opening directed fishing for pollock in the Aleutian Region, on the stock itself and the seafloor habitats of the Aleutians are unknown. Due to these uncertainties, we recommend that the Council adopt Alternative 2 in the Draft EA/RIR/IRFA for Steller Sea Lions, upholding the precautionary actions taken in 1998.

Sincerely,



Dorothy Childers  
Executive Director

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<sup>2</sup> National Research Council 2002. Effects of Trawling and Dredging on Seafloor Habitat. National Academy Press, Washington D.C. pg 21.

From: Appendix A: Stock Assessment and Fishery  
 Evaluation Report For the Groundfish Resources  
 of the Bering Sea/Aleutian Islands Regions.  
 NPFMC November 2001.

November Draft

**1.15. Aleutian Island Region Pollock**

In 1997 we presented an updated analysis of the age-structured information available for the Aleutian Islands Region. Geographically, there are questions as to the appropriateness of defining pollock caught in the "Aleutian Islands" region as being from a separate stock. From this early analysis, it was clear that removals from this area are potentially from the EBS stock. Therefore, interpretations of the results raised many important questions.

The 2000 Aleutian Island bottom trawl survey estimated biomass at 105.5 thousand t, a 13% increase over the 1997 survey estimate of 93.5 thousand t (Table 1.19). Surveys from this region indicate that the biomass peaked in 1983 and declined to the 1994 level. The 1994 survey indicated a strong mode of either age 1 or 2 pollock—the 1992 or 1993 year-class. These fish appeared to have entered the fishable population in 1996 and have stabilized or increased pollock biomass in the Aleutian Islands in recent years.

Table 1.19. Pollock biomass estimates from the Aleutian Islands Triennial Groundfish Survey, 1980-2000.

|      | Aleutian Islands and<br>Unalaska-Umnak area (~165W-170W) | Aleutian Region<br>(170E-170W) |
|------|--|--------------------------------|
| 1980 | 308,745  | 252,013                        |
| 1983 | 778,666  | 495,982                        |
| 1986 | 550,517  | 448,138                        |
| 1991 | 218,783  | 167,140                        |
| 1994 | 117,198  | 77,503                         |
| 1997 | 158,912  | 93,512                         |
| 2000 | 133,366  | 105,554                        |

Catch-age data are relatively scarce for pollock caught in the Aleutian Islands region; the data that are available come primarily from the eastern area (INPFC area 541). Trawl survey data show that most of the biomass is located in the eastern Aleutian Islands and along the north side of Unalaska-Umnak islands in the eastern Bering Sea region (Fig. 1.49). The stock definition for "Aleutian Islands pollock" is therefore confounded with Bering Sea abundance levels and abundance in the Aleutian Basin. We therefore consider pollock in the Aleutian Island region as an operational "stock" for management with biomass levels on the order of 100 - 200 thousand tons (for age 3 and older). In the past two years, harvest levels in this region have only been about 1,000 tons with no directed pollock fishing allowed.

It seems unlikely that pollock in the eastern Aleutian Islands represent a discrete stock, since pollock are continuously distributed from the eastern Bering Sea. In prior assessments it was assumed that stock dynamics in the Aleutian Islands are similar to that of eastern Bering Sea pollock and the biomass trend the same. Analyses on MSY values for Aleutian Islands pollock were not pursued given, among other things, potential problems with stock definition and paucity of data for this region.

Although limited a number of age-structured model runs were done on this stock in the past, the results showed a large degree of ambiguity. Consequently, until the issues of stock definition and survey interpretation are resolved, we recommend continuing the use of the most recent survey biomass estimate applied to an adjusted natural mortality. This gives an ABC based on Tier 5 (2000 survey biomass  $\times M \times 0.75$ ) of 23,750 t at a biomass of 105,554 t (with  $M = 0.3$ ). The OFL based on Tier 5 (2000 survey biomass  $\times M$ ) gives 31,666 t.

|           | 1997              | 1998     | 1999     | 2000     | 2001     | F              |
|-----------|-------------------|----------|----------|----------|----------|----------------|
| $F_{ABC}$ | 17,413 – 28,000 t | 23,760 t | 23,760 t | 23,760 t | 23,750 t | 0.225 = 0.75 M |
| $F_{OFL}$ | 24,000 – 38,000 t | 31,680 t | 31,680 t | 31,680 t | 31,666 t | 0.3 = M        |

PUBLIC TESTIMONY SIGN-UP SHEET FOR  
AGENDA ITEM C-6 Steller sea lions

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