



## C5 Sculpins to Ecosystem Component

June 2019 Council Meeting

### Action Memo

Staff: Steve MacLean  
Other Presenters: Megan Mackey, Presenter (AFSC)  
Action Required: 1. Initial Review Draft – review  
2. Identify preferred alternative

### BACKGROUND

In April 2019, the Council reviewed a discussion paper evaluating the appropriate level of conservation and management required for sculpins in the Bering Sea and Aleutian Islands Management Area (BSAI) and the Gulf of Alaska (GOA) consistent with the Magnuson-Stevens Fishery Conservation and Management Act (MSA) and National Standard (NS) Guidelines. That discussion paper summarized the available scientific information to assess whether sculpins could be managed as non-target species, and specifically whether sculpins could be identified as “non-target ecosystem component species not in need of conservation and management.” After review, the Council adopted a purpose and need statement and identified a range of alternatives to consider the appropriate conservation and management status for sculpins in the BSAI and GOA. Alternatives include the Status Quo Alternative and the Action Alternative to designate sculpins in the BSAI and GOA as non-target ecosystem component species. The Action Alternative would require regulations to prohibit directed fishing for sculpins, establish a Maximum Retainable Amount (MRA) for sculpins, and require recordkeeping and reporting to monitor catch and discard of sculpin species.

At this meeting the Council will review the Initial Review Draft EA/RIR with the potential to determine their preferred alternative and schedule final review.

### Alternatives

Two alternatives are considered in this analysis. The Council’s identified Preliminary Preferred Alternative is identified in bold:

1. Status Quo. Continue to manage sculpins as target species in both the BSAI and GOA groundfish FMPs. OFL < ABC, and TAC will continue to be set for sculpins in both areas.
2. **Designate sculpins in both BSAI and GOA FMPs as non-target ecosystem component species. Establishment of OFL, ABC, and TAC will no longer be required. Remove regulations referring to sculpins as target species and implement regulations for the groundfish fisheries that:**
  - **Prohibit directed fishing for sculpins,**
  - **Establish a sculpin maximum retainable amount (MRA) when directed fishing for other fisheries at a level to discourage retention while allowing flexibility to prosecute other fisheries:**
    - Option 1 MRA = 2%
    - Option 2 MRA = 10%
    - **Option 3 MRA = 20%**

- **Require recordkeeping and reporting to monitor and report catch and discards of sculpin species annually**

As noted in the analysis, there are no conservation concerns for sculpins, sculpins are not targeted as a food production Alaska, fishing related mortality of sculpins is low, and future uses of sculpins remain available. Maintaining sculpins as a target species in the BSAI and GOA FMPs is not likely to improve or maintain stock condition.

### **Environmental Assessment**

The Environmental Assessment (EA) evaluates the direct and cumulative impacts of the alternatives and options on various resource components and relies heavily on information and evaluations contained in previous EAs. Because neither alternative would affect current fishing regulations that affect seasons, gear types, or protections for habitat or important breeding areas, no effects are expected on marine mammals, seabirds, habitat, or the ecosystem. The analysis, therefore, focuses on potential effects on sculpins, groundfish, and on social and economic impacts.

Because neither alternative will change fishing mortality or spatial and temporal distribution of sculpins or other groundfish, any impacts of either alternative are expected to be insignificant. Alternative 2 would free approximately 5,000 mt of TAC under the 2 million mt OY limit for the BSAI. The Council would be able to allocate this additional TAC to any species in the BSAI during the annual harvest specifications process. Because it is not possible to predict here the additional TAC would be allocated, it is not possible to determine whether there are likely to be any significant impacts to prohibited species. However, because the additional available TAC under Alternative 2 is relatively small compare to the OY limit, changes to prohibited species catch are expected to be minimal. The Council will consider those potential impacts when considering harvest specifications.

### **Regulatory Impact Review**

Sculpins are currently taken only as incidental catch in fisheries directed at other, currently more valuable species. The value of retained sculpins is limited to fish meal, and has routinely been \$0.02 per pound or less. A few processors in Kodiak have experimented with processing and marketing sculpins, but there is currently no market or interest in developing a market for sculpins. Alternative 2 would eliminate the need for TAC for sculpins in the BSAI to be “funded” by reduced TAC of other, presently more valuable groundfish species. Reclassifying sculpins to non-target EC category would free up approximately 5,000 mt of TAC that would be available to allocate to other species during the annual specifications process.

Alternative 2 contains options for establishing an MRA of 2%, 10%, or 20% for sculpins in the BSAI and GOA. Current MRAs for sculpins in the BSAI and GOA are 20% for most basis species, although retention of sculpins has been well below that amount in recent years. There appears to be no conservation value in reducing the MRA below 20%, nearly all retained sculpins are processed as low-value fish meal and there is little incentive for fishermen to attempt to top off on sculpins. Reducing the MRA to 2% or 10% would likely increase operating costs for vessels by increasing regulatory discards.

Both alternatives would directly regulate any vessel operator harvesting sculpins in Federally managed groundfish fisheries in the BSAI and GOA. Economic impacts of Alternative 1 are neutral, economic impacts of Alternative 2 are primarily beneficial or neutral.

### **Management and Enforcement**

Management and enforcement concerns of the alternatives are few, and monitoring catch to ensure MRAs and TAC (if applicable) are not exceeded and determining the appropriate penalty for MRA overages because of the low price of sculpins.