



NORTH PACIFIC FISHERY MANAGEMENT COUNCIL

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Action Memo

File Number:GF 14-005

Agenda Date10/6/2014

Agenda Number:C5

John Henderschedt, Acting Chairman
Chris Oliver, Executive Director

SUBJECT:
GOA Skate MRA revisions - Initial Review

ESTIMATED TIME:
2 hours

ACTION REQUIRED:
Review Draft EA/RIR/IRFA and select Preliminary Preferred Alternative

BACKGROUND

This document analyzes the environmental impacts of proposed action alternatives to reduce the maximum retainable amount (MRA) for skates in the Gulf of Alaska (GOA) groundfish and halibut fisheries, the economic benefits and costs of the action alternatives, as well as their distribution, and the impacts of the action on directly regulated small entities.

In December 2013, the Council was made aware that incidental catch of skates (primarily big skates, *Raja binoculata*, and longnose skates, *R. rhina*) has exceeded the intrinsic rate of skate incidental catch in GOA groundfish fisheries in some years. Testimony indicated that this is because the MRA for skates in the GOA (20%) allows industry to top off on skates while fishing for groundfish. The purpose of this action is to slow the harvest rate of skates and decrease the incentive for vessels to top off on skates by reducing the MRA to levels that more accurately reflect the intrinsic rate of the incidental skate catch in the GOA.

Four alternatives were considered in this analysis:

- Alternative 1 is the no-action alternative and would maintain the MRA for skates for all basis species at 20%.
- Alternative 2 would reduce the MRA for skates for all basis species to 15%.
- Alternative 3 would reduce the MRA for skates for all basis species to 10%.
- Alternative 4 would reduce the MRA for skates for all basis species to 5%.

The proposed action is limited in scope and will not likely affect all environmental components of the GOA. No effects are expected on the physical environment (habitat), ecosystem or ecosystem components species, marine mammals, or seabirds. It is possible that reductions in skate MRAs may result in reduced catch of some target groundfish species, but changes in catch are expected to be minor and not affect management of the GOA groundfish fisheries. The proposed action to reduce skate MRAs in groundfish target fisheries are not likely to result in any significant impacts to skate stocks.

Since 2008, the estimated catch of big skate has exceeded the ABC/total allowable catch (TAC) in the Central GOA in 2010, 2011, 2012, and 2013, and the estimated catch of longnose skate has exceeded the ABC/TAC in the Western GOA in 2009, 2010, and 2013. Big skate catches in the Eastern and Western GOA, longnose

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skate catches in the Eastern and Central GOA, and other skate catches throughout the GOA, have been within ABC/TAC levels. The GOA-wide ABCs have not been exceeded for big skate, longnose skate, or other skates.

Under the no action (or status quo) alternative, the GOA skate MRA would remain at 20 percent of the basis species. However, the MRA tool is used in conjunction with the Regional Administrator's decision about whether or not, and when, to prohibit retention, and place skates on prohibited species status. In recent years the Regional Administrator has found it necessary to place big skate in the Central GOA on prohibited species status increasingly early in the year. In 2014, big skate in the Central GOA were placed on prohibited species status on February 5.

In 2015, and in subsequent years, if fishing conditions are found similar to those in 2014, it is likely that big skate in the Central GOA would be placed on prohibited species status and retention prohibited early in the fishing year, perhaps earlier than in 2014. A prohibition on retention might be lifted later in the year if it becomes apparent that the annual TAC would not be reached.

Reductions in the MRA will affect retained catch but may not reduce discarded catch. ABC/TAC limits have been exceeded for big skate in the Central GOA and longnose skate in the Western GOA. A large proportion of big skate in the Central GOA are retained, while relatively more longnose skate in the Western GOA are discarded. Thus, a tightening of the MRA constraint may have more impact on the Central GOA big skate catch.

Various factors may limit the efficacy of a reduction in the MRA level: (1) retention as a percent of basis species estimates suggest that reductions in the MRA by half (to 10 percent) are likely to have relatively little impact on skate catches for operators with MRAs between the 20 percent level and the lower level to which the MRA would be changed; (2) many operators will not be constrained by MRA reductions (as they will have been operating below the new MRA), and may even be able to expand production if the reduction in harvest by operations constrained by the MRA increases prices, and the incentive to retain skates; (3) the MRA is a GOA-wide limit covering all species of skates with a single MRA, whereas the problem appears to be species and area-specific.