

MEMORANDUM

TO: Council, AP, and SSC Members

FROM: Clarence G. Pautzke
Executive Director



DATE: June 16, 1993

SUBJECT: Establish Atka Mackerel as a Separate Target Species in the GOA.

ESTIMATED TIME

1 HOUR

ACTION REQUIRED

Final decision on establishing a separate target category for Atka mackerel in GOA.

BACKGROUND

In December, the Council recommended apportioning the "other species" TAC by management area, rather than Gulfwide. This would prevent a directed fishery for Atka mackerel in the Western GOA from using up the whole "other species" TAC this year. "Other species" TAC is calculated each December as 5% of the subtotal of all other target groundfish species, and normally is harvested as bycatch in these target fisheries.

The Council's action was intended as an interim measure, until a plan amendment could be developed to establish a separate target category for Atka mackerel. An analysis was prepared and reviewed in April. After incorporating several minor changes, the analysis was sent out for public review on May 11, 1993. The Executive Summary is attached. The Council is scheduled to take final action at this meeting.

The purpose for the proposed amendment is to improve management of the Atka mackerel resource in the Gulf of Alaska. By establishing Atka mackerel as a target species, harvest levels would be based on biological stock assessments. The proposed amendment would not only reduce the potential for overfishing Atka mackerel, but also allow for increased harvesting of the "other species" complex, and reduce user conflicts within the Western GOA.

EXECUTIVE SUMMARY

Atka mackerel, Pleurogrammus monopterygius, has recently become a target species in the Gulf of Alaska (GOA). This species is part of the "other species" category, which also contains bycatch species of minor commercial importance including sculpins, skates, squid, smelts, sharks, eulachon, capelin, and octopus. The other species category has been available as a Gulf wide Total Allowable Catch (TAC) equal to 5% percent of the sum of TACs for all target fisheries. High landings of Atka mackerel in 1992 accounted for almost the entire TAC of other species in the GOA, resulting in other species becoming non-retainable early in the year (May) in the entire GOA. Although other species were apportioned by management area in 1993, a target fishery for Atka mackerel resulted in a closure to directed fishing for other species in the Western Regulatory Area (Western GOA) early in the year (April 2).

The GOA FMP defines other species as groundfish species and/or species groups which currently are only of slight economic importance or contain economically valuable species but insufficient data exist to allow separate management. Atka mackerel no longer meets this definition. The purpose for the proposed amendment (Number 31 to the GOA FMP) is to improve management and conservation by establishing Atka mackerel as a target species in the GOA. Two alternatives are examined:

- (1) Status quo.
- (2) Establishing a separate target category for Atka mackerel.

Under Alternative 1, Atka mackerel would remain in the other species category. The Atka mackerel fishery would likely utilize the entire Western GOA other species TAC. Landings of Atka mackerel would be constrained by the Western GOA TAC, which for 1993 is 3,065 mt. Careful management would be needed to ensure that bycatch of species other than Atka mackerel in the Western GOA remains available for target fisheries operating in that area. Other species and target fisheries in the Central and Eastern Regulatory areas are not likely to be impacted.

Under Alternative 2, Atka mackerel would be a target category with harvest levels constrained by a Gulfwide TAC. Harvest levels of Atka mackerel would be based on biological stock assessments. Given the most recent estimate of GOA biomass, potential yield of Atka mackerel could be 4,800 mt. The 1,735 mt TAC difference between Alternatives 1 and 2 for 1994, could be between \$1,204,888 and \$1,927,820 in additional exvessel income under Alternative 2. By breaking out Atka mackerel, TAC for the other species category would be slightly increased, as it is specified as 5% of the sum of the groundfish TACs. The other species category would appropriately be comprised of species currently taken in very small amounts and which are needed for bycatch in target fisheries. The other species TACs have not been utilized for species other than Atka mackerel to any significant extent in the past 2 years, and are therefore expected to remain available throughout the fishing year.

The bycatch of prohibited species (halibut, salmon, crab) is expected to increase slightly under Alternative 2 if the TAC for 1994 is increased relative to the status quo. For example, a catch of 4,800 mt of Atka mackerel would require about 37 mt of halibut mortality, based on the relatively low bycatch rates observed for this fishery. Bycatch of other allocated species (such as Pacific cod, walleye pollock, and rockfish) could increase under Alternative 2 relative to Alternative 1, however these bycatch rates are relatively low, and adverse impacts under either alternative are not anticipated.

At the low levels of harvest resulting from Alternatives 1 and 2 marine mammals are not likely to be adversely affected, even though the Atka mackerel fishery may occur within 20 miles of the Steller sea lion rookeries near Umnak Island. However, the Atka mackerel resource and its predators (including

marine mammals and the fishery) would benefit from biologically-based management which will only occur under Alternative 2.

The Council is scheduled to take final action on this proposed amendment at the June 1993 meeting. If approved by the Secretary of Commerce, the amendment could be implemented for the 1994 fishery.

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AGENDA D-2(c)
JUNE 1993
SUPPLEMENTAL

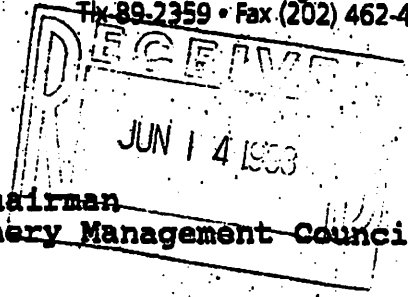
GREENPEACE

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From: P. PAWEL

FAX: 202 462 4507



June 9, 1993

RE: COMMENTS
ON AKA
MANAGER

IN GOA

YPS

Richard Lauber, Chairman
North Pacific Fishery Management Council
P.O. Box 103136
Anchorage, AK
99510

Dear Mr. Chairman and members of the Council:

On Behalf of Greenpeace and its approximately 1.8 million supporters in the United States, I would like to comment on the Environmental Assessment/ Regulatory Impact Review/ Initial Regulatory Flexibility Analysis (EA/RIR/IRFA) for the proposed amendment to remove Atka mackerel from the "other species" category and establish a separate Atka mackerel target category to the Fishery Management Plan for the groundfish fishery of the Gulf of Alaska (GOA).

In our view, this proposed amendment addresses an important conservation issue with respect to the unknown stock status of Atka mackerel in the GOA. We also believe that the current amount of fishing mortality on Atka mackerel far exceeds that which can be maintained by the stock and efforts must be made to significantly reduce the amount of exploitation before this stock is put in further jeopardy.

These comments will seek to outline our concerns with this fishery in the GOA and will advocate the adoption of Alternative 2 which would remove Atka mackerel from the "other species" category. In addition, we are requesting that a target fishery for Atka mackerel is not encouraged until the impacts of such a fishery are adequately addressed.

INTRODUCTION

Atka mackerel, Pleurogrammus monopterygius, has an interesting catch history in the GOA. Landings of Atka mackerel in the GOA increased through the 1970s, peaked in 1975 (about 28,000 metric tons(mt)) and declined steadily to near zero in 1986 (Berger et al., 1986; NPFMC, 1987). It once was an important target species for the foreign fishery which operated through the early 1980s. Apparently, by the mid-1980s, the Atka mackerel population had all but disappeared, which resulted in lack of interest by commercial fishers to prosecute this fishery. Currently, there is no species specific quota for Atka mackerel. In 1988, Atka mackerel was

combined with the "other species" category which included species considered by the National Marine Fisheries Service (NMFS) as commercially unimportant (sculpins, skates, squid, smelts, etc).

In the past, the National Marine Fisheries Service (NMFS) was not able to derive reliable biomass estimates for Atka mackerel and depended on average historical catches to set quotas. Apparently, setting quotas based on historical catch did not prevent GOA Atka mackerel from being overfished. USSR catch per unit effort (CPUE) estimates and NMFS resource surveys suggest that the biomass peaked in the late 1970s, possibly at around 90,000 mt, and that it declined rapidly to about 30,000 mt by 1984 (Alverson 1992).

Currently, U.S.-Japan cooperative survey efforts in 1984 and 1987 and the domestic survey in 1990, provide the only direct estimates of Atka mackerel population biomass from the GOA. The 1984 and 1987 biomass estimates were 36,000 mt and 33,000 mt, respectively. The 1990 estimate was 32,100 mt. However, catches of Atka mackerel in 1992 were considerable (about 14,000 mt) and represent a removal level of approximately 43% of the estimated biomass. It is not yet known how this level of exploitation may have impacted the Atka mackerel stock in the GOA.

PRECAUTIONARY MANAGEMENT MEASURES SHOULD BE TAKEN TO ALLOW FOR THE CONSERVATION OF ATKA MACKEREL IN THE GOA

The stock status of Atka mackerel in the GOA warrants precautionary measures. Because Atka mackerel are highly localized, have no swim bladder, and live in shallow water on hard, rough and rocky bottom, they are difficult to survey. Additionally, when the abundance of a fish stock becomes very low, it is extremely difficult to obtain a meaningful estimate of stock size with trawl surveys following random sampling techniques (Ronholt 1989).

In order to control the amount of Atka mackerel that is removed during commercial fisheries in the GOA, it would be prudent of NMFS to take Atka mackerel out of the "other species" complex. Current levels of exploitation put an already depressed stock at further risk of overfishing. By setting Atka mackerel as a target fishery however, should not imply that this fishery is to be subject to increased exploitation. On the contrary, the purpose of this measure is to provide for better conservation of this already overfished Atka mackerel stock.

Additional precautionary measures that may provide for the protection of Atka mackerel in the GOA include significantly lowering the total allowable catch (TAC) so that a targeted fishery is not encouraged. Until information from the 1993 survey is available and more data is compiled on the potential impacts of a directed fishery on Atka mackerel in the GOA, efforts should be made to lower fishing mortality on this species.

ECOSYSTEM CONSIDERATIONS

There are ecosystem issues to consider when addressing the Atka mackerel fishery in the GOA. Allowing for a more biologically based acceptable biological catch (ABC) determination of Atka mackerel will provide for more prudent management measures than are currently available under its current placement in the "other species" category. Presently, there is little afforded protection for Atka mackerel and therefore, no consideration of impacts on other marine species that interact with it in the GOA. Because the fishery is conducted in a highly localized area, uncontrolled levels of exploitation may result in depletion of the stock. Localized depletion of Atka mackerel may have adverse impacts on predators such as various piscivorous seabirds and marine mammals in addition to, other marine species.

The potential impact of Alternative 2 may also result in other problems in the "other species" category. Because the level of this category is determined as 5% of the aggregate GOA TAC, this level will increase and more "other species" may be incidentally harvested. And unfortunately, until a multi-species type of approach is used in fisheries management, this issue will not be resolved. However, removing Atka mackerel from this category is warranted and will improve the collection of biological data of this species and ideally, other marine species.

CONCLUSION

The unknown stock status of Atka mackerel in the GOA warrants further protection of this species. Because of the increased interest in this species in the GOA and subsequent excessive exploitation rates, Atka mackerel should be removed from the "other species" category immediately. Furthermore, efforts must be made to gather more information on the status of the Atka mackerel stock in the GOA before a targeted fishery is considered. The "boom and bust" history of Atka mackerel fishery in the GOA follows the infamous pattern of the Pacific Ocean perch fishery.

In order to avoid further depletion of fish stocks in the North Pacific, conservation measures must be implemented that reflect risk-averse management decisions. To this end, we respectfully request that the North Pacific Fishery Management Council remove Atka mackerel from the "other species" category and instead place it under a biologically-based management system. Additionally, we ask that the Council err on the side of conservation and disallow a directed fishery on this stock until it can be proven that the population can sustain exploitation.

Thank you for considering our views.

Sincerely,



Penny Pagels

Northwest Fisheries Campaigner

REFERENCES CITED

Alverson, D.L. 1992. A review of commercial fisheries and the Steller sea lion (Eumetopias jubatus): The conflict arena. Revs. in Aquat. Sci., 6(3,4):203-256.

Berger, J.B., J.E. Smoker, and K.A. King. 1986. Foreign and joint-venture catches and allocations in the Pacific Northwest and Alaska fishing area under Magnuson Fishery Conservation and Management Act, 1977-1984. U.S. Dept. Commer. NOAA Tech. Memo. NMFS F/NWC-99. 53p.

North Pacific Fishery Management Council (NPFMC). 1987. Fishery Management Plan for the Gulf of Alaska Groundfish. NPFMC, Anchorage, Alaska.

Ronholt, L.L. 1989. Atka mackerel. In Condition of groundfish resources of the Gulf of Alaska in 1988. T.K. Wilderbuer (editor), NOAA Tech. Memo. NMFS F/NWC-165.

Jessi Elanett

STATE OF ALASKA

WALTER J. HICKEL, GOV

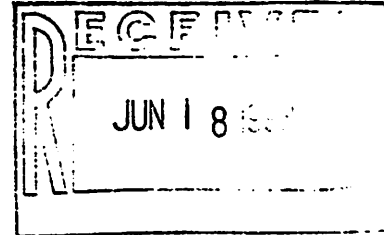
DEPARTMENT OF FISH AND GAME

DIVISION OF COMMERCIAL FISHERIES

P.O. BOX 3-2000
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PHONE: (907) 465-4210

October 9, 1992

Mr. Steven Pennoyer, Director
National Marine Fisheries Service
P.O. Box 21668
Juneau, AK 99802-1668



Dear Steve:

At the last council meeting two issues arose related to "Other Species" in the Gulf of Alaska. There is a need to develop both short and long term solutions to the problems that surround this group.

For the short term, it was suggested that the council set a separate total allowable catch (TAC) for Atka mackerel, based on recent catch levels. The state agrees with this approach, as such action would allow directed fisheries and bycatch retention of the remaining species that compose the group in 1993, rather than facing a mid-season shut down as occurred in 1992 when Atka mackerel catches exceeded the available "Other Species" TAC.

For the long term, we endorse the suggestion of the SSC that the council reestablish a separate acceptable biological catch (ABC) for Atka mackerel, and geographical TACs in the Gulf of Alaska. Additionally, the state had requested that the "Other Species" group be made consistent with state definitions. This would require: (1) that sculpin, sharks and skates remain in the "Other Species" groundfish category; (2) that capelin, smelt and eulachon be dropped as groundfish. These species are technically Osmerids and are managed for sport, commercial and subsistence usage under the state's Smelt regulations. There are no significant harvests of these species in federal waters (Table 1); (3) that squid and octopus be dropped from the "Other Species" category. Technically they are shellfish, and are managed under state regulations as such. While they make up an insignificant harvest in federal waters, there are directed fisheries for octopus in state waters (Table 2).

I understand that the Plan Team is meeting in mid-November, and a joint recommendation from our agencies could provide the impetus for them to provide recommendations to the council.

Sincerely,

Earl E. Krygier

Earl E. Krygier
Program Director

Table 1. Reported 1992 (as of October 5) catch of Osmerids from the EEZ waters of the Bering Sea and Gulf of Alaska. Catch reported in pounds.

Species	BSAI catch (lbs.)	GOA catch (lbs.)
Smelt	109,093	64,330
Eulachon & Capelin	3,505	285,256

Table 2. Reported 1992 (as of October 5) catch of Squid and Octopus from the EEZ waters of the Bering Sea and Gulf of Alaska. Catch reported in pounds.

Species	BSAI catch (lbs.)	GOA catch (lbs.)
Squid	293,367	21,201
Octopus	144,256	55,486

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UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
P.O. Box 21668
Juneau, Alaska 99802-1668

October 19, 1992

Mr. Earl Krygier
Program Director, Alaska Department
of Fish and Game
P.O. Box 3-2000
Juneau, Alaska 99802-2000

Dear Earl,

Thank you for your letter of October 9, 1992, in which you address concerns about Atka mackerel, and suggest ways to restructure the "other species" category of groundfish with respect to improving consistency with State of Alaska regulations.

The problem of preemption of Gulf of Alaska fisheries for "other species" by target fishing for Atka mackerel is being addressed in two ways. For 1993, the proposed specifications of groundfish harvest include separate specifications of total allowable catch (TAC) by regulatory area for "other species." Fishing for Atka mackerel in the Western Gulf would then not affect miscellaneous fisheries for the "other species" category in the Eastern and Central Regulatory Areas of the Gulf of Alaska.

However, your suggestion that separate total allowable catch (TAC) for Atka mackerel be established in the regulatory areas would require amendment of the Fishery Management Plan for Groundfish of the Gulf of Alaska, and is a longer term solution. At its November 1992 meeting, the Plan Team will consider that recommendation from the Scientific and Statistical Committee. An analysis could be prepared for consideration by the North Pacific Fishery Management Council (Council). If the Council reviewed the analysis at its April 1993 meeting and took final action at its June meeting, a proposed rule would be prepared for public review and comment. If approved by the Secretary, Atka mackerel TACs could be established in the Gulf of Alaska for the 1994 fishing year.

I anticipate that the Plan Team will discuss the general composition of the "other species" category, and would certainly consider your comments on behalf of the State of Alaska. Issues of data and management consistency, the necessity of reporting species of potential importance to marine mammals, and the level of harvest in Federal waters are all relevant to that topic.

The National Marine Fisheries Service (NMFS) Weekly Processor Reports (WPR) for 1992 show significantly higher catches of the species represented in your Tables 1 and 2. I suspect these differences result from the greater completeness of the NMFS



reporting system. The WPR information represents all waters, including, (1) internal waters and those 0-200 miles from shore; (2) information from all EEZ operators; and, (3) at-sea discards, the primary fate for most of this catch. A table of WPR data follows. Subtraction of Fish Ticket data for internal waters and 0-3 miles from table values will yield a more complete estimate of catch from Federal waters.

Table 1. 1992 Catch of Osmerids, squid, and octopus off Alaska. Data are from NMFS Weekly Processor Reports, in round pounds, through October 4. Figures include discards and catch in internal waters of the State, and from 0-200 miles.

<u>SPECIES</u>	<u>BSAI POUNDS</u>	<u>GOA POUNDS</u>
Smelt	240,963	66,138
Eulachon & capelin	72,090	310,628
Squid	1,198,200	55,115
Octopus	552,473	268,520

Although I support the establishment of separate TACs for Atka mackerel in the GOA, I prefer to reserve judgement on reorganizing remaining "other species" until after ramifications of any such action are clearer.

Thank you again for your interest and comments on these matters.

Sincerely,

Steven Pennoyer
 Steven Pennoyer
 Director, Alaska Region