

M E M O R A N D U M

TO: Council, SSC, and AP Members

FROM: Jim H. Branson
Executive Director

DATE: December 4, 1985

SUBJECT: Gulf of Alaska Groundfish Fishery Management Plan

ACTION REQUIRED

- (a) Review 1986 DAP and JVP estimates.
- (b) Identify groundfish species categories where DAP and/or JVP estimates exceed ABC.

BACKGROUND

A. Review 1986 DAP and JVP estimates.

During the September 1985 meeting, you received 1986 DAP and JVP estimates based on projected 1985 groundfish harvests. Those estimates were approved for public review and are included here as item D-1(b)1. Since then NMFS has completed its annual industry survey and the new estimates are provided as item D-1(b)2. The JVP estimates may require revision based on recent industry-to-industry negotiations.

On October 3, 1985 the Council released preliminary ABC, DAP, JVP and TALFF estimates for a minimum 30-day public review. Estimates of potential halibut bycatches were also included in the public review package. The review period on potential OYs, halibut PSCs and bycatch rates ended on November 8. The review period of preliminary DAP and JVP estimates ended on November 22. Copies of the public comments received were sent to you prior to this meeting. A summary of those public comments is included in your notebooks as item D-1(b)3. Written comments received after your mailing are included here as items D-1(b)4 and 5.

B. Identify groundfish species where DAP and/or JVP estimates exceed biological quotas.

The Council needs to determine initial DAP and JVP estimates for purposes of proceeding through the other agenda items. The DAP and JVP estimates will be finalized at the end of the meeting. A worksheet is included in your notebooks as an aid in determining initial DAP and JVP. From the review of the industry survey results it should be clear as to what groundfish resources are insufficient to fulfill U.S. and foreign requests. Gulf of Alaska groundfish species in this category will certainly include, pollock, POP, sablefish, Atka mackerel, and other rockfish. Other species may fall into this category as a result of your decisions on OY, DAP, and JVP values. A table presenting DAP and JVP deficits based on the industry survey results is provided as item D-1(b)6.

TABLE 1. PRELIMINARY 1986 GULF OF ALASKA GROUND FISH ABCs, DAPs, JVPs, AND TALFF (MT) RELEASED FOR PUBLIC REVIEW.

Species	Area	1985 OY	1986 ABC	1986 DAP	1986 JVP	Reserves ^{1/}	TALFF
Pollock	Western/Central	305,000	100,000	10,000	70,000 ^{2/}	20,000	0 ^{3/}
	Eastern	16,600	16,600	1	0	3,320	0 ^{3/}
Pacific Cod	W	16,560	37,500	3,000	300	3,312	30,888 ^{4/}
	C	33,540	76,000	1,300	4,000	6,708	63,992 ^{4/}
	E	9,900	22,500	60	0	1,980	0 ^{3/}
Flounders	W	10,400	23,000	30	600	2,080	20,290 ^{4/}
	C	14,700	101,000	20	1,200	2,940	96,840 ^{4/}
	E	8,400	17,000	40	0	1,680	0 ^{3/}
Pacific Ocean Perch	W	1,302	3,500	1,300	10	260	0
	C	3,906	4,000	100	20	781	3,005 ^{5/}
	E	875	5,500	40	0	175	0 ^{3/}
Sablefish	W	1,670	1,760-3,520	2,100	0	0	0
	C	3,060	6,080-12,160	3,800	0	0	0
	W. Yakutat	1,680	2,210-4,420	2,600	0	0	0
	E. Yakutat	1,135		3,000	0	0	0
	S.E. Outside	1,435	2,450-4,900		0	0	0
Atka Mackerel	W	4,678	4,678	0	300	936	0
	C	500	0	0	5	0	0
	E	100	0	0	0	0	0
Rockfish	S.E. Central Outside	600	600	600	0	0	0
	Remaining Gulf	4,400	1,700	340	15	880	3,505
Thornyhead	GW	3,750	3,750	50	5	750	2,945
Squid	GW	5,000	5,000	10	10	1,000	3,980
Other Species	GW	22,460	6/	20	2,300	4,492	6/
TOTAL		471,651	434,828-447,328	28,411	78,765	51,294	225,445

- 1/ A 20% Reserves is calculated based on the assumption that the 1986 OY will not exceed the 1986 ABC.
- 2/ This estimate is being constrained by the ABC. JVP demand in 1985 was 235,000.
- 3/ Foreign fishing is prohibited east of 140°W. by regulation.
- 4/ OY, and therefore, TALFF amounts for these species have been significantly lower in past years to minimize incidental catches of both prohibited and fully-utilized species. TALFF amounts will likely be reduced to bycatch levels only due to the depressed condition of this resource.
- 6/ Unknown. OY is determined by formula.

1986 Gulf of Alaska Groundfish Industry Survey of DAP and JVP (mt)

<u>Species</u>	<u>Area</u>	<u>Jan-Jun</u>	<u>Jul-Dec</u>	<u>Total DAP</u>	<u>JVP</u>	<u>DAH</u>	<u>1986 ABC^{1/}</u>
Pollock	W/C	54,535	40,340	94,875	198,175	293,050	75,600
	E	2	1,839	1,841	0	1,841	16,600
Pacific cod	W	3,654	21,877	25,531	590	26,121	37,500
	C	4,837	21,257	26,094	700	26,794	76,000
	E	96	8,061	8,157	0	8,157	22,500
Flounder	W	1,479	1,773	3,252	300	3,552	23,000
	C	505	2,228	2,733	0	2,733	101,000
	E	166	166	332	0	332	17,000
Pacific ocean perch	W	2,135	2,314	4,449	0	4,449	1,755
	C	408	2,288	2,696	0	2,696	2,015
	E	168	622	790	0	790	2,730
Sablefish	W	7,596	523	8,119	0	8,119	2,500
	C	6,304	3,038	9,342	0	9,342	11,562
	W.Yak.						2,200
	E.Yak.	2,893 ^{2/}	1,119 ^{2/}	4,012 ^{2/}	0	4,012 ^{2/}	846
	S.E.Out.						1,692
Atka Mackerel	W	0	0	0	5,100	5,100	4,678
	C	0	0	0	0	0	500
	E	0	0	0	0	0	100
Other Rockfish	S.E. Central						
	Outside	964	952	1,916	0	1,916	600
	Remaining Gulf	1,885	3,435	5,320	0	5,320	1,700
Thornyhead	GW	0	0	0	0	0	3,750
Squid	GW	0	0	0	0	0	5,000
Other Species	GW	0	0	0	200	200	NA
TOTAL		87,627	111,832	199,459	205,065	404,524	410,828

^{1/} ABC recommended by Plan Team.

^{2/} Survey estimates are for all Eastern districts combined.

Source: NMFS, December 3, 1985

GULF OF ALASKA PUBLIC COMMENT SUMMARY

Comments on initial 1986 ABCs, and proposed OYs

1. John Maher and Mike Mayo - set 1986 sablefish OY at 3,000-4,000 mt in the Southeast Outside District; establish three fishing seasons beginning on April 1, June 1, and August 1 with each season being allocated 1,000 mt, leaving a 1,000 mt for a reserve.
2. Alaska Dept. of Fish & Game - believes that there may be some risk in increasing the sablefish ABC too rapidly given the uncertainty surrounding the biomass estimate. If a pollock fishery is to be provided, some measure by the Council is required to assure that pollock is available to DAP fishermen throughout 1986.
3. The Fishing Company of Alaska - is opposed to lowering the 1986 ABC to 1,700 mt from 1985 levels(4,400 mt). Recommends that the sablefish OY be set at the upper limit of the ABC range to maximize the harvest to fishermen using trawl gear. The company believes that the Gulf POP stocks are in better condition than suggested by the plan team and is opposed to lowering the POP OY to bycatch levels only. Recommends that joint venture and foreign fishing for POP, rockfish, and thornyheads be terminated.
4. Alaska Longline Fishermen's Assn. - recommends a Gulfwide sablefish OY of 15,000 mt in 1986. They support the designation of POP as a incidental catch fishery only. The association is concerned over the expansion of the flounder fishery without a full economic study comparing the value of target species verses nontarget species.
5. Deep Sea Fishermen's Union - recommends that the sablefish OY be no higher than 12,500 mt to allow for continued rebuilding.
6. Fishing Vessel Owner's Assn. - recommends a 13,000 mt sablefish OY for 1986. They believe that a radical increase would hurt their markets.
7. Japan Deep Sea Trawlers Assn. and Japan Fisheries Agency - recommend that the pollock OY be set at about 200,000 mt for 1986. They believe that the existing stock can support a fishery at this level and a more restricted harvest would severely impact domestic fishermen who participate in joint ventures.
8. Alaska Factory Trawler Assn. - expressed their concern that whatever the sablefish OY, the trawl allocation may be insufficient given the strong likelihood that some targeting will occur. They recommend a sablefish OY of 25,000 mt and a Pacific cod OY of 50,000 mt. The association also recommends the use of the best scientific information available when determining halibut bycatch rates and PSC limits.
9. Joint Venture Fisheries, Ltd. - co-sponsored an NRC report to examine the current pollock situation and Plan Team/SSC ABC recommendations. They view the zero ABC recommendation as very conservative and would like the NRC report to be included in the review of best scientific information. The report concluded with a recommended ABC of 120,000-160,000 mt.

Comments received on initial DAH, JVP, and TALFF

1. Kodiak Longline Assn. - referring to statements made by the Council at the December 1984 and February 1985 meetings, the association supports the elimination of TALFF in the Gulf of Alaska.
2. Japan Deep Sea Trawlers Assn. and the Japan Fisheries Agency - is opposed to any artificial manipulation of DAP which would reduce or eliminate TALFF. Based on the initial ABC and DAH estimates, there appear to be substantial surpluses of Pacific cod, flounder, and other underutilized groundfish species. These surpluses should be allocated to TALFF in 1986 given that these species will remain underutilized for years to come. Harvest of Pacific cod and flounder by foreign fishermen under a carefully monitored system will minimize bycatches and produce useful incidental catch data. Sufficient bycatch amounts of fully-utilized species should be allocated to TALFF by emergency rule as was done in 1985.
3. Alaska Factory Trawler Assn. - recommends that the Gulf of Alaska groundfish fishery be reserved for the domestic fishery and that TALFF be set at zero for all species.

Comments received on halibut PSCs and halibut bycatch rates

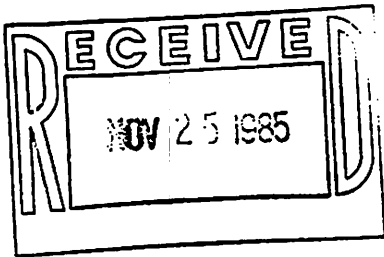
1. Bob Jacobson, fisherman - believes that the estimates of potential halibut bycatch in the pollock, cod and flounder fishery are unacceptably high and should be set no higher than that level which would maintain the directed halibut harvest at 1985 levels. Any greater allowance of halibut bycatch would severely impact the resource and/or the existing halibut fishery. An analysis should be conducted to determine the value of the cod, flounder, and pollock fisheries compared to the value of the fully-utilized and prohibited species caught in those fisheries.
2. Kodiak Longline Assn. - the potential halibut bycatches in the groundfish fisheries are unacceptable and should be set much lower.
3. Fishing Vessel Owners Assn. - recommend a halibut PSC equal to the last 5 years average bycatch, or 2,833 mt.
4. Deep Sea Fishermen's Union - recommends a halibut PSC of 2,500 mt which was the average catch during the last seven years. They also recommend that the Regional Director of NMFS be prevented from increasing the PSC during the season.
5. Midwater Trawlers Coop. - has asked for a clarification as to what gear the halibut PSC is applicable and what gear is exempt. They also believe that the pollock OY will be harvested with mid-water trawl gear and that the resulting halibut bycatch rate will much lower than rate presented in the public comment package.
6. Spike Jones, fisherman - recommends that the Council examine the value of all incidentally caught species and not just halibut when attempting to determine the costs of promoting the development of a trawl fishery.

Restrictive PSCs should be adopted for domestic draggers as an incentive to minimize their bycatches. Estimates of halibut bycatch in the pollock fishery will be less if the pollock are taken using mid-water trawl gear.

7. Alaska Longline Fishermen's Assn. - halibut PSCs should be set at a level to encourage conservation. The fact that halibut stocks are in good condition is not justification for increased damage through bycatch.
8. Alaska Factory Trawler Assn. - supports the comments submitted by the Mid-water Trawlers Cooperative concerning bycatch rates.
9. International Pacific Halibut Commission - recommends a 2,000 mt bottom trawl PSC limit. Such a limit would provide for continued development of the bottom trawl fishery and maintain the directed halibut harvest at 1985 levels. This recommendation is made assuming no foreign fishery in the Gulf of Alaska and that the halibut resource is capable of supporting the current MSY level.

Other

1. Alaska Longline Fishermen's Assn. - recommends that the Council consider implementing a 22" size limit for sablefish.
2. Fishing Vessel Owners' Assn. - believes that a sablefish size limit similar to the Pacific Council's is warranted. The association also recommends that the Council accept the Secretary's offer to publish a sablefish cut-off date and develop a limited entry program for this fishery.
3. Deep Sea Fishermen's Union - recommends that the Council adopt a 22" size limit for sablefish by emergency rule. The size limit would help with conservation of the resource and provide for a better market product. The Union also supports the development of a effort control program for the sablefish fishery and encourages the Council to accept the Secretary's offer to publish a September 26, 1985 cutoff date.
4. Kodiak Longline Assn. - is opposed to effort limitation in the sablefish fishery given the uncertainty surrounding the status of the resource. The resource is increasing and there fore limiting participation is not needed at this time. The association recommends that the Council not accept the Secretary's offer to publish a cutoff date.



AGENDA D-1(b)4
DECEMBER 1985

28 October 1985

North Pacific Fisheries Management Council
P.O. Box 102136
Anchorage, Alaska 99510

Attention: 1986 Gulf of Alaska Groundfish

Dear Sir:

The staff of the International Pacific Halibut Commission would like to comment on the halibut bycatch limits for 1986 in the Gulf Plan and their impact on the halibut resource and fishery.

First, the Commission's management policy during the 1970's and early 1980's has been to rebuild the resource by keeping the catch in the directed setline fishery below the annual surplus production. This policy has been successful and the resource is presently in good condition. In 1985, a new management policy was adopted where catch limits are based on keeping the halibut resource at MSY levels. Catch limits are calculated by subtracting incidental mortality (adjusted for growth and mortality) from the total available yield. Hence, the higher the incidental mortality the lower the yield available to the setline fishery.

Table 5 in the Council document illustrates the impact that an uncontrolled flounder and Pacific cod fishery could have on the halibut fishery. The information suggests that the directed fishery could be severely curtailed or even eliminated. Further, the results in Table 1 do not consider the effect of migration or additional losses due to growth. In fact, incidental mortality in the western and central areas will impact the directed fishery in the eastern Gulf as well as off British Columbia, Washington, and Oregon. The impact of migration will vary with the size of halibut caught incidentally. The migration rate is highest for small halibut (less than 65 cm). We suspect that most of the halibut caught in a shallow water fishery for Pacific cod and flounder would be small and the impact on the directed fishery in the eastern Gulf and farther south could be large.

North Pacific Fisheries Management Council
October 28, 1985
Page 2

The IPHC staff recognizes that some halibut mortality is unavoidable in the groundfish fisheries, but considers the potential bycatch indicated in the document to be excessive. We recommend that the PSC be set at a point which allows for the orderly development of the groundfish fisheries, while at the same time provides for the continuation of the directed halibut fishery at the 1985 level or greater.

We suggest that the Council set the PSC at 2,000 mt in 1986. As additional information becomes available on bycatch rates, as well as the economic and biological requirements of both fisheries, the PSC could be increased or reduced in 1987. Assuming no foreign fishery, a PSC of 2,000 mt would allow for a healthy expansion of the domestic groundfish fishery based on the projected 1985 harvest shown in Table 4. Similarly, a 2,000 mt PSC is in line with the halibut bycatch mortality in the foreign fisheries since 1977 (Table 1, Plan Team Report). The halibut resource, under a conservative management policy, was rebuilt to its current level during this time, and maintaining bycatch mortalities at this level should allow the directed fishery to continue at the present level of harvest.

Thank you for the opportunity to express our views.

Sincerely yours,

Stephen H. Hoag
Assistant Director

SHH:ps

cc: Robert W. McVey
Robert Alverson
Ron Hegge
Oliver Holm



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206/285-5139

November 15, 1985

Mr. Jim H. Branson
Executive Director
North Pacific Fishery Management Council
P.O. Box 103136
Anchorage, Alaska 103136
RE: Gulf of Alaska

Dear Jim:

You have requested comments on three issues concerning the Gulf of Alaska Fishery Management Plan - 1) the OY for individual species, 2) the amounts to be reserved for harvest by the domestic industry, and 3) the incidental halibut catch required by the domestic trawl industry.

1) Optimum yield -

Pollock - AFTA is unable to take a position at this time regarding Gulf pollock OY because of the uncertainty surrounding the ABC determination. Hopefully we will be able to make an informed comment at the Council meeting. We are hopeful that the OY which is established will support the domestic roe, fillet and surimi fisheries. Because the OY will be limited this year the Council must be particularly sensitive to the requirements of the domestic industry. In particular, the factory trawler fleet has made a tremendous investment in the development of the market and processing capability for pollock. With the help of Saltonstall Kennedy funds, AFTA and PSPA have launched this month, a generic campaign to promote Alaska pollock fillets. Significant amounts of new processing capacity has been developed over the previous year, both at sea and on shore. Furthermore, because of the low availability of pollock this year, attention must be paid to pollock as a bycatch species. Thus the Council should consider very carefully, the impact of the OY figure of the desire of the domestic fisheries to utilize this species in 1986 and future years.

Sablefish - The controversies surrounding sablefish in the Gulf of Alaska exist because of the concern of the trawl industry that the severe restrictions of Amendment 14 will impede the developing fisheries for more plentiful species like Pacific cod and flounders. Also the high value of sablefish in the present market assures that sablefish will be sought as a target species by all fishermen.

The limitation of the trawl and pot gear to small percentages of the OY places significant economic burdens on these fisheries. To minimize the impact on these fisheries, OY's for sablefish should be established at the upper limit of the range published in the notice to reviewers, 25,000 metric tons. In the Central Area for example, allowing the trawl fisheries to take 20% of 6,080 (1216 mt) will curtail the trawl fishery much more than 20% of the 12,160 (2432 mt).

Pacific cod - The Pacific cod fisheries are extremely important to the developing U.S. groundfish fisheries. The cod fisheries in the Bering Sea have been expanding quite rapidly, with the development fostering new markets and a growing demand for Pacific cod. The cod harvest has never approached the levels suggested in the notice to reviewers. We think the levels are quite optimistic. They do not correspond with the reality which we have observed in the cod fishery itself.

The plan team report suggests that Amendment 14 will address the bycatch of halibut issue and therefore it is unnecessary to keep the OY low because of halibut bycatch. This is not the case because Amendment 14 does not address bycatch by longline gear which, according to historical data, is quite high. We would strongly request that the OY for Pacific cod be established at the historic levels of 50,000 metric tons.

2. Domestic Groundfish Fishery

As with the original intention of the Council for the 1985 fishery, AFTA recommends that the Gulf of Alaska groundfish fishery be reserved for the domestic fishery and that zero TALFF be set. This is particularly true with the emphasis which the Council is placing on bycatch. If bycatch is to control the fishery, we can ill afford to permit any of the valuable bycatch species to be used by the foreign fishery.

3. Halibut bycatch

AFTA is very concerned that the Council is focusing only on the bycatch by trawl gear. We of course must be concerned about bycatches by trawl gear, but why is there not a similar concern about the bycatches of longline gear? Clearly in the cod fishery, longline gear has the highest sablefish bycatch rates.

There is a halibut bycatch in the longline fishery for black cod as well. It is not fair to ignore one gear while imposing restrictions on other gear when the problem is equally applicable to both.

We adopt the comments submitted by the Midwater Trawlers Cooperative concerning the bycatch rates sent out for public review. We feel that the Council should obtain the best information available pertaining to these fisheries prior to putting it out for public comment. Then the Council should review the public comments to refine the information. At this time, in the embryonic stage of trawl fishery development, the managers should work carefully with the industry to assure a system which permits the maximum development of the trawl fisheries in the Gulf with minimal impact on the halibut fisheries.

Thank you for reviewing our comments.

Sincerely,


Edward D. Evans

GULF OF ALASKA

Pollock, Pacific ocean perch, Sablefish, Atka mackerel
and other rockfish deficits projected for 1986 (mt)

<u>Species</u>	<u>Area</u>	<u>OY</u> ^{1/}	<u>R</u>	<u>.8 OY</u>	<u>DAP</u> ^{3/}	<u>DAP</u> <u>Deficit</u>	<u>JVP</u> ^{3/}	<u>JVP</u> <u>Deficit</u>
Pollock	W/C	75,600	15,120	60,480	94,875	-34,395	198,175	-198,175
Pacific ocean perch	W	1,755	NA	NA	4,449	-2,694	0	0
	C	2,015	NA	NA	2,696	-681	0	0
Sablefish	W	2,500	NA	NA	8,119	-5,619	0	0
Atka mackerel	W	4,678	936	3,742	0	0	5,100	-1,357
Other Rockfish	S.E. Cent.	600	NA	NA	1,916	-1,316	0	0
	Remaining Gulf	1,700	NA	NA	5,320	-3,620	0	0

1/ Recommended ABCs by Plan Team.

2/ DAP from NMFS, December 3, 1985

3/ JVP from NMFS, December 3, 1985

NA = Not applicable given the species is fully-utilized by DAP fishermen.

1986 DAP, JVP WORKSHEET

Species	Area	OY	DAP +	JVP = D.F.I.T	Reserves	TALFF
Pollock	W/C E		94,875 - 1,841	233,960 0		AP 04 Rec'd 75,600 16,600
Pacific cod	W C E		25,531 26,094 - 8,157	4,361 5,119 0		
Flounders	W C E		3,252 2,733 332	15,590 0 0		33 <u>33,500</u>
POP	W C E		4449 2696 790	0 0 0		
Sablefish	W C W. Yakutat E. Yakutat S.E. Outside		8,119 9,342 — 4,012 —	4,540 0 0 0 0		7570 JPT's ANCU 65000 E.G 875+ W 19 2850 C 48 6150 M 17 2750 E/SG 232-3450 <u>15,000</u>
Atka mackerel	W C/E		0 0 0	4,540 0 0		
Rockfish	Gulfwide			0		2300
Thornyhead	Gulfwide			0		Status Q
Squid	Gulfwide			0		4
Other species	Gulfwide			200		11

* 25,000 not be
of 'es 4/1/86