


M E M O R A N D U M

TO: Council, SSC, and AP members

FROM: Jim H. Branson 
Executive Director

DATE: May 13, 1987

SUBJECT: Gulf of Alaska Groundfish Fishery Management Plan

ACTION REQUIRED

- (1) Review results of Shelikof pollock survey.
- (2) Review NMFS survey of industry and recommend changes in DAP and JVP apportionments as necessary.
- (3) Final approval of Amendment 16 and implementing regulations for Secretarial review.

BACKGROUND

Preliminary Results From the Shelikof Pollock Survey

In March the Council received testimony from domestic fishermen stating that their low pollock catches were in part due to lower abundance of spawning pollock in Shelikof Strait. During March 11-31, 1987, the Northwest and Alaska Fisheries Center conducted its sixth annual hydroacoustic survey in Shelikof Strait. An interim report on the survey was sent to you in the last Council mailing. Preliminary survey results support the plan team's December 1986 RAD analysis and their 1987 ABC recommendation of 95,000 mt of pollock for the Western/Central Regulatory Areas. An oral report on the survey is available.

Groundfish Apportionments

Under the Gulf of Alaska Groundfish FMP, the Regional Director of NMFS routinely compares the progress of the various groundfish fisheries against the initial specification of DAP, JVP, and TALFF approved by the Council in December. If necessary, reapportionment of groundfish species or a release of reserves is authorized to achieve a complete utilization of fish resources. A table summarizing the initial 1987 specifications for pollock, Pacific cod, flounders, and other species, and the catch to date, is provided as item D-3(a).

At the March meeting NMFS requested the Council's recommendations with regard to apportionment of pollock in the Gulf of Alaska. NMFS has expressed concern that the preseason estimate of DAP (set equal to TQ less bycatch amounts, or 83,700 mt) was unrealistically high and should be adjusted to provide more fish to JVP. The Council concurred with NMFS that some of the estimates of domestic harvesting and processing requirements obtained from the survey may

need adjustment, but also recognized that some domestic processors may not have been included in the survey. Therefore, the Council requested NMFS to conduct a new industry survey to determine domestic processing requirements and present the results at this meeting. This information may suggest a reapportionment or reserve release of pollock to JVP. Other groundfish apportionments may also require re-examination.

Amendment 16

In March the Council approved Amendment 16 and the associated draft Regulatory Impact Review/Initial Regulatory Flexibility Analysis/Environmental Assessment (RIR/EA) for public review. This amendment contains six issues and their management alternatives:

1. DAP priority within 100 miles of Unalaska Island.
2. Revise the definition of "prohibited species".
3. Improve catch recording requirements.
4. Establish a framework procedure for setting seasons.
5. Expand the existing halibut PSC framework to include salmon and king and Tanner crab.
6. Update the plan's descriptive sections, reorganize chapters, and incorporate Council policy as directed.

Eleven comments were received during the comment period which began on April 4 and ended on May 4, 1987 and sent to you in last week's Council mailing. An overview of Comments by Issue is provided as item D-3(b). Additional comments received since the Council mailing are included in your notebooks as item D-3(c).

Since the March meeting, the staff has received several editorial comments on the analyses from members of the plan team. These will be incorporated into the final document prior to submission to the Secretary.

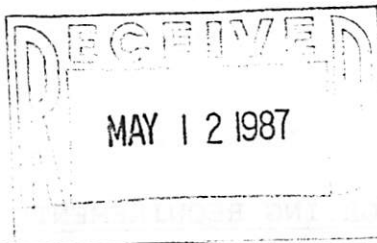
Final action on Amendment 16 should be taken in three steps:

1. The Council should identify their preferred alternative for each of the six amendment topics.
2. The plan team and NOAA General Counsel will prepare the "Changes to the FMP" document and draft implementing regulations. A supplement to the RIR/EA may also need to be prepared.
3. The Council will consider the recommendations of the team and General Counsel and give final approval to send Amendment 16 to Secretarial review.

These documents (the "Changes to the FMP", draft regulations, RIR/EA) will constitute most of the formal Amendment 16 package submitted to the Secretary. The remaining transmittal documents, preamble, etc. will be prepared as soon as possible. The amendment should be implemented by November 1987.

1987 Initial TQ, DAP, and JVP apportionments and catch to date for pollock, Pacific cod, flounder, and other species in the Western and Central Regulatory Areas (in metric tons).

Species	Area	TQ	Apportionments		Catch to Date		Percent of Apportionment Taken
			DAP	JVP	DAP	JVP	DAP
Pollock	W/C	84,000	83,700	300	6,174	0	7%
Pacific cod	W	15,000	15,000	0	228	0	2%
	C	33,000	32,775	225	7,545	0	23%
Flounders	W	3,000	3,000	0	2	0	1%
	C	5,500	4,000	1,500	201	0	5%
Other species	Gulfwide	10,312	9,212	1,100	0	0	0%



ALASKA FACTORY TRAWLER ASSOCIATION
4039 21ST AVE. WEST, SUITE 400
SEATTLE, WASHINGTON 98199
(206) 285-5139
TELEFAX 206-285-1841
TELEX 5106012568, ALASKA TRAWL SEA

May 10, 1987

Mr. Jim Branson
Executive Director
North Pacific Fisheries
Management Council
P.O. Box 103136
Anchorage, Alaska 99510

Dear Jim:

The Alaska Factory Trawler Association (AFTA) is taking this opportunity to comment on proposed amendments to the Gulf of Alaska Groundfish Fishery Management Plan. AFTA must once again express its concern that draft amendment and regulatory language is not provided in the amendment package. The vague nature in which the proposals are presented forces the plan team to attempt to prepare an analysis covering almost limitless possible methods of implementation, and make it difficult for the public to comment in an informed manner. The result is that the EA/RIR is not focused enough to be an adequate decision document.

(1) DAP PRIORITY WITHIN 100 MILES OF UNALASKA ISLAND.

AFTA addresses the DAP priority proposal a separate comment on the amendment proposals to the Bering Sea/Aleutian Islands Groundfish Fisheries Management Plan.

(2) REVISE THE DEFINITION OF "PROHIBITED SPECIES".

AFTA supports this effort to clarify which species are to be treated as prohibited species. As we interpret this proposal, it changes neither the species categorized as "prohibited" or the way in which they are treated.

AFTA does have questions concerning the method in which these "traditional" prohibited species are designated. For example, will there be a herring FMP which analyses the benefits of a high seas fishery - particularly when the Council has expressed concern about roe stripping? Will such designation further curtail directed fishing for groundfish? Will there be a procedure for retention of these species if the Council so

decides?

(3) IMPROVE CATCH REPORTING REQUIREMENTS

AFTA comments on this proposal are contained in an attached letter.

(4) and (5) FRAMEWORKING PROPOSALS

AFTA strongly opposes these proposals to implement additional frameworking mechanisms for the management of the groundfish resources. These proposals are in direct conflict with the stated objective of the Gulf of Alaska Groundfish FMP of providing a stable regulatory environment in which changes are kept to a minimum. Instead of promoting stability in the management of the resource, these proposals will require the Council to make even more management decisions on the eve of the new fishing year.

A stable regulatory environment is necessary to make the long-term investment and operations plans essential for success in the groundfish industry. Putting every basic management parameter up for debate each year will not promote the regulatory stability that is necessary to permit long-term planning and investment. We expect that were these framework provisions to be adopted, critical mass would be reached and the December Council meeting would, indeed, explode.

(4) FRAMEWORK PROCEDURE FOR SETTING SEASONS.

Implementation of a frameworking procedure for setting fishing seasons for each groundfish species on an annual basis will decrease industry's ability to accurately plan and forecast their operations on any type of long-term basis, will reduce the flexibility of the fleet to adjust to changes in the location and availability of various species, and will create another forum for the intensifying battle between domestic harvesters over allocations.

There is no documented need for adoption of a procedure with such a broad scope, and the proposal does not make clear the specific goal the proposal is designed to achieve.

No Long-term Planning

As noted above, if all decisions on setting seasons are left until the December Council meeting, participants in the fishery will not be able to plan a strategy for the upcoming season. Fishermen and processors will be required to wait for the outcome of the Council meeting, then scramble to react to the conditions presented them. The Council will have preempted industry's ability to plan a fishing strategy by specifying where and when each species can be caught. The analysis accompanying the amendment proposal does not address the increased planning costs associated with implementation of this proposal, even though AFTA

cited such costs in earlier comments.

Reduced Flexibility

Groundfish operations, unlike salmon and halibut fisheries, are high volume/low margin endeavors which require year-round operation for success. To achieve this goal of year-round operation, there must exist the flexibility to shift from area-to-area and species-to-species as location and availability of fish change. Approving this proposal would be a major step towards reducing that flexibility. While this management tool may be appropriate for other types of fisheries, this degree of micro management is not suited for the groundfish fishery as a whole.

Allocative Impacts

This management tool would likely have extreme allocative impacts. It is quite conceivable that seasons would be set in such a manner that harvesters will be forced to choose between fishing in particular areas or for particular species to the exclusion of others.

The analysis accompanying this amendment package is flawed in that it gives only cursory mention to "minor redistribution of total catch." GOA12/AL-5. Implementation of this proposal would likely lead to major redistributions of harvest. Various interests will propose setting seasons in a manner to give them an advantage, or to work a disadvantage on a competing group.

This proposal would result in an almost limitless number of season proposals being submitted for Council consideration each year. Apparently, seasons would be set by allocation category (DAP, JV and TALFF), for each gear type (trawl, long-line and pot), for each area (Western, Central and Eastern) and for each species. It could be anticipated that a number of proposals would be submitted for each season decision that must be made.

The quantity of proposals that can be anticipated will certainly overtax the amount of time industry and the Council have available to analyze them. Since the groundfish fishery is necessarily a multi-species fishery, the impact of setting one season requires analysis of how that impacts on the participants ability to participate in other fisheries. With almost limitless combinations of seasons to consider, it is unlikely that the Council or industry would be able to accurately forecast the impact of their decisions.

No Need Identified

The need for such a broad proposal has not been identified. The RIR states that "[e]xcept for the sablefish and pollock roe fisheries, there is not an immediate need to provide for the flexibility to change seasons in the Gulf of Alaska." GOA12/AL-3. If this is the situation, amendments should be drafted to deal with these specific fisheries. AFTA agrees that circumstances may arise in which it would be wise to set seasons

for particular fisheries, but the amendment process is the appropriate vehicle for implementing those seasons on a case by case basis.

Since little or no need has been shown for this broad proposal, it is evident that the planning burden and possible adverse allocative impacts of this proposal on segments of the industry outweigh any benefit.

Possible Alternative

If the Council determines that adopting broad season setting authority is necessary, changes must be made to the procedure as proposed. The proposal sent out for public review does not provide sufficient discussion of the parameters to be used in setting seasons, or of the criteria to be used to judge whether a proposed season "provides significant advantages" over the status quo or other proposals.

While we oppose this procedure as proposed, we suggest that seasons may be set through a framework procedure only if it is determined that the setting of such season will have no significant allocative impacts. Actions that have significant allocative impacts deserve the degree of public scrutiny afforded through the amendment process. The procedure for setting the seasons must include an analysis of whether the proposal is consistent with the national standards set forth in the MFCMA. In addition, decisions on seasons should not be made at the December Council meeting, since the agenda for that meeting is currently over-burdened and making a decision at that time gives industry little time to attempt to plan its operation for the year.

(5) FRAMEWORK FOR SALMON AND CRAB PSC LIMITS

How to deal with bycatch of prohibited species in a multi-species fishery is a question that must be addressed by industry and resource managers, but this proposal to expand the halibut PSC limit framework to cover crab and salmon gets us no closer to an answer. We are not convinced that the proposed procedure will do anything to improve the management of bycatch, while we are convinced that significant costs will accrue to the groundfish industry through the closure of fisheries based on arbitrarily designated acceptable bycatch mortality goals. This is another example of a problem that is not suited to a quick fix "framework" solution.

No Need Identified

The EA/RIR fails to support the proposition that there is a need for this type of micro-management. The Kodiak Island crab closure, described as a situation in which this frameworking could have helped, is actually documentation that existing management tools can be employed to effectively resolve the problems. AFTA is convinced that the current method of dealing

with bycatch problems - through industry work groups - is superior to relying on an intricate matrix of PSC limits arrived at using second-hand data and set under the pressures of the hectic December Council meeting.

The RIR mentions that this proposal will cure the inequitable procedure under the halibut framework which singles out bottom trawlers for closure when the PSC limit is reached. This inequity must be cured, but approval of this amendment package is not required for the Council to alter the halibut PSC system so that gear types other than bottom trawl may be closed if PSC limits are reached. The FMP currently allows such action; only the regulations need to be changed. This can be done separately from this amendment package.

The Proposed System is Unworkable

It is difficult to determine how this system would work. The proposal does not give the public a clear understanding of how the PSC limits would be determined or how these limits would be monitored and enforced.

Framework management techniques require specific parameters to guide decisionmakers and to ensure accountability. NMFS Operational Guidelines require that each framework element contain provisions that (a) define the circumstances that will trigger a change in management; (b) indicate the criteria that will be considered in determining if a change is needed and for selecting a response; (c) define the procedures to be used in making changes; and (d) set limits to the adjustments. The framework must also include a determination that the proposed change is consistent with the FMP's objectives.

This framework proposal lacks certain of these essential elements. A timetable is given for setting the PSC limits, but no parameters are given for the Council to use in determining "acceptable bycatch mortality goals". No guidance is given on how decisions should be made to set a PSC limit higher or lower, how to divide the acceptable mortality among gear types and by area, how to determine whether PSC limits should be allocated to individual operations and how these allocations would be made, and so on. It appears that the Council will be given free rein to make recommendations on each of these issues, and that the Regional Director will make the decisions with no objective criteria against which to judge them. Accountable, well-reasoned decisions are essential on any matter that places constraints on groundfish operations.

The experience of setting the 1987 halibut PSC limit is used as the example of how smoothly these limits could be determined and how effective such measures would be. The example is misleading. Setting the 1987 halibut limit was a largely ceremonial exercise that everyone new was unlikely to have any effect on how the groundfish fishery was conducted. Since halibut stocks are currently in such an abundant state, all the Council needed to do

was set the goal at the projected bycatch level and call it fair. No decisions needed to be made on whether it was better to catch the halibut as bycatch or as a directed fishery. No decisions needed to be made on setting quotas by gear type, by area or by individual operation. Since the decision was to have no impact, there was little industry interest. Such will not be the case when setting mortality goals for salmon and crab.

If this proposal is adopted, the Council will be called upon to make a multitude of decisions. Decisions such as: What are the acceptable bycatch mortality rates? What are the proper PSC limits by area? By gear type? By operation? The Council will have to make these decisions at the December Council meeting, at a time when it is also making all of the other major allocative decisions for the year. Since the PSC limits cannot be set until after other seasonal allocations are made, little time will be available to review the proposals before the Council must act on them.

This proposal does not provide a method for monitoring the amount of actual bycatch. It is unclear how the management agency would determine whether a bycatch limit is met. The RIR states that JV bycatch rate information will be used to set bycatch limits, but the document does not explain how the agency will determine whether those limits are being reached during the season. Of course, the use of the historical JV bycatch rates may not be an accurate gauge of bycatch rates for domestic operations, and since little or no JV activity is anticipated in the Gulf in the future, the validity of that data will become even more suspect.

The document mentions that the limits will be enforced by at-sea enforcement. While this would be effective as a means of enforcing closures due to the limits, it is of no use in determining whether bycatch limits are actually being reached.

Costs Outweigh Benefits

If we are reading this proposal correctly, the PSC limits derived through this framework could be the overriding means by which the groundfish fishery is managed. Once a PSC limit is reached, fishing must cease, regardless of the level of groundfish harvest or cost to the groundfish industry. Thus the December meeting will serve to set numerous catch limits, any one of which will serve to close fishing to groundfish. Is this truly the policy of the Council? Shouldn't there be an objective which seeks to provide PSC allowances to groundfish fisheries so that groundfish fishing may continue uninterrupted?

The benefit-cost analysis in the RIR is of such a speculative nature that the Council would be better served by ignoring that section. This is not to infer that the staff's analysis is intentionally skewed, only that the range of potential impacts of this provision are so broad and unpredictable that a meaningful benefit-cost analysis is probably not achievable.

If sufficient parameters were placed on the decisions to be made so that a benefit-cost analysis could be conducted, the analysis would have to go further than simply analyzing the benefits to the those participating in the directed fisheries for the prohibited species. The analysis would also document the potential costs to groundfish harvesters and processors. No estimate is provided of the anticipated loss to the groundfish fishery. This estimate would require analysis of not only ex-vessel price of fish, but also a comparison of economic returns from the end products of the various species.

The potential allocative impacts of this proposal need to be focused on in the benefit-cost analysis. It is improper to assume that the same economic return will come from the resource regardless of which fisherman is allowed access to the resource. PSC limits could be set in such a manner that the allocative impacts result in making it infeasible for particular gear types to participate. These issues need to be addressed before this framework is adopted.

Finally, if the Council decides to adopt this proposal despite the uncertainty over its impacts and over our objections, a number of changes still must be made.

- The proposal should make clear that no area closures would be implemented through the use of this procedure. Area closures deserve the degree of analysis and scrutiny afforded by the amendment process.
- These PSC limits should be set at a meeting other than the December meeting. The agenda for the December meeting is already full, and the PSC limits could not be made until the allocation decisions are finalized.
- The decisions on the limits need to be reviewed for consistency with the goals and objectives of the FMP and the MFCMA.

6. UPDATE OF GULF OF ALASKA FMP.

AFTA supports the concept of keeping the narrative language of the FMP up-to-date. The FMP serves as the basis upon which management decisions must be based, and for that reason it is important that it reflect accurate information on the current state of the fishery and industry, and accurately reflect current management policy and parameters.

However, AFTA is concerned with the method that apparently is being used in revising the document. If the action that the Council is being asked to take is simply to direct the staff to prepare an updated document for later public review and Council approval, AFTA supports this proposal. On the other hand, if the Council is being asked to approve the revision of the FMP before the revision has been completed and submitted for review, we must

strongly protest.

The proposal contains a description of how the document will be revised, but the actual language of the FMP is very important. Without the opportunity to review a completed document, the public and Council have no way of knowing whether or not the document accurately portrays the fishery and the management regime.

AFTA is concerned that changes to the management plan could be made through the "updating" procedure that escape the scrutiny they deserve. For example, this proposal includes a change in the method of management for rockfish. Amendment 14 appears to have divided rockfish into: POP, Demersal Shelf Rockfish, and Other Rockfish. This proposal would re-categorize rockfish as: Slope Assemblage, Shelf Demersal Assemblage, and Shelf Pelagic Assemblage. While the impact of this change is unknown, a similar change was given amendment status in 1985. The Council must act on such proposals on an individual basis.

The Council should act to direct the staff to revise the FMP, but must also clarify that before that document is adopted, it must be reviewed and approved by the Council as a plan amendment. Redrafting the FMP is more than a ministerial function - it sets the foundation for important management decisions.

Sincerely,



Bill Orr

Director, Government Affairs



MAY 12 1987

AGENDA D-3(c)
MAY 1987

ALASKA FACTORY TRAWLER ASSOCIATION

4039 21ST AVE. WEST, SUITE 400
SEATTLE, WASHINGTON 98199
(206) 285-5139

TELEFAX 206-285-1841
TELEX 5106012568, ALASKA TRAWL SEA

May 11, 1987

Mr. Jim Campbell, Chairman
North Pacific Fisheries Management Council
P.O. Box 103136
Anchorage, AK. 99510

Re: Proposed catcher/processor reporting requirements

Dear Mr. Campbell:

The following comments pertain to the proposal of the National Marine Fisheries Service to require additional reporting from catcher/processors operating in the Bering Sea and Gulf of Alaska. Comments on the other amendment proposals are sent separately.

THE PROPOSAL

For the third amendment cycle in a row, reporting requirements for catcher processors are being proposed. This round of proposals seeks to enhance enforcement abilities of the National Marine Fisheries Service to assure that fishermen comply with the catch quotas, and that processors report the amount of fish that they report they have processed and transferred from the factory.

In order to accomplish this objective, NMFS is proposing that additional reporting requirements be placed upon floating processors only. The additional requirements are:

- 1) to report transfers from catcher/processors of processed fish and
 - 2) maintain a daily cumulative log on board the vessel.
- The cumulative log requirements include a:

- A. Daily effort section.
- B. Daily discard section.
- C. Daily cumulative production log.

THE STATUS QUO

Floating processors currently provide management and enforcement personnel with more information than any other segment of the domestic groundfish harvesting or processing industry, and do so in a more timely manner. Catcher/processors report:

- * catch on a weekly basis
- * when they begin operation, when they shift areas and when they stop operation.
- * catch a second time by fish tickets at the end of a voyage.

Other harvesters are required only to submit fish tickets. Other processors have no reporting requirements, although they often take on the burden of handling fish tickets for vessels delivering to them.

AFTA'S POSITION ON TRANSFER REPORTS

AFTA supports the concept of transfer reports although we would want to see the details of the requirement before we support any proposed regulation. Amendatory and regulatory language has not been provided in the RIR and therefore we are unable to comment on the specifics of the proposal.

AFTA'S POSITION ON CUMULATIVE PRODUCTION LOG

NMFS seeks to require floating processors that operate in the FCZ to maintain a cumulative production log, apparently as a means of assuring compliance with catch quota. The cumulative log requirement is not the best nor the fairest way to accomplish the enforcement objective. We believe that weekly catch or production reports, coupled with transfer reports, check-in/check-out reports and begin/cease reports, are sufficient to assure accountability in the system.

The Requirement is Unnecessary for Enforcement - The following arguments are offered to demonstrate the lack of rationality of this proposal:

A domestic at-sea processor does not have the same incentive to deceive. While foreign processors realize that their operations in U.S. waters are short-term, domestic operations must take care to ensure the long-term viability of the fishery. Unlike on a foreign vessel, a U.S. crew has the opportunity, and is more likely to inform authorities of schemes to deceive, since they are paid on a production basis.

Some of the requirements placed on foreigners were done because of competition for fully utilized species. The same does not

apply to domestic operations. For 95% of the biomass there is no economic incentive to under-report. Factory trawlers are harvesting and processing only 10% of the available resources. The resources are totally available to them in the quantities that they want and need.

The Requirement is Unduly Burdensome - The burden that the maintenance of the cumulative daily production log places on vessel operators far outweighs the enforcement convenience which is derived. The cumulative production requirement can be compared to the IRS requiring that individuals report a running account of their taxable income, rather than simply reporting it at the end of the year.

The burden of this proposed measure is far beyond the requirement that vessels place upon themselves in the course of business. While vessels do maintain production records, the requirement for accuracy does not accrue until the point of off-loading and sale. This measure is requiring a continuous accuracy that we are held to anytime one of our vessels happens to be boarded.

The cost of inadvertent errors is unstated, but we feel it will be substantial. Mistakes will be made. The range of penalties is unstated. Penalties, so far as we know, could go from minor fines to permit sanctions to vessel seizure. What is the cost of our compliance and noncompliance with the rule?

NMFS demands accuracy to within .01 mt. This assures that any vessel boarded will be in at least technical violation of the regulation. Shrinkage of product may be 5%. If a vessel has 100 mt aboard, shrinkage could be anticipated to be about 5 mt, but since it is a gradual process, it would be impossible to know product weight within .01 mt at any particular time.

We greatly fear that vessels may be lulled into complacency by infrequent boardings. That is, vessels which have not been boarded in some time may forget the significance of this real time record keeping and fall behind or fail to pay attention to detail. This will not constitute a violation of the law until the vessel gets boarded, at which time some penalty - from a warning to vessel seizure will be assessed. The cost of violation of this regulation is unstated in the RIR and is not analyzed.

Other costs which are significant to the operators of floating processors are:

- a. The cost of reducing or halting production while NMFS counts the product on board. This cost becomes enormous if NMFS determines that the only way to get an accurate count is to off-load the vessel.

b. The cost of maintaining records varies with the degree of accuracy required by the regulation. Remember that this regulation requires not a report on a periodic basis, but a continuous running tally that must be accurate at the time the Government boards our vessels. The cost of compliance will be extremely high.

The Requirement is Inequitable in that it Only Applies to Certain Processors - With respect to the applications of both of the provisions, we feel that the government is making a serious error if it does not apply the measures of any reporting system to all applicable operations. For one, it gives our segment of the industry the sense that it is being singled out for attention when such discrimination is not warranted or justified. Secondly it leaves serious voids in the data collection process which make the collection from one segment of the fleet meaningless, or less significant.

If the proposal goes ahead as proposed by NMFS, the following inequities will exist:

Daily Cumulative Production Log	
Number of processors required to keep	25
Number of processors not required to keep	33

Whatever the incentive to cheat, shore-side operations cannot be distinguished from at-sea and the opportunity to cheat is as great. Shore-side enforcement coverage is not so intense as to thwart schemes to under-report.

AFTA'S POSITION ON THE DAILY EFFORT AND DISCARD LOG

AFTA opposes the requirement for daily effort logging - This section would require vessels to report a variety of effort data, including position, depth, and length of tow. AFTA is concerned that this would lead to the release of proprietary fishing data to competitors. Even if this concern was alleviated, the scientists and managers have gone on record as not supporting the collection of this data until a system is set up to verify and use it. AFTA must agree with this position - the mandatory collection of data that will not be used pursuant to a plan is irrational.

Furthermore, we must object to the selectivity of the application of this requirement to catcher/processors only. To do so would result in the following inequity:

Daily Effort Log	
Vessels required to keep	25
Vessels not required to keep	1180

The irrationality of having such selective data collection is

readily apparent.

AFTA opposes the requirement for daily discard logging - Again, the plan team scientists and managers do not believe this information will be of any use in the management of the fishery. Fishermen have commented that under current operating conditions, only estimates of composition of fish discarded can be made. It is unlikely that making such estimates on a daily basis would improve the confidence level over estimates that can be made on a seasonal or fishery basis.

The inequitable application of the requirement is reflected by the following count of vessels having to comply with the requirement.

Daily Discard Log

Vessels required to keep	25
Vessels not required to keep	1180

Thank you for the opportunity to comment. We would like to stress that all of the nine amendments in the Bering Sea and Gulf of Alaska impact the viability of our fishery. They are very important to us. We respectfully ask that the Council take the time to absorb and heed our comments.

Sincerely,



Edward D. Evans
Executive Director

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GULF OF ALASKA GROUND FISH PLAN TEAM REPORT
(May 14, 1987)

REVIEW OF INTERIM REPORT ON 1987 SHELIKOF POLLOCK SURVEY

The Gulf of Alaska Groundfish Plan Team discussed on May 11, 1987, via teleconference, a paper reporting on the 1987 Shelikof Strait acoustic pollock survey. The paper entitled "Interim report on the 1987 Shelikof Strait echo integrator/midwater trawl pollock survey, March 11-31, 1987", was prepared by Dr. Edmund P. Nunnallee of the RACE Division of the Northwest and Alaska Fisheries Center and is dated May 6, 1987.

The report is of a preliminary and qualitative nature. The final report with estimated biomass is not expected to be available until the middle of July 1987.

The Team reviewed the report to determine if there was any evidence that the 1987 pollock stock surveyed in Shelikof Strait was different from the projections reported by the Team in the 1986 RAD for the Gulf Of Alaska.

We note from the report that:

1. The abundance of mature pollock in the strait was perceived to be considerably less than during the 1986 survey. This reflects the removals from the mature population in 1986, mortality to the mature population between 1986 and 1987, and the fact the four-year-old fish (1983 year class) are from a weak year class. Recall that the three-year-old fish (1984 year class) are still sexually immature.

2. The abundance of juvenile pollock in the strait in 1987 was perceived as greater than during the 1986 survey. The 1984 year class is very strong and the 1985 year class is of at least average strength. In addition, an aggregation of one-year-old fish (1986 year class) of undeterminable abundance was found in lower Shelikof Strait.

The Team considers this information from the interim report to be closely in line with the projections from the 1986 RAD. Consequently, we find no reason to alter our recommendation for ABC for pollock in the Gulf of Alaska.

The Team position on ABC for pollock, as reflected in the 1986 RAD summary was:

POLLOCK - The biomass dropped to 620,000 mt in 1986, the lowest value since the hydroacoustic surveys began in 1981. The forecasting model projects an increasing trend in biomass for the next few years due primarily to a strong 1984 year class. The PT set ABC for the Central and Western Regulatory Areas in the range of 70,000 to 120,000 mt using an age-structured model. Due to positive forecasts in biomass trends, tempered by the uncertainty relative to the likely spawning success of the current record low population levels, the Team set ABC at 95,000, the midpoint of the range for the Central and Western Regulatory Areas.

The Team sounds one cautionary note. The average size of the three-year-old fish in Shelikof Strait in 1987 was less than during any previous survey period. Other year classes at age 3 have ranged from 32 to 36 cm; this year the average was only 28-29 cm. The average length of 1984 year class fish at age 2 was also small.

There are several plausible hypotheses that could explain this decreased length at age, and is not a cause for alarm. It does seem likely, however, that because the 1984 year class is growing slower, it is likely to reach sexual maturity at a later age. While the percent of sexually mature four-year-old females in Shelikof Strait has averaged about 80 percent over the surveys to date, it would not be unusual if the percentage was lower in 1988.