

M E M O R A N D U M

TO: Council, SSC and AP Members  
FROM: Jim H. Branson  
Executive Director  
DATE: November 29, 1984  
SUBJECT: Bering Sea/Aleutian Islands Groundfish

ACTION REQUIRED

Set JVP and DAP for 1985 groundfish fishery.

BACKGROUND

DAP and JVPs for 1985 are to be set equal to the 1984 catch plus additional amounts necessary for U.S. increased fishing in 1985 (subject to TAC constraints). The estimated amount necessary for 1985 have changed since the proposed DAPs and JVP were sent out for public review on October 22.

Table 1 shows the projected 1984 DAP and JVP harvests and proposed 1985 DAP and JVP. Table 2 shows the updated estimates of 1985 DAP and JVP, the proposed TACs (October 22 version), and groundfish "deficits." The "deficits" only show that for some species of groundfish, the U.S. industry is already constrained by available resources. These constraints may be eased for Pacific ocean perch, sablefish and Pacific cod by raising the TACs.

Table 3 is a worksheet for your use as you make final decisions. Copies of all comments received to date on DAP and JVP follow Table 3.

TABLE 1

Bering Sea/Aleutian Islands Groundfish  
Projected 1984 DAP and JVP Catch and Proposed 1985 DAP & JVP

<u>SPECIES</u>	<u>DAP Projected 1984 Harvest</u>	<u>JVP Projected 1984 Harvest</u>	<u>Proposed 1985 DAP</u>	<u>Proposed 1985 JVP</u>
Pollock/BS	3,000	235,863	6,826	274,500
Pollock/AI	300	6,766	300	10,000
Pacific ocean perch/BS	1,360	196	578	0
Pacific ocean perch/AI	100	422	100	2,310
Rockfish/BS	50	9	600	20
Rockfish/AI	5	37	5	535
Sablefish/BS	1,000	76	1,979	100
Sablefish/AI	50	271	100	417
Pacific cod	60,000 <sup>1/</sup>	34,011	62,940	40,000
Yellowfin sole	200	32,683	3,076	57,000
Turbots	0	273	0	2,000
Other flatfish	100	17,552	907	22,000
Atka mackerel	0	35,595	0	32,045
Squid	0	36	0	30
Other species	<u>1,000</u>	<u>2,609</u>	<u>1,000</u>	<u>2,800</u>
TOTAL	67,165	366,399	78,411	443,757

1/ May not include latest ADF&G figures for catcher-processors.

TABLE 2  
 Bering Sea/Aleutian Islands Groundfish  
 Pacific ocean perch, Sablefish, Pacific cod, Atka mackerel  
 "Deficits" Projected for 1985

<u>Species</u>	<u>Proposed TAC</u>	<u>0.85 TAC</u>	<u>DAP<sup>2/</sup></u>	<u>DAP "Deficit"</u>	<u>JVP<sup>2/</sup></u>	<u>JVP "Deficit"</u>
Pollock (BS)	1,100,000	935,000	17,680	----	274,500	----
Pollock (AI)	100,000	85,000	4,540	----	7,415	----
POP (BS)	680	578	3,000	-2,422	1,010	-1,010
POP (AI)	3,800	3,230	2,450	----	2,310	-1,530
Rockfish (BS)	1,120	952	600	----	10	----
Rockfish (AI)	5,500	4,675	800	----	535	----
Sablefish (BS)	2,640 <sup>1/</sup>	2,244	600	----	10	----
Sablefish (AI)	1,920 <sup>1/</sup>	1,632	10,326	-8,694	417	-417
Pacific cod	210,000	178,500	206,400 <sup>3/</sup>	-27,900	40,150 <sup>4/</sup>	-40,150
Yellowfin sole	288,700	245,395	1,770	----	65,500 <sup>4/</sup>	----
Turbots	50,000	42,500	0	----	2,000	----
Flatfish	139,840	118,864	1,200	----	21,824	----
Atka mackerel	37,700	32,045	0	----	56,360	-24,315
Squid	10,000	8,500	0	----	0	----
Other Species	46,700	39,695	0	----	600	----

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<sup>1/</sup> Suggested by Plan Team  
<sup>2/</sup> From NMFS Industry Survey unless otherwise noted  
<sup>3/</sup> Alaska Factory Trawler Assn. Ltr, Nov. 19, 1984  
<sup>4/</sup> From JV permit applications

TABLE 3

Bering Sea/Aleutian Islands Groundfish  
1985 Final DAP and JVP Worksheet

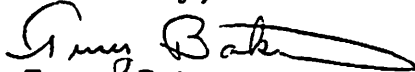
<u>SPECIES</u>	<u>FINAL DAP</u>	<u>FINAL JVP</u>
Pollock/BS		
Pollock/AI		
Pacific ocean perch/BS		
Pacific ocean perch/AI		
Rockfish/BS		
Rockfish/AI		
Sablefish/BS		
Sablefish/AI		
Pacific cod		
Yellowfin sole		
Turbots		
Other flatfish		
Atka mackerel		
Squid		
Other species		
TOTAL		



It should be noted that the traditional summer fishery in the Port Moller area for Pacific Cod was 50% less in 1984 versus 1983. Several of our member vessels invested thousands of dollars and over 30 days of prospecting as far north as St. Lawrence Island and west of the Pribilof Islands in search of Pacific Cod. The results of this prospecting and surveying were no better in the northern areas than were found off of Port Moller. This reduction in CPUE directly conflicts with NMFS's opinion that the fish have moved north. Basically, it is our opinion that the foreign fleets have worked the pre-spawning Cod stocks (for Roe only) so hard, and combined with the 30% annual mortality rate on Pacific Cod, that the suggested TAC is possibly too high. The main issue in this situation that the members of AFTA are asking, is that since there is doubt as to the credibility of NMFS's Pacific Cod TAC that the benefit of the doubt should be left with the domestic harvesters and processors and not be given to any foreign fishing fleets.

As an industry, the members of AFTA are deeply concerned that no TALFF be given to any foreign fishing fleet on Pacific Cod. It is crucial for the stability of the developing groundfish industry that the projected TAC on Pacific Cod be reviewed very closely. The Pacific Cod fishery is the base that the U.S. fishing fleet will utilize to develop other underutilized species. Your consideration of our proposal will be appreciated and should you have any comments, please do not hesitate to contact me.

Sincerely,



Terry Baker  
President

Alaska Factory Trawlers Association  
4250 - 24th Avenue West  
(206)282-3445

TB:bw

1985 Pacific Cod Harvesting & Processing Capacity  
United States Factory Trawlers and Domestic Processors

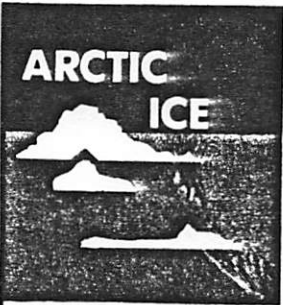
Company/Vessel	Daily Freezing Capacity Lbs Round Weight	Production Days 1985	Available 1985 Capacit
<b>Factory Trawlers</b>			
1. Arctic Alaska Seafoods			
a) F/T Northwest Enterprise	120,000 lbs	250	30,000,000
b) F/T Aleutian Enterprise	120,000 lbs	250	30,000,000
c) F/T Ocean Enterprise	120,000 lbs	250	30,000,000
d) F/T Pacific Enterprise	120,000 lbs	250	30,000,000
2. Trans Pacific Seafoods			
a) F/T Arctic Trawler	160,000 lbs	250	40,000,000
b) F/T Aleutian Trawler	120,000 lbs	250	30,000,000
3. Glacier Fish Company			
a) F/T Northern Glacier	160,000 lbs	250	40,000,000
4. American Fishing Ventures			
a) F/T Ocean Bounty	100,000 lbs	250	25,000,000
b) F/T Aleutian Bounty	100,000 lbs	250	25,000,000
5. F/T America No. I	120,000 lbs	200	24,000,000
6. Misc Salt Cod Vessels	100,000 lbs	200	20,000,000
7. Trident Seafoods			
a) Akutan Plant	300,000 lbs	200	60,000,000
8. Arctic Alaska Seafoods			
a) Floater M/V Arctic Ent.	280,000 lbs	250	70,000,000
			<u>454,000,000</u>
			206.4 MT

\*Operations with 250 days production target 100% on Pacific Cod

\*Operations with less than 250 days may opt to process other species







# Arctic Alaska Seafoods, Inc.

4250 24th Avenue West  
Seattle, Washington 98199  
(206) 282-3445

RECEIVED NOV 26 1984

COPY FOR  
INFO

November 19, 1984

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

Attn: 1985 Bering Sea/Aleutian Islands Groundfish

ACTION	ROUTE TO	INITIAL
	Exec. Dir.	
	Deputy Dir.	
	Admin. Off.	
	Exec. Sec.	
	Staff Asst. 1	
	Staff Asst. 2	
	Staff Asst. 3	
	Gen. Inv.	
	Sec. Office	
	Sec. Typist	

Dear Sir:

We are opposed to any TALFF for Pacific Cod in 1985. During 1984, we have operated two factory trawlers targeting on Pacific Cod. Both of these vessels operated at less than 50% capacity in 1984. In 1985, we are adding two additional vessels to target on Pacific Cod, bringing our fleet total to four Factory Trawler vessels. Our capacity to harvest and process with the four factory vessels for 1985 is 54,545 MT. We are most concerned that any consideration would be given to allocating any TALFF on Pacific Cod, especially due to the fact that our vessels are operating only at 50% of capacity.

Please do not hesitate to contact me should you have any questions.

Sincerely,

Francis Miller  
President/Chairman of the Board  
Arctic Alaska Seafoods

FM:bw

COPY FOR YOUR  
INFORMATION

# Arctic Enterprise, Ltd.

RECEIVED NOV 26 1984

4250 24th Avenue West

Seattle, WA 98199 ACTION  
(206) 282-3445

ROUTE TO	INITIAL
Exec. Dir.	
Deputy Dir.	
Adm. Off.	
Exec. Sec.	
Staff Asst. 1	
Staff Asst. 2	
Staff Asst. 3	
Staff Asst.	
Sec. Adm.	
Sec. Fin.	
Sec. Legal	
Sec. Oper.	
Sec. Tech.	
Sec. Training	
Sec. Public Aff.	
Sec. Safety	
Sec. Security	
Sec. Shipping	
Sec. Support	
Sec. Systems	
Sec. Telecomm.	
Sec. Travel	
Sec. Warehouse	
Sec. Other	

November 19, 1984

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

Attn: 1985 Bering Sea/Aleutian Islands Groundfish

Dear Sir:

We are opposed to any TALFF for Pacific Cod in 1985. Our floating processor, the M/V Arctic Enterprise, was converted during 1984 to process bottomfish. The M/V Arctic Enterprise will require a catching fleet of four to six vessels. Our primary target and market is for Pacific Cod. Our annual capacity to process beginning in 1985, will be 31,818 MT. Between the M/V Arctic Enterprise and the fishing vessels, we will have created over 150 jobs for Americans in the groundfish industry. In order to maintain these jobs and protect our investment, we are asking that no TALFF be given on Pacific Cod beginning in 1985.

If you should have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,



Daniel A. Roberts  
Vice President-Administration  
M/V Arctic Enterprise, Ltd.

DAR:bw

RECEIVED NOV 2 6 1984

GLACIER FISH COMPANY LIMITED PARTNERSHIP

200 Fisheries Building  
4241 21st West  
Seattle, WA 98199

Telephone (206) 285-6627  
Telex 320221



November 20, 1984

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

NOTION	ROUTE TO	INITIAL
	Exec. Dir.	
	Dist. Dir.	
	ADM. C. O.	

RE: 1985 Bering Sea/Aleutian Islands Groundfish

Dear Mr. Branson:

Glacier Fish Co., Ltd. is the owner/~~operator of the factory trawler~~ Northern Glacier. Designed primarily to catch and process Pacific Cod, the Northern Glacier represents approximately a 12 million dollar investment by our company. The vessel started fishing in December 1983, adding better than 18,000 metric tons of processing capability per year to the rapidly growing U.S. bottomfish industry.

Because of our substantial investment and the growth of the U.S. bottomfish industry, we strongly oppose any TALFF on Pacific Cod. This past year our vessel operated at less than 50% capacity, as did the other U.S. factory trawlers. It is absurd to give our fish to foreigners when our domestic fleet is underutilized. Eliminating TALFF on Pacific Cod will help protect the current investment in the U.S. bottomfish industry and encourage future growth as stocks permit. It is the hope of Glacier Fish that the Council will eliminate TALFF at the December meetings.

Thank you for your consideration.

Best Regards,

GLACIER FISH COMPANY LIMITED PARTNERSHIP

Erik Breivik,  
Manager

EB:jk



COPY FOR YOUR  
INFORMATION

North Pacific  
Fishing Vessel  
Owners' Association

RECEIVED NOV 21 1984

ACTION	ROUTE TO	INITIAL
November-20,	1984	

Mr. Jim H. Branson  
Executive Director  
North Pacific Fishery Management Council  
P.O. Box 103136  
Anchorage, AK. 99510

RE: 1985 Bering Sea/Aleutian Islands/Gulf of Alaska  
Groundfish Comments on TAC's, DAP's and JVP's.

Dear Jim:

The following comments were collected from a NPFVOA sub-committee meeting. The participants represented the trawling segment of the Association. To simplify the comment process I will first summarize the groundfish comments for the Bering Sea/Aleutian Islands and second summarize the Gulf of Alaska. Within the summary context I will attempt to re-draft the allocation charts for the two areas. The reason why I say attempt redrafting the charts is that much of the JVP and TALFF information relies on a U.S./Japan Industry-to-Industry meeting which has not yet come to fruition.

I). 1985 Bering Sea/Aleutian Islands Groundfish:

- A. Bering Sea Pollock: There is concern by the U.S. Industry over the amount of fish, primarily pollock, but including herring and other species, that the foreigners are harvesting east of St. Matthew Island outside of the U.S. FCZ. The U.S. should monitor this fishery and with proper aerial/at-sea surveillance determine the respective harvests by each foreign country. This harvest should then be accounted for, by deducting the harvested amount from that countries TALFF.
- B. POP/BS; POP/AI; Rockfish/BS; Rockfish/AI: The JVP factor for these species are much too conservative, interest by U.S. fishermen has increased tremendously this past year. Because of this increased interest and the fact that these species are long lived "cridders" it is our recommendation that the Council bank these species for future U.S. harvest. We recommend increasing the JVP and Reserve categories appropriately, thus zeroing out TALFF on these species.

As you will recall recent legislation (an amendment to the MFCMA) signed by the President gives U.S. fisheries managers the flexibility of "banking" fish. The language change of "shall allocate" to "may allocate" gives the U.S. a vehicle to do so.

- C. Sablefish/BS; Sablefish/AI: The harvesting capacity of the U.S. Joint Venture and Longline fleets for sablefish has increased significantly. The Council should exercise its ability to recommend to the Secretary that when in question of allocating TALFF or not, the U.S. fleet will get the benefit and zero TALFF will be recommended.
- D. Pacific Cod: The debate between the biologists and the industry in regards to the total cod biomass in the Bering Sea has continued for over a year now. The catcher/processor fleet continues to observe decreasing catch patterns and at times are forced to fish pollock because of the low abundance of cod. We suggest that the anticipated JVP catch is too low, all indications are that it will be 25% larger for calendar year 1985. The TALFF should be zero to benefit the U.S. industry and TAC should be lowered to echo the trends that the fleet has observed during the 1984 seasons.
- E. Yellowfin Sole: The potential social and economic concerns of the U.S. industry while utilizing this resource outweigh any benefit for the U.S. by "giving this resource away to the foreigners". Reduce TALFF, increase JVP (57,000 is too low) and give the U.S. industry the benefit of the doubt.
- F. Turbots; Flatfish: NPFVOA recommends that the Council separate these two categories into the following:
  - 1). Arrowtooth Flounder
  - 2). Greenland Turbot
  - 3). Rocksole
  - 4). Other flatfish

These are relatively valuable species in the market place. We predict that within the very near future U.S. vessels will actively seek Greenland Turbot and Rocksole. Anticipating greater U.S. involvement we suggest that the Council separate the four categories for management ease in the future.

G. Atka Mackerel: Not much is known about this species, we stress the need for detailed research and evaluation. We as fishermen and you as managers need a "handle" on resource population and distribution information for this species.

1985 BERING SEA/ALEUTIAN ISLANDS GROUND FISH

<u>Species</u>	<u>TAC</u>	<u>DAP</u>	<u>JVP</u>	<u>DAH</u>	<u>Reserve</u>	<u>TALFF</u>	<u>NPFVOA comments paragraph</u>
POLLOCK/BS	1,100,000	6,826	274,500	281,326		653,674 <sup>1/</sup>	A
POLLOCK/AI	100,000	300	10,000	10,300		74,700	
POP/BS	680	578	0 <sup>7/</sup>	578		0	B
POP/AI	3,800	100	2,310 <sup>7/</sup>	2,410		-820 <sup>2/</sup>	B
ROCKFISH/BS	1,120	600	20 <sup>7/</sup>	620		-332 <sup>2/</sup>	B
ROCKFISH/AI	5,500	5	535 <sup>7/</sup>	540		-471 <sup>352/</sup>	B
SABLEFISH/BS	2,600	1,979	100	2,079		-131 <sup>2/</sup>	C
SABLEFISH/AI	3,360	100	417 <sup>7/</sup>	517		-273 <sup>392/</sup>	C
P.COD	210,000	62,940	40,000 <sup>7/</sup>	102,940		-757 <sup>5602/</sup>	D
YELLOWFIN SOLE	288,700	3,076	57,000	60,076		185,319 <sup>3/</sup>	E
TURBOTS	50,000	0	2,000	2,000		40,500 <sup>4/</sup>	F
FLATFISH	139,840	907	22,000	22,907		95,957 <sup>5/</sup>	F
ATKA MACKEREL	37,700	0	32,045	32,045		0 <sup>6/</sup>	G
SQUID	10,000	0	30	30		8,470	
OTHER SPECIES	46,700	1,000	2,800	3,800		35,895	
TOTAL:	2,000,000	78,411	443,757	522,168	300,000 <sup>8/</sup>	1,117,832 <sup>9/</sup>	

- 1/. Depends on out-come of U.S./Japan Industry-to-Industry Meetings.
- 2/. Zero TALFF.
- 3/. Suggested decrease in TALFF.
- 4-5/. Separate into: Arrowhead Flounder, Greenland Turbot, Rocksole, and Other species.
- 6/. Need for extensive research.
- 7/. JVP's are to conservative.
- 8/. Could change depending on outcome of other NPFVOA recommendations.
- 9/. Anticipated decreases due to changes in individual stocks.

II. 1985 Gulf of Alaska Groundfish:

- A. Pollock: We anticipate the JVP for this species to be greater than indicated, possibly 30,000 mt larger. In the process of evaluating TALFF the law outlines our priority: 1). Conservation of the resource; 2). Domestic allocation; 3). JVP allocation and 4). TALFF allocation. We suggest that prior to recommending any TALFF we maximize the benefit to the U.S. industry by fulfilling all Domestic and Joint Venture needs.
- B. Pacific Cod: We suggest that the Council evaluate these DAH figures to verify their levels. Our concern is that if there is any non-used DAH we would want the Joint Venture operations to have the flexibility to harvest this allocated proportion.
- C. Flounders: As in our comments for the BS/Aleutians we suggest for the same reasons that flounders be separated: i.e.
- 1). Arrowtooth Flounder
  - 2). Greenland Turbot
  - 3). Rocksole
  - 4). Other Flatfish.
- D. P. Ocean Perch: Recommend the E. Gulf of Alaska allocation be zero. Sablefish/POP incidental by-catch levels must be established for Joint Ventures so as to utilize the resource without wastage. These levels must be realistic and depict actual fishing practices. The classic example is that of black cod where the by-catch level is lower than what is needed to eliminate wastage. These vessels are not targeting on this species, but need the flexibility to retain their by-catch.
- E. Atka Mackerel: JVP data for the Western and Central Gulf is too low. For all three areas the TALFF should be adjusted downward and reserves should be increased, anticipating greater U.S. participation. As in the Bering Sea we strongly encourage more research on this species.
- F. Rockfish: With increased U.S. interest in rockfish we suggest that the Council recommend to the Secretary zero TALFF. Domestic and JV operations should have the opportunity to benefit from this valuable resource.

1985 GULF OF ALASKA GROUND FISH

<u>Species</u>	<u>Area</u>	<u>OY</u>	<u>Reserve</u>	<u>DAP</u>	<u>JVP</u>	<u>DAH</u>	<u>TALFF</u>	<u>NPFVOA Commer.</u>
POLLOCK	W/C	400,000	80,000	2,023	-190,000 <sup>1/</sup>	192,023	127,977	
	E	16,600	3,320	5	0	5	13,275	
TOTAL:		416,600	83,320	2,028	-190,000 <sup>1/</sup>	192,028	141,252	A
PACIFIC COD	W	16,560	3,312	600	5,965	6,565	6,683	
	C	33,540	6,708	8,691	8,200	16,891	9,941	
	E	9,900	1,980	120	0	120	7,800	
TOTAL:		60,000	12,000	9,411	14,165	23,576 <sup>2/</sup>	24,424	B
FLOUNDERS <sup>3</sup>	W	10,400	2,080	400	800	1,200	7,120	
	C	14,700	2,940	1,486	3,000	4,486	7,274	
	E	8,400	1,680	300	0	300	6,420	
TOTAL:		33,500	6,700	2,186	3,800	5,986	20,814	C
P.OCEAN PERCH	W	2,700	540	2,160	0 <sup>5/</sup>	2,160	0	
	C	7,900	1,580	6,320	0 <sup>5/</sup>	6,320	0 <sup>4/</sup>	
	E	875	175	136	0 <sup>5/</sup>	136	0 <sup>4/</sup>	
TOTAL:		11,475	2,295	8,616	0 <sup>5/</sup>	8,616	0	D
SABLEFISH	W	1,670	334	1,336	0 <sup>5/</sup>	1,336	0	
	C	3,060	612	2,448	0 <sup>5/</sup>	2,448	0	
	W.YAK	1,680	336	1,344	0 <sup>5/</sup>	1,344	0	
	E.YAK	1,135	0	1,135	0 <sup>5/</sup>	1,135	0	
	S.E.OUT	1,435	0	1,435	0 <sup>5/</sup>	1,435	0	
TOTAL:		8,980	1,282	7,698	0 <sup>5/</sup>	7,698	0	D
ATKA MACKEREL	W	4,678	936	0	3,400 <sup>6/</sup>	3,400	342	
	C	20,836	4,167	0	500 <sup>6/</sup>	500	16,169	
	E	3,186	637	0	0	0	2,549	
TOTAL:		28,700	5,740	0	3,900 <sup>6/</sup>	3,900	19,060	E
ROCKFISH	GW	7,600	1,520	2,947	1,765	4,712	1,368 <sup>7/</sup>	F
THORNYHEAD	GW	3,750	750	40	10	50	2,950	



1985 GULF OF ALASKA GROUND FISH CONTINUED

<u>Species</u>	<u>Area</u>	<u>OY</u>	<u>Reserve</u>	<u>DAP</u>	<u>JVP</u>	<u>DAH</u>	<u>TALFF</u>	<u>NPFVO Comme</u>
SQUID	GW	5,000	1,000	100	10	110	3,890	.
OTHER SPECIES	GW	28,780	5,756	150	1,400	1,550	21,474	.
TOTAL		604,385	120,363	33,176	215,050	248,226	235,796	

- 1). Anticipated increase.
- 2). Check with processing industry to verify anticipated level.
- 3). Separate species.
- 4). Recommend zero TALFF.
- 5). Reasonable by-catch levels must be established.
- 6). JVP's too low.
- 7). Recommend zero TALFF.

We can not stress to you enough that when the Council is in question of an allocation, the resource should come first and secondly the benefit of any opportunities should be given to the expanding U.S. Industry. Thank you for this opportunity to voice our concerns. We will be available for comments at the December Council Meeting.

Happy Thanksgiving!

Sincerely,



Barry D. Collier  
Executive Director  
NPFVOA

BDC:djp

**FISHING VESSEL OWNERS' ASSOCIATION****INCORPORATED**ROOM 232, C-3 BUILDING  
FISHERMEN'S TERMINAL  
SEATTLE, WASHINGTON 98119

(206) 284-4720

November 1, 1984

Chairman James Campbell  
North Pacific Fishery  
Management Council  
P.O. Box 10136  
Anchorage, Alaska 99510

Chairman Campbell:

This letter is in response to the Council's request for comments concerning Total Allowable Foreign Fishing Joint Venture Processing and Domestic Available Processing for the Bering Sea/Aleutians and the Gulf of Alaska as they apply to blackcod.

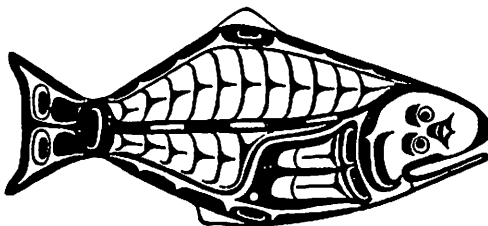
The listed DAP values for sablefish for the areas of the Central, Western Yakutat and Western Areas represent the height of annoyance from both the Scientific and Statistical Committee and the Council itself. It almost seems that the Council can not stand to accept that longline fishermen went out and caught the DAP for 1984. The proposed DAP values for the 1985 season are less than what the U.S. Industry caught and processed in both the Western Yakutat and Central Areas during 1984. The Council's proposal is basically to reduce DAP by 20% in the Central and West Yakutat Areas for "by-catch in joint venture and foreign fisheries".

The proposal is to allow 1,282 metric tons of the Gulf of Alaska quota in the Western, Central and West of Yakutat Areas for joint venture operations. It would seem that the Council is attempting to second-guess the law (MFCMA). According to the law, once the U.S. fishermen and processors catch and process the resource, the amount available for joint venture or foreign allocation is zero or zip or "nada" (Spanish for "nothing"). The Senate comments on amendments to the FCMA of June 14, 1978, state the following:

"Reception of species fully utilized by the U.S. Fishing Industry should be very limited and retention of such species should not be permitted."

The footnote on the Gulf of Alaska proposals from the Council says:

"DAP is set equal to the greater of the NMFS survey results



or the projected NMFS 1984 catch, but less than or equal to 80% of the optimum yield.

This redefinition of DAP results in a reduced harvest from 1984 to U.S. processors and those U.S. fishermen dependent on shorebound processors. According to NMFS, Montlake, there was no joint venture harvest of blackcod in the West Yakutat Area and only 140.8 tons harvested by joint ventures in the Western Area and 138 tons in the Central Area. (Numbers good through September 1984)

The Scientific and Statistical Committee and Council proposals suggest a 500% increase in joint venture allocations in the Gulf of Alaska equaling 20% of the quota in the Central, West Yakutat and Western fisheries, plus a redefinition of DAP. The Council has proposed this even though the total optimum yield in the Central Area and West Yakutat Areas were harvested by U.S. fishermen and shore-based processors in 1984.

We recognize that there is a problem with declaring a resource totally domestic as there may be an unavoidable amount taken in the joint ventures. The proposal to allow 1,282 metric tons for incidental catch is not acceptable to us in light of the joint venture harvest in 1984 of less than 300 metric tons. We would suggest no more than this amount be placed in reserve for joint venture trace catches for 1985 in the Gulf of Alaska.

We further request that no joint venture or foreign allocations be allowed in the Western District of the Gulf of Alaska, other than the trace amount mentioned above.

With regards to the Bering Sea/Aleutian Island Areas, there should not be any TALFF available in either area. There is adequate new fishing and processing capability intending to operate in the Aleutians and Bering Sea Areas.

There are numerous new pot vessels and longline vessels gearing up to participate in the Aleutian and Bering Sea and no further allocations to foreign interests should be permitted. The Scientific and Statistical Committee's, Councils and NMFS's interpretation of the 1984 season were inaccurate last year and resulted in an 800 metric ton allocation in the Kodiak Area to foreign interests. It was not used by foreign interest only due to accelerated U.S. effort last year. I believe NMFS to be inaccurate for 1985 as well. The harvest will come from the Aleutians which has the better habitat where blackcod are generally found. The Council's mailing suggests the Bering Sea is where the domestic production is going to come from. I think

Page three. . .  
Chairman Campbell/Request for comments

this could be embarrassing to the NMFS survey program if the DAP numbers published were actually put into quotas. We recommend no foreign allocations in the Bering Sea or Aleutians based on the accelerated interest and growth in vessels intending to operate in these two areas.

We have included ADF&G charts showing the short duration of time that the U.S. industry took the blackcod harvest in 1984. This should stress to the Council the need for no joint venture processing or foreign allocation of blackcod during 1985 in either the Gulf of Alaska or Aleutians.

Very truly yours,  
FISHING VESSEL OWNERS ASS'N.

  
Robert D. Alverson, Mgr.

RA/jd  
Enc.

TABLE 1  
1985 PROPOSED BERING SEA/ALEUTIAN ISLANDS GROUND FISH

<u>SPECIES</u>	<u>TAC</u>	<u>DAP</u>	<u>JVP</u>	<u>DAH</u>	<u>RESERVE</u>	<u>TALFF</u>
POLLOCK/BS	1,100,000	6,826	274,500	281,326		653,674
POLLOCK/AI	100,000	300	10,000	10,300		74,700
POP/BS	680	578	0	578		0
POP/AI	3,800	100	2,310	2,410		820
ROCKFISH/BS	1,120	600	20	620		332
ROCKFISH/AI	5,500	5	535	540		4,135
SABLEFISH/BS	2,600	1,979	100	2,079		131
SABLEFISH/AI	3,360	100	417	517		2,339
P. COD	210,000	62,940	40,000	102,940		75,560
YELLOWFIN SOLE	288,700	3,076	57,000	60,076		185,319
TURBOTS	50,000	0	2,000	2,000		40,500
FLATFISH	139,840	907	22,000	22,907		95,957
ATKA MACKEREL	37,700	0	32,045	32,045		0
SQUID	10,000	0	30	30		8,470
OTHER SPECIES	46,700	1,000	2,800	3,800		35,895
<b>TOTAL</b>	<b>2,000,000</b>	<b>78,411</b>	<b>443,757</b>	<b>522,168</b>	<b>300,000</b>	<b>1,177,832</b>

1985 GULF OF ALASKA GROUND FISH

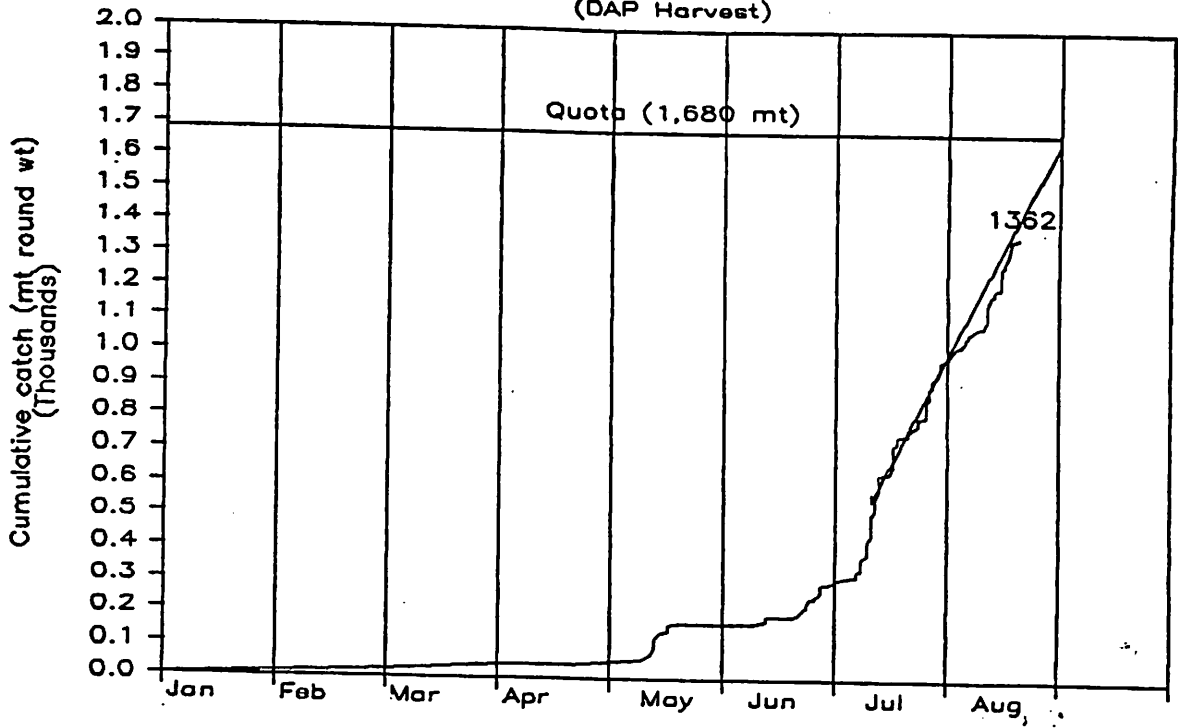
SPECIES	AREA	OY	RESERVE	DAP <sup>2/</sup>	JVP <sup>3/</sup>	DAH	TALFF
POLLOCK	W/C	400,000	80,000	2,023	190,000	192,023	127,977
	E	16,600	3,320	5	0	5	13,275
	TOTAL	416,600	83,320	2,028	190,000	192,028	141,252
PACIFIC COD	W	16,560	3,312	600	5,965	6,565	6,683
	C	33,540	6,708	8,691	8,200	16,891	9,941
	E	9,900	1,980	120	0	120	7,800
	TOTAL	60,000	12,000	9,411	14,165	23,576	24,424
FLOUNDERS	W	10,400	2,080	400	800	1,200	7,120
	C	14,700	2,940	1,486	3,000	4,486	7,274
	E	8,400	1,680	300	0	300	6,420
	TOTAL	33,500	6,700	2,186	3,800	5,986	20,814
P. OCEAN PERCH	W	2,700	540 <sup>1/</sup>	2,160 <sup>a</sup>	0 <sup>a</sup>	2,160	0
	C	7,900	1,580 <sup>1/</sup>	6,320 <sup>a</sup>	0 <sup>a</sup>	6,320	0
	E	875	175	136	0	136	564
	TOTAL	11,475	2,295	8,616 <sup>a</sup>	0 <sup>a</sup>	8,616	564
SABLEFISH	W	1,670	334 <sup>1/</sup>	1,336 <sup>a</sup>	0 <sup>a</sup>	1,336	0
	C	3,060	612 <sup>1/</sup>	2,448 <sup>a</sup>	0 <sup>a</sup>	2,448	0
	W. YAK	1,680	336 <sup>1/</sup>	1,344	0	1,344	0
	E. YAK	1,135	0	1,135	0	1,135	0
	S. E. OUT	1,435	0	1,435	0	1,435	0
	TOTAL	8,980	1,282	7,698 <sup>a</sup>	0 <sup>a</sup>	7,698	0
ATKA MACKEREL	W	4,678	936	0	3,400	3,400	342
	C	20,836	4,167	0	500	500	16,169
	E	3,186	637	0	0	0	2,549
	TOTAL	28,700	5,740	0	3,900	3,900	19,060
ROCKFISH	GW	7,600	1,520	2,947	1,765	4,712	1,368
THORNYHEAD	GW	3,750	750	40	10	50	2,950
SQUID	GW	5,000	1,000	100	10	110	3,890
OTHER SPECIES	GW	28,780	5,756	150	1,400	1,550	21,474
TOTAL		604,385	120,363	33,176	215,050	248,226	235,796

<sup>a</sup>Indicates of downward adjustment of results obtained from the NMFS Regional office survey.

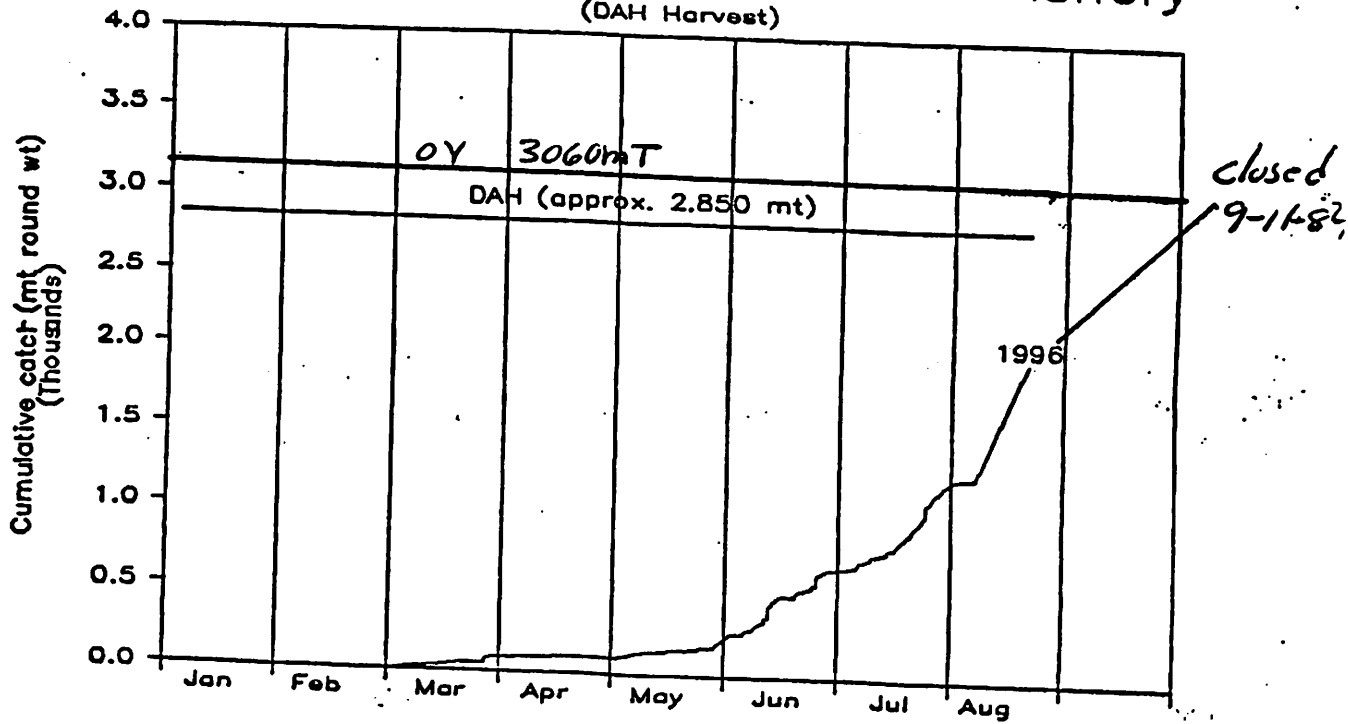
FOOTNOTES

- 1/ Most of the reserves will be apportioned to DAP. Some reserves may be needed for bycatch in joint venture and foreign fisheries for other species.
- 2/ DAP is set equal to the greater of the NMFS survey results or the projected NMFS 1984 catch, but less than or equal to 80% of the OY.
- 3/ JVP is set equal to the greater of the NMFS survey results of the projected NMFS 1984 catches, but less than or equal to the remainder of 80% of OY minus DAP.

# 1984 Western Yakutat Sablefish Fishery (DAP Harvest)



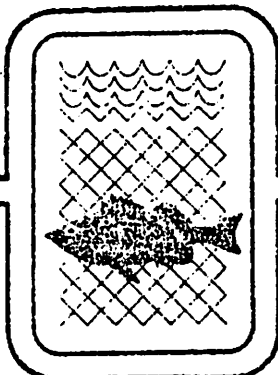
# 1984 Central Gulf Sablefish Fishery (DAH Harvest)



Landings in the Central Gulf FMP area are estimated at 1,996 metric tons round weight as of August 22. Assuming that DAH will be 2,850 metric tons, the fishery will reach this harvest level between Sept. 8 and Sept. 15 if the current rates of harvest continue.



RECEIVED OCT 19 1984



# ALASKAN FISHERIES COMPANY

335 West 4th Avenue, Suite 315  
Anchorage, Alaska 99501  
(907) 270-4551

ACTION	ROUTE TO	PRIORITY
	EXPO. DIST.	39
	Domestic Dist.	

October 17, 1984

Janet Smoker  
National Marine Fisheries Service  
Fisheries Operations Branch  
P.O. Box 1668  
Juneau, AK 99802

RE: Area Quotas Domestic Allocation

Dear Janet:

Please find enclosed an addition to our utilization survey which should reveal more clearly our true intentions for the 1985 fishing season.

Also we are intending to fish in the Eastern area on the way south this November for exploratory purposes.

We intend to fish in the Eastern areas for Pacific Ocean Perch next spring on our way up also, if this fall shows some sign. We feel these grounds may have good fishing prospects. They have not been used for many years now.

We really appreciate your help and flexibility in these matters. Getting a ground fish operation off the ground is not easy, but you folks have given us much confidence in our system.

Sincerely,

Ted H. West  
General Manager

Additional to 1985 NMFS Domestic Fishery Utilization Survey.

ALASKAN FISHERIES COMPANY

Eastern Areas

	Jan. - Jun.	Jul. - Dec.
Pacific Cod	300	300
Flounders	200	200
Pacific Ocean Perch	500	500
Rockfish	200	200
Sablefish	200	200

Aleutian Islands

Pacific Cod	600	600
Flounders	400	400
POP	1000	1000
Rockfish	400	400
Sablefish	400	400

RECEIVED SEP 2 5 1984

**THE HIGHLINERS ASSOCIATION**

4055 — 21st Avenue West

Seattle, Washington 98199

Telephone (206) 784-5818 or 285-3493

September 19, 1984

**President**  
Rudy A. Petersen  
**Vice President**  
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Marvin Stone  
Reidar Tynes  
Konrad S. Uri

ACTION	ROUTE TO	INITIAL
		M
		Y

Mr. Jim Branson  
Executive Director  
North Pacific Fishery Management Council  
P. O. Box 3136DT  
Anchorage, Alaska 99501

Dear Mr. Branson:

As you are aware, 1984 will show some significant advances in the development of U.S. fisheries in the Bering Sea and Gulf of Alaska. The sablefish catch by U.S. fishermen this year is likely to exceed 7,500 metric tons, resulting in closure to date of southeast Alaska, eastern Yakutat, western Yakutat and the central Gulf of Alaska. U.S. fishermen are currently engaged in what appears to be a very successful Pacific ocean perch fishery in the Gulf. The catch of Atka mackerel in joint venture fisheries reached OY and cod catches in the Bering Sea will be approximately 100,000 metric tons.

These development patterns plus an aggressive and continued pursuit of these fisheries in 1985 should provide the basis for termination of foreign directed fisheries for 1) sablefish throughout the Gulf of Alaska and Aleutians, 2) Atka mackerel in the Akutan/Bering Sea region, 3) Pacific ocean perch in the Gulf of Alaska and Aleutians, and 4) codfish in the Bering Sea. Comments on developments in each of these fisheries follow.

1. The rapidity of growth in the sablefish fishery seems to have caught many of us by surprise, although it was predicted by Bob Alverson. What we have seen for 1984 appears to be just the tip of the iceberg. The number of larger vessels gearing up

Mr. Jim Branson  
September 19, 1984  
Page 2

for the remainder of the fall season to fish both line and pot sablefish almost insures that next year's effort will double the 1984 season. A combination of factors appears to be fueling the rapid growth of the sablefish fishery. First, the price makes the fishery more attractive than it has been for the past several years; second, the investment of Japanese capital into the U.S. fishery has provided needed monies for conversion and gear purchase; third, the continued poor showing in the Alaska crab fisheries has left vessels searching for alternatives and willing to participate in less lucrative fisheries; and finally, the abbreviated halibut seasons have forced larger vessels into this fishery to seek alternatives during the halibut "recess" periods. Although we do not have firm figures on the number of new entrants for 1985, the addition of the Sablefish, Baranof, Courageous, Cordova, Arctic Mist, North Star and others should provide the impetus for total Americanization of the sablefish fleet next year. In our view, there is no basis for continuation of TALFF in the Gulf of Alaska and Aleutians region in 1985 unless there is a significant increase in OY.

2. The 1984 joint venture catch figures for Atka mackerel more than justify elimination of a TALFF in this fishery next year. It is our understanding that the initial JVP was exceeded by more than 17,000 metric tons.

3. U.S. fishermen caught about 57-65 thousand metric tons of cod in the Bering Sea through August and should end the year with a harvest of 80-100 thousand metric tons. With the increased number of factory trawlers that operate throughout the year, return of Trident, and increased interest in joint ventures, 1985 goals could reach 130-150 metric tons. This year's production has been hampered somewhat by difficulties in locating fish during the summer. Many fishermen stated that the stocks are at lower levels than in 1984. This may be attributed in part to increased competition between vessels. Lower catch rates have been aggravated by lower prices resulting from products imported into the U.S. market. Currently, factory trawlers are having some economic difficulty.

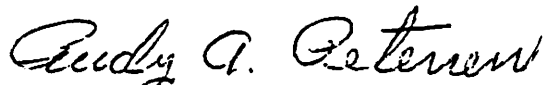
In considering OY and TALFF for cod in the Bering Sea, several factors need careful consideration: a) Stock sizes are anticipated to decline in 1985; b) U.S. effort will continue to increase; c) there is a great deal of uncertainty in annual stock estimates; and d) total U.S. industry harvest is targeted at 80 to 90 percent of the projected EY in 1985. We feel these

Mr. Jim Branson  
September 19, 1984  
Page 3

facts, combined with the purposes of the MFCMA, which state that it is the intent of Congress to encourage the development by United States' fishermen of fisheries that are currently underutilized or not utilized by U.S. fishermen, including groundfish off Alaska, and to that end to ensure that optimum yield determinations provide such developments, provide a more than sufficient basis to terminate directed fisheries for cod in the Bering Sea. Even if the total U.S. harvest projections for 1985 do not equal EY, the remainder need not be allocated to TALFF. The current economic problems confronting our cod fisheries, uncertainty of the future stock size, and a growing U.S. fishery, warrant the adjustment of OY, downward if necessary.

Many of the same arguments can be made for Pacific ocean perch. For the other two species, sablefish and Atka mackerel, the 1984 catch statistics and growth patterns appear to more than justify the requested termination of directed fisheries by foreigners.

Yours sincerely,



Rudy A. Petersen  
President