


M E M O R A N D U M

TO: Council, SSC and AP members
FROM: Strategic Planning Subcommittee 
DATE: September 25, 1984
SUBJECT: Draft Comprehensive Fishery Management Goals

ACTION REQUIRED

- (a) *Review public comments on draft comprehensive management goals and subcommittee recommendations and adopt final comprehensive management goals.*
- (b) *Appointment Council review teams for shellfish, bottomfish, halibut, salmon and herring to draft fisheries specific goals and objectives.*

BACKGROUND

At the May meeting, the Council accepted and released for public comment draft comprehensive fishery management goals. Those goals (Attachment A) were mailed to the public on June 11, 1984 along with a notice that any written comment should be submitted to the Council offices by August 15, 1984. The public was also notified that hearings on the goals would be held in Seattle, Washington on September 7, 1984 and in Anchorage on September 24, 1984.

On August 30, 1984 the Council, SSC and AP were mailed copies of written public comments submitted concerning the goals along with summaries of those comments. On September 14, 1984 the Council, SSC and AP were mailed a synopsis of the testimony from the September 7 public hearing in Seattle. Included with this memorandum as Attachment B is a synopsis of the September 24, 1984 public hearing held at the Council offices.

The Strategic Planning Subcommittee met on September 24 and September 25 to consider the testimony and written comments on the draft goals. The subcommittee redrafted some of the findings, the preamble and some of the goals and their explanations to reflect recommendations submitted by the public. A copy of the new subcommittee Draft Comprehensive Goals is included as Attachment C.

Recommendations submitted by the public but not adopted by the subcommittee are as follows:

1. the goals are not needed: the Council should, instead, operate under the MFCMA National Standards which provide adequate guidance for fishery management actions;

2. the comprehensive goals should be stated in more succinct terms so that their achievement may be measureable;
3. the Council must allow more time for industry review and participation in the setting of comprehensive management goals;
4. Goal 2 should be amended to read, "Ensure that society and those foreign nations that have cooperated with the U.S. fishing industry benefit from optimum utilization of the common property resources.";
5. Council goals should provide explicitly for protection of subsistence small scale fisheries engaged in by Alaska natives;
6. Council goals should provide explicitly for meeting treaty obligations to Indian tribes.

The subcommittee recommends the Council adopt the comprehensive management goals as amended and appoint Council review teams for shellfish, bottomfish, halibut, salmon and herring to draft fisheries specific goals and objectives based on the Council's comprehensive goals.

Since the fisheries specific goals and objectives will, in some cases, constitute fishery management plan amendments, a detailed impact analysis will be required before Council adoption of these specific goals and objectives. For this reason, the Council may wish to direct a review team to work on one fishery management plan as a pilot project with draft fisheries specific goals and objectives presented at the December 5-7, 1984 meeting. These drafts would then be released for public review with possible Council adoption at the March 27-29, 1985 meeting.

North Pacific Fishery Management Council

James O. Campbell, Chairman
Jim H. Branson, Executive Director

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June 11, 1984

TO PERSONS INTERESTED IN THE NORTH PACIFIC FISHERY MANAGEMENT COUNCIL'S
COMPREHENSIVE FISHERY MANAGEMENT GOALS:

Enclosed for your review and comment is a draft of the findings and comprehensive management goals that the Council will consider for adoption at its September 26-27, 1984 meeting. These findings and goals are the result of a month-long effort by an ad-hoc Council workgroup. The comprehensive goals, revised on the basis of public input and Council deliberations in September, are intended to convey a target or course for future action, and will serve as a basis for yet-to-be-developed strategies and subsequent management decisions. After the Council adopts comprehensive goals, specific goals and operational objectives will be drafted for each fishery within the Council's jurisdiction.

Because of expanding U.S. participation in fisheries in the Alaska Fishery Conservation Zone and experience gained over the last seven years with adopting fishery management goals on an ad-hoc basis, the Council has concluded that a set of comprehensive management goals is needed to guide its management actions. The Council wishes to emphasize that these comprehensive goals must be considered as an integrated whole, not as separable elements. Together they are intended to provide general guidelines for Council decisions, i.e., an array of targets to be considered in conservation and management of Alaska's fishery resources. The Council recognizes that these goals are not fully compatible and that many management decisions will require compromises among them; however, they believe that the goals provide defined targets for the decision process even though their full attainment may not always be possible.

These findings and goals were accepted by the Council on May 24, 1984 as drafts to be submitted to the public for review and comment. Written comments must be received at the Council offices by August 15, 1984. Comments should be addressed to:

NPFMC-Comprehensive Goals
P.O. Box 103136
Anchorage, Alaska 99510

When reviewing these goals and preparing written comments, it may be helpful to ask the following questions:

1. Is this a proper fisheries management goal?
2. Should this goal be expanded in scope?
3. Should this goal be narrowed in scope?
4. Should other comprehensive goals be included?

It would assist the Council in its deliberations if your written comments explained your answers to the questions and any other position you may have on this subject.

Public hearings will be held in Seattle on September 7, 1984 at the Northwest & Alaska Fisheries Center at 9:00 a.m. and in Anchorage on September 24 at the Sheraton Anchorage Hotel at 5:00 p.m. The Council will review all public comments and the draft findings and goals at its September 26-27 meeting in Anchorage.


Following is the schedule for development of comprehensive goals and fisheries-specific goals and objectives:

Schedule for Development of Comprehensive Management Goals
And Fisheries-Specific Goals and Objectives

- A. Acceptance of draft comprehensive goals - May 24, 1984
- B. Release of draft comprehensive goals for public review - June 8-15, 1984
- C. End of written comment period - August 15, 1984
- D. Public hearings - Seattle, Sept. 7, 1984/Anchorage, Sept. 24, 1984.
- E. Adoption of final comprehensive management goals - Sept. 26-27, 1984
- F. Appointment of Council review teams for shellfish, bottomfish, halibut, salmon and herring - Sept. 26-27, 1984

The review teams will draft fisheries-specific goals and operational objectives based on the Council's comprehensive goals. Since these fisheries-specific goals and objectives will in some cases constitute fishery management plan (FMP) amendments, detailed impact analyses will be required before Council adoption. For this reason, the Council may, at the September meeting, direct a review team to work on one FMP as a pilot project with draft fisheries-specific goals and objectives to be presented at the December 5-7, 1984 meeting. These drafts would then be released for public review with possible Council adoption at the March 27-29, 1985 meeting. The Council intends to solicit and consider public comment at every stage in this process.

Sincerely,


Jim H. Branson
Executive Director

attachments

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D R A F T

FINDINGS BY THE NORTH PACIFIC FISHERY MANAGEMENT COUNCIL
REGARDING FISHERY MANAGEMENT POLICY
May 1984

The North Pacific Fishery Management Council finds the following:

1. Marine and anadromous fish off Alaska, which comprise approximately 80% of the total fishery resources in the U.S. Fishery Conservation Zone, are a valuable and renewable natural resource which contributes significantly to the food supply, economy, health and recreational opportunities of the Region and the Nation.
2. The fishery resources off Alaska are the property of the United States and should be managed for the benefit of everyone in the U.S. in accordance with the provisions of the MFCMA.
3. The common property nature of fishery resources tends to cause overcapitalization in the industry, increases the chances of resource depletion, and decreases the incentive for conservation of the resource by the users.
4. Because fishery resources are limited, proper management requires allocation of fishery resources among users.
5. Commercial and recreational fisheries are a major source of employment and significant contributors to the economy of the Region and Nation. Full domestic utilization of resources off Alaska would increase their contribution and lessen the Nation's foreign trade imbalance by reducing domestic dependence on imported fish products.
6. The lack of timely and adequate data has hampered decision-making and management to the detriment of the resource and the economy.
7. Management of the fishery resources off Alaska requires consideration of all components of the ecosystem, including birds and mammals.

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8. The existing administrative process of management should be more timely and responsive and regional fisheries management and policy development should be fully embodied in the Council as intended by the MFCMA.
9. Clearly specified goals and objectives are necessary for development of a regional management system that will conserve and fully utilize the Region's fishery resources.

The Council therefore proposes the following comprehensive goals as the basis for managing the fishery resources in the FCZ off Alaska. These goals are to be considered as a unit, not as separate elements and the order of listing implies no priority.

- GOAL 1: ASSURE NATURAL PRODUCTIVITY OF FISH STOCKS THROUGH MAINTENANCE OF THE PRODUCTIVITY OF THE ECOSYSTEM.
- GOAL 2: ENSURE THAT SOCIETY AS A WHOLE BENEFITS FROM OPTIMUM UTILIZATION OF THE NATION'S COMMON PROPERTY FISHERY RESOURCES.
- GOAL 3: PROVIDE OPPORTUNITIES FOR ECONOMIC STABILITY, GROWTH AND SELF-SUFFICIENCY IN MARITIME COMMUNITIES.
- GOAL 4: ACHIEVE FULL UTILIZATION BY U.S. CITIZENS OF FISHERY RESOURCES IN THE FISHERY CONSERVATION ZONE OFF ALASKA.
- GOAL 5: MINIMIZE THE CATCH OF NON-TARGET SPECIES AND REDUCE THE ADVERSE IMPACTS OF ONE FISHERY ON ANOTHER.
- GOAL 6: MAINTAIN EXISTING U.S. FISHERIES WHILE ENCOURAGING DEVELOPMENT OF UNDERUTILIZED FISHERIES.
- GOAL 7: MANAGE EACH FISHERY TO ENCOURAGE A REASONABLE RATE OF RETURN TO THE FISHING INDUSTRY ON AGGREGATE INVESTMENT AVERAGED OVER THE LONG-TERM.
- GOAL 8: IMPROVE RESEARCH, DATA COLLECTION AND ANALYSIS, DECISION-MAKING, AND THE REGULATORY PROCESSES USED BY THE NORTH PACIFIC FISHERY MANAGEMENT COUNCIL.

Following is an explanation of how these goals will be employed in the Council's planning processes.

As the Council develops amendments to management plans and promulgates regulations governing related fisheries, it will be mindful of its responsibility to assure future productivity of fish stocks by guarding against overfishing,

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protecting critical habitat, and taking into account the varied interactions of those stocks with other elements of the ecosystem (Goal 1). At the same time, the Council will support the stability and economic well-being of the fishing industry and the communities dependent upon that industry. Contributing goals include full U.S. utilization of Alaska's fishery resources through domestic harvesting, processing, and distribution (Goal 4); assurance of fishery stability and productivity so that reasonable returns can be expected from investments in the fishery (Goal 7); and providing opportunities for maritime communities to participate in these economic and social benefits (Goal 3). In addition, the Council has an obligation both to the fishing industry and the general public to conduct its business efficiently -- to develop high quality information bases for decision-making, and to improve the timeliness and effectiveness of the entire decision-making process (Goal 8).

Beyond question, the Council's most difficult decisions usually will concern allocation of harvest privileges among competing users. Here the Council will seek to maintain established fisheries while at the same time encouraging development of fisheries presently not fully utilized by the U.S. industry (Goal 6). Maintenance of traditional fisheries is important to the well-being of maritime communities and to the stability of the economic market place, and to the degree possible, development of fisheries for underutilized resources should not be at the expense of those established fisheries. While the Council recognizes the inevitability of competition among users for a limited resource, the Council expects each fishery to develop harvest techniques which avoid needless by-catch waste of non-target species, and which minimize interference with other fisheries that depend upon the same species or fish the same grounds (Goal 5).

Finally, while the Council intends that its management practices and decisions provide all possible encouragement for a healthy and prosperous domestic fishing industry, the Council also is mindful of its responsibilities as custodian of a valuable portion of the Nation's common property resources, and the attendant responsibility to manage those resources for the benefit of society as a whole (Goal 2).

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Explanation of Goals

GOAL 1: ASSURE NATURAL PRODUCTIVITY OF FISH STOCKS THROUGH MAINTENANCE OF THE PRODUCTIVITY OF THE ECOSYSTEM.

This goal serves Purpose 1 of Magnuson Fishery Conservation and Management Act [Sec. 2(b)(1)], which is, "to conserve and manage the fishery resources found off the coasts of the United States, and the anadromous species and Continental Shelf fishery resources of the United States . . ." As set out in the Act, "conservation and management" refers to all the rules, regulations, conditions, methods, and other measures (A) which are required to rebuild, restore, or maintain . . . any fishery resource and the marine environment; and (B) which are designed to assure that (i) a supply of food and their products may be taken, and that recreational benefits may be obtained, on a continuing basis; (ii) irreversible or long-term adverse effects on fishery resources and the marine environment are avoided; and (iii) there will be a multiplicity of options available with respect to future uses of these resources." [Sec. 3(2)]

Issues and concerns to be addressed under this goal include:

(1) management practices

- a. preventing overfishing
- b. rebuilding depleted fish stocks
- c. minimizing waste of resources as by-catch
- d. maintaining the integrity and stock strength of individual species

(2) habitat quality

- a. minimizing damage by fishing gear
- b. reducing losses of fish, marine mammals and birds, due to derelict fishing gear and other marine debris
- c. concerns for coastal development impacts on critical habitats
- d. concerns for OCS developments: potential pollution and habitat destruction
- e. concerns for freshwater habitats of anadromous species

(3) food chain interdependency

- a. impacts of management on marine mammals and birds
- b. impacts of management on food chains--shifting prey-predator relations, etc.

GOAL 2: ENSURE THAT SOCIETY AS A WHOLE BENEFITS FROM OPTIMUM UTILIZATION OF THE NATION'S COMMON PROPERTY FISHERY RESOURCES.

This goal recognizes public ownership of fishery resources and the obligation therefore to serve the public interest under the optimum yield concept defined in MFCMA.^{1/} Its achievement requires recognition of diverse public concerns for securing consumer products at reasonable prices; access to recreational opportunities; achievement of economic viability for the fishing industry and supporting community services for the social and economic benefit of the Nation; and minimal public costs of resource management.^{2/}

Issues and concerns to be addressed under this goal include:

1. production of high quality fish products over the maximum season at acceptable prices;
2. provision for recreational opportunities;
3. economic self-sufficiency and viability of domestic fishing industry and supporting infrastructure (cf. Goals 4 and 5);
4. increased domestic fishery utilization and resultant reductions in negative balance of payments (cf. Goal 3);
5. generation of reasonable economic rent ^{3/} from utilization of publicly-owned resources; and,
6. positive benefit-cost ratio for public management operations.

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1. MFCMA National Standard 1 [Sec. 301(a)(1)] states:
"Conservation and management measures shall prevent overfishing while achieving, on a continuing basis, the optimum yield from each fishery." Optimum yield is defined [Sec. 3(18)] as follows: ". . . the amount of fish (A) which will return the greatest overall benefit to the Nation, with particular reference to food production and recreational opportunities; and (B) which is prescribed as such on the basis of the maximum sustainable yield from such fishery, as modified by any relevant economic, social, or ecological factor." (Emphasis Added)
 2. MFCMA National Standard 7 [Sec. 301(a)(7)] states: "Conservation and management measures shall, where practicable, minimize costs and avoid unnecessary duplication."
 3. i.e., The return to the resource as a factor of production in addition to capital and labor.

GOAL 3: PROVIDE OPPORTUNITIES FOR ECONOMIC STABILITY, GROWTH AND SELF-SUFFICIENCY IN MARITIME COMMUNITIES.

For existing as well as developing fisheries, consideration should be given to how management programs will affect the economic conditions of maritime communities (e.g., what effect does a short, intense fishing season have on such communities?). A maritime community is a coastal community whose structure, in part, depends on adjacent fishery resources and industry. Improving the opportunity for these maritime communities to enhance their self-sufficiency can benefit the Region and the Nation.

Economic conditions can be enhanced by:

1. stabilizing the flow of fishery-related revenues through a community so that revenues occur during longer and more regular periods of time throughout the year. This is more beneficial than short, intermittent bursts of activity;
2. increasing the opportunities for fishery-related economic activity; and thereby
3. fuller and more consistent utilization of fishery resources.
4. extending, within biological limits, the availability of fishery resources to the industry over the longest feasible season. This strategy recognizes that maximum benefits from a fishery may be generated by rationalizing harvest effort and product flow to market and will tend to:
 - a. discourage overcapitalization;
 - b. minimize waste;
 - c. minimize gear conflicts;
 - d. prevent overfishing;
 - e. minimize cost of management;
 - f. minimize costs of labor and operations;
 - g. encourage wise planning;
 - h. provide a steady supply of high quality/low cost fishery products to consumers; and,
 - i. stabilize the seafood industry and maritime communities.

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GOAL 4: ACHIEVE FULL UTILIZATION BY U.S. CITIZENS OF FISHERY RESOURCES IN THE FISHERY CONSERVATION ZONE OFF ALASKA.

This goal recognizes the economic importance of this nation's fishery resources and the need for U.S. citizens to reap full benefits of those resources. Issues and concerns to be addressed under this goal include:

1. U.S. balance of trade deficits;
2. domestic processing capabilities and economic incentives;
3. fluctuations in employment in maritime communities;
4. equitable allocation among domestic user groups;
5. development of underutilized fisheries;
6. domestic vs. foreign markets;
7. tax incentives (or disincentives);
8. capabilities of domestic fleets;
9. open entry vs. limited access;
10. implementation of "fish and chips"; and,
11. promotion of non-commercial domestic marine fisheries.

GOAL 5: MINIMIZE THE CATCH OF NON-TARGET SPECIES AND REDUCE THE ADVERSE IMPACTS OF ONE FISHERY ON ANOTHER.

The intent behind this goal is to encourage the development of gear and techniques that reduce the catch of non-target species. This could include such methods as regulating mesh sizes, time and area closures or economic disincentives for by-catch species. Reduction of by-catch will lessen the impact on other fisheries directly and even on the subject fishery if the catch of pre-recruits of the target species is reduced. In addressing this goal, it should be recognized that a by-catch is, in fact, an allocation from the Total Allowable Catch of the by-catch species. When such allocations are made, consideration must be given to the total economic value to the competing fisheries. Management should strive to reduce or eliminate non-productive or damaging by-catches and sources of conflict between fisheries.

Issues and concerns to be addressed under goal include:

1. gear conflicts;
2. competition for fishery grounds;
3. timing of seasons;
4. conflict for harvesting, processing or support capabilities;, and,
5. gear impact on habitat.

GOAL 6: MAINTAIN EXISTING U.S. FISHERIES WHILE ENCOURAGING DEVELOPMENT OF UNDERUTILIZED FISHERIES

Fishery management measures should promote and support the economic viability of existing U.S. fisheries to the greatest extent practicable. The domestic development of underutilized fisheries should not be permitted to interfere with traditional U.S. fisheries except when overriding and significant benefits to the Region and the Nation can be demonstrated.

Issues and concerns addressed under this goal include:

1. the present share of the resource available to existing fisheries; and,
2. the economic and social stability in fisheries and communities.

GOAL 7: MANAGE EACH FISHERY TO ENCOURAGE A REASONABLE RATE OF RETURN TO THE FISHING INDUSTRY ON AGGREGATE INVESTMENT AVERAGED OVER THE LONG-TERM.

This can be accomplished by encouraging investments at a level to generate a reasonable rate of return. This rate should be comparable to other high risk variable industries.

Issues and concerns to be addressed under this goal include:

1. fishery management should be such that the fishing industry can rationally deploy its capital and labor;
2. harvest effort levels and management strategies affecting operating costs should be such that economic returns to the industry are optimized;
3. coordination of tax incentives and other subsidy programs with aspects of fishery management;
4. evaluation of shipping and trade regulations that may impede expansion of the domestic fishing industry; and,
5. evaluation of management strategies such as reduction of regulated inefficiencies, control of investment incentives and limited entry.

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GOAL 8: IMPROVE RESEARCH, DATA COLLECTION AND ANALYSIS, DECISION-MAKING, AND THE REGULATORY PROCESSES USED BY THE NORTH PACIFIC FISHERY MANAGEMENT COUNCIL.

This goal addresses the need for an adequate information base for decision-making which: (1) includes relevant biological, economic and social information; (2) is properly formatted and documented; and (3) is provided early in the decision-making process to allow adequate analysis, public review and application to issues of concern. The goal also recognizes current impediments to effective and timely implementation of fishing regulations due to Federal administrative requirements for FMP approval. Also recognized is the need to remove unnecessary impediments to management while still retaining straight-forward processes for public review of management proposals.

SUMMARY OF PUBLIC TESTIMONY
on
DRAFT COMPREHENSIVE FISHERY MANAGEMENT GOALS

Anchorage, Alaska
September 24, 1984

The North Pacific Fishery Management Council conducted a public hearing on its draft comprehensive fishery management goals at the Council offices in Anchorage, Alaska, on September 24, 1984. The hearing was chaired by Sara Hemphill. Other Council and staff members in attendance were: John Harville, Henry Mitchell, Rudy Petersen, John Peterson, John Winther, Ron Miller and Pat Travers. The hearing began at 5:00 p.m. and ended at approximately 6:15 p.m. A synopsis of the testimony is given below.

ALLEN SCHMITT (Alaska Legal Services Corporation, representing Ben Golodoff of Unalaska, Alaska). Mr. Schmitt read into the record his written comments dated August 13, 1984 that had been previously submitted on the goals and objectives. A copy of these written comments, forwarded to all Council, AP and SSC members on August 30, 1984, are included with this synopsis as Attachment 1. The essence of the written submission is that the Council should adopt a separate goal that would protect subsistence and small-scale fishing as practiced by Alaska natives. This separate goal should also recognize that the subsistence lifestyle is a part of our country's heritage and deserves to be protected.

OLIVER HOLM (Kodiak Halibut Fishermen's Assn). The Council does not need these goals as such since there are already adequate goals in the Magnuson Fishery Conservation and Management Act. The comprehensive goals as drafted are vague. Finding #2 would better be stated to indicate that the fishery resources belong to the people of the United States and not to the government of the United States because the government is using the goals and the MFCMA to take fishery resources away from the population like in Latin American countries where a few own all the basic resources and the rest of the people are serfs. Finding #3 is inaccurate because the tax laws, fishery cycles, and economic cycles actually cause overcapitalization and not the common-property nature of the fishery resource. Goal 1 is a good goal but it's already stated in the MFCMA. Goal 2 is vague and could be used by the National Marine Fisheries Service to allocate the resources away from the people. Goal 3 sounds good, but in actuality there is no economic stability that the government can enforce on a fishery. A government cannot forecast the ups and downs of a fishery and therefore cannot guarantee economic stability. The Council may do more harm than good in the long run in trying to enforce a specific goal of economic stability on the industry. Goal 7 is too narrow in focus. The Council must manage all fisheries together as a complex. It is impossible to look at each fishery and gear type and set long-term goals for that fishery or gear type. Goal 8 is a good goal, but the Council isn't working toward achieving that goal at the present.

ERIC JORDAN (Fisherman - Sitka, Alaska). The goals must be measurable in order that they may be evaluated at a later date to determine progress toward achievement. These goals do not do that. The Council must define the purpose of these goals succinctly. It is important to establish goals that set a

direction for the Council, especially when the membership on the Council changes. New members may have personal management strategies and goals for fisheries that differ from those of their predecessors. The Council should go back to the MFCMA and start its goal-drafting process over. The draft comprehensive goals are too general and the Council should define immediate directions for fisheries management and work toward those directions.

Goal 1 should be amended to read, "Preserve the natural productivity of fish stocks through maintenance of the historical productivity of the ecosystem and, where economically and biologically feasible, to artificially enhance the productivity of those stocks."

KIM HAN MO (Korea Deep Sea Fisheries Assn). The speaker read into the record written comments from his association dated September 24, 1984 and included with this synopsis as Attachment 2. KDSFA recommended that Goal 2 should be rewritten to read, "Ensure that society and those foreign nations that have cooperated with the U.S. fishing industry benefit from optimum utilization of the common property fishery resources." Goal 4 should be rewritten to replace "full utilization by U.S. citizens" with "optimum utilization by U.S. citizens."

DENNIS PETERSEN (North Pacific Fishing Vessel Owner's Assn). The speaker recapped the testimony given at the September 7 hearing in Seattle, Washington, and the testimony at the present Anchorage hearing. He asked the Strategic Planning Subcommittee what would be done with the public comments on the draft goals and what recommendations would be made to the full Council. Chairwoman Hemphill responded that the Council would be presented with all written comments and summaries of the public testimony from the two public hearings, as well as recommendations from the Strategic Planning Subcommittee. Ms. Hemphill also said that she could not at present state what those recommendations would be because the Subcommittee had not met to consider the comments received at the hearing.

Subcommittee member John Harville affirmed the Subcommittee's intent to present to the Council all recommendations received from the public, even those not adopted by the Subcommittee.

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August 13, 1984
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4. inventorying those areas solely dependent on small scale and subsistence fishing; and
5. assessing other relevant economic, social, or ecological factors involved.

We trust the NPFMC will address these concerns in the final comprehensive management goals.

Sincerely,

ALASKA LEGAL SERVICES CORPORATION



ALAN L. SCHMITT
Supervising Attorney

ALS/rjm

cc: Ben Golodoff

KOREA DEEP SEA FISHERIES ASSOCIATION

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#10-1, 2GA. HOIHYUN-DONG.
SEOUL. KOREA

REF NO: _____
DATE : Sept. 24 1984

To: NPFMC-Comprehensive Goals
P.O. Box 103136
Anchorage, Alaska 99510

Re: COMMENT ON NORTH PACIFIC FISHERY MANAGEMENT
COUNCIL'S COMPREHENSIVE FISHERY MANAGEMENT GOALS

Korean fishing fleet has been fishing in Alaska water since 1960's and this water is a vital fishing ground for Korean fleet throughout the world. Particulary, the water off Alaska are the major fishing grounds for Korean trawlers today because of limited access. Also Korea has very a strong ties and good cooperation with the U.S. fishing industry here and Korea values this relationship highly.

If the proposed fishery management goals are established as written, it seems to us that the Korean fishing industry will be directly affected and we will be forced for economic reasons to reduce our cooperative effort with the U.S. industry. For a long time, Korea has fished in this area, and has cooperated with U.S. in many ways. We would like to suggest some of the goals be rewritten to achieve better benefit and welfare for U.S. fishing industry and the foreign nations that have devoted their effort for mutual interest.

Korean wishes to make the following comments:

First, goal 2

We recommend that goal 2 be rewritten to read:
"Ensure that society and those foreign nations that have cooperated with the U.S. fishing industry benefit from optimum utilization of the common property fishery resources."

As dictated in MFCMA, the resource is publicly owned and must be utilized fully so as not to waste any harvestable level in any given year. We realize that the existing system already provides priority for U.S. fishermen, however foreign partners that have cooperated to U.S. fishermen should have some priority also for the opportunity to participate in this fishery.

Second, goal 4

We strongly recommend that the words "full utilization by U.S. citizens" be rewritten to read "optimum utilization."

In the draft, the economic importance of this resource is indicated and stressed. The language implies that full utilization by the U.S. will result in maximum or optimum utilization and benefit to the U.S.

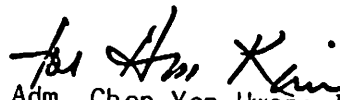
As we review your concerns and consider the factors that influenced you in establishing this goal, we would like to point out that our reaction to language may be different from what you might expect.

Most of nations fishing in this area have cooperated with U.S. in trade, fishing policy and joint venture to the extent that that particular nation could afford it. And most have, we believe, operated in good faith.

We have no doubt that these nations will continue to extend cooperation with your fishing industry in future. Full utilization implies to us total, immediate phase out of all foreign fleets. This threat will lead to inhibit rather than encourage investment and cooperation from our private sector.

Full utilization by the U.S. may come in future, but at this time using the words "Optimum Utilization" will, we believe, facilitate cooperation and best benefit the U.S. as a whole.

Sincerely yours,


Adm. Chon Yon Hwang (Ret)
President

FINDINGS BY THE NORTH PACIFIC FISHERY MANAGEMENT COUNCIL
REGARDING FISHERY MANAGEMENT POLICY
May 1984

The North Pacific Fishery Management Council finds the following:

1. Marine and anadromous fish off Alaska, which comprise approximately 80% of the total fishery resources in the U.S. Fishery Conservation Zone, are a valuable and renewable natural resource which contributes significantly to the food supply, economy, health and recreational opportunities of the Region and the Nation.
2. The fishery resources off Alaska are the property of the United States and should be managed for the benefit of everyone in the U.S. in accordance with the provisions of the MFCMA.
3. The common property nature of fishery resources tends to cause over-capitalization in the industry, increases the chances of resource depletion, and decreases the incentive for conservation of the resource by the users.
4. Because fishery resources are limited, proper management requires allocation of fishery resources among users.
5. Commercial and recreational fisheries are a major source of employment and significant contributors to the economy of the Region and Nation. Full domestic utilization of resources off Alaska would increase their contribution and lessen the Nation's foreign trade imbalance by reducing domestic dependence on imported fish products.
6. The lack of timely and adequate data has hampered decision-making and management to the detriment of the resource and the economy.
7. Management of the fishery resources off Alaska requires consideration of all components of the ecosystem, including birds and mammals.

D R A F T

8. The existing administrative process of management should be more timely and responsive and regional fisheries management and policy development should be fully embodied in the Council as intended by the MFCMA.
9. Clearly specified goals and objectives are necessary for development of a regional management system that will conserve and fully utilize the Region's fishery resources.

NORTH PACIFIC FISHERY MANAGEMENT COUNCIL
COMPREHENSIVE MANAGEMENT GOALS

INTRODUCTION

The nine Comprehensive Fishery Management Goals which follow are intended to convey targets for future Council action -- a sense of direction for the course of fishery management over the next decade. They must be considered as an integrated whole, not as separable elements, and some address values conflicting with those in other goals. The order of listing does not imply priority.

These Comprehensive Goals will serve as a basic framework for fishery-by-fishery development of specific goals, operational objectives, and strategies for ultimate incorporation into fishery management plans. All goals should be considered in the context of the amplifying statements, issues and concerns appended to them.

The Council fully accepts and endorses the purposes, policies, and seven National Standards mandated by the Congress in the Magnuson Fishery Conservation and Management Act (MFCMA). Briefly summarized, these National Standards require that the Council and its Fishery Management Plans (FMPs):

1. will not allow overfishing, and will manage for optimum yield;
2. will use the best available scientific information;
3. will manage a stock throughout its range;
4. will not discriminate among residents of different states;
5. will promote efficient utilization of fishery resources;
6. will be flexible;
7. will manage in a cost-effective fashion.

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The Council's Comprehensive Goals are consistent with these national mandates, and are intended to supplement and apply them to specific issues and needs of the Region. Because socio-economic aspects of fishery development in the Gulf of Alaska and Bering Sea require particularly complex and difficult decisions, a major proportion of Council Goals address the need for amplification of the National Standards as applied to these aspects. In this context, consistent with the MFCMA, the term "United States fishing industry" refers to the full range of economic activities that are related to the harvesting, processing, marketing, and transportation of fish by nationals and vessels of the United States.

Following is an explanation of how these goals will be employed in the Council's planning processes.

As the Council develops amendments to management plans and promulgates regulations governing related fisheries, it will be mindful of its responsibility to assure future productivity of fish stocks by guarding against overfishing, protecting critical habitat, and taking into account the varied interactions of those stocks with other elements of the ecosystem (Goal 1). At the same time, the Council will support the stability and economic well-being of the fishing industry and the communities dependent upon that industry. Contributing goals include optimum U.S. utilization of Alaska's fishery resources through domestic harvesting, processing, and distribution (Goal 4); assurance of stability of fishery management processes to promote reasonable returns from investments in the fishery (Goal 7); and providing opportunities for maritime communities to participate in these economic and social benefits (Goal 3). In addition, the Council has an obligation both to the fishing industry and the general public to conduct its business efficiently -- to develop high quality information bases for decision-making, and to improve the timeliness and effectiveness of the entire decision-making process (Goals 8 and 9).

Beyond question, the Council's most difficult decisions usually will concern allocation of harvest privileges among competing users. Here the Council will seek to minimize the negative impacts on established fisheries of developing

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fisheries for underutilized species by the U.S. industry (Goal 6). Maintenance of traditional fisheries is important to the well-being of maritime communities and to the stability of the economic market place, and to the degree possible, development of fisheries for underutilized resources should not interfere with those established fisheries. While the Council recognizes the inevitability of competition among users for a limited resource, the Council expects each fishery to develop harvest techniques which avoid needless by-catch waste of non-target species, and which minimize interference with other fisheries that depend upon the same species or fish the same grounds (Goal 5).

Finally, while the Council intends that its management practices and decisions provide all possible encouragement for a healthy and prosperous domestic fishing industry, the Council also is mindful of its responsibilities as custodian of a valuable portion of the Nation's publicly-owned resources, and the attendant responsibility to manage those resources for the benefit of society as a whole (Goal 2).