

M E M O R A N D U M

TO: Council, AP and SSC Members
FROM: Jim Branson *JSB*
Executive Director
DATE: May 5, 1982
SUBJECT: Gulf of Alaska Groundfish

ACTION REQUIRED

Final action on the remaining parts of Amendment #11 on sablefish. Approval of Amendment #12 on pollock DAH. Consideration of gear conflict resolution by NMFS Regional Director.

BACKGROUND

I. AMENDMENT #11 ON SABLEFISH

A. Council Actions in March

At the March meeting the Council lowered the sablefish OY from 13,000 mt Gulf-wide to 8,200 mt, changed the sablefish Equilibrium Yield (EY) in the FMP from 17,400 - 19,800 mt to 10,965 mt Gulf-wide (the EY had been calculated as 14,000 mt in 1979, but the FMP was not updated), and continued the Davidson Bank as a domestic fishing sanctuary. The Gulf groundfish minutes from March are included as Agenda Item D-5(f) for your reference.

The following parts of Amendment #11 still require final Council action:

1. The Determination of DAH and Reapportionment of Reserve and Unutilized DAH.
2. The Alaska Longline Fishermen's Association proposal to make sablefish an exclusive hook and line fishery east of 140°W.
3. The ALFA proposal to close the sablefish fishery from December 15 to March 15.
4. Domestic Reporting Requirements.
5. Field order authority for the NMFS Regional Director to adjust time and/or area restrictions on foreign fisheries for conservation reasons.

B. PMT Recommendations in March on the Unresolved Parts of Amendment #11

1. The determination of DAH and reapportionment of reserve and unutilized DAH

The PMT recommends that the following procedure, put forth by the National Marine Fisheries Service, be adopted.

Derivation of DAH, Reserve, and TALFF Amounts

Initial DAH amounts for each species or species group established for the beginning of the fishing year shall equal the amount of those species harvested by domestic fishermen during the previous year plus any additional amounts the Regional Director projects to be necessary to satisfy the needs of the growing domestic fishery. These supplemental amounts will be based on projected increase in (1) U.S. processing capacity and/or intention to process and (2) U.S. harvesting capacity and/or intention to harvest. The initial reserve amounts for domestic fishery expansion will equal 20 percent of the OY for each species or species group. The TALFF amounts for each species or species group will be established from the following equation: $TALFF = OY - (DAH + Reserve \text{ for domestic fishery expansion})$.

Reapportionment of Reserve and Unneeded DAH

At any time, the Regional Director may assess DAH and apportion to DAH any amounts from the reserve for domestic fishery expansion that are needed in order to prevent a closure of the domestic fishery. As soon as practicable after April 1, June 1, August 1, and on such other dates as he determines necessary, the Regional Director may apportion to TALFF any portion of DAH or the reserve for domestic fishery expansion that he determines will not be harvested by United States fishing vessels during the remainder of the fishing year.

When the Regional Director determines that apportionment is required on dates other than those scheduled and that immediate action is necessary to increase a TALFF or DAH amount, he may decide that such an adjustment is to be made without affording a prior opportunity for public comment. Public comments on the necessity for, and the extent of the apportionment, shall then be submitted to the Regional Director for a period of 15 days after the effective date of such action.

If the Council adopts this methodology, DAHs and Reserves for all groundfish species in the Gulf of Alaska may change in 1983, based on the 1982 domestic harvest.

2. The ALFA proposal to make sablefish an exclusive longline fishery east of 140°W

The PMT has not received enough information to evaluate this proposal and therefore does not have a position on it.

Comments on this subject from the March briefing books have been included as Agenda Items D-5(b),(c), and (d).

3. The ALFA proposal to close the sablefish fishery from December 15 to March 15

The team received no new information on the biology of sablefish which would indicate that there are winter spawning concentrations which need to be protected. The team, therefore, does not recommend a winter closure of the sablefish fishery at this time.

4. Domestic reporting requirements

Based on the public testimony received and the desire to minimize the regulatory burden on domestic fishermen, the team recommends that domestic fishing vessels report their catch or advise the management agencies by radio or telephone of their departure before leaving Alaskan waters.

5. Field order authority for the NMFS Regional Director to adjust time and/or area restrictions on foreign fisheries for conservation reasons

The Council staff reported at the January 1982 meeting that the Council should consider adding to Amendment #11 a provision for the NMFS Regional Director to issue field orders to adjust time and/or area restrictions on foreign fisheries for conservation reasons. This provision is now in the FMP but applies only to domestic fisheries. We suggest that the same language be added to the management measures for foreign fisheries.

C. AP and SSC Action in March on the Unresolved Parts of Amendment #11

1. The determination of DAH and reapportionment of reserve and unutilized DAH

AP: The AP endorsed the SSC proposal for determining DAH.

SSC: The SSC still supports their proposed method of determining DAH and reserve, i.e. that DAH equal the previous year's catch of record and any anticipated increase over last year's catch be put in reserves rather than in DAH.

The NMFS Region comment on this approach is in your briefing books as Agenda Item D-5(a).

2. The ALFA proposal to make sablefish an exclusive longline fishery East of 140°W

AP: The AP recommended that between Cape Addington and 140°W Pot fishing not be allowed due to gear conflict problems and based on historical deployment of pot gear in the Southeast Alaska region.

SSC: The SSC believed that this proposal may conflict with one of the plan objectives but makes no recommendations.

3. The ALFA proposal to close the sablefish fishery from December 15 to March 15

AP: The AP recommended against this closure at this time.

SSC: The SSC received no new information on the proposed amendment and therefore cannot support this proposed closure.

4. Domestic reporting requirements

AP: No comment from the draft minutes.

SSC: The SSC supports the need for this information and supports reporting requirements which acquire the information at the least cost to the industry.

5. Field order authority for the NMFS Regional Director to adjust time and/or area restrictions on foreign fisheries for conservation reasons

AP: No action.

SSC: No action.

D. Information on the March 1982 Council Action to Lower the Sablefish OY from 13,000 mt to 8,200 mt

The 8,200 mt OY is approximately 75% of the 10,965 EY which the Council accepted as the best available information in March. The March Council action also changed the number of sablefish management areas by consolidating Yakutat East of 140°W and Southeast, and designating a separate OY for Yakutat west of 140°W. The distribution of OY and EY resulting from the March Council motion is given in Table 1.

TABLE 1
Gulf of Alaska Sablefish
Distribution of 8,200 mt OY

	<u>Western</u>	<u>Central</u>	<u>Eastern</u>	
			<u>W of 140°W</u>	<u>E of 140°W</u>
EY	2,225	4,075	2,240	2,425
OY	1,660	3,050	1,680	1,810

At the April 29, 1982 Plan Maintenance Team (PMT) Meeting, the PMT considered whether or not separate OY's should be designated for the Southeast and Yakutat East of 140°W areas, given that separate EYs had been designated for the areas. The PMT made no recommendation on this question because no consensus was reached on the necessity for such an action. The PMT pointed out that although separate OYs may minimize the possibility of short term overfishing, separate OYs could force fishermen to fish in areas where traditionally low CPUEs would not justify added expenses. This would tend to retard the development of the domestic fishery.

Additionally the PMT noted that with the OYs as the Council designated them in March, the possibility of localized depletions is minimal. The PMT believes that it is probable that if Southeast stocks were to further decline, declining CPUEs would cause fishermen to seek other grounds or stop fishing before depletion occurred. Also, as already stated in the March 11 PMT report, recent studies indicate greater movement of sablefish than previously suggested and this would tend to mitigate the effects of localized fishing effort in the Southeast. Furthermore, the estimates of EY are directly related to the pot surveys in Southeast, and as discussed in the April 29 PMT report, may be underestimated.

If the Council decides to designate separate OYs for Southeast and Yakutat East of 140° based on 8,200 mt Gulf-wide OY, the OYs would be as given in Table 2.

Table 2
Eastern Gulf of Alaska Sablefish
Possible EY and OY for SE, Yakutat W and E of 140°W

	<u>Yakutat W of 140°W</u>	<u>Yakutat E of 140°W</u>	<u>Southeast</u>
EY	2,246	1,135	1,290
OY	1,680	850	960 (460 in FCZ)

Five hundred metric tons will have to be excluded from the Federal Regulations in the Southeast due to the harvest in State managed waters. Therefore only 460 mt would be available in the FCZ off Southeast.

The April 29, 1982 PMT report which was mailed to you on May 7th discusses the 10,965 mt Gulf-wide EY. The PMT makes no additional recommendations at this time, but does request that the next status of stocks document consider the following points:

1. Sablefish growth is still very much a question. Using a slower growth rate than Balsiger's (1981) would result in a lower EY. Future EY calculations should be appropriately qualified as to the likely accuracy of the growth rate used.
2. It is unclear whether the Council wants to manage the sablefish resource exclusively for fish over 67 cm (5 lbs dressed weight), or maintain the status quo. Managing for this larger size fish will result in a much lower EY value.
3. The quality and quantity of sablefish data from the Yakutat area make its use in EY calculations questionable. An effort should be made to obtain better data.
4. The Zenger pot survey (1981) showed a 50% decline in relative abundance of sablefish in Southeast in 1981. The team notes that this is a precipitous unexpected decline, based on estimated rates of mortality and recruitment. The team considered

that the 50% decline shown by Zenger (1981) may be due to a decrease in availability of sablefish to the survey gear. This possibility would result in an underestimate of the EY for Southeast. The effect of changes in availability on the survey results and the EY estimates should be examined in the next status of stocks documents.

II. AMENDMENT #12 ON POLLOCK DAH

A. Increase Pollock DAH in the Central Gulf

The joint venture fisheries in the Central Gulf of Alaska have been highly successful during the first quarter of 1982. As of April 3, joint venture pollock catches totaled 66,531 mt.

The current FMP allocates only 7,940 mt of pollock for joint ventures in the Central Gulf. Reserves are only 19,040, totaling 26,980 mt. Unless the FMP is amended to increase DAH, there will be a shortfall of at least 39,551 mt in 1982.

Unallocated pollock TALFF currently totals 40,490 mt. NMFS and the State Department have withheld further pollock allocations pending Council action. In order to ensure enough pollock for the domestic fishery, all 40,490 mt should be designated for DAH by the Council for the 1982 fishing year.

In order to assure enough pollock for DAH in 1983, the Council should also consider reallocating all or part of the allocated TALFF to DAH for 1983 and the foreseeable future.

As of April 23, foreign pollock allocations in the Central Gulf of Alaska are as follows:

Japan	- 16,320 mt
Korea	- 5,610 mt
West Germany	- <u>420 mt</u>
Total	22,350 mt

B. Status of the Pollock Stocks

Currently, pollock MSY Gulf-wide is estimated to be 169,000 mt to 338,000 mt. The MSY range for the individual management areas has not been calculated, although ABCs are given in the FMP which total the low end of the MSY range. For the Central Gulf, ABC equals 95,200 mt, which is also the OY.

The Gulf of Alaska PMT has not met to consider the current pollock Optimum Yield or any possible decrease or increase. Nor has the PMT met to discuss the status of the pollock stocks.

We have been informed that a scientist from the Northwest and Alaska Fisheries Center may be present at this meeting to answer questions about the Gulf of Alaska pollock resource.

III. RESOLUTION OF GEAR CONFLICTS

Part 5 of Amendment #8 has been officially disapproved. This part would have given the NMFS Regional Director authority to resolve gear conflicts using time and area adjustments. The amendment wording and the letter explaining the disapproval are under Agenda Item D-5(e).

Specific deficiencies cited in the disapproval letter were: (1) the amendment contained no criteria for reopening an area after it had been closed to foreign fishing; (2) a lack of procedure to selectively enforce a closure on different foreign nations and/or different gear types; (3) a failure to specify the status of joint venture foreign processing vessels under such a closure; (4) no specification of limits to areas which can be closed and the determination of such limits; (5) no criteria to determine the length of a closure; (6) no provision to allow for affected vessels to leave a closed area; (7) failure to allow affected parties to comment on proposed closures; and (8) "no provisions to assure that OY will be achieved."

Given these comments the Council may want to reconsider its policy of giving the Regional Director field order authority for time-area closures to resolve gear conflicts between foreign and domestic fishermen.

IV. STATUS OF AMENDMENT #10

Amendment #10 which lowers the Pacific ocean perch OY in the Eastern area from 14,400 mt to 875 mt and restricts foreign trawlers to pelagic gear is scheduled to be implemented by June 1, 1982. Under the former management regime, foreign fishing with bottom trawls would have resumed in the Eastern area on June 1, 1982.

Longline Survey clearly indicates that there is a size/age directed short-term migration of sablefish and that the resource needs to be managed on a Gulf-wide basis. A 6100 Gulf-wide OY will provide for as rapid as possible a rebuilding rate, both in terms of absolute abundance and size composition while insuring the existence of an on-going domestic fishery.

NPL Proposal to Allow Foreign Longlining in the Davidson Bank Area

ALFA continues to oppose the reopening of the Davidson Bank area to foreign fishing for either Pacific cod or sablefish. We believe that domestic efforts for Pacific cod will continue to expand in this area and further that the depressed condition of the sablefish resource renders any increased foreign effort on that stock unjustifiable.

ALFA Proposal to Prohibit the Use of Pots for Taking Sablefish E. of 140° W

In September, 1981, ALFA proposed that the use of sablefish pots be prohibited E of 140° W longitude. In November, we supplied substantial written testimony in support of this proposal. During the December council meeting, the Council urged the various concerned user groups to meet and discuss various options that might be used to resolve the problems outlined. Such a meeting was held on January 19, 1982 in Seattle.

A report on this meeting was prepared by Henry Haugen and forwarded to the Council in a letter dated January 22, 1982. ALFA believes that the report prepared by Mr. Haugen represents a fair and accurate summary of the proceedings. Two points which arose at this meeting are relevant to this portion of Amendment #11. On page two, number six of the meeting summary, the participants agreed that because there is no present or planned domestic trawl fishery for sablefish East of 140°, that there is no need at this time for restrictions on the domestic trawl fishery in this area. Secondly, on page 3, the summary correctly points out that ALFA offered as an alternative to a pot restriction in the entire FCZ East of 140°, a closure from 140° east to Cape Addington. Our review of ADF&G data regarding sablefish catches by gear type and management area (Table 1, ALFA testimony) and the discussions held at the user group meeting leads us to believe that using Cape Addington as a dividing line between pot and longline areas fairly represents the historical distribution of catch by gear type. Additionally, it should be pointed out that the Southeastern area (INPFC) contains the smallest area of productive sablefish grounds in the Gulf and that ALFA's proposal

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Jim Branson, Executive Director


pot restriction from Cape Addington to 140° W leaves the majority of the FCZ open to pot fishing as well as longlining and trawling. Consequently, ALFA proposes that the North Pacific Fisheries Management Council recommend to the Secretary that the use of pots for harvesting sablefish be prohibited from the latitude of Cape Addington West to 140° W longitude. For a complete discussion of ALFA's rationale for this proposal, please see our written testimony dated November 16, 1981.

Winter Closure for Sablefish

We continue to believe that a winter closure of the sablefish fishery will be in the best interest of the resource and the development of improved markets. For a complete discussion of ALFA's proposal for a winter closure, please see our written testimony dated November 16, 1981. ALFA notes that all the industry groups attending the January 19th meeting referenced above, supported a winter closure. Additionally, the Seattle Fishing Vessel Owners Association supported a winter closure from December 1 to February 15. Because the primary issue involved is one of product quality, marketability and value, we urge the Council to accept the industry's recommendations.

Thank you for the opportunity to comment further on this FMP Amendment.

Sincerely,


F. Gregory Baker
President

FGB:cd

JAN 28 1982

Haugen and Thoreen

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HAROLD A. THOREEN
LISE KENWORTHY

HENRY HAUGEN

January 22, 1982

Mr. Jim Branson
Executive Director
North Pacific Fishery
Management Council
P. O. Box 3136DT
Anchorage, Alaska 99510

Re: Amendment #11, Gulf of Alaska Groundfish Plan

Dear Jim:

Pursuant to the encouragement of the North Pacific Fishery Management Council, a meeting of interested domestic user groups was held in Seattle on January 19, 1982, to attempt to resolve some of the differences as to the proposals being considered by the North Pacific Fishery Management Council as it relates to the sablefish fishery in the Gulf of Alaska, and in particular in the fishery conservation zone adjacent to Southeast Alaska. A list of the attendees is attached and generally represented the domestic longline, pot, and trawl fishermen who are interested in this fishery.

Specifically addressed were the proposals made by ALFA (Alaska Longline Fishermen's Association) to restrict the present level of fishing. This letter is intended to be a report on the conclusions of that conference, and a copy is being provided other participants for their comments to ensure accuracy.

I particularly note with pleasure the willingness of all user groups to sit down at an informal conference such as this and honestly discuss their differences. The areas of agreement are as follows:

1. Fishermen feel that the present market is too dependent on Japanese influence with wide fluctuations in the prices realized with resulting disruption to orderly fishing operations. There was agreement that additional markets should be developed with emphasis on the domestic market.

2. Fishermen expressed an uneasiness with the status of the resource and felt that there was a distinct need for greater scientific attention to management. There is much contradictory information available, but without a more unanimous scientific

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January 22, 1982
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opinion, there was not a consensus as to steps which should be taken to better manage the resource.

3. The participants agreed that serious consideration should be given to establishing a minimum size limit of 5 lbs. round, or 3 lbs. dressed, for all landed sablefish. It is desired that there be scientific input into the validity of this or a similar size limit and that there must be greater input from domestic fishermen before there be any size limit established. It is felt that the fish smaller than the proposed limits have a poor market value and taking of the smaller fish probably is not the wisest use of the resource.

4. The participants agreed that there should be a winter closure in the fishery conservation zone running from approximately December 15 to March 15. During the winter months the quality is poor due to spawning of the sablefish, the weather is bad, and such a closure might prove beneficial to the resource.

5. There is a consensus that a considerable amount of lost and abandoned gear, primarily of foreign origin, is unfavorably impacting the fishery. An effort should be made to remove this gear by the National Marine Fisheries Service, probably acting through a charter arrangement with a U. S. vessel. This would probably prove to be the most beneficial thing that the government could do for the fishermen.

6. Because there is no present or planned domestic trawl fishery in the area which impacts the sablefish resource, there is no real need at the present time for restrictions on the domestic trawl fishery.

There was a failure to reach an agreement or consensus on the major issues presented, that is the need for a reduction in the Optimum Yield or the ALFA proposal to restrict the sablefish to hook and line east of 140° west. A number of possible alternatives were discussed to avoid conflicts, but none seemed to be able to adequately address the issue. This is essentially a conflict between pot fishermen and longliners. Both groups fish in depths of approximately 150 to 700 fathoms. Neither group sets in a predictable pattern as to either depth or direction. Though buoys and flags are utilized, they are not effective in indicating in which direction the gear might lie. Though many make a serious attempt to communicate by radio with other fishermen, some do not, and the level of cooperation cannot be expected to be 100%. One difference noted was that pots can fish on a

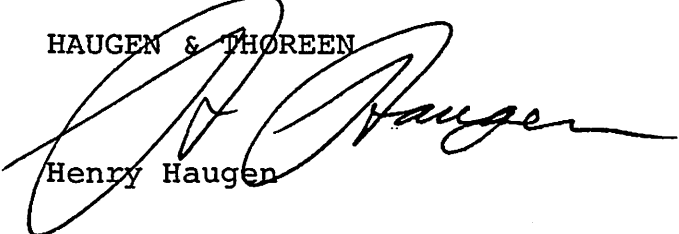
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January 22, 1982
Page Three . . .

so-called slime bottom, whereas longline gear cannot. This differentiation appears inadequate to form the basis for any regulatory control. If the longline gear tangles with the pot gear, the longline gear comes out the loser as it is generally of lighter construction. A discussion proposal was made such that the closure to pot gear would run from Cape Addington to 140° west, rather than from Dixon Entrance, but, again, there was no agreement as to this alternative.

After a suitable period passes for comments by other participants, this report may be placed before the Council, recognizing that each group fully reserves the right to comment further as to its position on the proposed changes.

Very truly yours,

HAUGEN & THOREEN



Henry Haugen

HH;ljw
Enclosure

cc: Richard Goldsmith
Greg Baker
Al Burch
Jake Phillips
Virgil Gordon
Jim Goldade
Rudy Johanson
Steve Hughes

SABLEFISH FISHERMEN MEETING

Seattle, Washington
January 19, 1982

<u>NAME</u>	<u>GEAR TYPE</u>	<u>ORGANIZATION</u>
Richard Goldsmith	Trawl & Crab Pot	NPFVOA
Greg Baker	Longline	ALFA
Al Burch	Trawl	ADA
Jake Phillips	Longline	ALFA
Dwight Chapin	Pot	----
John Phillips	Longline	ALFA
Linda Olin	Longline	ALFA
Wilbur Olin	Longline	ALFA
Virgil Gordon	Pot Fisherman	Vessel owner
James Goldade	Pot Fisherman	Vessel owner
Steve Hughes	----	N. R. C.
Henry Haugen	----	Attorney
Jim Branson	----	NPFMC

March 2, 1982

Mr. Jim H. Branson
Executive Director
North Pacific Fishery Management Council
P. O. Box 3136 DT
Anchorage, Alaska 99510

Dear Jim:

We appreciate the opportunity to respond to Amendment #11 and related material, including the Terry/Balsiger paper and Bracken's February draft report on sablefish migration.

We would first like to introduce ourselves. We are the "Coalition for Open Ocean Fisheries" representing a newly formed focal point of fishery interests, consisting of many familiar faces. By way of introduction, we offer our policy statement.

As a position, we support an open ocean multiple-fishery-use concept within the U.S. FCZ by domestic fisheries and oppose the establishment of special interest fishing zones, exclusion zones, exclusive gear use or limited entry. This position embraces conservation through sound management so long as it does not involve closure of fishing grounds or gear restrictions which promote privileged use of fishery resources at the expense of other users of the resource and the national interest as addressed in the MFCMA.

We are dedicated to the resolution of conflicts among domestic user groups, should they arise, by means of negotiated settlement whenever possible rather than government intervention and regulation.

Our membership presently includes 1) North Pacific Fishing Vessel Owners Association, 2) The Highliners Association, 3) Marine Resources Company, 4) Royal Viking, Inc., 5) Fishing Ventures International, Inc., 6) American No. 1 Fisheries, and 7) Ocean Spray Fisheries.

Mr. Jim H. Branson
March 2, 1982
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Our views on Amendment #11 and related material follow.

Sablefish EY and OY. Fishing experience, research surveys and most scientific evidence indicate that Gulf of Alaska sablefish stocks have undergone a long history of decline and that significant recovery has not occurred. The Coalition for Open Ocean Fisheries supports option #6 of Amendment #11, as described on page 3 of the 12/16/81 draft, which reduces the Gulfwide OY from 13,000 mt to 10,435 mt and assigns specific OY's for the Western, Central and Yakutat Areas west of 140°W and EY/ABC for the Yakutat east of 140°W and Southeastern Areas.

ALFA Proposal. This proposal requests that the FMP be amended to allow harvest of sablefish by hook and line gear only, east of 140°W and to close the sablefish fishery for four months from November 15 to March 15.

The Coalition for Open Ocean Fisheries strongly opposes the total ALFA proposal. The proposal appears founded solely on special interests of ALFA to the exclusion of all others. Statements of resource damage due to trawl and pot gear, gear conflicts and grounds preemption are largely without merit. The arguments supporting a winter closure are viewed largely as a means of closing grounds during bad weather when ALFA vessels cannot operate in coastal areas. Pot vessels have operated successfully when longline vessels have not suggesting that implementation of a longline fishery only closes a viable gear option and may promote inefficiency.

North Pacific Longline-Gillnet Association Proposal. This is a proposal to exempt foreign longliners from the Davidson Bank closure.

The Coalition for Open Ocean Fisheries opposes foreign longlining in the Davidson Bank closure area. U.S. cod fisheries are growing rapidly, totaled about 30,000 mt in 1981 and are likely to double in 1982. U.S. salt cod operations in the western Gulf-eastern Aleutian regions will be particularly important in 1982. All target foreign fisheries on cod should be halted.

Terry/Balsiger Economic Analysis. This analysis pertains to one user group, ALFA. No consideration to other groups was given. The results must be interpreted as supporting a limited entry fishery. We would favor similar economic analysis of fishing operations by larger longliners and pot vessels for the purpose of comparison before conclusions are drawn.

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Bracker's Sablefish Migration Theory. Migration theories Bracken presents are interesting but have some technical problems because no consideration was given to fishing efforts and, hence, opportunities to capture tagged fish. His recommendation that Gulf of Alaska sablefish be managed as one stock appears counter-productive to other conservation measures. Sablefish fisheries have long shown that local depletion often occurs as a result of intense localized fisheries. In the midst of a stock rebuilding program, it seems that several regional harvest guidelines within the Gulf of Alaska areas, such as the INPFC areas, would promote stock rebuilding. Because most of the Gulf areas are fished by the Japanese, measures to reduce intense fishing in small areas appears advantageous.

Sincerely,

Rudy A. Petersen
Pres, Highliners association

Haare Ness - President
Rogae Viking Inc.

Haare Ness
Pres. North Pacific Fishing Vessel Owner Assoc

Kenneth R. Petersen, American No 1 -

Annis Petersen
Ocean Spray Fisheries, Inc

Severin O. Gelle

Highliners Association

Bill V. Perquin Vice Pres. & General Manager
Marine Resources Co.



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Washington, D.C. 20235

	Exec. Dir.	F/CM6:AMA
	Deputy Dir.	
JAN 28 1982	Admin. Off.	
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	Telephone Rm.	
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Mr. Clement Tillion
Chairman, North Pacific
Fishery Management Council
P.O. Box 3136DT
Anchorage, Alaska 99510

Dear Clem,

On January 11, 1982, I disapproved the remaining portion (Part 5) of Amendment 8 to the FMP for Gulf of Alaska Groundfish--the part authorizing the NMFS Regional Director (RD) to issue field orders to resolve gear conflicts between foreign trawlers and domestic fixed-gear fishermen. I did so, not because I am opposed to delegating authority to the RD, but because this part of Amendment 8 was vague and incomplete. Also, with the approval of Amendments 9 and 10, which filled most of the need for the field order authority, I decided that it would be better to wait for the Council to submit an amendment that was complete and precise rather than implement this part of Amendment 8 as written. I realize that even with Amendments 9 and 10 it may be desirable for the RD to have authority to issue field orders for resolving gear conflicts in the Gulf of Alaska.

I decided the amendment was incomplete and unclear for several reasons. For example, although the amendment states that "field orders may open or close fishing areas or parts thereof . . .," it contains no criteria for opening an area after it has been closed. Also, the criteria fail to specify whether a closure would apply to some or all foreign nations, to some or all gear types (i.e., does foreign trawling mean off-bottom as well as on-bottom trawling?), to harvesting-only as well as processing and harvesting/processing vessels, and to processing vessels engaged in a joint venture with domestic harvesting vessels. Further, the criteria fail to specify limits to areas that can be closed, how those limits will be determined, how long the areas would be closed, and how many days would elapse between announcement of an order and its effective date (i.e., how long would foreign vessels have to leave the grounds?). Finally, the amendment fails to specify what procedures, if any, are available for concerned parties to comment on proposed closures, and it contains no provisions to assure that OY will be achieved.



The Council could remedy most of the shortcomings in Part 5 by writing the criteria and procedures more precisely. For example, specify what categories of vessels would be stopped from fishing; would a closure apply to all foreign fishing vessels, or only to those of one type of gear from one nation? Would restrictions on bottom trawling apply to domestic as well as foreign fishermen? If not, why not? How long would a field order stay in effect? What criteria would allow the RD to rescind the field order and reopen the area? Although there appeared to be no insuperable legal problems in delegating this field order authority to the RD, the Council should provide assurance that the OY would likely be achieved, that non-excluded foreign fishermen would have opportunities to harvest their allocation, and that excluded foreign fishermen would have an opportunity to be heard.

I regret that we took so long with this part of Amendment 8, but it was a precedent-setting concept and required careful consideration of the legal and policy issues.

Sincerely yours,



William G. Gordon
Assistant Administrator
for Fisheries

Amendment B, part 5

(b) The Regional Director or his designee shall have the authority to issue field orders for time and/or area restrictions on foreign vessels to solve gear conflict problems between domestic fixed gear fishing operations and foreign trawlers. The field orders may open or close fishing areas or parts thereof to solve such situations. There has been a demonstrated inability to react to gear conflict problems in a timely manner (e.g., the foreign trawl fishery and domestic crab pot fishery near Kodiak Island in 1979). The authority above would help solve this problem. The criteria are:

- (1) More than two gear loss reports have been sub-mitted in person or by radio to NMFS or Coast guard detailing--(a) amount of gear lost, (b) date set and date gear was found missing, (c) observations of foreign vessels operating in area, identified, if possible by call letters, and (d) other pertinent information on a gear conflict situation. Reports of gear loss must be confirmed by affidavit at the earliest opportunity.
- (2) Foreign vessels are verified by NMFS or Coast Guard to have been operating in the area of conflict.
- (3) A Coast guard or NMFS patrol unit has visited the area and confirmed the general gear conflict situation as indicated by reports.
- (4) Foreign vessels in area have been contacted by patrol unit or by radio message advising of the gear conflict, defining the problem area, and requesting that the foreign vessels depart the area voluntarily.
- (5) Foreign vessels decline to depart area and domestic fixed gear fishing is continuing and the need for a specific closure is clear.

D-5 Gulf of Alaska Groundfish FMP

Proposed Amendment #11 to the Gulf of Alaska Groundfish FMP has been under Council review since the September 1981 meeting. There have been three public mailings, on October 2 and December 16, 1981 and February 16, 1982. The public comment period for the amendment ended on March 5, 1982.

The Plan Maintenance Team met on March 9-11 to consider the implications of sablefish migration for management, the comments received on the proposed amendment, and to evaluate available options for determining sablefish optimum yield. A copy of the PMT's report is made a part of these Minutes as Appendix VI.

After reviewing all available information on the migration of sablefish, the PMT concluded that:

1. Long-distance interchange of sablefish between management areas does occur. Seasonal movements to and from spawning grounds possibly also occur. The extent of the interchange appears to be greater than has been previously reported in the literature.
2. Different opportunities for recapture and differential reporting of recovered tags by fleet or season could bias the estimated rate of migration but not change the conclusion that east-west migration of sablefish occurs in the Gulf.
3. Bracken's estimated migration rates probably provide an upper bound on the actual long-distance migration rates; however, this estimate has not been corrected for any bias which may arise from different recapture opportunities.
4. Additional research and analysis are needed to more precisely estimate the pattern and rates of sablefish migration.
5. Sablefish should be managed as a unit stock although catch limits for each major management area should be maintained to avoid the possibility of area depletion, to control interception of fish moving from one area to another, and to allow the harvest of locally spawned and resident stocks.
6. The question of sablefish migration is less important if the objective of Amendment #11 is to provide for the development of the domestic sablefish fishery Gulf-wide as opposed to only revitalizing a domestic fishery concentrated in Southeast Alaska.

The PMT recommended that the Council adopt a Gulf-wide sablefish optimum yield of 6,100 mt for the following reasons:

1. It will enable a more rapid recovery of the sablefish resource when compared to the higher levels of OY proposed.

2. It will provide a sufficient amount of sablefish to enable expansion of the directed sablefish fisheries in the Gulf of Alaska.
3. It will provide for an incidental sablefish catch in the trawl fisheries and foreign longline fisheries for Pacific cod.
4. It will allow for a 20% reserve, which is consistent with the current management regime and necessary for domestic fishery expansion.
5. Based on the results of the simulation model designed by Joseph Terry and James Balsiger, there would be positive net earnings in 1983 and a 32% increase in gross earnings for the period 1981-84.

The PMT recommended that the suggestion put forth by the National Marine Fisheries Service for the determination of DAH and reapportionment of reserves and unutilized DAH be adopted:

Derivation of DAH, Reserve, and TALFF

"Initial DAH amounts for each species or species group established at the beginning of the fishing year shall equal the amount of those species harvested by domestic fishermen in the previous year, plus any additional amounts the Regional Director projects will be necessary to satisfy the needs of the growing domestic fishery. These supplemental amounts will be based on projected increases in:

1. U.S. processing capacity and/or intention to process; and
2. U.S. harvesting capacity and/or intention to harvest.

The initial reserve amounts for domestic fishery expansion will equal 20% of the OY for each species or species group. The TALFF amounts for each species or species group will be established from the following equation: $TALFF = OY - (DAH + Reserve \text{ for Domestic Fishery Expansion})$."

Reapportionment of Reserve and Unutilized DAH

"At any time the Regional Director may assess DAH and apportion to DAH the amounts from the reserve for domestic fishery expansion that are needed in order to prevent a closure of the domestic fishery. As soon as practicable after April 1, June 1, August 1, and on such other dates as are determined necessary, the Regional Director may apportion to TALFF any portion of DAH or reserve for domestic fishery expansion that he determines will not be harvested by United States fishing vessels during the remainder of the fishing year. When the Regional Director determines that apportionment is required on dates other than those

scheduled and that immediate action is necessary to increase a TALFF or DAH amount, he may decide that such an adjustment is to be made without affording the opportunity for public comment. Public comments on the necessity for and the extent of the reapportionment may then be submitted to the Regional Director for a period of 15 days after the effective date of such action."

The PMT discussed the North Pacific Longline and Gillnet Association's proposal to allow foreign longlining in the Davidson Bank area and recommended that this proposal not be adopted, as domestic fishermen are using the area more now than previously for bait fishing and the salt cod fishery.

The PMT did not evaluate the Alaska Longline Fishermen's Association's proposal to establish an exclusive hook and line fishery east of 140°W because it had not received enough relevant information for a proper evaluation.

The PMT received no new information on the biology of sablefish which would indicate that there are winter spawning concentrations which need to be protected by a winter closure as proposed by ALFA. For this reason, the PMT did not recommend a winter closure in the sablefish fishery at this time.

Based upon public testimony and comments received and the desire to minimize the regulatory burden on domestic fishermen, the PMT recommended that domestic fishing vessels report their catch by radio or telephone before leaving Alaskan waters.

Jim Crutchfield of Natural Resources Consultants, Seattle, reported the results of an evaluation of technical reports used as background information in developing Amendment #11. Natural Resources Consultants was retained by the Japanese North Pacific Longline and Gillnet Association to evaluate the assumptions made in those reports. The conclusion of the evaluation was that the need for additional studies using all kinds of evidence bearing on questions on the inter-relationships of sablefish stocks is apparent and the need is greatest off Alaska, where the most contradictory results have recently been forthcoming. Dr. Crutchfield said that consideration of the entire of body of evidence strongly supports their view that sablefish do form localized and discreet adult stock units; however, such a situation would not exclude the possibility that extensive movement of juveniles does take place. This could mean that any particular stock is at least partially dependent upon outside recruitment. Natural Resources Consultants concluded that the recent evidence of significant stock interchange within the Gulf of Alaska cited in proposed Amendment #11 in support of a Gulf-wide OY should undergo further examination. Assumptions, methodologies, and differences by nationalities in the degree of reporting of tag recoveries could greatly influence the conclusion about movements drawn from any tagging study.

In reviewing the Terry/Balsiger simulation model for sablefish in the Gulf of Alaska, Natural Resources Consultants concluded that the model seems too skimpy to be used as a management tool for a fishery which includes a much broader range of vessels having different characteristics and operational modes. They suggested that a re-worked and corrected version of the model using data for appropriate classes of vessels, CPUE's, and better cost and price data would be required for assessing alternative management strategies.

Public Testimony

Mick Stevens and Barry Fisher, speaking on behalf of the Coalition for Open Ocean Fisheries, elaborated on a letter written to the Council explaining the position of their group, particularly as it relates to Amendment #11. The Coalition is a newly formed group of fishery interests which supports an open ocean, multiple fishery use concept within the U.S. FCZ by domestic fisheries and opposes the establishment of special interest fishing zones, exclusion zones, exclusive gear use, or limited entry. Their position embraces conservation through sound management so long as it does not involve closure of fishing grounds or gear restrictions which promote privileged use of fishery resources at the expense of other users of the resource and the national interest as addressed in the MFCMA. The group is dedicated to the resolution of conflicts between domestic user groups by means of negotiated settlement whenever possible, rather than government intervention and regulation.

The Coalition for Open Ocean Fisheries supports a Gulf-wide OY of 10,435 mt and specific, assigned OY's for the Western, Central, and Yakutat area west of 140°W, and an EY/ABC for the Yakutat east of 140°W and Southeast areas. The Coalition opposes the ALFA proposal for an exclusive hook and line sablefish fishery east of 140°W and the winter closure from November 15 to March 15; and also opposes allowing foreign longliners to fish in the Davidson Bank area.

James Goldade, testifying on behalf of pot fishermen in general, said he opposed the ALFA proposal for an exclusive hook and line fishery for sablefish east of 140°W.

Mark Lundston, vice president of the Deep Sea Fishermen's Union, testified on the difficulties the Union members have faced in the last year or so in locating sufficient quantities of marketable-sized sablefish upon which to concentrate their fishing efforts in the Central and Western regulatory areas of the Gulf.

Henry Haugen presented a report on a January 19, 1982 meeting of interested domestic user groups to attempt to resolve some of the differences between them relating to management proposals contained in Amendment #11. Attendees at the meeting represented domestic longline, pot, and trawl fishermen interested in the sablefish fishery. The fishermen agreed that the present market is too dependent upon Japanese influence, with wide fluctuations

in prices and resulting disruption to orderly fishing operations. They also agreed that additional markets should be developed with emphasis on the domestic market. Fishermen expressed uneasiness with the status of the resource and agreed that there is a distinct need for greater scientific attention to management. The participants agreed that serious consideration should be given to establishing a minimum size limit of five pounds round or three pounds dressed for all landed sablefish and that there should be a winter closure in the FCZ from approximately December 15 to March 15. The group felt that a considerable amount of lost and abandoned gear, primarily of foreign origin, is adversely affecting the fishery and that this gear should be removed by the National Marine Fisheries Service, probably acting through a charter arrangement with a U.S. vessel. Because there is no present or planned domestic trawl fishery in the area which would harvest the sablefish resource, the group felt there is no real need at this time for restrictions on the domestic trawl fishery. The group did not reach a consensus on the major issues presented, i.e., the need for reduction in optimum yield for sablefish or the ALFA proposal to restrict the sablefish fishery to hook and line only east of 140°W.

Paul MacGregor, representing the Japanese North Pacific Longline and Gillnet Association, said that their Association developed the sablefish longline fishery in Southeast Alaska and the resulting sablefish markets in Japan. He spoke in favor of allowing foreign longliners to fish in the Davidson Bank area. The Japanese North Pacific Longline and Gillnet Association favors a Gulf-wide of OY of 10,435 mt.

Greg Baker, President of the Alaska Longline Fishermen's Association, testified in favor of the management objective recommended by the Plan Maintenance Team that the sablefish resource be managed to provide for the development of the domestic sablefish fishery Gulf-wide. ALFA supports the recommendation of the Alaska Department of Fish and Game and the Board of Fisheries for a Gulf-wide sablefish OY of no more than 6,100 mt; opposes the opening of the Davidson Bank area to foreign longliners; and supports the proposal for an exclusive hook and line sablefish fishery east of 140°W longitude. ALFA continues to support their proposal for a winter closure in the sablefish fishery both to aid the resource and for the development of improved markets.

SSC and AP Reports

The SSC recommended that the Council establish a new EY for sablefish in the Gulf of Alaska of 10,965 mt Gulf-wide to be allocated among the various management areas as follows:

Western	2,225 mt
Central	4,075 mt
Yakutat west of 140°W	2,240 mt
Yakutat east of 140°W	1,135 mt
Southeast	1,290 mt

The SSC was unable to reach agreement on which of the alternatives for optimum yield they could recommend because SSC members were unable to resolve their differences in opinion on growth, migration, or the economic consequences of the various OY levels.

The SSC reviewed the December 21, 1981 letter from National Marine Fisheries Service on the proposed procedure for determining DAH and the reserve amounts. The SSC continued to support its own proposed method for determining DAH and reserve. They noted that it was not their intention to restrict the release of reserves to DAH to the schedule for release of reserves to TALFF. The SSC felt that the release of reserves to DAH should be accomplished as needed in accordance with the performance of the domestic industry.

The SSC recommended that the Gulf-wide OY value be allocated between management areas and sub-areas in accordance with the latest estimates of EY. The SSC supported the need for reporting requirements which acquire the necessary information at the least cost to the industry. They made no recommendation on the proposal to open Davidson Bank to foreign longliners; or the ALFA proposal to make the sablefish fishery east of 140°W an exclusive longline fishery. The SSC did not support the ALFA proposal for a winter closure.

The Advisory Panel endorsed the PMT's management objective to manage the sablefish resource to provide for the development of the domestic sablefish fishery Gulf-wide. The Advisory Panel recommended an optimum yield of 6,100 mt to be distributed as follows:

Western	1,238 mt
Central	2,067 mt
Eastern	2,595 mt

The AP also endorsed the PMT proposal for determining DAH and reserves, recommended that Davidson Bank not be opened to foreign longliners, and opposed the ALFA proposal for a winter closure. They recommended that pot fishing for sablefish not be allowed between Cape Addington and 140°W longitude because of gear conflict problems, but did recommend that pot fishing be allowed in the area from Dixon Entrance north to Cape Addington based on historical pot fishing activity in the area.

Council Action

Don Bevan moved that the Council accept the SSC's recommendation for an EY of 10,965 mt to be distributed over the five management areas; seconded by Gene DiDonato. Upon call for the question, the motion carried on a vote of 6 to 1 with James Brooks in objection.

Don Collinworth then moved that the Council set the optimum yield for the sablefish fishery Gulf-wide at 6,100 mt. There was no second for this motion.

Don Bevan moved that the Council establish the optimum yield for each management by reducing the equilibrium yield of 10,965 mt for each of the five areas by 10%; seconded by Harold Lokken. Upon call for the question, the motion failed on a vote of 6 to 1, with James Brooks, Don Collinsworth, Kirk Beiningen, Clem Tillion, Harold Lokken, and Gene DiDonato in objection.

Gene DiDonato moved that the Council adopt the SSC's alternative #2 for an optimum yield of 8,200 mt Gulf-wide, to be distributed among the five management areas; seconded by Harold Lokken.

Donald Bevan requested concurrence of the mover to amend the motion that for the Southeast area, DAH would be less than or equal to OY. Gene DiDonato concurred with the amendment to the motion.

James Brooks requested concurrence of the mover to amend the motion to combine the optimum yields for the Yakutat east of 140°W and Southeast management areas, even though optimum yield for those areas would then be greater than the equilibrium yield. The motion was subsequently withdrawn by the mover.

James Brooks moved that the Council adopt SSC option #2 for a Gulf-wide optimum yield of 8,200 mt allocated as shown in the SSC's Minutes, except that optimum yields for the Yakutat east of 140°W and Southeast areas would be combined. The motion was seconded by Gene DiDonato. Upon call for the question, the motion carried by a vote of 5 to 2 with Don Collinsworth and Donald Bevan in objection.

Harold Lokken moved that the Council reject the Japanese North Pacific Longline and Gillnet Association proposal that Davidson Bank be opened to foreign longlining; seconded by Don Bevan. There being no objection, it was so ordered.

Due to loss of a quorum, remaining Council action on Amendment #11 to the Gulf of Alaska Groundfish FMP was deferred to the May meeting.

D-6 Bering Sea/Aleutian Islands Groundfish FMP

The Council was scheduled to review and possibly take action on the establishment of a U.S. Fishery Development Zone in the Bering Sea to protect areas of high fish concentrations traditionally favored by domestic fishermen. Due to time constraints of the meeting, action on this agenda item was deferred to the May Council meeting.



AGENDA D-5 Suppl.
 MAY 1982
UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
 NATIONAL MARINE FISHERIES SERVICE
 Washington, D.C. 20235

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	Sec. 720	

MAY 6 1982

Honorable Slade Gorton
 United States Senate
 Washington, D.C. 20510

Dear Senator Gorton:

Thank you for your letter of April 19, 1982, conveying concerns expressed by your constituent, John Martin.

Mr. Martin makes three specific recommendations. Recommendations 1 and 3, involving the Pacific cod total allowable level of foreign fishing and joint venture activity around Kodiak, require action on the part of the North Pacific Fishery Management Council (Council). I note that Mr. Martin, appropriately, has sent a copy of his letter to the Council. You might encourage Mr. Martin to continue interacting with the Council.

Mr. Martin's second recommendation concerns the foreign fishing fee for pollock in the Gulf of Alaska. In 1982, we increased the fee per metric ton of pollock substantially from the 1981 fee (from \$14.00 in 1981 to \$23.00 in 1982). We probably will revise the fee schedule for 1983. As in past years, any revision will consider the value of the raw product.

Thank you for asking us to comment on your constituent's concerns.

Sincerely yours,

William G. Gordon
 for William G. Gordon
 Assistant Administrator
 for Fisheries

cc: F, F/CM, F/CM6(2), Fx31, GCF, NPFMC, F/AKR, CA, CA(2)

F/CM6:NMFS:CBribitzer:634-7449:4/26/82:sp (d)
 Revised:CBribitzer:5/3/82:las (f)

Control No. NMFS - 208

United States Senate

WASHINGTON, D.C. 20510

April 19, 1982

National Marine Fisheries Service
NOAA
Washington, D.C. 20235

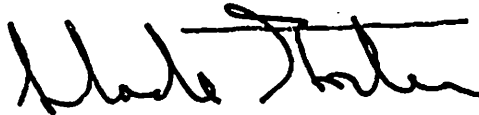
Dear Sir:

Enclosed please find a copy of a letter from Alaska Food Company, Inc. As you will note, this constituent is concerned with foreign competition.

I would appreciate your consideration of their comments on this issue.

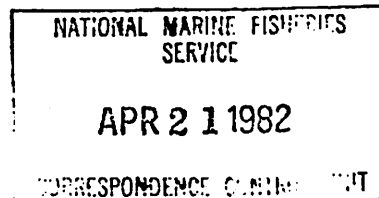
Thank you for your attention to this inquiry.

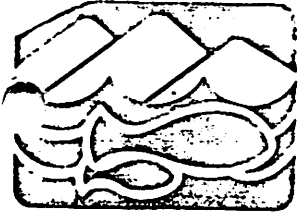
Sincerely,



SLADE GORTON
United States Senator

SG:cck
Enclosure





ALASKA FOOD COMPANY, INC.

February 22, 1982

The Honorable Slade Gorton
Commerce, Science and
Transportation Committee
U.S. Senate
5202 Dirksen Senate Office Bldg.
Washington, D.C. 20510

My Dear Senator Gorton:

Alaska Food Company, Inc. (AFC) owns and operates a shore-based bottomfish filleting facility in Kodiak, Alaska, producing frozen Alaska Pollock and Alaska Cod fillets for the U.S. market. As such, we are the only shore-based plant currently producing frozen fillets in Alaska. Sir, we are not talking of entering the fishery five years hence; we currently employ 40-50 U.S. citizens per shift in production of these "under-utilized" species.

As you are no doubt well aware, competing with the Koreans and Japanese in production of these products is very difficult. Perhaps we would be on an equal basis if the U.S. government could invoke the following:

- 1) Reduction to zero the TALFF for Pacific Cod in the Gulf of Alaska;
- 2) Increase the foreign fishing fees for pollock in the Gulf of Alaska to reflect the value of the raw product; and;
- 3) Implementation of the Processor Preference Amendment to the MFCMA, precluding foreign directed fishery and joint-venture activity within a 150 mile radius of Kodiak.

The Honorable Slade Gorton
Page 2
February 22, 1982

Alaska Food Company, Inc. is committed to development of the whitefish industry in Alaska; we would ask a commensurate commitment from the public officials empowered to implement an aggressive policy of fisheries development.

Sincerely Yours,

ALASKA FOOD COMPANY, INC.



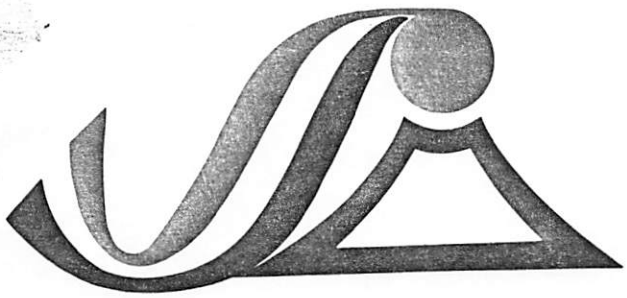
John B. Martin
Vice President

JBM/nch

cc: Mr. Clem Tillion
Chairman
North Pacific Fisheries
Management Council

APR 26 1982

SITKA SOUND SEAFOODS, INC.		INITIAL
Seafood Processors		
Deputy Dir.		
Box 830, Sitka, Alaska 99835		<i>Jr</i>
Phone: (907) 747-8630		



April 22, 1982

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

Re: Pot fishing off S. E. Alaska

Dear Jim:

Thanks for your speedy reply to my letter in which I expressed concern for the planned pot fishery for sablefish off our Sitka coast.

We mark all of our cartons containing sablefish with "Alaska Longline Caught Sablefish." We feel that we get a preferential price for the longline-caught fish. The Alaska Longliners Association also marks their cartons in this manner and also share my opinion that we are getting a better price because they are caught by hook and line.

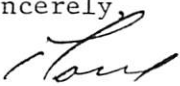
Very many black cod have been caught in the past off the coast of California and Oregon, but they generally bring a lower price and are sold for a lower price. My opinion is that they are an inferior quality, and this was backed up by sales experience we had at Icicle Seafoods, For the past three years we refused to buy pot caught sable because of criticism we had from our customers.

I have written a letter to Mr. Gene Rutherford, formerly senior vice-president and sales manager of Icicle Seafoods, Inc. who actually spearheaded the decision by Icicle to refuse delivery of the product. I have asked him to write you a memorandum regarding this.

The Korean will be fishing and freezing the product at sea; so the freshness of the product is insured, but I feel the damage is done while the fish are in the pots.

As I said, my main concern at this point is the problem of lost pots contaminating the traditional area and their continued fishing even after being lost.

I will also call some of my friends in California who have more experience with pot-caught product and pass on to you any useful information I get.

Sincerely,

 T. E. Thompson
 President

(PS) It is interesting to note that the Japanese effort is all longline, and they know quality.

North Pacific Fishery Management Council

13.

Clement V. Tillion, Chairman
Jim H. Branson, Executive Director

Mailing Address: P.O. Box 3136DT
Anchorage, Alaska 99510

Suite 32, 333 West 4th Avenue
Post Office Mall Building



Telephone: (907) 274-4563
FTS 271-4064

April 20, 1982

Mr. T. E. Thompson
President
Sitka Sound Seafoods, Inc.
Box 830
Sitka, AK 99835

Dear Tom:

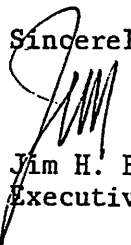
Thanks for the warning on All Marine Products, Inc. on their plans to fish black cod with pots off Southeast. I'll make sure the Council is aware of it. The ALFA proposal to close the area west of Addington will be before the Council again in May and they can, if they wish, act on the proposal at that meeting.

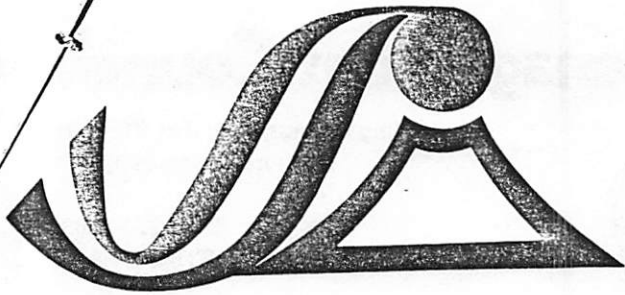
Do any of the black cod buyers in the U.S. pay a differential for line-caught as opposed to pot-caught fish? I hear stories on either side of the quality argument for pot-caught fish in about equal proportions. Can you think of any way we can get an objective assessment on quality? Does it affect all the black cod markets or just some of them, and if so, which ones? There is going to be a lot of pressure to allow fishing with pots out to the westward from some of the crab boats that are looking for something to do to meet payments. We're going to need a pretty good argument to prohibit them, and so far the Council really hasn't heard any except for the usurption of grounds for hook and line fishermen. At the moment, of course, that wouldn't be a problem out west.

Thanks again for the timely warning.

Best regards.

Sincerely,


Jim H. Branson
Executive Director



APR 19 1982

FROM	ROUTE TO	INITIAL
SITKA SOUND SEAFOODS, INC. 3		
Seafood Processors		
Box 830, Sitka, Alaska 99835		
Phone: (907) 747-8630 747-3630		

Mr. James Branson, Director
North Pacific Management Council
Anchorage, Alaska

Re: Pot fishing off S. E. Alaskan Waters

Dear Jim:

I had a caller the other day, Mr. Seoung Soo Cho, who is president of All Marine Products, located in San Pedro, California.

What he proposed was that he would bring two 108' black cod pot fishing boats up to fish off S. E. Alaska, manned by Korean crews. He would freeze at sea, and seeing he would target for the areas off of Sitka, would like to have me unload the product and place in vans for about 1.5¢ per pound.

Of course I told him no, remembering the disaster we had when the Billie Dawn tried pot fishing off of Sitka and planted 150 pots right on out best fishing areas - the pots are still there fishing, and our fishermen are unable to effectively fish the area because of the tangle of gear which is created when they set there.

ALFA has proposed that the area from Cape Addington to Cape Fairweather be closed to pot fishing. I agree 100% and would advise that serious consideration be given to closure out to the 200 mile limit. I think this same problem could be had further west and that consideration should be given to also include that area as soon as possible.

This is something that is happening right now, and I urge the Council to recognize it and do something about it before it is too late.

Mr. Cho has already contacted Foss Alaska to haul his product south; so the fishing could be imminent.

Thanks for the help you can give us on this, Jim - it is a vital concern to us right now.

Sincerely,

T. E. Thompson
President

cc: Greg Baker
Harold Thompson



All Marine Products, Inc.

SEOUNG SOO CHO
President

1300 South Beacon Street
Suite: 115
San Pedro, CA 90731

(213) 519-1593
(213) 519-1243
Telex: 664845

STATUS OF THE GULF OF ALASKA POLLOCK RESOURCE

Miles Alton and Russ Nelson^{1/}
(May 1982)

Between the early 1960's and early 1970's a major increase in pollock occurred as evidenced from research trawl surveys in the Gulf of Alaska (Alton, 1981). From surveys that took place in the early 1970's a density picture was developed for the Alaska region which indicated that pollock biomass was highest in the western Gulf of Alaska and eastern Bering Sea. Potential yields by INPFC Area for the Gulf of Alaska were estimated for management purposes in 1976 based on these early 1970 surveys. Since then, these yields have been used as a basis for determining allowable biological catch (ABC) (Table 1).

The annual catch of Gulf of Alaska pollock increased steadily since 1972 and reached 147.2 thousand metric tons (mt) in 1981. The majority of the 1981 catch came from the Chirikof-Kodiak area (91.0 thousand mt) followed by the Shumagin area (47.6 thousand mt); only 8.6 thousand mt have been caught in the eastern Gulf of Alaska. This report examines indicators of increasing trends in abundance and stock condition is such that EY could exceed the low end of MSY in the Central (Chirikof-Kodiak areas) and western (Shumagin) management regimes of the Gulf of Alaska.

Catch Patterns

1. In 1981 the total catch of pollock from the Gulf of Alaska was the highest of all previous years, reaching 147.2 thousand mt, of which 130.3 thousand mt was taken in the foreign fisheries (Table 2) and 16.9 thousand mt taken in joint venture fisheries (Table 3).

2. In 1981, as in previous years, most of the foreign pollock catch was taken in the western Gulf of Alaska, but a major change was the marked decline

^{1/} Northwest and Alaska Fisheries Center, 2725 Montlake Boulevard East, Seattle, WA 98112.

of the catch in the Kodiak Area (Table 2). The Japanese fisheries took almost 48 thousand mt from the western Gulf in 1981 and the Republic of Korea some 34 thousand mt for a total for both nations of 82 thousand mt. A departure from previous years, in which ROK caught most of their pollock in the Shumagin area, was ROK's sharp increase of pollock catch in the Chirikof area in 1981.

3. In 1981 freezer trawlers and surimi-type trawlers accounted for most of the foreign pollock catch (Table 4). Surimi trawlers operated mainly in the Chirikof-Kodiak area.

4. In Jan-Apr of 1982 joint venture fisheries operating in the Chirikof area (lower Shelikof Straits) landed an estimated 77.0 thousand mt of pollock (preliminary, Table) which is the highest on record for that area.

Stock Units

1. Differences in age composition of the catch between the Shumagin INPFC area and that of the Chirikof-Kodiak area (Figure 2) suggest a continued separation of these two areas for management purposes, i.e., for separate OY's. Pollock of the eastern Gulf of Alaska (Yakutat and Southeastern) have a separate OY.

2. The Chirikof area has been the only area of the western Gulf of Alaska (Shumagin-Kodiak) that major spawning of pollock has been found. Surveys of ichthyoplankton have taken place in the western Gulf with good coverage of the Kodiak and Chirikof areas but incomplete coverage of the Shumagins.

3. The relationship of the large spawning biomass of pollock in the Shelikof region in late winter-early spring to pollock of other regions is not known. There is evidence that there is no large resident population in the Shelikof region. It is assumed that the majority of the spawning fish move out of the Shelikof region to other regions of the Gulf of Alaska. Hughes and Hirschhorn (1979, Table 1) showed a low density of pollock in the Shelikof region during May-June following the spawning period (March-April).

Abundance Trends

1. Three nation-vessel classes were examined for CPUE trends (Table 5 and 6). For the Japanese surimi-type trawlers CPUE increased in both the Shumagin and Chirikof Areas in 1980 but declined in the Kodiak Area. Since the NWAFC has yet to receive the reported fishing effort from the foreign nations for 1981, the CPUE from the Japanese surimi-type trawlers having observers aboard was used as an indicator for the total Japanese surimi trawler operations. This subsampling indicated that in the Shumagin Area CPUE rose slightly in 1981 but sharply increased in the Chirikof region. For Korean large freezer trawlers CPUE rose slightly in 1980 in the Shumagin Area, but from the sampling of this vessel class using observer data, CPUE increased markedly in both the Shumagin and Chirikof Areas in 1981.

CPUE of Japanese large freezer trawlers rose in the Chirikof and Kodiak areas in 1980 (Table 6).

In summary, for all nations vessel classes examined CPUE rose in both the Shumagin and Chirikof Areas in 1980 and 1981. In the Kodiak area the CPUE of surimi-type trawlers has shown a decline from 1977 through 1980; no information is available as yet for 1981. Japanese large freezer trawlers, however, show a rise in CPUE for the Kodiak Area for 1980.

2. Since the mid-70's, three strong year classes have been evident in the Gulf of Alaska: 1972, 1975, and 1976. The 1975 and 1976 year classes became prominent in the fisheries of the Chirikof-Kodiak area in the period 1978-80 and were the dominant age groups (age 5 and 6) found in the joint venture fisheries and hydroacoustic assessment surveys in the Shelikof region in 1981. A subsampling of various nation-vessel classes by area and time in 1981 shows four-year-old fish dominant in the catch in all areas (Shumagin, Chirikof, and Kodiak) followed by the 1976 year class as 5 year olds; the mean size of fish by nation and area has been almost consistently in the 43-44 cm range.

From the joint venture fisheries and the foreign fisheries, the pollock catch has been predominantly mature fish in 1981 consisting mainly of 3-4 age groups (ages 3-6). In the joint venture fisheries in early 1982 the catch continues to be mainly of mature fish (>30 cm), as it was in 1981 (Table 7).

3. Biomass estimates of pollock from acoustic surveys in 1980 and 1981 in the Chirikof area during the spawning period (Table 8) show that a large concentration of pollock was present in this area during these surveys (Nunnallee, Williamson, and Nelson, 1982).

Derivation of MSY

MSY was obtained from biomass estimates from bottom trawl surveys that took place in various areas during the years 1972-77 (Alton, Hughes, and Hirschhorn, 1977). Biomass estimates from regions not surveyed, e.g., the region around the Shumagin Islands (Figure 2), was obtained from extrapolations from density figures from adjacent surveyed regions. Estimates of exploitable biomass and MSY by INPFC areas are shown in Table 1; the lowest of the estimates, based on a catchability coefficient of 1.0, was accepted for MSY. Estimates for the Chirikof and Kodiak areas were later combined under central Gulf of Alaska, as were those for Yakutat and southeastern areas (eastern Gulf of Alaska).

Since 1977 the allowable biological catch has been set the same as the low end of the MSY range.

Discussion

CPUE for the foreign fisheries in the western (Shumagin) and central (Chirikof-Kodiak) Gulf of Alaska has increased in 1980 and 1981. Two year classes, 1975 and 1976, were important in the fisheries in 1979 and 1980 and in the joint venture fisheries in early 1981. In the foreign fisheries in 1981 age 4 fish became prominent followed by age 5 fish (1976 year class) and in certain areas and seasons age 3 and age 6 fish. The importance of older ages in the fisheries was indicated by the mean size of fish which was 43-44 cm for most areas and times sampled. The increase in CPUE and the presence of mature fish dominating the foreign catch suggest that the pollock resource in the western and central areas of the Gulf is at a high level of abundance and that equilibrium yield (EY) at this time may exceed MSY for the pollock resource in these areas.

A substantial amount of pollock have been found to spawn in the only known area (Chirikof) of the western and central Gulf of Alaska in the March-April period. The relationship of these fish to the Shumagin and Kodiak areas need to be determined. There is no evidence that most of these fish are resident in the Shelikof region. In the early months of both 1981 and 1982 the pollock masses in the Shelikof region was subject to joint venture fisheries. Between 1981 and 1982 the landings from these fisheries increased almost 5-fold, from 16.8 thousand mt to 77.5 thousand mt. The impact of such a concentrated effort and high removal in 1982 of fish in the spawning area needs to be examined. A deficiency in monitoring the joint venture fisheries is the lack of an adequate means of estimating effective effort.

Impact of OY increase on prohibited species

The catch of pollock and corresponding incidental catch of halibut is given in Table 9 by INPFC area and year. The highest incidence in recent years (1980-81) has been in the Kodiak area.

If the OY for pollock is to be increased, the increased catch may result in additional catch of prohibited species. Assuming that OY is increased 25% in the the western and central regions (Table 10), and applying the incidental rates for 1981, the potential incidental catch of halibut would be 347.1 thousand fish (Table 11). This will exceed the amount taken in the foreign trawl fisheries in 1981 by 259 thousand fish. However, this assumes the equal disposition of the Central Gulf of Alaska OY between the Chirikof and Kodiak areas and does not consider the joint venture fisheries whose annual catch is increasing rapidly in the Chirikof area. The incidental rate of halibut is very low in the joint fisheries of that area.

The potential catch of other prohibited species (salmon and crab) is also shown in Table 11.

Table 1.--Estimates of exploitable biomass and potential yield of pollock by INPFC areas in the Gulf of Alaska (in 1,000 mt).

Area	Biomass (B) ^{1/}	Yield (MSY = ABC) ^{2/}	Year of Survey
Shumagin	357-713	57-114	1974
Chirikof	340-680	54-109	1973, 1975
Kodiak	255-511	41-82	1972-73
Yakutat	78-155	12-25	1975
Southeastern ^{3/}	11-22	2-4	1976-77
All Areas	1,041-2,081	166-334	

1/ $MSY = M(0.4)(B) = (0.4)(0.4)(B)$

2/ Range of biomass is based on catchability coefficient of 1.0 and 0.5.

3/ Outside waters.

Table 2.--Foreign catches of pollock in the Gulf of Alaska "best blend estimate" in metric tons^{1/}.

Pollock	1977	1978	1979	1980	1981
Shumagin	56,730	31,301	30,218	46,648	47,560
Japan	8,626	3,539	1,366	378	14,125
Korea	34,166	26,268	23,312	24,926	17,191
Poland	-	-	249	5,849	16,244
USSR	13,938	1,494	170	15,495	-
Mexico	-	-	5,121	-	-
Chirikof	27,743	43,801	29,184	35,102	65,094
Japan	14,999	5,777	3,743	9,876	24,661
Korea	1,413	784	-	-	16,809
Poland	-	-	18,515	7,237	23,624
USSR	11,331	37,240	6,537	17,989	-
Mexico	-	-	389	-	-
Kodiak	28,157	17,698	38,413	26,616	9,095
Japan	10,970	13,249	23,957	23,099	8,943
Korea	-	-	-	-	152
Poland	1,256	1,227	787	-	-
USSR	15,931	3,222	10,550	3,517	-
Mexico	-	-	3,119	-	-
Yakutat	6,255	2,538	4,816	4,198	7,574
Japan	5,910	2,538	2,523	4,111	3,155
Korea	-	-	2,202	87	4,400
Poland	-	-	-	-	19
USSR	345	-	43	-	-
Mexico	-	-	48	-	-
Southeast	1,488	990	555	434	1,001
Japan	1,488	990	331	434	1,001
Korea	-	-	224	-	-
Poland	-	-	-	-	-
USSR	-	-	-	-	-
Mexico	-	-	-	-	-
Total Gulf of Alaska	120,373	96,328	103,187	112,996	130,323
Japan	41,993	29,093	31,920	37,897	51,885
Korea	35,579	27,052	25,739	25,013	38,552
Poland	1,256	1,227	19,551	13,085	39,886
USSR	41,545	41,956	17,301	37,001	-
Mexico	-	-	8,677	-	-

Table 3.--Pollock catch (t) in joint venture fisheries in the Gulf of Alaska
1980-82.

Year	INPFC Area			Total
	Shumagin	Chirikof	Kodiak	
1980	112	496 (Apr-May)	527 (Apr-Jun)	1,135
1981	20	16,836 (Feb-May)	---	16,856
1982 ^{1/}	---	76,700 (Jan-May)	---	76,700

^{1/} Preliminary, as of May, 1982

Table 4.--Disposition of 1981 pollock catch (mt) in Gulf of Alaska by nation, vessel class, and area.

Vessel class	Nation	Shumagin	Chirikof-Kodiak	Yakutat-Southeastern	All areas
Small trawler	Japan	3,707	6,478	2,115	12,300
	ROK	1,820	2,617	459	4,896
Large freezer trawler	Japan	1,234	5,551	1,999	8,784
	ROK	15,371	14,344	3,941	33,656
	Poland	16,243	23,624	19	39,886
Surimi-type trawler	Japan	9,083	21,302	23	30,408
Longline	Japan	101	274	19	394
	ROK	trace	trace	trace	trace
Joint venture	---	20	16,836	--	16,856
All	All	47,579	91,026	8,575	147,180

Table 5.--CPUE of Japanese surimi-type trawlers and ROK freezer trawlers
(Class 4) in western Gulf of Alaska (tons/hr) (3rd and 4th quarter).

Year	Japan					
	(61) Shumagin		(62) Chirikof		(63) Kodiak	
	3	4	3	4	3	4
1977	--	17.2	--	15.2	--	25.9
1978	--	2.3	--	4.5	--	12.9
1979	4.2	--	3.8	--	5.5	8.0
1980 ^{1/}	--	6.4	9.3	6.9	4.8	5.9
1981 ^{2/}	6.4	6.6	--	12.2	--	--

Year	ROK					
	(61) Shumagin		(62) Chirikof		(63) Kodiak	
	3	4	3	4	3	4
1977	9.4	6.8	--	11.9	--	--
1978	4.0	6.8	--	--	--	--
1979	4.5	5.6	--	--	--	--
1980	5.4	6.7	--	--	--	--
1981 ^{3/}	8.0	24.9 ^{4/}	5.0	15.8	--	--

1/ 70% rule on medium trawlers; Japan did not report in a separate category their catch and effort of Surimi trawlers.

2/ From observer cruises on Surimi large trawlers; reported total catch and associated effort not available from Japanese as of May 7, 1982

3/ From observer trips only

4/ Based on only 9 hours of effort

Table 6.--CPUE of pollock in the Japanese fisheries using the 30% rule^{1/}--class 7 stern trawler (western Gulf of Alaska).

Year	Shumagin				Chirikof				Kodiak			
	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>
1977	0.7	2.6	---	7.3	1.0	2.6	2.7	3.7	2.0	2.4	2.1	4.7
1978	2.3	1.8	2.6	---	2.0	1.8	1.7	4.0	1.0	2.3	1.4	3.8
1979	---	---	1.5	3.5	---	1.9	2.0	3.6	---	0.7	2.9	3.9
1980	---	---	---	---	3.5	1.5	5.6	7.0	1.7	3.5	3.2	5.8

^{1/} Catch-per-unit-effort is based on catch and effort data in statistical blocks and months when pollock catch was 30% or more of the total catch.

Table 7.--Size composition of pollock taken in the joint venture fisheries in the Shelikof region of the Gulf of Alaska in 1981 and 1982 (source - NMFS Observer Program).

Year	Size intervals (cm)							Mean
	<21	21-25	26-30	31-35	36-40	41-45	>45	
	----- percent -----							
1981	tr	1.1	0.9	18.4	44.1	23.0	12.5	39.3
1982 ^{1/}	-	1.0	8.0	34.0	32.8	17.3	6.9	36.8

^{1/} Preliminary

Table 8.--Estimates of pollock biomass in the Shelikof Strait-Chirikof Island region determined from acoustic surveys in April 1980 and March and April 1981 (Nunnallee, et. al., 1982).

	<u>1980</u>				
	Mean density (\bar{D}) (kg/1000m ²)	SD(\bar{D})	Area (km ²)	Biomass (mt)	95% C.I. (mt)
Northern area	24.8	2.4	4,109	101,851	82,837 - 120,865 (+ 19%)
Southern area	77.2	9.2	7,861	607,132	465,443 - 748,821 (+ 23%)
Total			11,970	708,983	566,024 - 851,942 (+ 20%)
<u>Survey Dates</u>	<u>1981</u>				
March 2-19	116.2	19.8	6,870	801,008	534,397 - 1,067,619 (+ 33%)
March 24-29	66.5	11.6	8,674	576,455	379,242 - 773,668 (+ 34%)
April 4-10	45.9	7.9	12,138	557,793	369,848 - 745,738 (+ 34%)

Table 9.--The estimated catches of pollock (metric tons) and halibut (nos.) taken by trawl fisheries conducted in the Shumagin, Chirikof, and Kodiak INPFC Areas, 1977-81.

	Shumagin			Chirikof			Kodiak		
	Pollock (mt)	Halibut (nos)	(No/mt of pollock)	Pollock (mt)	Halibut (nos)	(No/mt of pollock)	Pollock (mt)	Halibut (nos)	No/mt of pollock)
1981	47,560	17,194	(0.362)	65,094	25,582	(0.393)	9,09	45,567	(5.010)
1980	46,647	28,828	(0.618)	35,101	5,178	(0.148)	26,616	102,112	(3.836)
1979	30,218	44,413	(1.470)	29,184	7,512	(0.257)	38,414	52,878	(1.376)
1978	31,300	174,197	(5.565)	43,801	62,371	(1.424)	16,471	14,540	(0.883)
1977	61,495	116,417	(1.893)	22,576	80,621	(3.571)	28,017	178,017	(6.356)

Table 10.--Increase of EY = ABC of pollock by 25% in the western (Shumagin) and central (Chirikof-Shumagin) Gulf of Alaska (in 1,000 mt).

Area	Estimated EY = ABC	25% increase of low end of EY
Western	57-114	71
Central	95-191	119
Combined area	152-305	190

Table 11.--Potential catch of prohibited species (1,000 fish) in the western and central Gulf of Alaska if OY is increased by 25% and all of OY is caught by the foreign trawl fisheries. Incidence rates in numbers per ton shown in parenthesis.^{1/}

Prohibited Species	Shumagin	Chirikof ^{2/}	Kodiak ^{2/}	All areas
Halibut	25.6 (.362)	23.4 (.393)	298.1 (5.010)	347.1
Salmon	3.3 (.047)	11.2 (.189)	7.8 (0.131)	22.3
King crab	0.6 (.009)	0.1 (.002)	1.0 (0.016)	1.7
Tanner crab	1.2 (.017)	4.7 (.079)	8.5 (0.143)	14.4

^{1/} Incidental rates from 1981 foreign trawl fisheries assuming same catch patterns by nation and vessel class.

^{2/} OY of 119 thousand mt (Table) equally divided between the Chirikof and Kodiak areas.

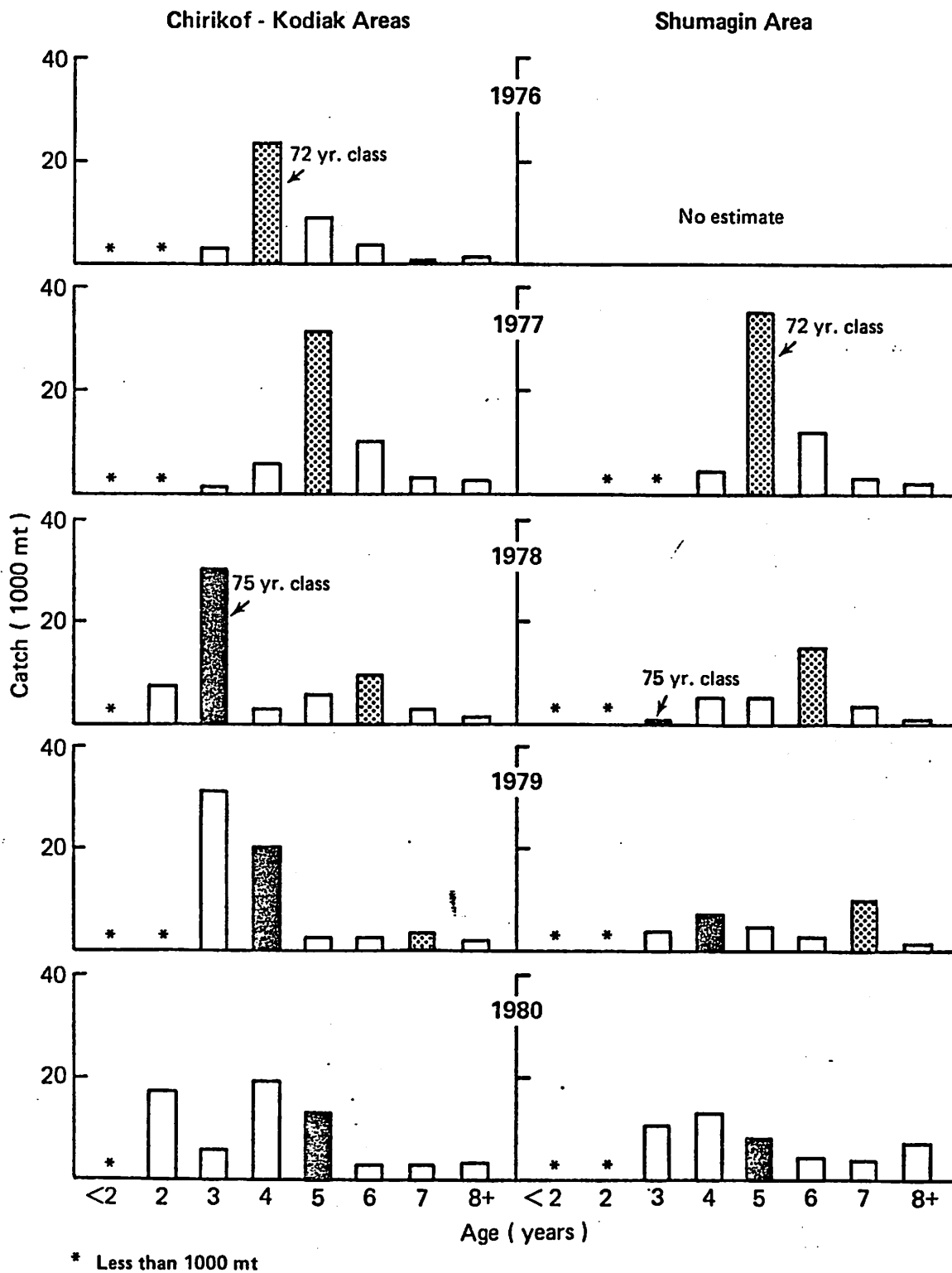


Figure 1.--Age composition of annual pollock catch (weight) in the foreign trawl fisheries in the Chirikof-Kodiak and Shumagin areas.

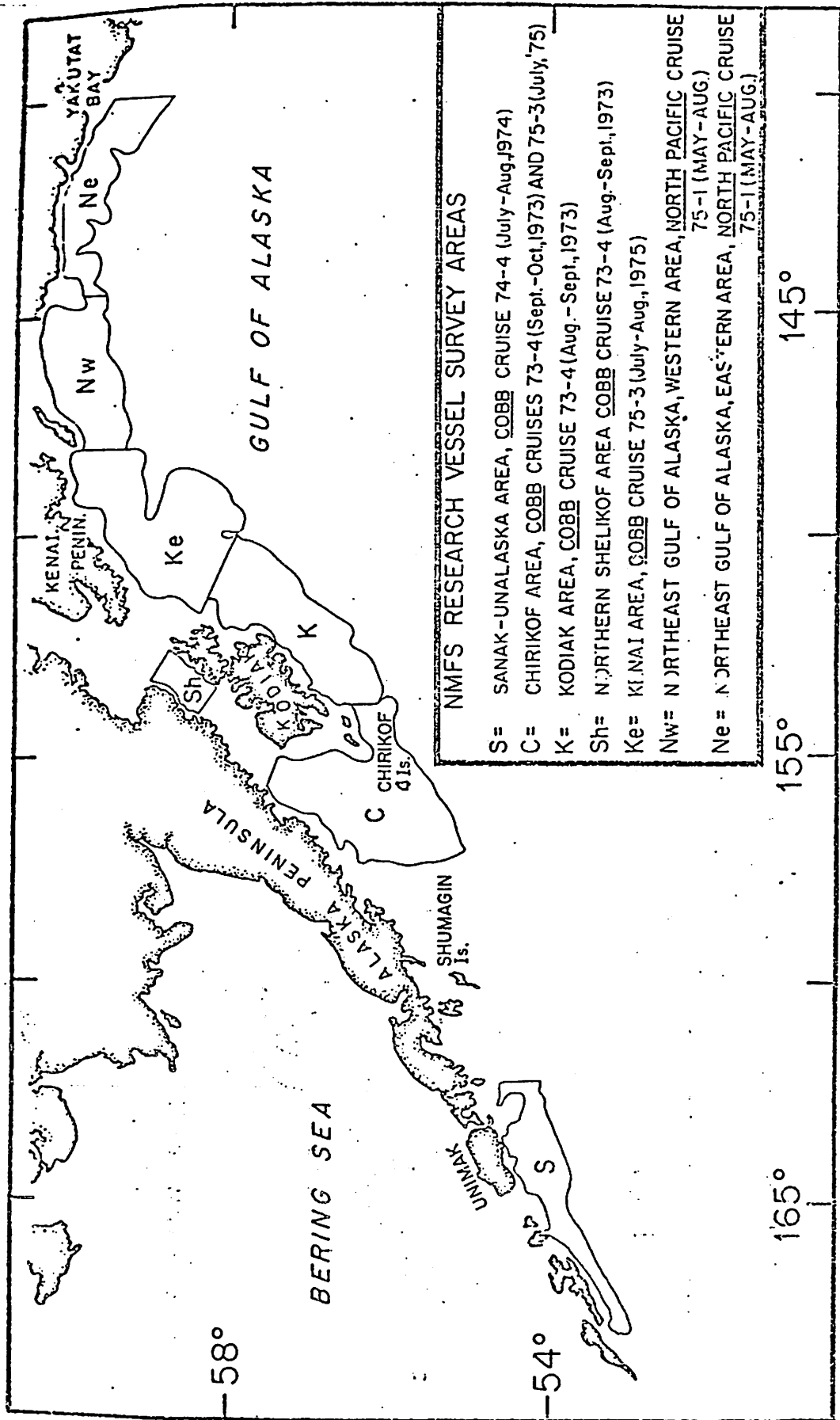


Figure 2.--Locations and periods of NMFS trawl surveys used in estimating exploitable biomass of pollock.

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May 12, 1982

Mr. Jim Branson
Executive Director
North Pacific Fishery
Management Council
P.O. Box 3136 DT
Anchorage, AK 99510

Re: Adjustment of OY in the Central Area of the Gulf of Alaska.

Dear Jim:

We are writing to you on behalf of the Japan Deep Sea Trawlers Association to express the views of our clients with respect to what modification of the Gulf of Alaska groundfish EMP may be appropriate in light of the substantial joint venture harvest of pollock in the Central Gulf.

The problem which arises from the substantial joint venture catches of pollock this year in the Central Gulf of Alaska is as follows: Unless the pollock OY for that management area is increased, the directed foreign fisheries (which have caught over 60,000 m.t. of pollock in the Central Area in recent years) will be shut down when their catch reaches 16,000 m.t., and maybe before. This situation results from the fact that the joint venture catch of pollock so far this year has been approximately 79,000 m.t. Since the pollock OY for the Central Area is currently 95,200 m.t., the maximum TALFF available is 16,200 m.t. -- if no further domestic harvest occurs, If the current DAP estimate (5,380 m.t.) is retained or a reserve is set aside, the potential foreign catch is reduced to 11,000 m.t. or less.

Thus, the issue is not whether DAH should be increased -- it obviously should be. The issue is whether the OY should be

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Please reply to Seattle office

Mr. Jim Branson
May 12, 1982
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increased to accommodate something like normal operations by the directed foreign fisheries.

There is little doubt that pollock stocks in the Central Gulf are adequate to support an increased OY of at least 60,000 m.t. It is our view, therefore, that the OY should be increased by at least this amount to avoid shutting down the directed foreign fisheries in that area prematurely. In the absence of any danger of overfishing, it would seem inappropriate to penalize the foreign fisheries (and particularly the Japanese) for the substantial joint venture activities which they have undertaken this year.

There is ample biological justification for an increase in the Central Gulf OY:

1. The Gulf of Alaska pollock stock has been "relatively lightly fished." GoA FMP at p. 4-16. The Gulf of Alaska pollock stock "has been increasing both in distribution and abundance." GoA FMP at p.4-17. This was true when the FMP was originally adopted and remains true today. In his September, 1981 assessment of the central Gulf of Alaska pollock resources, Miles Alton (NWAFC) identifies three apparently strong year classes (1975, 1976, and possibly 1978). In addition, Alton references the discovery in 1980 of spawning pollock concentrations in Shelikof Strait with a biomass between 600,000 and 700,000 tons. A 1981 survey estimated the biomass of this Shelikof concentration at between 600,000 and 800,000 tons. Since the FMP estimates the Central Gulf of Alaska pollock biomass at between 595,000 and 1,191,000 m.t., the discovery of previously unknown concentrations almost equal to the prior estimate would seem to indicate that the actual pollock biomass is substantially underestimated in the FMP. Mr. Alton concludes his discussion of this subject with the understatement that "the high biomass of spawning pollock found in the Chirikof-Kodiak region in both 1980 and 1981 is a healthy sign and raises questions as to . . . the adequacy of current estimates of equilibrium yield." Balsiger & Alton, 1981, at p.38. Plainly, the EY, ABC and OY for the Central Gul should be substantially increased.

2. The current OY's for the Gulf of Alaska (and particularly for the Central Area) were set on a highly conservative basis. The FMP describes the Gulf of Alaska pollock biomass as at MSY level. MSY and ABC were estimated at between 169,000 and 338,000 m.t. Total OY for the Gulf was set at the extreme low end of this range, i.e., 169,000 m.t. See GoA FMP Table 58. The comparable ABC range for the Central Area is 95,200 m.t. to

Mr. Jim Branson
May 12, 1982
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190,400 m.t. Again, OY was set at the low end of this range. Thus, not only was the Gulf pollock biomass probably underestimated, but the OY was set at the extreme low end of the OY ranges produced from those underestimates. With or without an upward adjustment to the pollock biomass estimate, it is plain that the total Gulf OY of 169,000 m.t. may be easily increased by 60,000 m.t. without even exceeding the midpoint of the OY range. The discovery of the enormous Shelikof pollock stock certainly implies that this increase could be taken in the Central Area without danger of overfishing.

As demonstrated above, there is no apparent biological impediment to increasing the pollock OY in the Central Gulf to accommodate the directed foreign fishery. There are sound practical reasons why this should be done. First, failure to increase the OY would inflict serious harm upon the foreign fisheries operating in the Central Gulf. This is unnecessary and would accomplish no useful purpose.


In addition, it would seem quite inappropriate to punish the foreign fisheries (and particularly the Japanese) for the 1982 increase in Japanese joint venture operations in the Gulf of Alaska. The ability of Japanese companies to increase their joint venture purchases will be enhanced if U.S. management authorities are flexible in accommodating the directed fishing activities of these companies and their co-nationals.

For all of the above reasons, we urge the Council to increase the pollock OY for the Central Gulf to 155,200 m.t.

We are attaching copies of Tables 58 and 64 from the Gulf of Alaska FMP for quick reference by the Council. Also attached is analysis of this issue by Natural Resources Consultants.

Very truly yours,

GARVEY, SCHUBERT, ADAMS & BARER
A Professional Services Corporation

By 
Stephen B. Johnson

SBJ/je

Table 58 -- The Derivation of Optimum Yield (OY) for
Gulf of Alaska Groundfish Resources (1,000s mt)

	SPECIES	WESTERN	CENTRAL	EASTERN	TOTAL
Exploitable biomass	Pollock	357 - 713	595 - 1191	103 - 206	1055 - 2110
	Pacific Cod	40 - 79	82 - 161	23.9 - 48	368 - 736
	Flounders	220	346	206	772
	Pacific Ocean Perch		-Unknown-		
	Other Rockfish		-Unknown-		
	Sablefish		-Unknown-		
	Atka Mackerel				(110) <u>1/</u>
	Squid				
	Rattail		-Unknown-		
	Idiot Rockfish		-Unknown-		
Maximum Sustainable Yield (MSY)	Pollock				169 - 338
	Pacific Cod				88 - 177
	Flounders				67
	Pacific Ocean Perch				125 - 150
	Other rockfish				7.6 - 10
	Sablefish				22 - 25
	Atka Mackerel				(33) <u>1/</u>
	Squid				5.0
	Rattail	3.3	7.1	2.8	13.2
	Idiot Rockfish				3.75
Equilibrium Yield (EY)	Pollock				N/A
	Pacific Cod				N/A
	Flounders				N/A
	Pacific Ocean Perch				50
	Other Rockfish				N/A
	Sablefish				17.4 - 19.3
	Atka Mackerel				N/A
	Squid				N/A
	Rattail				N/A
	Idiot Rockfish				N/A
When stock incapable of producing MSY	Pollock <u>2/</u>	57.0	95.2	16.6	168.8
	Pacific Cod <u>2/</u>	16.5	33.5	10.0	60.0
	Flounders <u>2/</u>	20.8	30.6	16.6	67.0
	Pacific Ocean Perch <u>3/</u>	5.3	15.7	29.0	50.0
	Other Rockfish <u>3/</u>	0.3	0.6	6.5	7.6
	Sablefish <u>3/</u>	2.8	5.1	10.6	17.4
	Atka Mackerel <u>4/</u>	4.7	20.8	3.2	28.7
	Squid <u>5/</u>	1.0	2.0	2.0	5.0
	Rattail <u>6/</u>	3.3	7.1	2.8	13.2
	Idiot Rockfish				3.75
Allowable Biological Catch (ABC)	Other Species	4.3	8.6	3.1	16.2
	Pollock	57.0	95.2	16.6	168.8
	Pacific Cod	16.5	33.5	9.9	60.0
	Flounders	10.4	14.7	8.4	33.5
	Pacific Ocean Perch	2.7	7.9	14.4	25.0
	Other Rockfish	0.3	0.8	6.5	7.6
	Sablefish	2.1	3.8	7.1	13.0
	Atka Mackerel	4.7	20.8	3.2	28.7
	Squid	1.0	2.0	2.0	5.0
	Rattail	3.3	7.1	2.8	13.2
Optimum Yield (OY)	Idiot Rockfish				3.75
	Other Species	4.4	8.6	3.2	16.2
	Pollock	57.0	95.2	16.6	168.8
	Pacific Cod	16.5	33.5	9.9	60.0
	Flounders	10.4	14.7	8.4	33.5
	Pacific Ocean Perch	2.7	7.9	14.4	25.0
	Other Rockfish	0.3	0.8	6.5	7.6
	Sablefish	2.1	3.8	7.1	13.0
	Atka Mackerel	4.7	20.8	3.2	28.7
	Squid	1.0	2.0	2.0	5.0
TOTAL		102.4	194.4	74.2	374.75

1/ From unsubstantiated Soviet reports

2/ Apportioned on basis of trawl survey data

3/ Apportioned on basis of 1973-75 Japanese catch

4/ Apportioned on basis of 1973-75 Soviet catch and 1978 Japanese catch

5/ Apportioned equally to each INPFC area

6/ Apportioned on basis of sablefish allocations

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OY--DAH--DAP--DNP--JVP--Reserve--and TALFF by Area (1000s mt)

Species		Western	Central	Eastern	Total
Pollock	1. OY	57.0	95.2	16.6	168.8
	2. DAH				21.31
	3. ...DAP	0.025	5.38	0.695	
	4. ...JVP	5.75	7.94	1.52	
	5. Reserve	11.4	19.04	3.32	33.76
	6. TALFF	39.25	62.84	11.65	113.73
Pacific Cod	1. OY	16.56	33.54	9.9	60.0
	2. DAH				10.00
	3. ...DAP	0.24	3.48	0.280	
	4. ...DNP <u>1/</u>	0.60	1.200	1.200	
	5. ...JVP	1.04	1.37	0.59	
	6. Reserve	3.312	6.708	1.980	12.0
	7. TALFF	11.368	20.782	5.850	38.0
Flounders	1. OY	10.4	14.7	8.4	33.5
	2. DAH				3.18
	3. ...DAP	0.1	0.3	0.9	
	4. ...JVP	0.6	0.82	0.46	
	5. Reserve	2.08	2.94	1.68	6.7
	6. TALFF	7.62	10.64	5.36	23.62
Pacific Ocean Perch	1. OY	2.7	7.9	14.4	25.0
	2. DAH				2.915
	3. ...DAP	0.025	0.295	0.08	
	4. ...JVP	0.32	0.96	1.235	
	5. Reserve	0.54	1.58	2.88	5.0
	6. TALFF	1.815	5.065	10.205	17.085
Other Rockfish	1. OY	0.3	0.8	6.5	7.6
	2. DAH				0.9
	3. ...DAP	0.045	0.200	0.455	
	4. ...JVP	0.03	0.05	0.12	
	5. Reserve	.06	0.16	1.3	1.52
	6. TALFF	.165	0.39	4.625	5.18
Sablefish	1. OY	2.1	3.8	7.1	13.0
	2. DAH				6.48
	3. ...DAP	0.1	1.00	4.7	
	4. ...JVP	0.17	0.22	0.29	
	5. Reserve	0.42	0.76	1.42	2.6
	6. TALFF	1.41	1.82	0.69	3.92
Atka Mackerel	1. OY	4.678	20.836	3.186	28.7
	2. DAH				2.07
	3. ...DAP	-0-	-0-	-0-	
	4. ...JVP	0.290	1.080	0.70	
	5. Reserve	0.936	4.167	0.637	5.740
	6. TALFF	3.452	15.589	1.849	20.89



NATURAL RESOURCES CONSULTANTS

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May 11, 1982

Mr. Stephen B. Johnson
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Dear Steve:

This letter is in response to your request that NRC investigate the basis for flexibility in deriving and setting the Optimum Yield (OY) for Alaska pollock in the central Gulf of Alaska (INPFC Areas Chirikof and Kodiak).

We have considered the question from two standpoints. We first examined the basis for a policy of flexibility in terms of whether or not it would conform to the general management philosophy or regime that is stipulated in the Fishery Management Plan (FMP) for the Gulf of Alaska Groundfish Fishery. We next examined the technical or biological basis for a possible increase in the OY over the 95,200 metric tons stipulated in the FMP.

Before reporting on our findings, it seems worthwhile to provide you with updated information on the status of the joint venture fisheries for pollock in Shelikof Strait. As of March 27, the catch of pollock by these fisheries was reported by the North Pacific Fishery Management Council to be over 57,000 metric tons, with at least another 10,000 tons expected to be taken before the fishery ceased. According to a just-completed analysis by the Northwest and Alaska Fisheries Center, the catch of pollock through April 17 amounted to 75,700 metric tons (including discards). Our estimate is that another 3,000 tons were taken after April 17, making a total harvest to the end of the fishery of 78,700 tons. Assuming that there are no further joint venture catches of pollock from elsewhere in the central Gulf during 1982, which seems likely, the following situation will exist:

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OY.....	95,200	metric tons
DAP.....	5,380	metric tons
JVP.....	79,000	metric tons
DAH.....	84,380	metric tons

The foregoing would leave a total of only about 11,000 metric tons of pollock to be held in reserve for domestic fisheries, or to be allocated to foreign fisheries. Even if the entire 11,000 tons were to be allotted to foreign fisheries, there would still be a shortfall of about 52,000 tons, compared to the initial TALFF of 62,840 metric tons of pollock established for the central Gulf.

FMP Management Philosophy

There are two aspects of management philosophy stated in the FMP that appear to be particularly relevant to the question of flexibility in establishing an OY for pollock. In section 6.0 of the FMP, where the OY concept is discussed, it is clearly stated that a conservative approach to the exploitation of all species of groundfish will be followed because of a general incompleteness of biological information when the FMP was prepared. The practical application of this philosophy for pollock and some other species was to set the Allowable Biological Catch (ABC) equal to the low end of the range of estimated Maximum Sustainable Yield (MSY). However, the possibility of raising ABC was left open, if later evidence were to be developed to support the contention that higher yields could be sustained. The technical basis to support such a contention is discussed in the following section of this letter.

Another relevant aspect is the repeated reference in the FMP to the important role that the conservation of halibut played in establishing the management philosophy and regime for groundfish. This is perhaps exemplified in Section 8.1 of the FMP where one of the four priority objectives cited as dictating the philosophy of management of the groundfish fishery was given as follows:

"(2) Protection of the Pacific halibut resource, which for decades has supported the only significant US groundfish fishery in the region, but which is currently in a state of grave decline."

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The importance attached to the conservation of halibut is further expressed in Section 8.3.3.4 of the FMP, reproduced as follows:

"This plan has a most significant relationship to the management of the Pacific halibut fishery which continues to be vested with the International Pacific Halibut Commission. Many of the management measures contained herein are for the expressed purpose of mitigating a severe crisis in the domestic halibut fishery by recognizing a situation in which the trawl fishery (and possibly the sablefish setline fishery) could be a major contributor to declining abundance."

The emphasis given to halibut is an important consideration here because it is our understanding that the joint venture fishery for pollock in Shelikof Strait was characterized by an extremely low incidental catch of halibut in the pelagic trawls used by the American catcher vessels. This was reported to us by several captains of trawlers involved in the fishery, and we understand that a preliminary and partial examination of observer reports at the Northwest and Alaska Fisheries Center strongly supports this contention. It is our general impression that the incidental catch of halibut in the Shelikof Strait fishery was perhaps the lowest on record, and inconsequential from the standpoint of impacting on the halibut resource. Catches of crab and shrimp are also reported to have been practically nil. If such be the case, the possibility of increasing OY for pollock in the central Gulf of Alaska should be decided solely on the technical basis of the status of the pollock resource itself, and its ability to contribute larger yields.

Technical Basis for Increasing OY

Factors of particular importance in evaluating the technical basis for increasing the OY for pollock in the central Gulf of Alaska include: (1) the methods and limitations involved in deriving the original estimates of pollock biomass, upon which the calculations of MSY were based; (2) the current status

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of the pollock resource in respect to strength of year classes and abundance; and (3) the significance of the large biomass of spawning pollock now known to occur in Shelikof Strait, but which was not included in the original surveys.

The estimates of biomass used in the FMP to calculate MSY were based on NMFS surveys with bottom trawls carried out in the Chirikof-Kodiak areas during the August-October period of 1973 and 1975. Only a limited portion of Shelikof Strait (northern Shelikof) was included in the area surveyed, and the survey was done several months after the time when very large spawning concentrations of pollock have subsequently been found to occur in Shelikof Strait. The estimates of exploitable biomass determined from the surveys and the corresponding potential yields (MSY) were as follows:

<u>Area</u>	<u>Exploitable Biomass in Metric Tons</u>	<u>MSY</u>
Chirikof	340,000- 680,000	54,000-109,000
Kodiak	255,000- 511,000	41,000- 82,000
Total	595,000-1,191,000	95,000-191,000

The minimum estimates (595,000 metric tons of biomass and 95,000 tons MSY) are those used to establish the ABC and OY values in the FMP, and they continue to be used today.

In deriving the biomass estimates, some assumption had to be made about the effectiveness of the bottom trawl in capturing pollock. This was commented on in a paper by Alton, Hughes and Hirschorn (1979)¹, who stated that while the coefficient of catchability was not known, it was assumed to be within the range of 0.5 to 1.0. However, they further noted that since pollock are known to occur above the sea floor out of range of a bottom trawl, the actual coefficient was probably less than 1.0, assuming no compensating effects due to other factors. They also commented that in the northeast Atlantic the estimates of catchability coefficient given for some gadoid species were reported to range from 0.08 to 0.51. The use in the FMP of the

¹ Alton, M., S. Hughes, and G. Hirschorn
1977. Gulf of Alaska pollock--its fisheries and resource potential. A report submitted to the International North Pacific Fisheries Commission by the U.S. National Section, NMFS, Northwest and Alaska Fisheries Center, Seattle: 25 pages.

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minimum estimate of MSY derived from an assumed catchability coefficient of 1.0 can thus be viewed as being quite conservative, and undoubtedly much more so for pollock than for such bottom-dwelling species as cod, for which the same coefficient was used.

The pollock resource in the Gulf of Alaska is viewed by U.S. and Japanese investigators as currently being in good condition. The presence of strong 1975 and 1976 year classes and possibly a strong 1978 year class in the Chirikof-Kodiak region is cited by U.S. scientists in support of this view. The absence of such strength of these year classes in the Shumagin area is considered to support the present policy of separating these areas for catch allocation purposes. It should be noted, however, that several strong year classes were remarked as being present in the Chirikof-Kodiak region during the original NMFS surveys made in 1973 and 1975. From a consideration of year class strength, therefore, it cannot be said with any certainty that the current status is better now than it was earlier.

The large biomass of spawning pollock found in surveys of Shelikof Strait in 1980 and 1981 and which supported this year's highly successful joint venture fishery is also viewed as a healthy sign. Three separate estimates of pollock biomass from an acoustical survey made during the period early March to early April 1981 ranged from 558,000 metric tons to 800,000 tons. It seems likely that they would be minimum estimates of the total biomass present in Shelikof Strait during this period, because fish were probably entering and leaving Shelikof Strait during the interval between the first and last estimates. However, if we just use the average of the three estimates (645,000 metric tons), it is larger for Shelikof Strait than the minimum biomass estimate of 595,000 tons for the entire Central Gulf upon which the present OY value is based.

However, the other side of the coin is that we do not know what the relationship of the Shelikof Strait spawning population is to populations elsewhere. It could be at least partially drawn from outside the central Gulf, or it may be derived entirely from within the central Gulf. There is a need to conduct simultaneous surveys inside and outside of Shelikof Strait during the spawning period to determine the amount of pollock present at that time in the various areas. Until such surveys can be carried out, some light can be shed on the question by examining statistics on catch per unit of effort and total catch by the foreign fisheries. If the catch per unit of effort and

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total catch were to be found to remain relatively high elsewhere in the central Gulf when the spawning concentrations are present in Shelikof Strait, one could surmise that the Shelikof Strait spawning biomass represents a significant net addition to the central Gulf biomass that was estimated from the early NMFS surveys and used to derive the current value of OY. It is our understanding that investigators at the Northwest and Alaska Fisheries Center intend to examine such data from this standpoint.

Conclusions

From the standpoint of management philosophy expressed in the FMP, there appears to be considerable room for flexibility in establishing OY for pollock in the central Gulf of Alaska. The OY of 95,200 metric tons in an acknowledged conservative value that was set equal to the minimum estimated value of MSY. (MSY range was 95,000 to 191,000 metric tons.) The FMP specifically provided for the possibility of increasing OY later, if evidence showed that higher yields could be sustained.

The importance given to conserving halibut in establishing the FMP management regime would not be contradicted by a policy of flexibility. To the contrary, the extremely low incidence of halibut (and other prohibited species) in the recently completed joint venture fishery for pollock in Shelikof Strait can only be viewed as a plus in this regard.

Although there appears to be a technical basis for some increase in the pollock OY in the central Gulf, the evidence is not clear as to how much of an increase could be justified. There are now several strong year classes of pollock in the central Gulf, but a similar situation apparently existed when the original NMFS surveys were carried out. A large spawning biomass of pollock has recently been found to occur in Shelikof Strait during the spring. Although it probably represents some additional biomass to the size of the previously estimated population in the central Gulf, the addition cannot be quantified until the relationship between the Shelikof Strait spawning population and pollock elsewhere is determined.

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Considering all factors, a reasonable approach for now might be to increase OY to some intermediate level between the minimum and maximum estimates of MSY used in the FMP. This would still conform with the conservative approach to exploitation stipulated in the FMP, and would also permit an evaluation to be made of the effect of an increased harvest under controlled and carefully monitored conditions. Additional data could be obtained and analyzed to permit a reevaluation of the situation prior to the 1983 fishery.

Yours sincerely,

NATURAL RESOURCES CONSULTANTS



D. L. Alverson
Managing Partner