

MEMORANDUM

TO: Council, SSC and AP Members

FROM: Clarence G. Pautzke
Executive Director



ESTIMATED TIME 4 HOURS (all D-2 items)
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DATE: January 26, 1998

SUBJECT: Western/Central Gulf Management Measures for Pollock and Pacific Cod

ACTION REQUIRED

Discussion of management measures for Western/Central Gulf pollock and Pacific cod.

BACKGROUND

The Council has been considering management measures to address the needs expressed by industry in the Western and Central groundfish fisheries in 1997. An industry committee forwarded its recommendations to the Council in September 1997. The Council approved developing two of the recommendations which are scheduled for final action at this meeting (under Agenda item D-1(b)). Plan Amendments 52/52 would require a stand-down before moving between fishing grounds in the pollock and Pacific cod fisheries and/or vessel registration before entering the fisheries.

For longer term solutions, the Council scheduled a discussion of GOA management measures for pollock and Pacific cod in the Western and Central GOA for this meeting. The Council expressed its intent to develop a problem statement and identify the specific alternatives to be developed further, with the intent of implementing the measures by January 1, 1999. The industry committee's minutes and a staff discussion paper are included as Items D-2(a)(1) and (2).

Trip Limit Committee: Melanie Gundersen (Chair), Steve Hughes, Joe Plesha, John Rotter, Jay Stinson, Dale Schwartzmiller, Sinclair Wilt (absent), Douglas Holmberg (Alternate for Corey Wilson)

Mr. Chairman and members of the Panel/Council. For the record, my name is Melanie Gundersen. I was appointed Chairman for the Trip Limit Industry Committee, bringing together individuals interested in and affected by the proposals requesting imposition of trip limits for pollock and Pacific cod for the Gulf of Alaska. We met on Wednesday September 26, 1997, for approximately four hours with all members or alternates being present except for Sinclair Wilt of Alyeska Seafoods. This meeting resulted in some consensus, mainly that something needs to be done to remedy the particular problem of over-harvesting the quota that recently was a very serious problem for Area 610. That quota was exceeded by over 100% in just a few days. We all agreed that this trend is a serious management problem. The Committee also recognized concerns about pre-emption of local small boat fleets.

Although there were some Committee members who do not favor a trip limit of any kind, several of the members present, do still support a trip limit in the range of 150,000 - 400,000 lbs. A vessel would be allowed one delivery per 24 hour period and must deliver all product on the vessel. As there was some agreement that imposition of a trip limit in the range of 200,000 - 300,000 lbs would accommodate the majority of the fleet that fishes the majority of the time in the Gulf of Alaska, concern was also voiced that other larger vessels with a long history in the Gulf who also operate in the Bering Sea would be disenfranchised by such a limit. Another item discussed was the possibility that if a trip limit was considered, that it be adjusted as the quota changes. For example, if the quota were to increase substantially, then too would the trip limit. Some individuals discounted this and some wanted it tied to vessel size or capacity. Also discussed was exclusive registration by season or by year between the Gulf and the Bering Sea. Also suggested was some form of pre-registration that would enable the National Marine Fisheries Service to be aware of the level of effort that intends to participate in a particular fishery. A stand down period of 48 up to 72 hours was discussed with concern voiced that this alternative alone would not be enough unless it were used in conjunction with a trip limit or area registration. This provision would require vessels switching between the Gulf and Bering Sea to cease fishing for the recommended time period. Also in conjunction with one or more of these requirements was a suggestion that the Western line of area 610 be moved eastward to Scotch Cap on the Western tip of Unimak Island. The argument reflecting the possibility that Bering Sea stocks are potentially migrating south from the Bering Sea, into 610. Another question raised, but not resolved because of a question of legality was whether it was possible to require that product caught in the Gulf be delivered in the Gulf and not to ports in the Bering Sea region or elsewhere such as out of State. As a somewhat separate but related issue, everyone agreed that elimination of and redistribution of the short June pollock quota into an A and B system would partly alleviate the problem of the added pressure from the Bering Sea during that particular opening.

Another alternative considered and agreed upon was dropping the requirement that fishery closures be noticed in the Federal Register. It was thought that this would allow NMFS to close fisheries in a more timely fashion and reduce the chance of large quota overages.

Mr. Chairman, in summary, there seemed to be general agreement that there are management and pre-emption problems in the Western and the Central Gulf pollock and cod fisheries. And, while there was not full agreement on any specific solution, everyone on the Committee offered one or more ideas. I'm not sure that the Committee would ever agree on one management scenario to bring to the Council, but I was encouraged that we all believe that something needs to be done.

Discussion Paper

**Proposed Trip Limit Programs
for the Central and Western Gulf of Alaska**

June 3, 1997

1 INTRODUCTION

Individuals that primarily participate in Gulf of Alaska fisheries have expressed concern that their fishing seasons are sometimes shortened when large vessels move from Bering Sea and Aleutian Islands fisheries into Gulf of Alaska fisheries. Various options have been proposed by Gulf of Alaska fishermen over the years to help mitigate their perceived problem. These proposals often included trip limits as a mechanism to help reduce the impacts felt by the smaller Gulf of Alaska vessels. This paper will provide a brief discussion of the trip limit alternatives that have been proposed.

The action needed by the Council at this meeting is to decide if these proposals should be sent back to staff for a complete analysis. If the Council does wish to see additional analysis on this issue, they will need to develop a problem statement and a list of alternatives to be studied. Implementing a trip limit program will require a plan amendment.

2 STRUCTURE OF THE TRIP LIMIT PROPOSALS

Trip limit proposals have been submitted for the Western and Central Gulf of Alaska (Appendix I). The proposal for the Western Gulf of Alaska came from the Peninsula Marketing Association, and the Central Gulf of Alaska proposal from the Alaska Dragger's Association and the Groundfish Data Bank. Together these proposals will form the baseline for this discussion.

Areas

Trip limits have been proposed for the Western and Central Gulf of Alaska. A program could be tailored for each of these areas, possibly patterned after the proposals that were submitted to the Council. No proposals have been received at the Council office for trip limits in the eastern Gulf of Alaska.

Defining the Western Gulf of Alaska area is straightforward. It is assumed to be the Gulf of Alaska waters between 159° W. and 170° W. However, the Central Gulf of Alaska will be redefined if the License Limitation Program (LLP) is approved by the Secretary of Commerce. Currently the Central Gulf of Alaska includes the waters from 147° W. to 159° W. Under the LLP, the Central Gulf of Alaska was expanded to include West Yakutat. Adding West Yakutat to the Central Gulf of Alaska changes the boundaries to be between 140° W. and 159° W. Should the Council decide to move forward with a formal analysis of the trip limit proposals, they may wish to implement the two programs concurrently and use the LLP area definition for the Central Gulf of Alaska.

Species

Trip limits are being proposed for pollock and Pacific cod. Originally the proposals focused on pollock, but both the Central and Western Gulf of Alaska proposals have been amended to include cod. Cod was added because of concerns that the larger boats would simply target cod if the size of their pollock trips were limited. If the fishing pressure on cod was increased, it would likely shorten the length of that fishery.

Size of Trips

The size of a trip could be defined in at least three different ways. A trip limit could be based on the total catch of all species. This would include target species as well as non-target species. Given that IR/IU in the Gulf of Alaska will likely include shallow-water flatfish species within five years, addressing this issue up front may be prudent. A second alternative would be to base the trip limit on the combined catch

of cod and pollock only. This alternative could reduce the incentive for pollock boats to top off with the amount of cod bycatch allowed under the directed fishing standards. Finally, the trip limit could be applied only to the target species. This would allow vessels to harvest the target species up to the trip limit and top off the trip with species other than the target.

Western Gulf of Alaska

A trip limit of 150,000 pounds (or about 68 metric tons) has been proposed for the Western Gulf of Alaska. This limit was suggested because it represents the approximate maximum hold capacity of a 58' salmon limit seiner. Those are the types of vessels typically owned by the local residents that this proposal is designed to protect.

Central Gulf of Alaska

The trip limit suggested for the Central Gulf of Alaska is 180 metric tons (397,000 pounds) per trip. Only a few Kodiak based catcher vessels have capacity greater than the suggested limit. Under the precedents section of the proposal, the authors indicate that catcher processors less than 125' fishing under the shorebased portion of the inshore/offshore quotas operate under a daily limit. That daily limit is set at 18 metric tons per day or 126 metric tons per week of cod and pollock combined. Given these limits, the average catcher vessel will be allowed to harvest more pollock and cod each day than the small catcher processors.

Overage Provision

An overage provision similar to that used in the open access halibut "clean up" fishery was suggested in the Groundfish Data Bank's proposal dated September 13, 1994. That fishery was basically a trip limit program based on eight vessel length classes. Enforcement was given some latitude when determining violations based on the amount catch a particular vessel was allowed. The International Pacific Halibut Commission and enforcement will need to be consulted further if this option is pursued.

Duration of the Program

Trip limits are suggested to remain effective until replaced by a comprehensive rationalization program. The authors did not consider LLP to be a comprehensive rationalization program that would replace trip limits. The tenor of the proposals was that when a program would protect the Gulf of Alaska based vessels from preemption by the larger Bering Sea and Aleutian Islands vessels (such as IFQs), the trip limit program would cease.

3 DATA

Fishticket data for the 1996 fishery are included for the reader in this discussion paper. Data are currently not available for the 1997 fishery. Should this proposal go forward for a complete EA/RIR, additional years of information will be provided. Fishtickets are used because processors are required to submit a fishticket to the State of Alaska each time a catcher vessel makes a landing within State waters. Also, catcher processors that fish under the inshore-offshore shoreside allocation are limited to 18 metric tons of pollock and cod a day. This level of catch is well below the proposed trip limits.

Catch

The catch of pollock and cod harvested in the Western and Central Gulf of Alaska are reported in this section. Only fishtickets where pollock or cod was considered the target are included. Cod and pollock targets were assigned if one of those species made up at least 50% of the catch reported on the fishticket.

Figure 1 shows the catch by trip in the Central Gulf of Alaska during 1996. The thick black line running horizontally across the page is the proposed trip limit size. The other two lines show the actual catch on each trip by vessels ≤ 58 ft. and vessels > 58 ft.

In the Central Gulf of Alaska vessels ≤ 58 ft. never took a trip that was equal to the proposed trip limit, and three trips over the limit were taken by large vessels. If trip limits had been in place in the Central Gulf of Alaska during 1996, they would have had almost no impact. In fact, if we assume that the fish taken above the limit was reallocated it would amount to less than one-half of one trip (190,000 lbs.). That calculation assumes that fishermen would not change their behavior and try to catch the limit on each trip. If fishermen below the trip limit did slightly increase their catch on each trip the extra one-half trip would no be available.

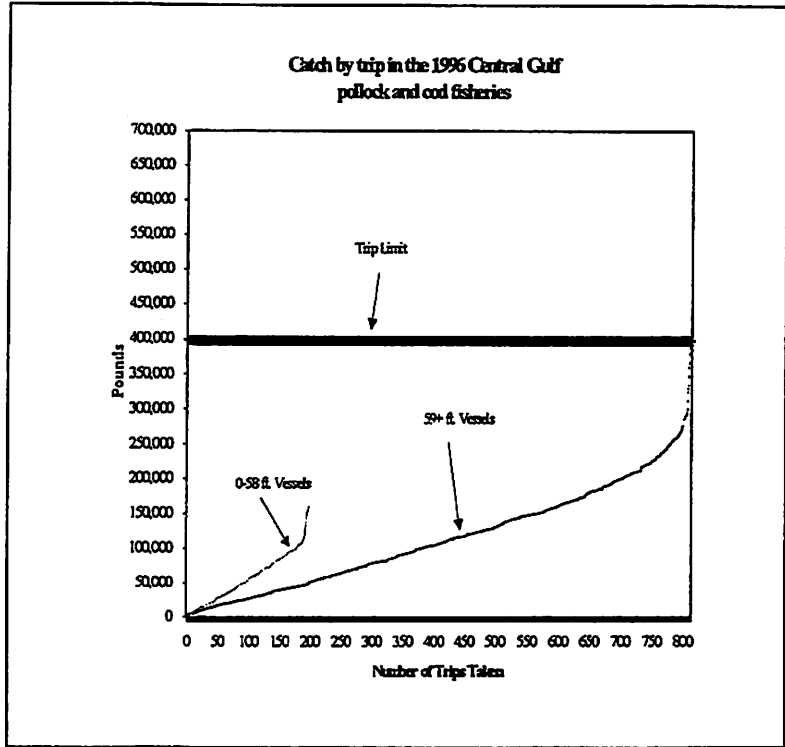
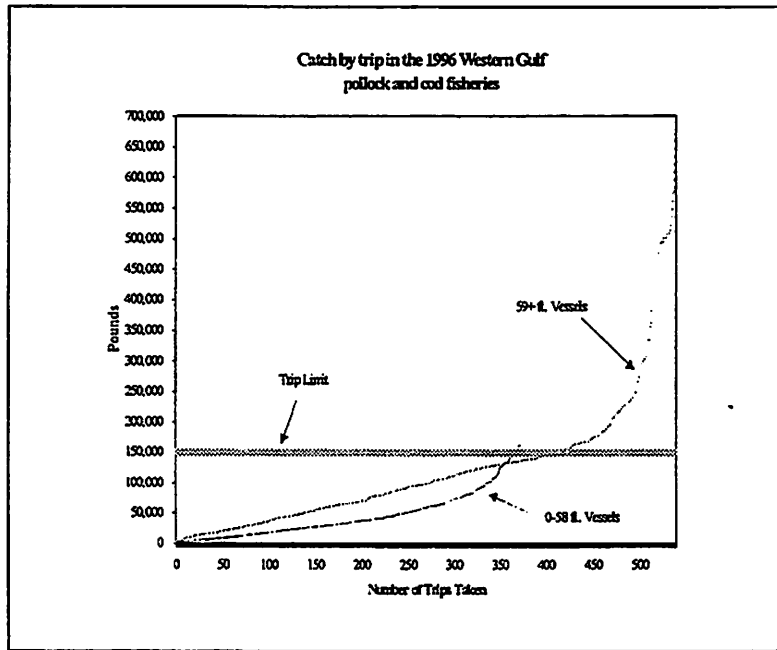


Figure 2 shows the 1996 catch in the Western Gulf of Alaska. The proposed 150,000 lb. trip limit would have almost no impact on vessels ≤ 58 ft. Vessels in the larger class would be impacted. They reported taking about 550 trips, and almost 125 of those trips were over the proposed limit. Summing the portion of those catches that was over the limit and dividing those pounds by the 150,000 pound limit, indicates that just over 100 additional trips could be taken. Again, this assumes that fishermen taking trips under the limit would not increase their catch per trip, as we expect they might, and that other vessels would not enter the fishery. Testimony from representatives of the Western Alaska communities have indicated that there are fishermen who would consider entering these fisheries if trip limits were imposed.



Given that about 80 vessels currently participate in the fishery, and there is the potential for vessels to enter the fishery or increase their trip size, it is unlikely that the average vessel would realize more than one additional trip.

Bering Sea Catch

Many large vessels that participate in the Gulf of Alaska pollock and cod fisheries spend the first part of the fishing season in the Bering Sea or Aleutian Islands. In fact, 61 of the vessels that fished in the Central or Western Gulf of Alaska also fished in the Bering Sea or Aleutian Islands. Only two of these vessels were 58 ft. or less.

Species Group	Metric Tons of Catch
Pollock	202,000
Pacific cod	24,000
Flatfish	12,000
All other Groundfish	<1,000

The Bering Sea/Aleutian Islands portion of the catch taken by vessels that fished in both areas was mainly pollock and cod. Pollock accounted for 202,000 metric tons of their Bering Sea and Aleutian Islands catch. Cod was about 10% of their pollock total (24,000 metric tons). Flatfish, rockfish, and other groundfish made up the remainder. In total, these species were less than 15,000 metric tons.

Length of Fishing Season

Using the rough estimates of potential additional trips that was made in the catch section of this document, it is unlikely that the pollock and cod season lengths would increase in the Central Gulf of Alaska. Western Gulf of Alaska seasons might increase by up to a week (7,000 mt. of pollock and cod catch combined). The 1996 trawl cod and pollock fishing seasons are listed in Tables 1 and 2, respectively.

<u>Bering Sea/Aleutian Islands</u>		
	<u>Dates</u>	<u>Days Total</u>
Inshore	Jan 20 – May 14	114
	June 16 – June 23	7
	Oct. 27 – Nov 9	14
<u>Gulf of Alaska</u>		
Area 610	Jan 20 – March 3	13
Area 620	Jan 20 – March 18	28
Area 630	Jan 20 – March 18	28

Table 2. 1996 Pollock Fisheries

Bering Sea

<u>A Season</u>	<u>Dates</u>	<u>Days Total</u>
Inshore		
open to all trawling	Jan 20 - March 2	12
open to pelagic gear	Jan 20 - March 2	12
Offshore		
open to all trawling	Jan 26 - Feb 26	12
open to pelagic gear	Jan 26 - Feb 26	12

B Season

Inshore		
open to all trawling	Sept 1 - Sept 7	7
open to pelagic gear	Sept 1 - Oct 17	17
Offshore		
open to all trawling	Sept 1 - Sept 7	7
open to pelagic gear	Sept 1 - Oct 17	17

Aleutian Islands

Inshore		
open to all trawling	Jan 20 - Mar 10	20
	March 15 - 16	1
open to pelagic gear	Jan 20 - Mar 10	20
	March 15 - 16	1
Offshore		
open to all trawling	Jan 26 - March 2	6
open to pelagic gear	Jan 26 - March 2	6

Gulf of Alaska

Area 610	Jan 20 - 28	8
	Sept 1 - 18	18
Area 620	Jan 20 - 29	9
	June 1-2	1
	Sept 1 - 19	19
Area 630	Jan 20 - 23	3
	June 1-2	1
	Sept 1 - 3	3

Where do the participants in the fishery reside

The residence of vessel owners that fish their vessels in the Central and Western Gulf of Alaska are listed in the Table below. Vessel owners residing in Sand Point, King Cove, and Other US cities appear to fish in both the Central and Western Gulf of Alaska. Kodiak vessels fish mainly in Central Gulf of Alaska. Vessels owned by individuals living in other Alaska cities also generally fish in the Central Gulf of Alaska. These distributions indicate that vessel owners tend to fish their vessels close to where they live. This is especially true for small vessels.

1996 Vessel Owner's Residence

Vessel Owner's Residence	Central Gulf		Western Gulf	
	0-58' Vessels	59'+ Vessels	0-58' Vessels	59'+ Vessels
King Cove	6	1	7	1
Kodiak	8	20	0	4
Sand Point	24	1	24	2
Other Alaska	6	3	1	1
Other US	11	34	9	31
Total	56	59	41	39

Vessels Potentially Not Qualified for the License Limitation Program.

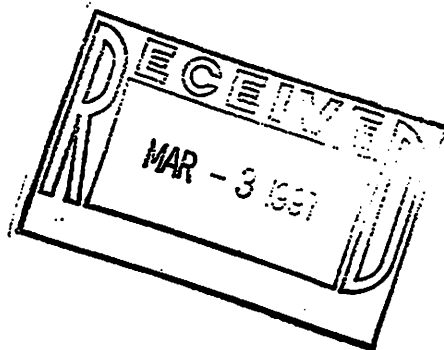
Based on the analysis data base constructed for the LLP it appears that 13 Central Gulf of Alaska vessels would not qualify to fish if the program is passed by the Secretary of Commerce. Eight of the vessels were > 58 ft, and five were ≤ 58 ft. In the Western Gulf of Alaska, it appears that six vessels would not qualify. Three of the vessels were > 58 ft, and five were ≤ 58 ft.

PENINSULA MARKETING ASSOCIATION

Appendix 1

P.O. BOX 248
SAND POINT, ALASKA 99661
PH(907)383-3600 FAX(907)383-5618

February 24, 1997



Mr. Richard Lauber, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Dear Mr. Lauber:

I would like to take this opportunity to convey to you my disappointment in not being able to provide comments on the trip limits for the Western Gulf at the recent meeting in Anchorage. I'm enclosing an amended proposal for pollock and cod fishing for this area. A vessel list for 1997 was provided to your staff member at the last meeting, who is compiling a report on trip and vessel sizes for 1995 and 1996. I hope that it will be helpful.

We would like to amend our original proposal to include cod along with the pollock and to lower the trip limit size to 150,000 pounds that is delivered in the Western Gulf. Currently, according to our calculations, there are currently 52 vessels that are trawl fishing in this area. Of these vessels, 36 are considered to be local who live in either Sand Point or King Cove. Many of these vessels do not currently pollock fish but many have the capability and desire to do so. As I'm sure you know, to gear up for this fishery would require a substantial investment. Many are apprehensive to do so without imposition of trip limits.

As you can see from the vessel list, 45 of these vessels carry 155,000 pounds or less in their holds. Only seven carry more than that, two of which hold 500,000 pounds. If more of these larger vessels were to participate and deliver to this area, the economy could be severely hurt and management by NMFS would become even more difficult resulting in over fishing of the already diminishing quota. You had asked me at the December meeting that if there were trip limits, would the larger boats then fish the areas where the smaller boats fish. Fishermen have told me

Mr. Lauber
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that they already do so. With the close of the Bering Sea pollock fishery, it is expected that many larger vessels will be arriving in this area soon to participate in the cod fishery that is going on now. Already, the vessels here are on a rotation basis because the canneries are having a difficult time keeping up with their processing.

We feel that this is a very important issue that will benefit the majority of the entire fleet. Therefore, we will continue to pursue this. As you know, the Western Gulf is not the only area pushing for trip limits. Fishermen from the Central Gulf have also submitted a similar proposal for their area, although due to the size of their vessels their limit would be higher. The staff research that was done for 1995 and 1996 indicates that these proposed trip limits will not disenfranchise very many vessels, but will benefit the majority of the fleet that has smaller capacity. As you can see from the enclosed 1997 boat list, this still holds true. Please understand the importance of this proposal to the economy of our area. With the devastated condition of our salmon fishery, our fishermen are becoming reliant on bottomfish to support their overall fishing operations.

I hope that the information I've provided you with is helpful in convincing you to continue serious consideration of imposing a trip limit. I hope that the Council will discuss this issue seriously at the April meeting, rather than letting it slip off the end of the agenda buried in "staff tasking". If I can be of further assistance in providing you with any additional information, please let me know.

Sincerely,



Melanie Gundersen, President

enclosure

cc: Bob King
David Benton
Steve Pennoyer

**GROUND FISH FISHERY MANAGEMENT PLAN AMENDMENT PROPOSAL
NORTH PACIFIC FISHERY MANAGEMENT COUNCIL**

Name of Proposer: Peninsula Marketing Association
Address: P.O. Box 248
Sand Point, Alaska 99661

Telephone: (907) 383-3600

Fishery Management Plan: GULF OF ALASKA GROUND FISH FMP

Brief Statement of Proposal: Establish a trip limit of 150,000 pounds per 24 hours for all vessels fishing and delivering pollock and cod in the Western Gulf.

Objective of Proposal: The License Limitation qualification criteria and season date timing have resulted in an increase in the number of larger vessels participating in the Western Gulf. The large harvest capabilities of the larger vessels often plug the canneries and deplete the quota much too quickly. Establishing a trip limit of 150,000 pounds for all vessels would allow a steady flow of product to the processors and allow equal access to the resource. It would slow down the harvests of what have been, and are likely to remain, relatively small TAC's for pollock and cod. Thus, the National Marine Fisheries Service would be better able to account for harvests inseason and provide for season closures in a timely manner without dramatically exceeding or under-cutting the quota.

Need and Justification for Council Action: The Council has the authority to manage and regulate this fishery.

Foreseeable Impacts of Proposal: The National Marine Fisheries Service will be better able to manage this fishery, despite the increased effort that has been created by recent regulatory changes. Also to benefit are the fishermen and families of the coastal communities of the area that depend upon fishing as their sole source of income. The staff research done thus far indicates that these proposed trip limits will not disenfranchise very many vessels, but will benefit the majority of the fleet that has smaller capacity.

Are there Alternative Solutions: No.

Supportive Data & Other Information: The local community fishermen who participate in this fishery, and who have testified before this council. The staff research that has been done thus far and the vessel list that we compiled and submitted for your review.