


MEMORANDUM

TO: Council, AP, and SSC Members

FROM: Clarence G. Pautzke   
Executive Director

DATE: April 7, 1989

SUBJECT: Requests for Immediate Council Action on Groundfish

**ACTION REQUIRED**

Review requests from industry to take emergency action to:

- (a) Prohibit roe-stripping and require full utilization of pollock or all groundfish in the Western/Central Gulf of Alaska or in all waters under Council jurisdiction by 1990.
- (b) Permit pollock bycatch to be retained up to 20% in other groundfish fisheries in the Western/Central Area throughout the rest of 1989.

**BACKGROUND**

At its December 1988 meeting, the Council recommended a 1989 pollock Total Allowable Catch (TAC) of 53,750 mt for the Western/Central Regulatory Area of the Gulf of Alaska. The Council also established a Shelikof District within this regulatory area, and restricted its TAC to 6,250 mt. These pollock quotas were set based on concerns expressed by the Plan Team and the SSC over the apparent low levels of exploitable pollock biomass in the Gulf of Alaska. A synopsis of the Council decision is in item C-7(a).

During the 1989 fishing year, industry rapidly attained the pollock TAC in both the Shelikof District and the Western/Central Regulatory Area; these areas were closed by NOAA Fisheries on March 21 and March 23, respectively. According to preliminary data provided by NOAA Fisheries, the 1989 pollock harvest to date has been:

Shelikof District	
Catcher/processors:	404.8 mt ( 6.4%)
Vessels delivering shoreside:	5,918.2 mt (93.6%)
Western/Central Regulatory Area	
Catcher/processors:	38,011.1 mt (62.8%)
Vessels delivering shoreside:	22,540.9 mt (37.2%)
<b>TOTALS</b>	
Catcher/processors:	38,415.9 mt (57.4%)
Vessels delivering shoreside:	<u>28,459.1 mt</u> (42.6%)
	66,875.0 mt

NOAA Fisheries is unable to accurately define how much of the quota was utilized for roe stripping operations. Based on industry reports, however, a significant amount of the quota was utilized in this manner.

Because of the rapid attainment of the Gulf pollock quota, and because of continued concerns over the practice of roe stripping in the pollock fisheries of the North Pacific, industry has asked that the Council take action to require full utilization by the 1990 fishing year and permit pollock bycatch to be retained up to 20% in other groundfish fisheries in the Western/Central Area throughout the rest of 1989 [items C-7(b-c)].

Governor Cowper also has expressed concern over the roe stripping practice, and has requested that the Council provide for retainable pollock bycatch in the Gulf for the remainder of 1989 [item C-7(d)].

NOAA Fisheries will present a status report on the 1989 Shelikof Strait acoustic survey of the spawning biomass. In June NOAA Fisheries will present an interim pollock stock assessment, including a more detailed analysis of the acoustic data and preliminary analyses of observer and port sampling data. As noted in C-7(a), the Council indicated last December that they would revisit the Gulf pollock TAC in June to determine if adjustments were necessary based on new fishery and survey data.

The Council has several options for responding to industry's concerns:

1. Full utilization/roe-stripping.

The first issue, to require full utilization and prohibit roe stripping, would require an amendment to the groundfish fishery management plans. Concern over roe stripping has been expressed by industry before. It was the subject of a proposal for Amendment 11 to the BSAI FMP; however, the Council rejected the Amendment 11 measure partly because the SSC found no biological basis for a prohibition. Roe stripping also was the subject of three proposed amendments [see item C-7(e)]. The Council chose not to process those proposals in this year's amendment cycle.

If requested by the Council, the groundfish plan teams could prepare a draft groundfish amendment for Council review in September, public review during October/November, and final Council action in December. An emergency rule also could implement the action for 1990, followed by a plan amendment in next year's cycle. (If an emergency rule is recommended by the Council, it could be in effect in approximately 40 days.) This schedule would permit the current groundfish amendment package to proceed through the public review and comment process without delay, while still allowing a full utilization measure to be in effect for 1990. The Council will need to clearly specify the areas and species that should be covered by the amendment and whether they want to move ahead more quickly than the schedule proposed here.

2. Provide for retainable pollock bycatch.

In order to allow pollock bycatch to be retained during prosecution of other groundfish fisheries in the Gulf in 1989, the Council must first raise the pollock TAC, and recommend that the additional quota be for bycatch only. The projected bycatch of 3360 mt of pollock in the cod and flounder fisheries is estimated in item C-7(f). Increasing the TAC could be accomplished by emergency rule, and could be in effect for the second half of the 1989 fishing year.

According to the Gulf plan, TACs are based on:

- (a) Estimated MSY and ABC.
- (b) Past and present catches.
- (c) Impacts of alternative harvest strategies.

- (d) Changes in groundfish markets.
- (e) Socioeconomic considerations.

The TAC conceivably could be raised without adjusting the ABC so long as such an increase did not constitute a threat of overfishing the pollock resource.

At the June Council meeting an interim stock assessment of pollock will be available from NOAA Fisheries. The Council may wish to defer action on raising the pollock TAC until hearing that report.

Future pollock stock assessments will continue to rely on the triennial trawl surveys in the Gulf (next scheduled for 1990), the annual Shelikof Strait acoustic survey, and observer and port sampling of the commercial catch. The Council may wish to recommend that NOAA Fisheries budget for an expanded Gulf pollock stock assessment program for future years in order to improve the plan team's data base for annually recommending ABCs for this fishery.

GULF OF ALASKA POLLOCK DECISIONS  
DECEMBER 1989

RAD Summary: Pollock maximum sustainable yield (MSY) is unknown. The Western/Central Area acceptable biological catch (ABC) in 1988 was 90,000-120,000 mt but is unknown for 1989. DAP Pollock catch through December 31, 1988 was 56,002 mt in the Western/Central Gulf (63% of the total allowable catch (TAC) of 89,500 mt in 1988).

Team Report: The 1988 acoustic survey in Shelikof produced a biomass estimate of only 330,000 mt, substantially below the most pessimistic projection of 1987. ABC would be zero if lower biomass estimates were used, however the team no longer supported the threshold of 770,000 mt. While the team could not identify an ABC, the biomass projection model showed little difference in short term biomass trends under catches ranging from 0 mt to 50,000 mt for 1989. The Team recommended a limited fishery in Shelikof Strait during the spring spawning period to provide data for future stock assessments. A limited fishery of 6,250 mt would provide about 25 loads of about 250 mt each for biological samples and encourage commercial operations outside the Strait. The threshold is the minimum stock size that has produced a strong year class (the 1977 spawning biomass of 768,000 mt) but the team now believes it is without credibility and fails to find the justification for its continued use.

SSC Report: The SSC agreed with the team that the threshold value is unknown. They derived an ABC of 60,000 mt for the Western/Central Area based on 10% exploitation of 1987 NMFS bottom trawl survey biomass estimate of 593,000 mt. They found that past harvests at a 10% rate of estimated biomass outside Shelikof Strait coincided with a substantial increase in the pollock population. The SSC recommended a separate Shelikof management area with a TAC of 6,250 mt. They agreed with the team in stating that a TAC in the range of 0-50,000 mt makes little difference in the projection model. They noted that additional information will be available by June including the results of the 1989 Shelikof survey.

AP: They unanimously recommended a Western/Central TAC of 50,000 mt and 10,000 mt for Shelikof, all to be allocated to DAP fisheries. The AP also recommended (by unanimous vote) that the Council encourage a voluntary industry agreement that there be full utilization of the carcass for either meal or filets. Third, the AP recommended that the Council add pollock to the June agenda and allow for emergency action to increase TAC and DAP if new scientific data show more fish.

Council Action: The Council clearly stated they were not abandoning the threshold concept but did want to follow the advice of the SSC with regard to ABC. They unanimously set Shelikof TAC at 6,250 mt. Discussion indicates this was an effort to encourage fishing outside Shelikof Strait. It was stressed that the Council needs to have maximum flexibility to respond to data that will be collected in any experimental research fishery in Shelikof and data acquired in other fisheries around Kodiak. The Council then set the Western/Central TAC at 53,750 mt (plus the 6,250 mt in Shelikof). They also took emergency action to establish the Shelikof District. The Council stated their intent to revisit the TAC in June and determine if adjustments were necessary based on further data generated from the fisheries and the surveys. The Council urged the industry not to roe-strip within Shelikof Strait, but to fully utilize pollock carcasses to allow a longer season and more information to be collected.

The Council also recognized that there would need to be pollock available as bycatch for JVP flatfish later in the year. The Council stated that the fishery would only be allowed if sufficient quantities of pollock and halibut were available for bycatch purposes.

March 27, 1989

John Peterson, Chairman  
North Pacific Fishery Management Council  
P.O. Box 103138  
Anchorage, Alaska 99510

RE: FULL UTILIZATION OF CENTRAL/WESTERN GULF OF ALASKA POLLOCK

Dear John:

The undersigned members of the Kodiak Coalition -- processors and fishing associations - request that the proposal submitted to the council earlier this year mandating full utilization of pollock be shifted from a low priority to a fast-track high priority.

We feel it is imperative after watching 60,000 MT of pollock be harvested in less than three months, and more than half of that amount harvested in less than two weeks, that every effort be made to regain control of the Central/Western Gulf pollock fishery.

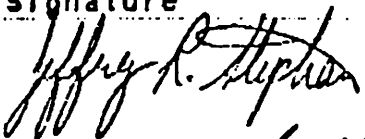
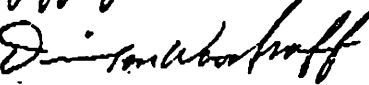
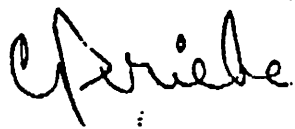
Roe stripping results in the total waste of all the male fish and the waste of all but the roe portion of the female fish, which is a disservice to the nation and the people depending on the pollock for food and those depending on pollock for employment.

Roe stripping also is a defacto transfer of the resource from those operations making maximum use of the resource to those operations making minimal use of the resource for the simple reason that an operation which is only roe stripping can harvest much more rapidly than an operation using the male fish and the carcasses of the female fish for fillets, surimi or meal.

We understand that the council may, if it desires, reconsider the pollock full utilization proposal at the April meeting, send it out for review and take action at the June meeting. This, according to NMFS, would allow time to have a regulation in place before the 1990 pollock roe season.

We appreciate the Council's willingness to consider our request.

Sincerely,

Signature	Name (Print)	Affiliation
	JEFFREY R. STEPHAN	UNITED FISHERMEN'S MARKETING ASSOCIATION
	DAVE WOODRUFF	ALASKA FRESH SEAFOODS IN PROCESSOR.
	CRAIG PRIEBE	EAGLE FISHERIES

The undersigned support immediate Council action to require full utilization of pollock carcasses by the 1990 roe season.

Signature \_\_\_\_\_ Name (Print) \_\_\_\_\_ Affiliation \_\_\_\_\_

<i>James Major</i>	JAMES MAJOR	EAST POINT SEAFOOD CO
<i>Timothy J. Blot</i>	TIMOTHY J. BLAT	ALL ALASKA SEAFOODS INC.
<i>Wayne Selby</i>	WAYNE SELBY	COOK INLET PROC
<i>Kenneth M. Allread</i>	KENNETH M. ALLREAD	WESTERN ALASKA FISHERY
<i>John Sevier</i>	JOHN SEVIER	ALASKA PACIFIC SEAFOOD
<i>Neil Shuckergow</i>	NEIL SHUCKERGOW	INTERNATIONAL SEAFOODS OF ALASKA
<i>Dan James</i>	DAN JAMES	KODIAK REDUCTION, INC
<i>Stuart Lutton</i>	STUART LUTTON	KING CRAB FARM
<i>Alvin R. Burch</i>	ALVIN R BURCH	ALASKA DRAGGAGE ASSN.
<i>Oral L. Burch</i>	ORAL L. BURCH	BURCH BROS. INC.
<i>Oscar Dixon</i>	OSCAR DIXON	MV PEGGY JO
<i>Chris Blackburn</i>	CHRIS BLACKBURN	ALASKA GROUNDROCK DATA BANK
<i>Dave Howille</i>	DAVE HOWILLE	KWT

*Dave Howille*  
by CJB

March 27, 1989

John Peterson, Chairman  
North Pacific Fishery Management Council  
P.O. Box 103138  
Anchorage, Alaska 99510

RE: RETENTION OF POLLOCK BYCATCH IN THE CENTRAL/WESTERN GULF OF  
ALASKA PACIFIC COD FISHERY.

Dear John:

The undersigned members of the Kodiak Coalition -- processors and fishing associations - request the North Pacific Fishery Management direct NMFS to act as quickly as possible to allow the retention of the pollock taken as bycatch in the other groundfish fisheries of the Central/Western Gulf of Alaska.

As you are aware the 60,000 MT pollock TAC was reached in the Central/Western Gulf of Alaska on March 23.

The rate at which the pollock was harvested exceeded all expectations and the TAC was reached before NMFS was able to complete the process for instituting a single species rule for the Gulf of Alaska.

The single species rule would have required NMFS to close the directed fishery before the TAC was reached to allow bycatch to be retained.

In making this request we note the following:

1. Pollock taken as bycatch in other groundfish fisheries are dead when they come onboard. Allowing the retention of bycatch will not increase the mortality on pollock, but will allow full use of the bycatch.
2. Pollock has a lower exvessel value than any other commercially fished groundfish species, so there is no incentive to target pollock. Allowing retention will not increase the catch of pollock.
3. Pacific cod feed on pollock, so a certain amount of bycatch is unavoidable in the Pacific cod fishery. Smaller pollock bycatches are associated with the other groundfish species.
4. At the traditional retainable bycatch amount of 20%, not more than 10,000 MT of pollock would be taken in the Pacific cod fishery if the remaining TAC's were fully caught. In reality, the amount would probably be less.

We have reviewed all available observer data and note that the aggregated ADF&G data for 1987-1989 shows that pollock made up 14.1 to 35.5% of the deliveries. Since some of the deliveries in the aggregated data undoubtedly targeted on pollock, we feel the 20% rate will allow retention of all pollock taken as bycatch in most tows.

In the flounder fisheries joint venture and ADF&G data indicate the pollock bycatch rate is 2-3%.

5. The SSC and PT have stated that biological harm to the pollock stocks would probably not occur unless 50% or more of the biomass was taken. An additional 10,000 MT would result in a total take of 70,000 MT out of a biomass estimated at around 800,000 MT.
6. The 80,000 MT quota was a conservative quota based on concern that the bulk of the pollock spawning occurred in Shelikof Strait.

The 1989 quota represents a 10% exploitation rate on the biomass estimate obtained from the 1987 bottom trawl survey. It should be noted that in 1984 the exploitation rate was 16% and in 1985 the rate was 35% (GOA RAD for 1989).

In 1986 and 1987 the exploitation rate was less than 10% due to market conditions.

7. All but 6,250 MT of the 1989 pollock harvest was taken on the East side of Kodiak. Observer data indicates these east side stocks were coming into spawn and could not be expected to spawn in Shelikof Strait.
8. Allowing retention of pollock taken as bycatch will increase the scientific information on the east side pollock stocks.
9. Reducing waste and encouraging full accountability is a policy of the North Pacific Fishery Management Council.

Because pollock are now being discarded in the other groundfish fisheries, any delay in allowing 20% retention of the pollock bycatch only exacerbates the waste. We request that the most rapid form of action possible be taken.

We realize that there may be some concern and/or difficulty allowing the pollock bycatch to be retained since the TAC has been reached and retaining the bycatch is a de facto increase in the TAC.

However, we note the following:

1. The de facto increase in the TAC exists whether the pollock are retained or are thrown over the side;



Pollock bycatch - page 3

2. In making a closure the Regional Director may also consider the risk of biological harm to the stock (minimal in this case) and risk of socioeconomic harm to authorized users.
3. The Regional Director may allow continued fishing with certain gear types.
4. The entire regulation section covering closures when the TAC is reached is concerned with preventing overfishing -- an issue which is not of concern or relevant in this particular case.

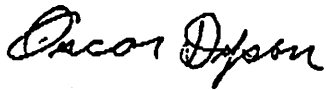

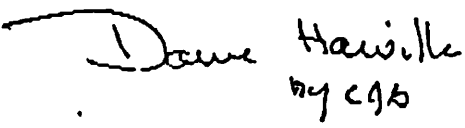
It would appear our request is well within the intent of the law. However, since the regulations did not anticipate a situation such as has occurred with Central/Western Gulf pollock, some creative interpretations may be necessary to allow implementation of the regulatory intent.

We thank the Council for its attention to our request.

Sincerely,

Signature	Name (printed)	Affiliation
<i>Jeffrey R. Stephan</i>	JEFFREY R. STEPHAN	UNITED FISHERMENS MARKETING ASSOCIATION
<i>Dave Woodruff</i>	DAVE WOODRUFF	ALASKA FRESH SEAFOODS PROCESSOR
<i>Craig Priebe</i>	CRAIG PRIEBE	EAGLE FISHERIES
<i>James Matton</i>	JAMES MATTON	ENOT POINT SEAFOOD CO
<i>Timothy F. Blott</i>	TIMOTHY F. BLOTT	ALL ALASKAN SEAFOODS INC
<i>Wayne Selby</i>	WAYNE SELBY	COOK INNET PROC.
<i>Kenneth M. Allread</i>	KENNETH M. ALLREAD	WESTERN ALASKA FISHERIES
<i>Neil Shuckrow</i>	NEIL SHUCKROW	INTERNATIONAL SEAFOODS
<i>John Sevier</i>	JOHN SEVIER	ALASKA PACIFIC SEAFOOD
<i>Dan James</i>	DAN JAMES	KODIAK REDUCTION, I.
<i>Stewart Lutton</i>	STEWART LUTTON	KING CRAB INC
<i>Alvin R. Burch</i>	ALVIN R. BURCH	AK DRAGONS ASSOCIATION
<i>Alvin R. Burch</i>	ALVIN R. BURCH	BURCH BROS. INC

The undersigned support action by the North Pacific Fishery Management Council to allow retention of the pollock bycatch in the Central/Western Gulf of Alaska Pacific cod fishery.

<u>Signature</u>	<u>Name (printed)</u>	<u>Affiliation</u>
	OSCAR DYSON	MV PEGGY JO
	Chris Blackburn	ALASKA GROUNDWATER DATA Bank
 by cgb	Dave Howille	KWT

APRIL 1989

A. W. BRINDLE  
H. A. BRINDLECHOICE ALASKA SEAFOOD  
SINCE 1912**Wards Cove Packing Company**88 E. HAMLIN STREET  
P.O. BOX C-5030  
SEATTLE, WA 98105-0030PHONE (206) 323-3200  
TELEX 328759Day Fax (206) 323-3200 Ext. 258  
Night Fax (206) 323-3204

March 28, 1989

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

Gentlemen;

The sudden, unexpected closure of pollock fishing in the Central and Western Gulf of Alaska on March 23, 1989, after less than 3 months of fishing in the year, dramatically demonstrates the need for the Council to prohibit by emergency action the practice of roe stripping. This action must result in effective regulations and enforcement procedures to eliminate the practice of roe stripping before the roe-bearing pollock season in the first quarter of 1990.

We urge the Council to take the following emergency action at it's April, 1989 meeting in all waters under its jurisdiction in the North Pacific Ocean, including the Bering Sea:

It shall be unlawful to take roe, milt or any other internal organs of any species of fish unless the carcass of such fish is also used for the production of food or industrial products.

Such a law must not include traditionally shucked shellfish species, the disposal of an acceptable amount of waste from fish processing operations, the freezing of fish in the round or normal sorting discards from fishing and processing operations.

Justification:

- a. Without question the major reason that the TAC for pollock in the Central and Western Gulf was caught in such a short period of time in 1989 was the concentration of a large number of factory trawlers on spawning stocks in these areas. Also, it is certain that a substantial portion of the pollock caught by this fleet was stripped of the roe and the carcasses discarded at sea without further processing.

Currently there are varying estimates of the number of factory trawlers which fished the concentrated pollock spawning populations and the proportion of the catch which was stripped and discarded but there is no question that both these numbers are large.

North Pacific Fisheries  
Management Council

Page Two

- b. This practice is extremely wasteful of a valuable resource and produces many negative impacts:
- 1) Premature capture of the pollock TAC by this wasteful practice prevents the continued operation of both floating and shore-based plants which utilize both roe and carcasses for the balance of the year. The negative economic impact on these operations, their employees and the communities in which they operate is great, although we cannot estimate it at this writing.
  - 2) Waste of the pollock resource is further compounded by the elimination of pollock as a retainable bycatch in the conduct of fisheries for other species. Under current regulations such pollock bycatches which will be taken by fisheries for other species must now be discarded at sea for the balance of the year. The Council should also take emergency action to avoid such waste if the condition of the resource will not be jeopardized by allowing reasonable bycatch retention.
- c. We recommend that the Council extend the prohibition of roe stripping to all areas and all species for the following reasons:
- 1) This wasteful practice must not be allowed to expand to cod and other species and create the same types of emergency situations as now exist with Gulf pollock.
  - 2) Roe stripping currently takes place to an unmeasured extent wherever spawning concentrations of pollock are fished by U.S. fishermen. The fact that this practice has not yet created emergency situations in the Bering Sea, such as now exists in the Gulf, does not make the practice any less wasteful and objectionable. Unless prohibited the practice of roe stripping will feed on itself and grow to emergency proportions. At some point in time, those who are not now roe stripping will tend to engage in the practice "for competitive reasons" unless it is prohibited for all concerned.

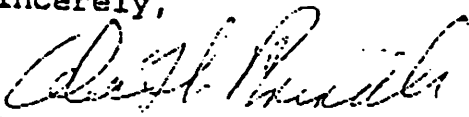
North Pacific Fisheries  
Management Council

Page Three

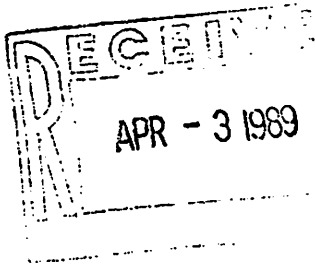
d. There is some division of scientific theory about the biological impact on the resources of harvesting a large proportion of the TAC of pollock and other species from the seasonally vulnerable spawning concentrations. The fact of the matter is that there is insufficient scientific information available to determine with a high probability the consequences of various levels of harvest from such spawning stocks on the levels of recruitment to the resource. Without such information, it seems prudent to at least restrict the capability of the fisheries on spawning stocks to the level of processing capacity available for carcass utilization.

We urge the council to take emergency action at the April meeting to resolve these problems before the roe season of 1990.

Sincerely,



Alec W. Brindle  
President



March 24, 1989

Dr. William Evans  
Undersecretary  
National Oceanic and  
Atmospheric Administration  
Department of Commerce  
Room 5128  
14th Street and Constitution Avenue, NW  
Washington, DC 20230

Dear Bill,

The closure, on March 23, of the Central and Western Gulf of Alaska to retention of walleye pollock for the remainder of 1989 brings into sharp focus a set of issues of grave concern to fishermen and processors of Alaska. Substantial investment has been made in vessels and processing plants to create a stable shoreside bottomfish industry, particularly in Kodiak where the availability of pollock and other groundfish on a year-round basis is of extreme importance to the entire community.

Of the entire 60,000 metric ton harvest limit for Western and Central Gulf pollock a majority was apparently taken by a fleet of only 10 or so factory/trawlers; local reports indicate that as much as 40,000 mt may have been simply stripped of its roe and the carcasses discarded in a race-for-fish among factory ships. The immense fishing capacity, high mobility, and ever larger numbers of these vessels pose a threat of biological, economic, and social harm to any long-term bottomfish industry in the state.

Because factory/trawlers neither carry observers, nor deliver their product ashore, there is no way to verify the amounts and composition of their target catch, discards, or incidental take of "bycatch" species. Because their product is normally transhipped at sea, little or no income flows to coastal communities. The practice of pollock roe stripping, particularly at the fast pace evident in the Gulf this year, constitutes a dramatic waste of a resource that could otherwise support a vital component of Kodiak's economy.

March 24, 1989

Regarding the recent closure, I commend the action of the National Marine Fisheries Service, Alaska Region, to require the off-loading of pollock prior to fishing or processing other species. This should at least help provide assurance that continued pollock fishing does not occur. However, it may be necessary as well to require inspection of at-sea processors by NMFS authorities, either at-sea or onshore, in order to ensure compliance with the prohibition. The Alaska Department of Fish and Game can provide assistance with such inspections if you wish.

For the remainder of this year, I encourage you to conduct whatever surveys may be reasonable to evaluate whether the original harvest limit was indeed appropriate. There appears to be some doubt that surveys of spawning pollock in Shelikof Strait adequately assess the entire Central and Western Gulf pollock population, especially in light of substantial catches of adult pollock off the southeastern shore of Kodiak Island this year. I also encourage you to consider a modest adjustment of the pollock harvest limit to allow retention of pollock taken incidently in other groundfish fisheries in 1989.

Bill, as you know from our previous conversations, the groundfish industry is vitally important to Alaska. The apparent conduct of what is a highly capitalized, mobile fleet of factory ships poses a severe threat to the social and economic stability of Alaska coastal communities. We are as yet unsure whether this practice may effect the resource itself. I hope that we can work together through the Regional Council process to deal more equitably with the conservation and allocation of groundfish resources off Alaska.

Sincerely,

S/S Steve Cowper

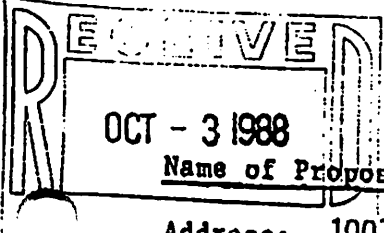
Steve Cowper  
Governor

cc: Jim Brennan, NMFS  
Steve Pennoyer, NMFS/AKR  
Bill Aron, NWAFC  
Clarence Pautzke, NPFMC

bcc: Cliff Davidson  
Fred Zharoff  
Jerome Selby  
Commissioner Collinsworth

SC/DSL/SS  
bill/sds

1112



GROUND FISH PLAN AMENDMENT PROPOSAL  
North Pacific Fishery Management Council

AGENDA C-7(e)  
APRIL 1989

OCT - 3 1988

Name of Proposer: SOUTHWEST ALASKA MUNICIPAL CONFERENCE

Date: Sept 30, 1988

Address: 1007 W. 3rd Ave Suite 201  
Anchorage, Alaska 99501

Telephone: 274-7555

Fishery Management Plan: Bering Sea and Gulf of Alaska

Brief Statement of Proposal: To prohibit the stripping of pollock roe with its attendant dumping of fish carcasses.

Objectives of Proposal: (What is the problem?)

The objective of the proposal is to slow down the harvest of pollock during the roe fishing season and to prevent habitat degradation due to the dumping of fish bodies.

Need and Justification for Council Action: (Why can't the problem be resolved through other channels?)

Due to the olympic system of both the JV and domestic fishery, the incentives are to harvest as quickly as possible. Under the JV fishery up to 70% of the quota were taken before the fish could spawn. Roe stripping helped achieve these levels of harvest. Regulations are necessary to overcome these economic incentives.

Foreseeable Impacts of Proposal: (Who wins, who loses?)

By reducing the level of harvest during roe season, more eggs will be available for spawning. This proposal would eliminate the pollution of dumped carcasses which in 1987 was responsible for killing scallop beds. The losers would be those who are hy-grading the roe. There would be an economic loss for them, but the overall system would be less wasteful.

Are There Alternative Solutions?: If so, what are they and why do you consider your proposal the best way of solving the problem?

We are not aware of any other solutions except to manage the roe fishery as a roe fishery and set a limit on the percentage of quota which can be taken during the roe season, similar to the current split season on JV fisheries.

Supportive Data & Other Information: What data is available and where can it be found?

NMFS has reports on the amount of roe stripping which has occurred in recent years.

Signature: John Levy, Executive Director  
Southwest Alaska Municipal Conference

588/AC-5



GROUND FISH PLAN AMENDMENT PROPOSAL  
North Pacific Fishery Management Council

8

Name of Proposer: KODIAK SEAFOOD PROCESSORS

Date: 9/23/88

Address: 911 Gibson Cove Rd.

Telephone: 907-486-3171/486-4760

Fishery Management Plan: Gulf of Alaska, Bering Sea and Aleutians Groundfish

Brief Statement of Proposal: We propose that action be taken to move toward fuller utilization of the bottomfish resource. To move toward achieving this purpose the stripping of roe and at sea dumping of fish carcasses would be disallowed. Full utilization is defined as the use of all fish flesh, less the heads, viscera and resultant "rack" or "fish frame" derived from fillet operations. Undersized fish can be utilized in meal plant operations. The dumping of fish carcasses at sea is prohibited.

Objectives of Proposal: (What is the problem?) The objective is to be responsible in our use of a valuable resource that has been provided us. The unrestricted harvesting of roe and dumping of fish carcasses at sea is irresponsible and an abuse of a valuable food resource. The tendency toward over harvesting thru under reporting in this type of operation must be accounted for. Presently, with no monitoring of sea processors, the large amounts of fish that are dumped at sea provide a danger to the survival of the resource.

Need and Justification for Council Action: (Why can't the problem be resolved through other channels?) Action by the council is necessary to protect the resource from this type of waste. As long as people are thinking of the short term, quick profit motive, the potential for damage to the resource is too great. The practice of disposing of valuable fish carcasses for the sake of making a quick dollar on roe is shortsighted and can lead to under reporting and over harvesting the resource.

Foreseeable Impacts of Proposal: (Who wins, who loses?)

The effect will be a more responsible use of this valuable resource. Presently it is too easy to burn through a valuable resource just for the sake of taking the Roe. Everyone wins in the long run.

Are There Alternative Solutions?: If so, what are they and why do you consider your proposal the best way of solving the problem?

NO

Supportive Data & Other Information: What data is available and where can it be found? It is common knowledge that a roe stripping operation can consume tremendous amounts of fish and has done so in the past. Without on board observer to verify the amount of allocation consumed, this practice must be curtailed.

Signature: *Da James*

## FULLER UTILIZATION OF THE BOTTOMFISH RESOURCE

It has come to the attention of the industry as to the uncertainty of the cod and pollock stocks in the Gulf of Alaska and in particular the Shelikof Strait. With the tremendous investment in recent years by both shore based processors, catcher processors and fishing vessels, it is essential we can say with more certainty the status of these stocks now and in future years.

There are several questions that come to mind.

1. What is the impact of Roe stripping on the stocks?
2. What effect does the intense fishing during Roe season have on spawning fish? Is undue stress put on the species during this period?
3. How do weather patterns and water temperature affect the spawners and juvenile fish.
4. Where are concentrations of other spawning stocks and what percentage of spawners is the Shelikof Strait comprised?
5. What effect does predation have on the cod and pollock stocks?

While there are various views and opinions within the industry there seem to be some fundamental questions that need further study and elaboration.

Until such time as more assurance can be put into the status of the resource a more conservative approach is in order.

While there is significant data from shore based processors and a system of check and balances, the catcher processor operation is open to abuse of the reporting systems. The shorebased processor is constantly being monitored. A plant inspection can occur at any time from any government agency. What is the likelihood of someone walking in the door on a catcher processor out on the high seas? Who writes the fish tickets for the catcher processor? Who monitors the bycatch of a particular species on the catcher processor? What message do we want to send to the industry? Without comparable monitoring systems between shoreside and at sea, the incentive tilts toward at sea harvesting to avoid the growing regulatory requirements. What effect does this have on shoreside investments and jobs in Alaska?

The system of checks & balance is clear on shore. The boats and plants are monitoring each other along with any number of government inspectors shoreside.

How much fish is simply thrown over the side, high graded for size, or stripped of roe and the carcass thrown out? Any Plant's production limitation is typically the freezing capacity and in the case of bottomfish fillet operations the speed of candling and trimming. For strictly a roe operation a tremendous amount of fish could be taken. At roe prices of \$3.00 to \$3.50/lb and rising, and revenues of \$50,000 - \$75,000/day, the incentive for the quick profit from roe stripping is significant.

Can the resource be overharvested? It appears this method of processing can result in the quickest demise of the stocks. How are we monitoring the harvesting of fish during the roe season? Can we know with certainty the reports are accurate? It is absolutely necessary to have full utilization of the resource and discontinue the practice of roe stripping until such time as on board observers can verify the harvest figures and more accurate stock assessments can be made.

#### SUMMARY

1. Unresolved questions needing further data and study.
2. The imbalance and unfairness between shoreside and at sea processors when comparing inspection and enforcement methods.
3. The need for on board observers.
4. The large amounts of fish that roe stripping operations can go through.
5. The waste of a valuable resource at a time of stock uncertainty.

GROUND FISH PLAN AMENDMENT PROPOSAL  
North Pacific Fishery Management Council

31

SEP 30 1988

Name of Proposer: UNITED FISHERMEN'S MARKETING ASSOCIATION, INC.

Date: 9/30/88

Address: BOX 1035, KODIAK, ALASKA 99615

Telephone: 907-486-3453

Fishery Management Plan: GULF OF ALASKA GROUND FISH

Brief Statement of Proposal: POLLOCK CARCASSES THAT ARE BY-PRODUCTS OF ROE-STRIPPING OPERATIONS IN THE GOA POLLOCK FISHERY MUST BE FULLY UTILIZED. FOR PURPOSES OF THIS PROPOSAL, FULL UTILIZATION INCLUDES CONVERSION OF CARCASSES INTO MEAL OR FOOD PRODUCTS.

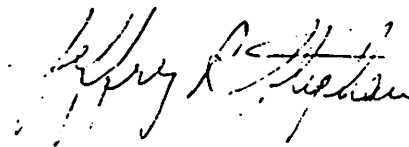
Objectives of Proposal: (What is the problem?) TO PROVIDE FOR FULL UTILIZATION, AS WELL AS MINIMIZATION OF WASTE, OF THE POLLOCK RESOURCE. TO MINIMIZE THE POTENTIAL DETRIMENTAL EFFECTS TO THE BOTTOM HABITAT AND THE ASSOCIATED BIOLOGY. TO PROVIDE FOR A MORE COMPLETE ECONOMIC UTILIZATION OF POLLOCK. MAINTENANCE OF UNPOLLUTED HABITAT.

Need and Justification for Council Action: (Why can't the problem be resolved through other channels?) IT APPEARS THAT THE ACHIEVEMENT OF THIS OBJECTIVE IS AVAILABLE ONLY THRU THE PLAN AMENDMENT PROCESS.

Foreseeable Impacts of Proposal: (Who wins, who loses?) MAXIMAL BENEFITS FROM A MORE COMPLETE UTILIZATION OF THE POLLOCK RESOURCE. MINIMIZATION OF WASTE AND <sup>THE</sup> POTENTIAL ASSOCIATED BIOLOGICAL IMPLICATIONS. IMPROVEMENT OF LONG TERM ~~WASTE~~ EFFICIENCY IN POLLOCK UTILIZATION.

Are There Alternative Solutions?: If so, what are they and why do you consider your proposal the best way of solving the problem? ~~WITHOUT THE REQUIREMENT OF TOTAL UTILIZATION OF POLLOCK CARCASSES, THIS OBJECTIVE WILL PROBABLY NOT BE ACHIEVED.~~

Supportive Data & Other Information: What data is available and where can it be found? STATE OF ALASKA REQUIREMENTS FOR FULL UTILIZATION OF HERRING. AFDF'S PROPOSALS REGARDING ~~WASTE~~ UTILIZATION OF FISHERY ~~RESOURCES~~ RESOURCE BY-PRODUCTS.

Signature:  (JEFFREY R. STEPHAN), Manager U.F.M.A.



UNITED STATES DEPARTMENT OF  
National Oceanic and Atmospheric Administration  
National Marine Fisheries Service  
P.O. Box 21668  
Juneau, Alaska 99802-1668

To: Bill Wilson

DATE: April 3, 1989

MEMORANDUM FOR: F/AKR1 - Dale R. Evans

FROM: F/AKR1 - Ron Berg

SUBJECT: Pollock bycatch needed to support trawl fishing for flounder and Pacific cod in the Gulf of Alaska

According to the March 18, 1989 NMFS DAP catch report, 24,000 mt of flounder and 55,115 mt Pacific cod remain to be harvested in the Western and Central Regulatory Areas. Pollock will be taken and discarded as a PSC in these fisheries. I estimate that at least 3,360 mt of pollock will be taken and discarded, depending on the magnitude of the bycatch.

We have received a few queries about how much pollock would be needed as non-retainable bycatch subsequent to the March 23, 1989 pollock closure in the Gulf of Alaska. Some parties may be concerned about possible overfishing of pollock. Other parties are seeking an increase in the pollock TAC of about 10,000 mt to allow for a target fishery. We need to know the differences between actual bycatch needs and target requests. To determine how much might be required as actual bycatch, I examined pollock bycatches in the flounder and Pacific cod trawl fisheries during 1988, using the State of Alaska fish ticket database to obtain pollock bycatch percentages when flounder or Pacific cod constituted more than 50 percent of the groundfish landings.

#### Worst Case Scenario

The worst case scenario assumes pollock occurs as a bycatch in all of the flounder and Pacific cod landings. Respective average bycatches were calculated from records when pollock was landed with flounder and Pacific cod during May-December 1988. Respective percentages were: 29 percent in a flounder fishery and 18 percent in a Pacific cod fishery.

#### Best Case Scenario

The best case scenario assumes pollock does not occur in all the landings. Respective percentages during May-December 1988 for all records (including when pollock was not landed) were: 11 percent in a flounder fishery and 4 percent in a Pacific cod fishery.



If the flounder and Pacific cod fisheries were independent fisheries, simply multiplying these percentages against remaining amounts of flounder and Pacific cod would yield pollock bycatch needs. However, some Pacific cod will be harvested in the flounder fishery. Likewise, some flounder will be caught in the Pacific cod fishery. To estimate amounts of both species that will actually be harvested in target fisheries, I again examined the fish ticket database.

During the period May-December 1988, the average bycatch of Pacific cod in flounder trawl fisheries was 22 percent (40 records); the average bycatch of flounder in Pacific cod trawl fisheries was 21 percent (115 records). Multiplying these percentages against remaining amounts of flounder and Pacific cod, and then subtracting the products from the remaining amounts suggests that 12,426 mt of flounder and 49,835 mt of Pacific cod will be caught in directed fisheries. Using the pollock bycatch rates (best scenario) of 11 and 4 percent, the bycatch needs can be estimated. To harvest 12,426 mt of flounder, 1,367 mt of pollock would be needed as bycatch. To harvest 49,835 mt of Pacific cod, 1,993 mt of pollock would be needed. The total amount of pollock bycatch, therefore, is 3,360 mt.

### Projections



Mar del Norte, Inc.  
P.O. Box 805  
Kodiak, Alaska 99615  
(907) 486-3790

March 31, 1989

North Pacific Fishery Management Council  
John G. Peterson, Chairman  
P.O. Box 103136  
Anchorage, Alaska 99510

Dear Sir:

As a Alaskan resident and commercial fisherman for the past fifteen years, I am appalled at what has happened to the pollock fishery in the Gulf of Alaska.

I have owned a commercial fishing vessel, the Mar del Norte, since 1976 and have been actively fishing several different species of seafood in the Kodiak area. I fished Shrimp, King crab, and Tanner crab but when these fisheries ended or slowed down I converted my boat, at considerable expense, to trawling.

In 1984 I started delivering Pollock and Cod to a shorebased plant here in Kodiak and have generated seventy five to eighty percent of my annual income since then by doing so.

I understand the importance of having good data available so that informed decisions can be made. Accurate estimates of the abundances of the different species, as well as insight into the true rate of bycatch, is of paramount importance. I have taken out observers for the Department of Fish, and the National Marine Fisheries Service, so that this data can be accumulated. All of the trips that I make with my vessel can be inspected in the cannery where we deliver.

I have worked hard to develop a fishing system that maximizes my catch, while minimizing bycatch, because the continued existence of healthy fish stocks in the Kodiak area is important to my business.

Now, it appears that all of this effort has been for nothing. A large fleet of completely unconcerned, unregulated, and unobserved, factory trawlers have appeared on the scene. Their discarding of other than the target species, bygrading within the target species, and unobserved dumping of bycatch species, is going to ruin these fisheries. It is totally unfair that the shorebased fleet should come under such close scrutiny while this factory fleet is given an open license to plunder our resources.

One hundred percent observer coverage of all at-sea processors is an absolute must. The cost of these observers should be covered by each individual vessel. Limits must be established on the amount of

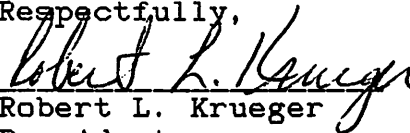


usable fish that can be dumped. The practice of stripping the roe out of a fish, and then dumping the carcass, must be stopped; our fisheries resources are much too important to allow this waste. Shorebased fishing and processing concerns must be given priority access to the available fish. It may be necessary to establish one hundred mile windows around any community that has the ability to process fish on shore. It may be necessary to exclude all factory trawlers from the Gulf of Alaska. The factory fleet must be forced to clean up their act or go fish in the waters of some other nation.

I know that any of these steps may reduce the profitability of these factory operations but I feel that if their profit comes from plundering our fisheries resources, with no thought of the long term health of the species, then it is time to do something about it, NOW.

Please do whatever you can to bring about a one hundred percent observer program for all at-sea processors. This will be an important first step in insuring that commercial fishing will continue to be Alaska's most important renewable resource.

Respectfully,

  
Robert L. Krueger  
President

cc:  
Governor Steve Cowper  
Senator Ted Stevens  
Senator Frank Murkowski  
Representative Don Young  
Senator Fred Zharoff  
Representative Cliff Davidson  
NPFMC Chairmen John Peterson



# ALASKA PACIFIC SEAFOODS, INC.

□ HOME OFFICE: 2155 N. NORTHLAKE WAY • P.O. BOX 31179 • SEATTLE, WASHINGTON 98103 • (206) 632-9900  
□ PROCESSING PLANT: P. O. BOX 1126 • KODIAK, ALASKA 99615 • (907) 486-3234

April 11, 1989

North Pacific Management Council  
Attn: John Peterson, Chairman  
P.O. Box 103136  
Anchorage, Alaska 99510

Dear N.P.F.M. Council members,

On behalf of Alaska Pacific Seafoods, I would like to update you on my firm's utilization of groundfish resources and present some suggestions for consideration in future management decisions.

At Alaska Pacific Seafoods, we established a trend over the years which indicated a steadily increasing use of our groundfish resources. Over the past five years we have more than tripled our capacity to a point where we are now capable of processing 210 MT of pollock daily representing 25% to 30% of the total harvest in the Central and Western Gulf. However for several different reasons our plant processed an average of only 80 MT daily from January to March for a total of 8361 MT in 1989.

What in fact appears to have happened is that we have regressed to the days when we first began harvesting pollock for domestic shore-based plants. We feel this is due to two reasons. First, due to a lack of data on our pollock stocks, a very conservative quota was set. As a result, our plants were forced to shut down early in March as well as cut back on the daily harvest from January to March. Secondly, the presence of Factory Trawlers in the Gulf of Alaska quickly used up the allowable harvest practicing Roe stripping. With no full utilization of the stock, we consider this practice to be an unqualified waste of our valuable groundfish resource.

On behalf of Alaska Pacific Seafoods I would like to make some suggestions which I hope you will consider in future allocation decisions. First, a quarterly quota system should be used rather than yearly. This would allow closer

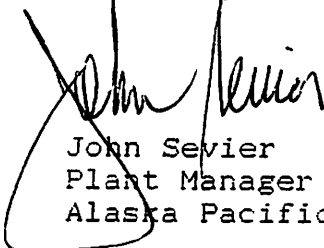
*Processors of Quality Alaska Seafoods*

observation and stricter control over the condition of our pollock stocks. Second, harvesting of Pollock for the sole purpose of Roe stripping should be prevented in the future. As I said before, this is a waste of a valuable resource. And third, require the presence of onboard observers on Factory Trawlers to prevent further abuse of groundfish resources.

I would also like to take this opportunity to point out the Western and Central Gulf represents an area covering over 70,000 square miles. Yet, the only area of harvest and data collection by catcher boats covers an area only about 500 square miles over the previous four years. In short, we have yet to explore the resource available to us as it exists today.

It is vital that a sufficient supply of groundfish be made available to our shore-based plants. To accomplish this goal, more control over the total harvest of our resource and the ultimate use of that harvest must be considered. It is my hope that the North Pacific Fishery Management Council will consider this in both its short-term and long-term allocation decisions.

Sincerely Yours,

A handwritten signature in black ink, appearing to read "John Sevier". The signature is written in a cursive style and is enclosed within a hand-drawn oval.

John Sevier  
Plant Manager  
Alaska Pacific Seafoods, Inc.



**KODIAK  
CHAMBER  
OF COMMERCE**

**FILE COPY**

P.O. Box 1485, Kodiak, Alaska 99615 (907) 486-5557

April 6. 1989

John Peterson, Chairman  
NORTH PACIFIC MANAGEMENT COUNCIL  
P.O. Box 103136  
Anchorage, Ak 99510

Dear Mr. Peterson,

The Board of Directors of the Kodiak Chamber of Commerce wish to go on record as supporting the position paper of the Kodiak fisheries coalition, on the Central/Western Gulf pollock management.

The Kodiak fisheries coalition is a group of Kodiak Processors, fishermen's associations and business people united to present the Kodiak Island communities position on the closing of the pollock fishery in the Gulf of Alaska.

The Kodiak Chamber of Commerce is a non-profit membership organization of business and professional men and women working together to promote the civil, commercial, and industrial progress of Kodiak. To that end, the Chamber has fully supported the Americanization of the 200 mile economic zone created by the Fishery Conservation Management Act.

As part of the support of the Americanization of the fishery the Chamber has consistently stated that the processing of the bottom fish resource must come on shore.

Until the events of late March, the shore based processing capacity was developing as scheduled.

The following statement from the coalitions position paper succinctly sums up the implications to the Kodiak Island Community. "The March 23 closure of the Central/Western Gulf of Alaska pollock fishery has eliminated work for at least 1,000 plant employees in Kodiak and up to 40 vessels, their crews and families.

Though the Kodiak processors will soon have herring to process, by fall 1989, if there are not additional releases of pollock, there will be no work at all for the processing plants. This effects the entire Kodiak community. Not only will the retail and service segments share in the financial downturn, families facing little or no income will bear and suffer both the economic and the concomitant social costs.

Dedicated to Kodiak's Future

**KODIAK CHAMBER OF COMMERRCE**  
**April 6, 1989**

The fishing industry is accustomed to fluctuations in stock abundances. However, the shorebased industry has historically expected that it reasonably could depend on harvesting the stocks within reach of the shorebased plants."

The report goes on the state that "When at-sea processing has the potential, as proven in the 1989 Gulf pollock fishery, to substantially reduce the fish available for the shorebased operations, investment decisions become impossible to make in any rational manner.

For example, the Kodiak processors are in the process of planning for substantial investment to upgrade the jointly owned meal plant. Without some assurance that their operations will be able to take the local pollock quota, it becomes impossible to determine if there will be any return on the investment.

The net result is to hinder or actually stop investment to upgrade shorebased operations and increase the return on fish processed onshore.

Further, within coastal communities whose economies are dependent on their shorebased processing industry, all other segments such as retail stores, service industries and local governments are adversely effected by uncertain and insecure investment climates."

The result of unmoderated competition between at-sea processors and shoarebased processors for the same resource in an area is to shift any economic benefit from an entire coastal community to the at-sea processor and disperse any economic benefits among many areas, none of which are dependent on that economic benefit.

Where economic resources are lacking to provide employment and the tax base for essential services the need for social services escalates rapidly.

This is why the Magnuson Fisheries and Conservation Act includes under "Purposes" that regulations under the Act must "take into account the social and economic needs of the States" and under "Policy" directs that management under the Act "is responsive to the needs of interested and affected States."

Elsewhere in the MFCMA there is language directing management to include socio-economic considerations."

As such, the Board of Directors of the Kodiak Chamber of Commerce have voted to support the Kodiak fisheries coalition's recommendations as follows:

KODIAK CHAMBER OF COMMERRCE  
April 6, 1989

1. There must be a shorebased preference policy in place as soon as possible to offer some degree of security to coastal communities.
2. Require full utilization of all fish harvested.
3. The N.P.F.M.C. should move swiftly to assure data collection using the best scientific methods, including observed coverage, from all segments of the industry, even if the industry must bear the cost of data collection.
4. Allow for retention of pollock in the pacific cod fishery.
5. N.M.F.S. should analyses the recent observer and survey information as rapidly as possible so that an analysis of the status of stocks is available at the June N.P.F.M.C. meeting in June, for a determination of whether the pollock total allowable catch should be raised.

Your attention to this issue is extremely important to the economic vitality of the Kodiak community, and as such we eagerly await your response to these requests.

Yours in economic prosperity,

  
EDWARD F RANDOLPH  
President

cc: Honorable Governor Cowper  
Denby Lloyd, Special Staff Assistant  
Senator Fred Zharoff  
Representative Cliff Davidson  
Senator Ted Stevens  
Senator Frank Murkowski  
Congressman Don Young  
Mayor Jerome Selby, Kodiak Island Borough

KODIAK CHAMBER OF COMMERCE  
04-01-89

A RESOLUTION OF THE KODIAK CHAMBER OF COMMERCE BOARD OF DIRECTORS SUPPORTING FULL UTILIZATION OF POLLOCK AND A SHOREBASED PREFERENCE IN THE DOMESTIC ALLOCATION OF ALL FISHERIES.

WHEREAS, the Americanization of the 200 mile Economic Zone has been accomplished faster than anyone thought was possible; and

WHEREAS, competition for fish among American fishermen has become very intense; and

WHEREAS, the development of floating processors which can move all over the Pacific Ocean has far exceeded all expectations; and

WHEREAS, the floating processors have an unfair advantage over shorebased processors due to the ability to move from area to area; and

WHEREAS, the shorebased processors are the economic lifeblood of coastal communities throughout Alaska and other states; and

WHEREAS, it is the legislative intent of the Magnuson Act to provide and protect the economic viability of coastal communities; and

WHEREAS, the floating processors have demonstrated they can easily shut down an entire region for most of a year; and

WHEREAS, the entire Gulf of Alaska 1989 pollock allocation of 60,000 MT has been reached in 3 months; and

WHEREAS, the shorebased processors fully utilized 23,000 MT of pollock in three months of operation; and

WHEREAS, eight factory/tractors consumed 37,000 MT in 11 days utilizing the roe only and discarding the carcasses; and

WHEREAS, 1500 Kodiak residents indeed the entire Kodiak economy depends upon the Fall pollock harvest for their September through December livelihood; and

WHEREAS, this problem will become more prevalent in other areas as resources shrink and/or processing capabilities continues to increase; and

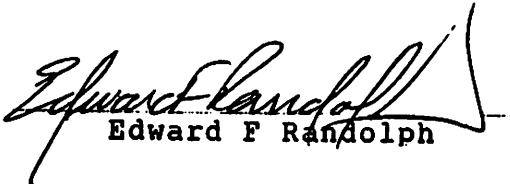
WHEREAS, a Kodiak community meeting of processors, fishermen, businessmen, workers and local government unanimously agreed that the following request for action be conveyed to the North Pacific Fisheries Management Council;


NOW THEREFORE BE IT RESOLVED by the Kodiak Chamber of Commerce Board of Directors that the North Pacific Management Council is urged to adopt the following policies:

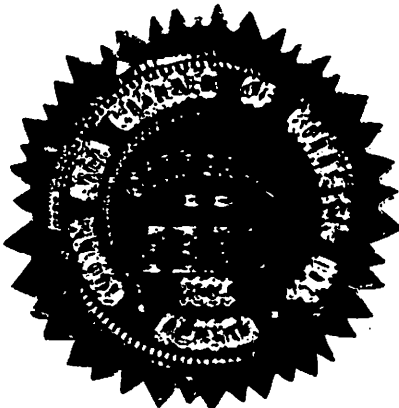
- 1) Immediate emergency meeting of the North Pacific Management Council for a 10,000 MT allocation of pollock for bycatch during the cod and flatfish season,
- 2) Request a 35,000 MT allocation of pollock if the National Marine Fisheries Service and other data supports it for the September to December 1989 time period,
- 3) For 1990, adopt a full-utilization requirement for all pollock, prohibiting roe-stripping only,
- 4) For 1990, make the Domestic Observer Program 100% mandatory,
- 5) For 1990, adopt a DAP (Direct Allocation) shorebase processor preference.

Signed this 7<sup>th</sup> day of April , 1989

KODIAK CHAMBER OF COMMERCE

  
Edward F Randolph

  
Jeri Jensen  
Secretary to the Board





# CENTRAL/WESTERN GULF POLLOCK MANAGEMENT

## POSITION PAPER

### KODIAK FISHERIES COALITION

(A coalition of Kodiak processors and fishermen's associations)

#### BACKGROUND

##### What Happened

In December 1988 it was anticipated that the 1989 Central/Western Gulf of Alaska pollock quota, set conservatively at 60,000 MT, would meet the year's production requirements of the Kodiak shorebased processors.

On March 23, 1989, pollock fishing in the Central/Western Gulf of Alaska closed because the entire 60,000 MT quota had been harvested.

##### Why It Happened

###### 1. At-sea Processing Effort Greater than Anticipated

An estimated 38% or 23,000 MT of the Central/Western Gulf of Alaska pollock quota was taken by shorebased processors. An estimated 62% or 37,000 MT was taken by at-sea processors.

In past years no more than two at-sea processors targeted the Central/Western Gulf of Alaska pollock stocks during any one month.

###### 2. Roe Stripping Increased Rate of Harvest

Some of these vessels "roe-stripped" -- removed the pollock roe from the females and threw both the female carcasses and the male fish overboard.

Roe stripping allows a processor to run through 2.5 to 3 times more fish in a given time than if the processor were fully utilizing the fish for fillets, surimi or meal.

An at-sea processor is also able to run through more fish before offloading by keeping only the roe onboard than if he had to allocate space and processing time for fillets, surimi or meal.

###### 3. Data on the Gulf of Alaska Pollock Biomasses Is Inadequate

The last bottom trawl survey on Gulf of Alaska pollock was made in 1987. It indicated declines in the stocks in the Western Gulf and increases in the biomass in the Kodiak area.

Subsequent analysis of 1987 and 1988 ADF&G data indicated continued increases in the Kodiak area pollock biomass.

The Shelikof Strait hydroacoustic data indicated a dramatic decline in the spawning aggregations during the sampling period. However, there are indications that the hydroacoustic survey did not sample during the peak of the spawn.

When the pollock fishery was a joint venture fishery conducted only in Shelikof Strait during the spawning period, the hydroacoustic survey was considered adequate.

Now that the bulk of the fishery has shifted to the East side of Kodiak Island and the Trinity Island area, the hydroacoustic survey no longer represents the stocks being harvested. Nor did the 1988 hydroacoustic survey represent the findings of the 1987 bottom trawl survey.

We note the following in the December 4-6 Draft Minutes from the North Pacific Fishery Management Council's Scientific and Statistical Committee (SSC):

- A. "Because the available indicators of stock strength are inconsistent, the team was unable to determine an ABC for the Gulf of Alaska pollock.
- B. "The data are insufficient to allow this action" (setting the ABC based on the 1987 bottom trawl survey).

The SSC did not set an ABC, but did recommend a Central/Western Gulf of Alaska quota of 10% of the 1987 bottom trawl survey -- 60,000 MT. The SSC also noted that new information would be available in June from the port sampling, observer and hydroacoustic programs conducted out of Kodiak February - March.

#### 4. No Regulatory Relief Was in Place

The potential for at-sea processors to adversely impact coastal communities has been recognized by all elements in the fishing community. While several efforts were made to mitigate the potential through regulatory action, none of the proposed actions were in place for the start of the 1989 season.

- A. Single Species Rule for Gulf of Alaska: This would allow NMFS to close any directed fishery before the TAC is reached to allow enough of the species for retainable bycatch in other fisheries.

The Single Species rule is designed to prevent waste.

NMFS is in the process of implementing the Single Species Rule for the Gulf of Alaska by regulatory amendment, but that amendment is still in process.

- B. Requiring full utilization of pollock: This proposal would have prohibited roe stripping and slowed down the rate at which pollock were harvested in the Central/Western Gulf of Alaska.

The Full Utilization proposal requires a plan amendment. It was given a low priority by the North Pacific Fishery Management Council and therefore was not in the system and could not be put in place by emergency regulation for the 1989 season.

Efforts are now in progress to assure that this regulation is in place for the 1990 season.

- C. Quarterly allocations: This was also proposed this year, but was given a low priority. Considering the rate at which the Central/Western Gulf of Alaska pollock were harvested in 1989 this probably would not have mitigated the current situation.
- D. Non-Specific Reserve: NMFS has recommended in the past that a portion of the total Gulf of Alaska TACs be put into a non-specific reserve to allow NMFS flexibility to meet situations such as the current closure of the pollock fishery.

Were there a non-specific reserve, pollock could have been immediately released for retainable bycatch in the other groundfish fisheries, eliminating the waste of throwing dead pollock overboard while targeting on Pacific cod.

## IMPLICATIONS

### 1. Employment

The March 23 closure of the Central/Western Gulf of Alaska pollock fishery has eliminated work for at least 1,000 plant employees in Kodiak and up to 40 vessels, their crews and families.

Though the Kodiak processors will soon have herring to process, by fall 1989, if there are not additional releases of pollock, there will be no work at all for the processing plants. This effects the entire Kodiak community. Not only will the retail and service segments share in the financial downturn, families facing little or no income will bear and suffer both the economic and the concomitant social costs.

## 2. Investment

The Kodiak fishing industry is accustomed to fluctuations in stock abundances. However, the shorebased industry has historically expected that it reasonably could depend on harvesting the stocks within reach of the shorebased plants.

Therefore, if the biological data indicates a stock is in good shape and has good recruitment, a processor or vessel owner historically could reasonably plan on working on that stock for several years into the future.

However, when at-sea processing has the potential, as proven in the 1989 Gulf pollock fishery, to substantially reduce the fish available for the shorebased operations, investment decisions become impossible to make in any rational manner.

For example, the Kodiak processors are in the process of planning for substantial investment to upgrade the jointly owned meal plant. Without some assurance that their operations will be able to take the local pollock quota, it becomes impossible to determine if there will be any return on the investment.

The net result is to hinder or actually stop investment to upgrade shorebased operations and increase the return on fish processed onshore.

The same lack of security also has implications for investments to upgrade at-sea operations.

Further, within coastal communities whose economies are dependent on their shorebased processing industry, all other segments such as retail stores, service industries and local governments are adversely effected by uncertain and insecure investment climates.

## 3. Economics

The result of unmoderated competition between at-sea processors and shorebased processors for the same resource in an area is to shift any economic benefit from an entire coastal community to the at-sea processor and disperse any economic benefits among many areas, none of which are dependent on that economic benefit.

Where economic resources are lacking to provide employment and the tax base for essential services the need for social services escalates rapidly.

This is why the Magnuson Fisheries and Conservation Act includes under "Purposes" that regulations under the Act must "take into account the social and economic needs of the States" and under "Policy" directs that management under the Act "is responsive to the needs of interested and affected States."

Elsewhere in the MFCMA there is language directing management to include socio-economic considerations.

#### 4. Statewide

The situation created in the 1989 Central/Western Gulf of Alaska pollock fishery has dire implications for every Alaskan community.

The sequence of events dramatically demonstrated:

1. A coastal community can lose its economic base to at-sea processing.
2. There is no regulatory relief or help possible under the current regulations.
3. The situation can occur more quickly than anyone anticipated and more quickly than any agency can act.

#### KODIAK COALITION PROGRAM

To address the current loss of the Central/Western Gulf pollock fishery, the long range health of not only the pollock stocks, but all marine resources, and the economic health of coastal communities, the Kodiak Coalition makes the following recommendations:

1. There must be a shorebased preference policy in place as soon as possible to offer some degree of security to coastal communities.

The policy should recognize that

- A. a large percentage of Alaska's fisheries lay in waters accessible only to at-sea processors;
- B. coastal communities in the State of Alaska are dependent on the resources of the waters of the continental shelf as defined by the Magnuson Act;
- C. substantial investment in fish harvesting and processing exists in coastal communities;
- D. the MFCMA intends that the socio-economic impacts of management decisions on States and segments of the industry be considered in management decisions;
- E. shorebased processing effort is constrained by availability of land in most coastal communities as well as availability of resource within a defined area;
- F. at-sea processing effort has no such constraints;
- G. all other nations have felt it in their national interests to protect the welfare of their coastal communities and onshore processing facilities.

2. Require full utilization of all fish harvested

At present the roe pollock stocks are the only stocks which appear to be stripped for roe and discarded.

A regulation requiring full utilization should be in place before the 1990 roe season.

3. The Council should move swiftly to assure data collection using the best scientific methods, including observer coverage, from all segments of the industry, even if industry must bear the cost of the data collection.

A proposal along these lines is already before the council and the Kodiak Coalition urges its rapid implementation.

The Coalition also urges Congress and NMFS to provide funding for an observer program.

4. Allow for retention of pollock in the Pacific cod fishery

Because Pacific cod feed on pollock there will be during the next few months a pollock bycatch in the Pacific cod fishery.

Because pollock have a lower exvessel value than Pacific cod there is no incentive to target pollock.

The pollock are dead when they are brought onboard, so there is no value to discarding the pollock.

Discarding pollock at-sea deprives managers of information on the amount of pollock taken.

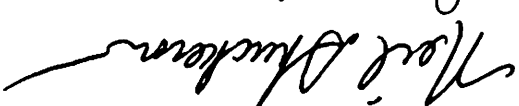
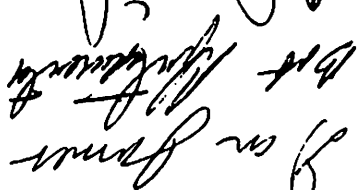
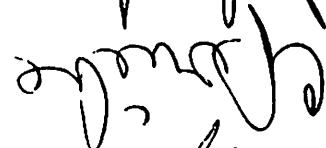
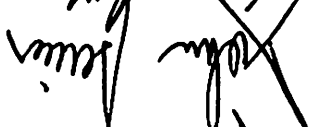

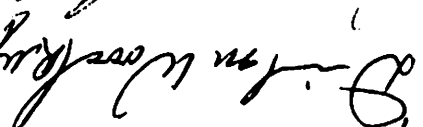
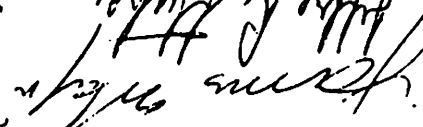
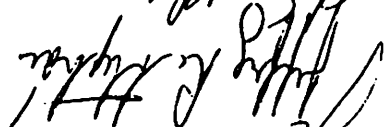
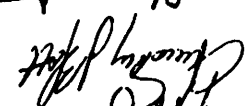
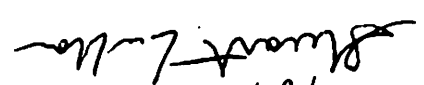
An emergency regulation or inseason adjustment should be made as rapidly as possible to allow the retention of pollock taken as bycatch.

5. NMFS should analyze the recent observer and survey information as rapidly as possible so that an analysis of the status of stocks is available at the June Council meeting for a determination of whether the pollock TAC should be raised.

If the data indicates that additional pollock may safely be released, the release should be made in time for the fall fishery -- approximately September 1.

The undersigned are in accord with the above statements and program of action and urge the State of Alaska, Congress, National Marine Fisheries Service and the North Pacific Fishery Management Council to assist in implementing all five action programs with minimal delay.

Signatures supporting the Kodiak Coalition Position Paper:

Signature	Name (Printed)	Affiliation
	NEIL SHUCKOROV	INTERMOUNTAIN SEAFOODS OF ALASKA, INC.
	DAN JAMES	KODIAK REGIONAL, LLC COAST GUARD PROCESSING
	CRAIG PRIEBE	ANGLE FISHERIES
	TODD SEVIER	ALASKA FRESH SEAFOODS
	KENNETH M. ALLREAD	WESTERN ALASKA FISHERIES
	DAVE WOODCOCK	ALASKA FRESH SEAFOODS
	JAMES NATHAN	EMST POINT SEAFOOD
	JEFFREY R. STEINHIL	UNITED FISHERMEN'S MARKETING ASSOCIATION, INC.
	TIMOTHY J. BLOT	ALL ALASKAN SEAFOODS INC.
	STUART L. LINN	KING (M.B. INC)

## RESOLUTION

A RESOLUTION OF THE ALASKA CONFERENCE OF MAYORS  
SUPPORTING FULL UTILIZATION OF POLLOCK AND A SHOREBASED  
PREFERENCE IN THE DOMESTIC ALLOCATION OF ALL FISHERIES.

Whereas the Americanization of the 200 mile Economic Zone has been accomplished faster than anyone thought was possible and

Whereas competition for fish among American fishermen has become very intense and

Whereas the development of floating processors which can move all over the Pacific Ocean has far exceeded all expectations and

Whereas the floating processors have an unfair advantage over shorebased processors due to the ability to move from area to area and

Whereas the shorebased processors are the economic lifeblood of coastal communities throughout Alaska and other states and

Whereas it is the legislative intent of the Magnusen Act to provide and protect the economic viability of coastal communities and

Whereas the floating processors have demonstrated they can easily shut down an entire region for most of a year and

Whereas the entire Gulf of Alaska 1989 pollock allocation of 60,000 MT has been reached in 3 months and

Whereas the shorebased processors fully utilized 23,000 MT of pollock in three months of operation and



Whereas eight factory/trawlers consumed 37,000 MT in 11 days utilizing the roe only and discarding the carcasses and

Whereas this constitutes criminal wanton waste of a valuable Alaskan protein resource in light of today's world food shortage and

Whereas 1500 Kodiak residents indeed the entire Kodiak economy depends upon the Fall pollock harvest for their September through December livelihood and

Whereas this problem will become more prevalent in other areas as resources shrink and/or processing capabilities continues to increase and

Whereas a Kodiak community meeting of processors, fishermen, businessmen, workers and local government unanimously agreed that the following request for action be conveyed to the North Pacific Fisheries Management Council;

NOW THEREFORE BE IT RESOLVED by the Alaska Conference of Mayors that the North Pacific Management Council is urged to adopt the following policies:

- 1) Immediate emergency meeting of the North Pacific Management Council for a 10,000 MT allocation of pollock for bycatch during the cod and flatfish season,

- 2) Request a 35,000 MT allocation of pollock if the National Marine Fisheries Service and other data supports it for the September to December 1989 time period,

3) For 1990, adopt a full-utilization requirement for all pollock, prohibiting roe-stripping only,

4) For 1990, make the Domestic Observer Program 100% mandatory,

5) For 1990, adopt a DAP (Direct Allocation) shorebase processor preference.

Adopted 3/30/89

Unanimous

KODIAK ISLAND BOROUGH  
RESOLUTION NO. 89-22-R

A RESOLUTION OF THE KODIAK ISLAND BOROUGH ASSEMBLY SUPPORTING  
FULL UTILIZATION OF POLLOCK AND A SHOREBASED PREFERENCE IN THE  
DOMESTIC ALLOCATION OF ALL FISHERIES

WHEREAS, the Americanization of the 200 mile Economic Zone has been accomplished faster than anyone thought was possible; and

WHEREAS, competition for fish among American fishermen has become very intense; and

WHEREAS, the development of floating processors which can move all over the Pacific Ocean has far exceeded all expectations; and

WHEREAS, the floating processors have an unfair advantage over shorebased processors due to the ability to move from area to area; and

WHEREAS, the shorebased processors are the economic lifeblood of coastal communities throughout Alaska and other states; and

WHEREAS, it is the legislative intent of the Magnusen Act to provide and protect the economic viability of coastal communities; and

WHEREAS, the floating processors have demonstrated they can easily shut down an entire region for most of a year; and

WHEREAS, the entire Gulf of Alaska 1989 pollock allocation of 60,000 MT has been reached in three months; and

WHEREAS, the shorebased processors fully utilized 23,000 MT of pollock in three months of operation; and

WHEREAS, eight factory/trauliers consumed 37,000 MT in 11 days utilizing the roe only and discarding the carcasses; and

WHEREAS, this constitutes criminal wanton waste of a valuable Alaskan protein resource in light of today's world food shortage; and

WHEREAS, 1,500 Kodiak residents, indeed the entire Kodiak economy, depends upon the Fall pollock harvest for their September through December livelihood; and

WHEREAS, this problem will become more prevalent in other areas as resources shrink and/or processing capabilities continue to increase; and

WHEREAS, a Kodiak community meeting of processors, fishermen, businessmen, workers, and local government unanimously agreed that the following request for action be conveyed to the North Pacific Fishery Management Council;

NOW, THEREFORE, BE IT RESOLVED by the Kodiak Island Borough Assembly that the North Pacific Fishery Management Council is urged to adopt the following policies:

- 1) Immediate emergency meeting of the North Pacific Fishery Management Council for a 10,000 MT allocation of pollock for bycatch during the cod and flatfish season.
- 2) Request a 35,00 MT allocation of pollock if the National Marine Fisheries Service and other data supports it for the September to December 1989 time period.
- 3) For 1990, adopt a full-utilization requirement for all pollock, prohibiting roe-stripping only.
- 4) For 1990, make the Domestic Observer Program 100% mandatory.
- 5) For 1990, adopt a DAP (Direct Allocation) shorebase processor preference.

PASSED AND APPROVED this 6<sup>th</sup> day of April 1989.

*Unanimous*

KODIAK ISLAND BOROUGH

By \_\_\_\_\_  
Borough Mayor

By \_\_\_\_\_  
Presiding Officer

Attest:

\_\_\_\_\_  
Borough Clerk

RESOLUTION

A RESOLUTION OF THE ALASKA MUNICIPAL LEAGUE BOARD OF DIRECTORS SUPPORTING FULL UTILIZATION OF POLLOCK AND A SHOREBASED PREFERENCE IN THE DOMESTIC ALLOCATION OF ALL FISHERIES.

Whereas the Americanization of the 200 mile Economic Zone has been accomplished faster than anyone thought was possible and

Whereas competition for fish among American fishermen has become very intense and

Whereas the development of floating processors which can move all over the Pacific Ocean has far exceeded all expectations and

Whereas the floating processors have an unfair advantage over shorebased processors due to the ability to move from area to area and

Whereas the shorebased processors are the economic lifeblood of coastal communities throughout Alaska and other states and

Whereas it is the legislative intent of the Magnusen Act to provide and protect the economic viability of coastal communities and

Whereas the floating processors have demonstrated they can easily shut down an entire region for most of a year and

Whereas the entire Gulf of Alaska 1989 pollock allocation of 60,000 MT has been reached in 3 months and

Whereas the shorebased processors fully utilized 23,000 MT of pollock in three months of operation and

Whereas eight factory/trawlers consumed 37,000 MT in 11 days utilizing the roe only and discarding the carcasses and

Whereas this constitutes criminal wanton waste of a valuable Alaskan protein resource in light of today's world food shortage and

Whereas 1500 Kodiak residents indeed the entire Kodiak economy depends upon the Fall pollock harvest for their September through December livelihood and

Whereas this problem will become more prevalent in <sup>many</sup> other areas as resources shrink and/or processing capabilities continues to increase and

Whereas a <sup>a meeting of the</sup> ~~Kodiak~~ <sup>Board of Directors</sup> community meeting of processors, fishermen, businessmen, workers and local government unanimously agreed that the following request for action be conveyed to the North Pacific Fisheries Management Council;

NOW THEREFORE BE IT RESOLVED by the Alaska Municipal League Board of Directors that the North Pacific Management Council is urged to adopt the following policies:

- 1) Immediate emergency meeting of the North Pacific Management Council for a 10,000 MT allocation of pollock for bycatch during the cod and flatfish season,

2) Request a 35,000 MT allocation of pollock if the National Marine Fisheries Service and other data supports it for the September to December 1989 time period,

3) For 1990, adopt a full-utilization requirement for all pollock, prohibiting roe-stripping only,

4) For 1990, make the Domestic Observer Program 100% mandatory,

5) For 1990, adopt a DAP (Direct Allocation) shorebase processor preference.

*Adopted 3/31/89 unanimous*

NORTH PACIFIC FISHERY MANAGEMENT COUNCIL

POLLOCK TESTIMONY

April 12, 1989

Good morning Mr. Chairman and Members of the Council. My name is Jerome Selby, Mayor of the Kodiak Island Borough and President of the Southwest Alaska Municipal Conference. You know why I am here, so I will not go into a lot of detail concerning the events that have happened. Suffice it to say, that stripping the roe from 37,000 metric tons of pollock and throwing the flesh and carcass over the side of the boat in the Gulf of Alaska, and thereby shutting down the economies of the communities of the coast of the Gulf of Alaska is not acceptable. I am here today to ask your action on five specific items. Those items are as follows:

- 1) Immediate allocation of a 10,000 metric ton pollock bycatch during the remaining cod and flatfish season.
- 2) In June 1989, an additional 35,000 metric ton allocation of pollock for the September to December 1989 time period if the National Marine Fisheries Service and data from the fishing industry supports it.
- 3) Adoption effective January 1, 1990, of a full-utilization requirement for all pollock, prohibiting roe-stripping only.



4) Adoption effective January 1, 1990, of a mandatory requirement for onboard Domestic Observers.

5) Adoption effective January 1, 1990, of a DAP shorebase processor preference which reserves an adequate allocation for shorebase processor full year operation first and allows any remaining allocation to be processed at sea.

I'll not comment further on items one and two since there are many other people here who can provide you with the information you need to make those decisions. The allocation of additional pollock in the Gulf of Alaska are decisions that you folks must make based on; A) the best scientific information that you have available, B) the desire to avoid additional waste of pollock in the Gulf during the cod and flatfish season, C) the consideration of the economic impact of not making that pollock available to the communities, and D) the potential damage to the stock if the scientific information does not support additional catch. This is a straightforward process and you folks must make that decision. I will focus my comments instead on the other three items which are somewhat interrelated, and which also represent two major policy decisions, which you folks must make, that will impact the future economic health of the United States of America.

The first policy decision you must face is the issue of the full-utilization requirement for pollock. Personally, I don't

think this is a hard decision to make. It is not very difficult to justify. The continued practice of absolute waste of a considerable amount of fish protein going over the side of a boat to muck up the bottom of the Pacific Ocean at a time when world hunger is at an all time high is criminal. In addition, as a Nation we are something less than stupid to continue to waste fish at a time when there is an insufficient resource to keep the shorebase economies operating, processing this very protein. Full-utilization is, in fact, a National issue for the United States, and I urge you folks to set the precedent and turn the policy toward the full-utilization of the available fish protein to feed people in the world now. At the same time, this resource provides additional economic opportunity for United States citizens. Full-utilization is a winner for everyone involved, whether it be for hungry people, or for people who need jobs, or for simply improving the economic balance of trade for the United States. There is no down side to full-utilization of any significance and I therefore urge you folks to adopt the policy of full-utilization requirement for all pollock at this time to be effective January 1, 1990.

The second National policy issue facing you is the issue of allocation for shorebased processor preference. This issue has ramifications for the entire United States and it is in the National interest of the United States to have you pursue this policy at this time. Shorebase processor preference is simply

a natural extension of the Magnuson Act to its ultimate conclusion and intention. It is very clear from the Magnuson Act, and you folks know that better than I do, that the Legislative intent was to provide for the economic base for shorebase facilities in areas where fisheries were abundant. At the time of the passage of that Act, very little local fishery was taking place because of foreign fishing activity. We have all watched as the application of the Magnuson Act has effectively reduced foreign fisheries and then totally eliminated them except for joint venture fishery. Now the joint venture fisheries have been virtually eliminated as the fishery has become totally American. Now we must come to grips with the much tougher decision-making process and that is how to allocate amongst American fishermen. But, the Magnuson Act is very clear that the intention is to provide an economic base for local communities. The option before you today, and the decision that you must make, is whether it is in fact in the Nation's best interest to provide an economic base for coastal communities throughout Alaska and other states, or is it preferable to turn those communities in the coastal part of the United States into a welfare state with little or no fishing activity which relies on handouts from the United States government for existence. The result of such a decision is a bigger demand on the tax base of an already burdened system with a large federal deficit to pump money to people who could be working in fisheries, but in fact have no jobs because there was no allocation of fishery to the shorebase.

Let me put the situation in perspective for you with a few statistics. First of all, the entire capability of the shorebase plants in the City of Kodiak is approximately equivalent to the production capacity of one large factory trawler. I am told that the factory trawler represents an investment of somewhere between 50 to 100 million dollars. The investment in the Kodiak community is in excess of 600 million dollars. Yet, the same amount of fish which keeps the factory trawler functional drives an economy for a community of 13,000 people as opposed to a few hundred people working on the factory trawler. Now, my question to you gentlemen, is it in fact in the National interest to eliminate jobs for a community of 13,000 people in order to allow one factory trawler to continue to float around and harvest resource at various locations? The factory trawler already has an advantage of being mobile and being able to fish in many different areas. As they did in Kodiak where the canneries will be empty all Fall, they can float off to the fishery. Our recommendation is simply this, that first, there should be enough allocation to drive the economies of the communities in the area of fishery and then the additional allocation of quota, if it is available, would be available for the floating factory trawlers. I think it is a very simple concept, and I think it is in fact the ultimate intention of the Magnuson Act that this is exactly what would take place. We are talking about jobs for an awful lot more people generated by the same amount of fish product. You can take the example I have just given you

for Kodiak Island and you can apply the same situation to Dutch Harbor, Sand Point, and other Alaskan communities such as Bethel, Dillingham, and to communities on the coast of the entire United States. The issue at hand folks is an issue of whether or not it is desirable to provide employment for literally thousands of people on the coast of the United States, thereby providing an economic base to many states. In Alaska, the economy is in a shrinking situation and these fisheries represent an opportunity to keep from turning Alaska into a giant welfare state which drains additional dollars off of the National treasury. Now is the time that we have to make that decision. On the other hand, there is an opportunity of a few hundred jobs, a few surviving factory trawlers which will survive bankruptcy in the next few years because there is just simply not enough product out there to keep everything afloat that is already constructed and/or under construction for processing. As is always the case, the American fisherman has demonstrated that he is more than capable of going out and eliminating any biomass of fish no matter how huge it begins.

Now, the fifth request that I've made actually supports both of the policy decisions that we are requesting that you make. Again, full-utilization of all pollock and a shorebased allocation preference. The fifth item is a matter of requirement for 100% coverage by domestic observers. We have been before you and have discussed this particular topic several times. There is no way we can get to the management of

the fishery without having the accurate data that will allow us to tell how much of any given species is actually being caught. The fact that we allow a catch of 60,000 metric tons during the actual fishery for a particular species, but then allow a great many additional thousands of metric tons to be caught and thrown over the side dead during other fisheries is not management of the fisheries and we all know that here in this room today. I think we all understand at this point that in order to try to maintain a stable supply of fish in any species we have to have the data that we can use to actually manage and make decisions about what the quota should be both for catch and bycatch. The only way we can get there from here folks is by having domestic observers on the boats so the data can be captured on all of the species. We urge you to make that decision here today.

Now I recognize that there are some folks in this room who will oppose our requests here today. And, I do have some ideas about interim solutions if the Council gets bogged down on the shorebased allocation. I'll reserve those comments until the June meeting if the opposition bogs down this request. However, I defy anyone in this room or elsewhere to tell me that healthy economies in coastal communities is not in the best interest of the United States. I therefore request the support of those other interests and their cooperation to provide a shorebased preference in a way that is least damaging to their interests instead of opposing National interest.



Telegram

2 APR 89 11: 5

07008 TDA SITKA AK 130 04-12 1150A ADT  
PMS DLR DLY PD  
MR JOHN PETERSON CARE SHERATON HOTEL  
01075  
ANCHORAGE AK

DEAR MR PETERSON,  
SITKA SOUND SEAFOODS JOINS THE MANY OTHER SHOREBASED PROCESSORS IN ALASKA IN URGING THE COUNCIL TO ADOPT MEASURES WHICH WILL GIVE SHOREBASED PROCESSORS PRIORITY ACCESS TO FISH RESOURCES VERSUS THE OFFSHORE FACTORY TRAWLER FLEET. THE RATE AT WHICH THIS HUGE CAPACITY FLEET CAN GOBBLE A QUOTA IS TRULY FRIGHTENING AND COULD SPELL DISASTER FOR SHORE PLANTS WITHOUT SOME PROTECTION. NOT ONLY CAN THESE FLEETS WITH THEIR MOBILITY MOVE FROM AREA TO AREA CREAMING THE FISHERIES THAT THEY CHOOSE, THEY ALSO ARE HAVING A VERY NEGATIVE IMPACT WITH REGARD TO DISCARDED BY-CATCH OF HIGH VALUE SPECIES THAT THE SHORE PLANTS HAVE TRADITIONALLY DEPENDED UPON. SHORE PLANTS MUST HAVE ACCESS TO PRODUCTS SPREAD THROUGHOUT THE YEAR TO KEEP CREWS BUSY AND SURVIVE.  
THANK YOU FOR YOUR CONSIDERATION.  
HAROLD THOMPSON, PRESIDENT  
SITKA SOUND SEAFOODS

KODIAK LONGLINE  
VESSEL OWNERS ASSOCIATION



P.O. BOX 135 • 326 CENTER AVENUE  
KODIAK, ALASKA 99615  
(907) 486-3781

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HALIBUT, SABLEFISH AND PACIFIC COD

April 8, 1989

Mr. John Peterson, Chairman  
North Pacific Fishery Management Council  
Anchorage, AK

Dear Mr. Peterson:

At approximately 2:00 a.m. the Rebecca Irene, a factory trawler, called boats in the vicinity of 57-48 North/149-40 West to find out where our gear was located. We are presently on our first black cod trip of the season.

I gave the Rebecca Irene the location of my four strings in the water. The upper end depth of them was around 275 fathoms. Above that depth, I encountered massive halibut biomass in one of my first sets on April 4, 1989. Last year at this time, the halibut were much further up the bank at approximately 230 fathoms.

I informed the skipper of the Rebecca Irene that we had encountered masses of flat fish above 270 fathoms. He said he'd be dragging in 180-200 fathoms. I asked him what he was dragging for, to which he replied, red fish. I told him I had not encountered many of those. He put his gear down anyway.

This morning while picking our first set, one of my crewmembers recognized the Rebecca Irene and told us he had worked on the vessel in April and May of 1988 dragging on the edge getting their 20% of black cod, which they were targeting on. I questioned him on their bycatch of halibut to which he replied that they caught a lot of halibut during his time on the vessel. Since all the catch goes into a tank to be sorted out, a lot of the halibut are dead by the time they get handled. He stated the mortality rate to be most severe on big halibut. The crew has a hard time getting the fish out of the holding tank and they get severely gaffed and when they are too large for the trash chute, they get cut up.

I believe the Rebecca Irene was cited last year for predated the black cod catch and was caught with 200 illegal cases aboard. Now the criminals are out there again. They unload to Japanese trampers in the bays of the Kodiak Archipelago, totally unsupervised!

I demand from the Council an immediate order requiring:

1. All factory ships to tranship their product in a designated custom port of the United States. The transshipment must be made under the observance of a Customs officer or a designated U.S. government official.



North Pacific Fishery Management Council

-2-

April 8, 1989

2. Placing observers on all factory trawlers to truly assess the magnitude of their bycatch.

3. Area closures for the factory trawl fleet when they touch upon sensitive areas with concentrations of prohibited species.

I am a longliner/crabber/tenderer. I have lived with short seasons for many years now. They are not to my liking, but I see the necessity for them.

I get furious, though, about the factory trawlers who are allowed to fish on my designated species (black cod, halibut, crab) 365 days a year. I demand equal time for our fisheries or equitable trawl closures which should be implemented to immediately stop this want and waste.

Last year we fished four days of the year for halibut. Why must the factory trawlers be allowed to fish all year on those stocks. Where is the justice in this?

At the Council meetings that I have attended, the factory trawlers banter around the facts about the large investments they have made into the fishery, which is true, but do they mention the gigantic profits that they have reaped? No, they don't mention them. So, by crying loudly and demanding 365 days of fisheries for themselves to be profitable, they destroy our resources.

Now the buck stops. With the pollock closure for the Gulf, brought on by another wanton waste fishery (pollock roe stripping), they closed down the economy of a town which had geared up for year-around employment and benefit for all Alaskans. Now, where do they go from here? They go to dragging for red fish, in reality targetting on black cod. In the process, they rip up massive amounts of halibut, a resource that we don't get to fish on for another month and then we get one 24-hour period.

This is a travesty of justice of tremendous consequence!

If we don't place immediate curbs on the factory trawlers deliberate rape of our resources, these waters will be like the East Coast, the Sea of Japan and the North Sea -- a wasteland. If you fail to act now, you are aiding and abetting the criminals who are destroying the public resources. The Council should quit throwing limited entry, which is sand in our eyes, and should address the real issues.

Indiscriminate hard-on-bottom trawling by the factory trawlers in areas of multi-species habitat must cease unless you institute an observer program now.

Since returning to town on April 11, 1989, I have spoken with numerous longliners who have encountered the trawl fleet all along the shelf dragging anywhere from depths of 180-260 fathoms. The vessels I encountered myself were the Rebecca Irene, the Amfish, the Alaska Harvester and the Bering I.

If the Council does not act in a responsible manner and address this problem immediately, there are disastrous consequences facing our fisheries in the near future. Please act now.

Sincerely,



Ludger Dochterman  
Vessel Owner/Operator  
Member of KLVOA  
Member of UFMA  
Vice-President of KLA

cmf

PS: It is sad that in the name of Americanization the robber barons of the trawl fleet will be able to accomplish in five years what the foreigners, with an observer program, were not able to accomplish in 20 years -- the destruction of the North Pacific fisheries resources.