

MEMORANDUM

TO: Council, SSC and AP Members  
FROM: Clarence G. Pautzke  
Executive Director  
DATE: April 12, 1994  
SUBJECT: Groundfish Management

ESTIMATED TIME

1 HOUR

**ACTION REQUIRED**

- (e) Consider extending emergency rule for GOA halibut PSC trawl fishery apportionment.
- (f) Review halibut bycatch rates for pelagic trawls and decide if action is necessary.
- (g) Rollover of excess PSC to specific quarter or trimester.

**BACKGROUND**

- (e) Emergency rule for GOA halibut PSC trawl apportionment.

In September 1993, the Council initiated a regulatory amendment for the GOA which would provide the mechanism to further apportion the trawl PSC cap by specific fishery. Apportionments for the overall cap may be made to a 'Shallow water complex' and a 'Deep water complex'. Species in the shallow complex are: pollock, Pacific cod, shallow water flatfish, Atka mackerel, and other species. Deep water complex species include: deep water flatfish, rockfish, flathead sole, sablefish, and arrowtooth flounder. The following apportionments of halibut mortality were proposed for 1994, and future modifications to the apportionments can be made during the annual specifications process:

<u>Quarter</u>	<u>Shallow</u>	<u>Deep</u>	<u>Total</u>
1	500 mt	100 mt	600 mt
2	100 mt	300 mt	400 mt
3	200 mt	400 mt	600 mt
4	No apportionment	400 mt	

In December, the Council recommended that this regulatory change be made by emergency rule so that it would be in effect for the 1994 fisheries. The first quarter shallow water PSC allowance was reached on March 21, closing directed fishing in all GOA regulatory areas for shallow water species by vessels using trawl gear (except for directed fishing for pollock with pelagic trawl gear in those areas that remained open). Through March 26, 530 mt of halibut PSC was taken by the shallow water complex fisheries, and 164 mt was taken by the deepwater complex fisheries.

The current emergency rule on GOA trawl PSC apportionment between shallow and deepwater complexes is scheduled to expire on May 12, 1994. This expiration will likely occur before the proposed rule gets published in the *Federal Register*, so the Council may want to recommend that NMFS extend the emergency rule for a second 90-day period.

(f) Halibut bycatch rates for pelagic trawls.

In September 1993, the Council reviewed information regarding bycatch of halibut by pelagic trawl gear, based on a request by industry to place the pelagic trawl fisheries under the halibut PSC cap. Under current regulations governing halibut PSC allowances, pelagic fisheries are exempt from the halibut PSC cap. However fishermen have been able to fish with a legal "pelagic trawl" in a non-pelagic mode because of difficulties in defining a true pelagic trawl. To address this problem, the Council previously has recommended changes to the pelagic trawl definition and developed a performance-based trawl regulation that became effective in August 1993. After review of PSC bycatch information last September, the Council voted to delay further consideration of a PSC cap for the pelagic trawl fisheries until the April 1994 meeting, when more comprehensive information would be available from the 1993 pollock season, and possibly from the 1994 pollock "A" season.

NMFS staff has provided a table summarizing the 1993 halibut bycatch and bycatch mortality in the pollock/Atka mackerel/"other species" fishery (Item D-3(f)(1)). The 1993 PSC cap for this fishery was set at 1,257 mt. Halibut bycatch restrictions closed directed fishing for pollock with non-pelagic trawl gear on August 25. Prior to the closure, 714,000 mt of pollock were harvested along with 848 mt of halibut mortality. Following the closure, 630,500 mt of pollock were harvested with only 64 mt of halibut mortality. With the exception of higher bycatch taken in the Atka mackerel fishery, the closure to non-pelagic gear reduced the halibut bycatch rate by over 90%. Data from the 1994 fisheries are not available.

(g) Rollover of excess PSC.

The Council has received two requests to change the way in which PSC is apportioned among quarters or trimesters. The IPHC conference board has recommended preparation of a regulatory amendment allowing for free apportionment of BSAI fixed gear halibut PSC among trimesters. Pacific Associates has recommended a more comprehensive regulatory amendment that would apply to all PSC in the GOA and BSAI (Item D-3(g)(1)). The change would allow leftover PSC from one quarter or trimester to be designated to other quarters or trimesters, rather than by rollover. Currently, leftover PSC in one quarter or trimester must be rolled over into the following quarter or trimester. Pacific Associates indicates that the proposed change would allow PSC to be utilized in a manner which would maximize its contribution to optimum yield. The Council can consider initiating analysis of such a regulatory amendment at this meeting.

Related PSC Item

The Council has received two letters Item D-3(supplemental) requesting that jig gear be exempted from the hook and line gear PSC caps, or be assigned a separate cap. Such an action would require a regulatory change. The Council may wish to take action on this item by initiating a regulatory amendment to define jig gear, thus allowing possible exemption for next year and beyond.

**Council Recommended 1993 BSAI Trawl Fisheries PSC Apportionments & Seasonal Allowances**

<b>Fishery Group</b>	<b>Assumed Mortality<sup>\1</sup></b>	<b>Halibut, Secondary Mortality Cap (mt)</b>	<b>Halibut, Primary<sup>\2</sup> Mortality Cap (mt)</b>	<b>Herring (mt)</b>	<b>Red King Crab Zone1</b>	<b>C. bairdi Zone1</b>	<b>C. bairdi Zone 2</b>
<b>Yellowfin sole</b> May 1 - Aug. 2 Aug. 3 - Dec. 31	70%	592  230 362	518  201 317	359	40,000	175,000	1,225,000
<b>Rocksole/other flatfish</b> Jan. 1 - Mar. 29 Mar. 30 - June 28 June 29 - Dec. 31	70%	588  427 80 80	514  373 70 70		80,000	475,000	200,000
<b>Turbot/arrowtooth/sablefish</b> June 29 - Dec. 31	40%	137  137	120  120				
<b>Rockfish</b> Mar. 30 - June 28 June 29 - Dec. 31	60%	201  81 120	176  70 105	9			25,000
<b>Pacific cod</b>	60%	1,000	874	27	40,000	175,000	400,000
<b>Pollock/mackerel/"o. species"</b> 'A' Season (1/20 - 4/15) 'B' Season (8/15-12/31)	60%	1,257  314 943	1,099  274 824	193	40,000	175,000	1,150,000
<b>7 MW Pollock (Herring)</b>				1,534			
<b>TOTAL</b>		<b>3,775</b>	<b>3,300</b>	<b>2,122</b>	<b>200,000</b>	<b>1,000,000</b>	<b>3,000,000</b>

<sup>\1</sup> Recommended Mortality rates based on IPHC and NMFS analysis of 1991 observer data.

<sup>\2</sup> Primary halibut cap closes Zones 1 and 2H (Areas 511, 512, 516 and 517).

**Council recommended 1994 BSAI Trawl Fisheries PSC Apportionments and Seasonal Allowances**

Fishery Group	Assumed Mortality*	Halibut Mortality Cap (mt)	Herring (mt)	Red King Crab (animals) Zone1	C. bairdi Zone1	C. bairdi Zone2
Yellowfin sole Jan. 20 - Aug. 2 Aug. 3 - Dec. 31	70%	592 230 362	332	40,000	175,000	1,275,000
Rocksole/other flatfish Jan. 20 - Mar. 29 Mar. 30 - June 28 June 29 - Dec. 31	70%	688 428 180 80		110,000	475,000	260,000
Turbot/arrowtooth/sablefish	40%	137				5,000
Rockfish Jan. 20 - Mar. 29 Mar. 30 - June 28 June 29 - Dec. 31	60%	201 40 120 41	8			10,000
Pacific cod Jan. 20 - June 28	60%	1,200	25	10,000	175,000	200,000
Pollock/mackerel/"o. species" Jan. 20 - April 15 April 16 - Dec. 31	60%	957 430 527	178	40,000	175,000	1,250,000
7 MW Pollock (Herring)			1,419			
<b>TOTAL</b>		<b>3,775</b>	<b>1,962</b>	<b>200,000</b>	<b>1,000,000</b>	<b>3,000,000</b>

\*\* Council recommended discard mortality rates for 1994.

**Council Recommended 1994 Non-Trawl PSC Bycatch Allowances (Dec. 93)**

Fishery Group	Assumed Mortality**	Halibut Mortality (mt)	Seasonal Apportion (mt)	%
Pacific Cod Jan 1 - April 30 May 1 - August 31 Sept. 1 - Dec. 31	12.5/15%	725	685 40 Rollover	95 5
Other Non-Trawl*	12.5/15%	175		
Groundfish Pot	5%	Exempt		
<b>TOTAL</b>		<b>900 metric tons</b>		

\* Includes Hook & Line Sablefish, Turbot, Rockfish and Jig. Lower number reflects the Careful Release Program.

\*\* Council recommended discard mortality rates for 1994. hook-and-line fisheries for 1994.

Summary of 1993 (through 03/30/94) groundfish catch, Pacific halibut bycatch and bycatch mortality in the BSAI pollock, Atka mackerel, and "other species" trawl fisheries before and after halibut bycatch restrictions closed directed fishing for pollock with non-pelagic trawl gear.

Year	Fishery	Groundfish Harvest (mt)	Halibut Bycatch (mt)	Halibut Mortality (mt)
<u>1993</u>				
<= Aug 25	Bottom Pollock	104,953	657	394
	MW Pollock	609,341	567	454
	Atka mackerel	37,673	40	28
	Other species	175	16	6
> Aug 25	Bottom Pollock	5,544	44	26
	MW Pollock	624,956	47	38
	Atka mackerel	31,913	255	178
	Other species	0	0	0

# PA Pacific Associates

116 Gold Street

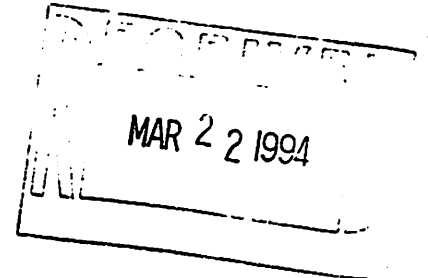
Juneau, Alaska 99801

(907) 586-3107

FAX 586-1001

March 18, 1994

Mr. Richard B. Lauber  
Chairman, North Pacific Fishery Management Council  
P. O. Box 103136  
Anchorage, Alaska 99510



Dear Chairman Lauber:

We hereby request the North Pacific Fishery Management Council (NPFMC) consider initiating a regulatory amendment at the April 1994 council meeting over the manner in which it currently apports leftover PSC from one quarter/trimester to the next. It is our intent that this regulatory amendment would apply to all PSC managed by the NPFMC in the Gulf of Alaska, Bering Sea and Aleutian Islands.

Currently, PSC saved in the first quarter or trimester in any calendar year must be rolled over into the following quarter or trimester. And similarly, PSC saved in the second is rolled into the third, and so on until the final quarter or trimester of the fishing year.

The purpose of our proposed regulatory amendment would be to permit the council, at each December meeting, to designate which quarters or trimesters PSC savings would be applied to during the following fishing year. For example, the council could designate that PSC saved in the Bering Sea Pacific Cod fishery during the first quarter of the calendar year would be applied to the third quarter of the calendar year. Or, in the Gulf of Alaska rock fish fishery, PSC banked in the first trimester could be saved for the third trimester.

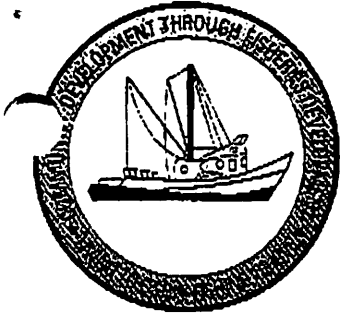
This regulatory amendment would provide the council with increased flexibility to utilize PSC in a manner which would maximize its contribution to optimum yield. Currently, PSC unused in one quarter or trimester must be rolled into the next quarter or trimester (which oftentimes is "dirtier" in terms of bycatch and PSC than a later fishing period).

Council members Linda Behnken, Oscar Dyson, and Ron Hegge have expressed support for considering this regulatory amendment in April. We believe you will see broad based industry support for it as well. Thank you for your consideration of this request.

Sincerely,

Joe Kyle

# Yukon Delta Fisheries Development Association



April 12, 1994

Mr. Richard Lauber, Chairman  
North Pacific Fishery Management Council  
P.O. Box 103136  
Anchorage, Ak 99510

Dear Chairman Lauber:

Beginning his year, there is a separate Pacific cod quota for jig gear in the Bering Sea. The jig quota for 1994 amounts to 2% of the BSAI Pacific cod ITAC or 3,247 mt. Jig fishing has the least impact on non-target species of any currently used gear and results in very low amounts of halibut mortality. In order to fully prosecute this fishery in 1994, it may be necessary to set aside sufficient halibut PSC or exempt jig gear from halibut PSC limits. If this is not done, the jig fishery may not be able to develop and those fishermen who have invested in jig fishing gear based on the separate P. cod allocation will suffer grievous economic loss.

At its June 1992 meeting, the Council passed Amendment 21 to the BSAI Fishery Management Plan. Provisions within this amendment allow PSC limits for fisheries to be changed by regulatory amendment and allow the Regional Director to exempt some non-trawl fisheries from the non-trawl PSC limits. As part of the discussion during the Amendment 21 decision making process, the Council specifically identified jig gear as a separate fishery. For PSC purposes, it was lumped with "other non-trawl fisheries" including hook-and-line caught sablefish and turbot.

At its June 1993 meeting, the Council passed Amendment 24 to the BSAI FMP. This amendment allocated BSAI Pacific cod to separate fisheries including 2% to the jig fishery. During the decision making process, Council members specifically asked about provisions to ensure that the jig fishery would not be halted due to halibut PSC catches in other fisheries. It was pointed out that halibut mortality associated with jig fishing was very low and halibut PSC limits would probably not be constraining. Assurance was given by NMFS that steps could be taken in a timely manner to ensure jig fishing could continue if other non-trawl fisheries used the annual allotted halibut PSC limits.

Representing the  
communities of  
Aleknagik  
Eggenak  
Kaktik  
Kaktik  
Kaktik

Mr. Richard Lauber  
April 12, 1994  
Page 2

The "other non-trawl" PSC limit for 1994 is set at 175 mt. So far less than 20% of this limit has been taken. However, the turbot fishery, which opens may 1, is expected to result in very high halibut mortality. It is possible that when the turbot fishery ends there will not be any halibut PSC left for the jig fishery.

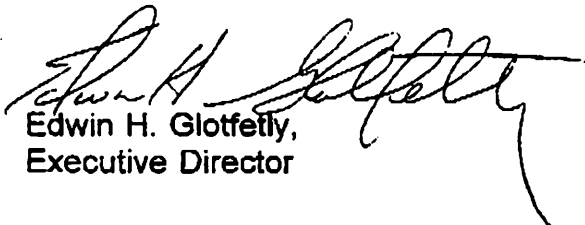
In the Gulf of Alaska there is an established jig fleet with vessels based in both Kodiak and Sand Point. Jig gear in the GOA is exempt from halibut PSC limits.

In past years there has been hardly any jig fishing in the federal waters of the BSAI. Some has occurred in State waters around Unalaska. Due to the Council's allocation of Pacific cod to a jig fishery, all of this is changing. Many vessels have purchased jig fishing machines and are prepared to fish beginning as early as late April. At least one processor is prepared to receive and process jig caught cod.

The interest in jig fishing in the BSAI is primarily locally based. Jig gear takes relatively little space and, while expensive, is easily added to a vessel. This has resulted in many small boats owned and based in the region gearing up for the fishery this year. The Yukon -Delta group has outfitted six boats for jig fishing. We are aware of many other boat owners in Unalaska and elsewhere who have either already purchased jig gear or are preparing to do so. Many of these boats, including ours, are not prepared to go elsewhere to fish if the jig fishery is not allowed to proceed. Also, due to the size of these operations and the relative cost of the jig equipment, all of us will suffer sever economic harm if the fishery does not proceed.

We request that the Council take whatever action is necessary at the April meeting to ensure that the jig fishery will be allowed to continue in the BSAI for 1994. We believe that a simple "housekeeping" regulatory change is all that is required to secure the independence of the jig fishery. It is our goal to secure the viability of this low impact fishery for 1994 and future years. We will be happy to work with the Council and provide any information which may help in the decision making process.

Sincerely yours,



Edwin H. Glottelty,  
Executive Director



UNALASKA NATIVE FISHERMAN ASSOCIATION  
P.O. BOX 591  
UNALASKA, ALASKA 99685  
(907)581-2920  
FAX (907)581-3644

MAR 21 1994

March 18, 1994

RICK LAUBER, CHAIRMAN  
NORTH PACIFIC FISHERIES MANAGEMENT COUNCIL  
P.O. BOX 103136  
ANCHORAGE, ALASKA 99510

Mr. Lauber,

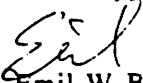
We are requesting that jigging be exempted from the hook and line gear (fixed gear) on the Pacific Cod fishery for the Bering Sea.

Leaving the jig fishery in the hook and line gear, would prematurely close the jig fishery because of the by-catch quota. Hopefully, we all agree that jig fishing is fairly selective with very little by-catch.

Prematurely closing the jig fishery because of the by-catch in the hook and line gear, would definitely cause a significant economic loss to our small boat fleet. Which in turn would cause a negative community impact.

Thank you in advance for your positive action on this matter.

Sincerely,



Emil W. Berikoff  
President



**UNITED STATES DEPARTMENT OF COMMERCE**

**National Oceanic and Atmospheric Administration**

*National Marine Fisheries Service*

*P.O. Box 21668*

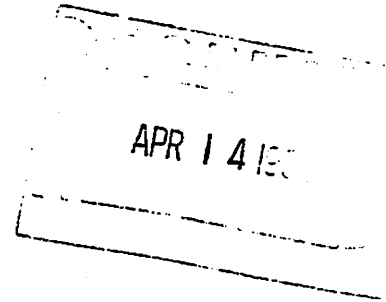
*Juneau, Alaska 99802-1668*

April 7, 1994

AGENDA D-3(g)

APRIL 1994

Supplemental



Clarence G. Pautzke  
Executive Director  
North Pacific Fishery Management Council  
P.O. Box 103136  
Anchorage, Alaska 99510

Dear Clarence,

Thank you for the opportunity to review the letter from Mr. Berikoff, which requests that jig gear be exempted from halibut bycatch restrictions. In your forwarding letter, you seek our comments about the likelihood that jig gear would be closed in 1994 as a result of reaching the halibut allowance specified for the "other non-trawl fisheries" in the Bering Sea and Aleutian Islands management area (BSAI).

Jig gear fisheries fall under the category "other non-trawl" gear fisheries as established by regulations implementing Amendment 24 to the FMP for the Groundfish Fishery of the Bering Sea and Aleutian Islands Area. This category also includes hook-and-line gear fisheries for groundfish other than Pacific cod, e.g. sablefish, rockfish, and turbot. The 1994 halibut bycatch allowance specified for the "other non-trawl" fisheries is 175 metric tons. This amount is a subset of the 900-mt halibut bycatch limit established for non-trawl gear fisheries, which includes the hook-and-line gear fishery for Pacific cod and pot gear fisheries. Pot gear is exempt from the halibut bycatch restrictions during 1994.

Through March 26, the "other non-trawl" fisheries have resulted in 30 mt of halibut mortality, or 17 percent of the 175-mt halibut allowance. Most of this amount has been caught while fishing with hook-and-line gear for sablefish and some rockfish. An additional amount of halibut will be caught as bycatch when the turbot fishery opens on May 1.

In 1993, the highest weekly halibut mortality in the turbot fishery was about 15 mt. Because the turbot fishery in 1994 will be open to trawl as well as hook-and-line gear, we expect the fishery to last only a few days, and result in little halibut mortality attributed to hook-and-line gear. In 1993, the "other non-trawl" fisheries took 136 mt of halibut mortality, 70 mt of which was taken in the hook-and-line turbot fishery. Because of the anticipated short duration of the 1994 turbot fishery and resulting lower halibut mortality compared to 1993, reaching the overall 175 mt cap seems unlikely.



We will not have enough information by the April Council meeting to judge whether the 175-mt halibut allowance allocated to "other non-trawl" fisheries will be reached prematurely. Nonetheless, if the Council reviews this issue at its April meeting, we will advise the Council that exempting vessels using jig gear from the halibut bycatch restrictions will require rulemaking.

Sincerely,



Steven Pennoyer,  
Director, Alaska Region

# Alaska Groundfish Data Bank

TO: RICK LAUBER, CHAIRMAN  
NORTH PACIFIC FISHERY MANAGEMENT COUNCIL

RE: EXTENSION OF EMERGENCY RULE

DATE: APRIL 12, 1994

DELIVERED BY HAND

Dear Mr. Lauber:

The members of the Alaska Groundfish Data support extending the emergency rule apportioning the Gulf of Alaska trawl halibut cap between the deep and shallow complexes, eliminating the use of arrowtooth flounder and species on bycatch only status from being used in the legal retention of bycatch only species calculations and opening flatfish fisheries in the Bering Sea January 20.

This emergency rule was designed to reduce influxes of effort into the Gulf of Alaska, reduce competition between modes for halibut bycatch cap, reduce the catch of sablefish, Pacific Ocean Perch, Shortraker/Rougheye and thornyheads and allow additional opportunities in the Bering Sea.

Based on the first quarter 1994 NMFS data, the emergency rule appears to have achieved its objectives.

1. INFLUX OF EFFORT FROM THE BERING SEA REDUCED:
  - a. In 1993 factory trawlers first arrived in the Central Gulf of Alaska the week ending Feb. 15. In 1994 no factory trawlers were in the Central Gulf until the week ending March 16.
  - b. Maximum number of factory trawlers in the Gulf in one week in first quarter 1993 was 11. In 1994 the first quarter maximum was 7.
2. COMPETITION FOR HALIBUT CAP WAS REDUCED; THE AT SEA AND SHOREBASED MODES DID NOT IMPACT EACH OTHER.
  - a. No operations fished any species in the Deep complex until late March. The rex sole fleet was able to arrive in the Gulf in late March and fish uninterrupted.
  - b. The first quarter shallow complex halibut cap was reached March 21. The early closure of the shallow complex impacted only the fleet responsible for the higher than normal halibut bycatch rate in this complex.
3. EFFECT ON HIGH VALUE PSC SPECIES IN THE CENTRAL GULF:
  - a. Pacific Ocean Perch: First quarter catch dropped from 1993's 111 MT to 51 MT.
  - b. Shortraker/Rougheye: First quarter catch dropped from 1993's 228 MT to 42 MT
  - c. Trawl Sablefish: First quarter catch dropped from 1993's 279 MT to 152 MT.
  - d. Thornyheads: First quarter catch dropped from 1993's 159 MT to 91 MT.

COMPARATIVE CATCH 1993 & 1994  
 GULF OF ALASKA  
 THRU APRIL 3, 1993 AND APRIL 2, 1994

WESTERN GULF

AREA	SPECIES	1993	1993	1993 TOTAL	1994	1994	1994 TOTAL
		SHRBSD MT CATCH	FAC TRAWL MT CATCH		SHRBSD MT CATCH	FAC TRAWL MT CATCH	
WG	ARRWTH	956	1277	2233	371	121	492
WG	DEEP FLT	14	352	366	2	19	21
WG	SHLLW FLT	307	61	368	151	56	207
WG	FLATHEAD	82	576	658	50	275	325
WG	POP	2	226	228	0	89	89
WG	SR/RE	0	10	10	0	1	1
WG	O.ROCK	69	1	70	0	6	6
WG	P.COD	11953	4103	16056	11044	3657	14701
WG	PS ROCK	11	33	44	9	5	14
WG	T SBLFSH	21	1	22	0	2	2
WG	NORTHERN	0	0	0	16	20	36
TOTAL ALL SPEC		13415	6640	20055	11643	4251	15894

CENTRAL GULF

AREA	SPECIES	1993	1993	1993 TOTAL	1994	1994	1994 TOTAL
		SHRBSD MT CATCH	FAC TRAWL MT CATCH		SHRBSD MT CATCH	FAC TRAWL MT CATCH	
CG	ARRWTH	558	5963	6521	643	2703	3346
CG	DEEP FLT	237	2282	2519	433	1159	1592
CG	SHLLW FLT	1029	52	1081	910	27	937
CG	FLATHEAD	333	398	731	168	68	236
CG	POP	7	104	111	1	51	52
CG	SR/RE	6	222	228	19	23	42
CG	O.ROCK	214	46	260	26	7	33
CG	P.COD	30997	744	31741	28642	580	29222
CG	PS ROCK	38	30	68	91	8	99
CG	T SBLFSH	34	245	279	70	82	152
CG	NORTHERN	0	0	0	106	9	115
TOTAL ALL SPEC		33453	10086	43539	31109	4717	35826

COMPARATIVE CATCH 1993 & 1994  
 GULF OF ALASKA  
 THRU APRIL 3, 1993 AND APRIL 2, 1994

AREA	SPECIES	1993		1994		1994 FAC TRAWL TOTAL
		SHRBSD MT CATCH	FAC TRAWL MT CATCH	SHRBSD MT CATCH	FAC TRAWL MT CATCH	
GW	THRNYHD	13	146	34	57	91

COMPARATIVE CATCH 1993 & 1994  
 GULF OF ALASKA  
 DIFFERENCE 1994 - 1993

WESTERN GULF

AREA	SPECIES	94-93	94-93	94-93 TOTAL
		SHRBSD MT CATCH	FAC TRAWL MT CATCH	
WG	ARRWTH	-585	-1156	-1741
WG	DEEP FLT	-12	-333	-345
WG	SHLLW FLT	-156	-5	-161
WG	FLATHEAD	-32	-301	-333
WG	POP	-2	-137	-139
WG	SR/RE	0	-9	-9
WG	O.ROCK	-69	5	-64
WG	P.COD	-909	-446	-1355
WG	PS ROCK	-2	-28	-30
WG	T SBLFSH	-21	1	-20
WG	NORTHERN	16	20	36
TOTAL ALL SPEC		-1772	-2389	-4161

CENTRAL GULF

AREA	SPECIES	93-94	93-94	93-94 TOTAL
		SHRBSD MT CATCH	FAC TRAWL MT CATCH	
CG	ARRWTH	85	-3260	-3175
CG	DEEP FLT	196	-1123	-927
CG	SHLLW FLT	-119	-25	-144
CG	FLATHEAD	-165	-330	-495
CG	POP	-6	-53	-59
CG	SR/RE	13	-199	-186
CG	O.ROCK	-188	-39	-227
CG	P.COD	-2355	-164	-2519
CG	PS ROCK	53	-22	31
CG	T SBLFSH	36	-163	-127
CG	NORTHERN	106	9	115
TOTAL ALL SPEC		-2344	-5369	-7713

GULF WIDE

AREA	SPECIES	93-94	93-94	93-94 TOTAL
		SHRBSD MT CATCH	FAC TRAWL MT CATCH	
GW	THRNYHD	21	-89	-68

**4. ALLOW ADDITIONAL OPPORTUNITIES IN THE BERING SEA:**

It appeared that the additional fishing opportunities in the Bering Sea created by this emergency rule allowed vessels to pursue a more orderly fishery than in the past few years -- This issue is better addressed by the rex sole fleet.

The members of Alaska Groundfish Data Bank want to express special thanks to National Marine Fisheries Service for the speed with which this emergency rule was implemented after the December Council meeting.

Sincerely,



Chris Blackburn, Director  
Alaska Groundfish Data Bank



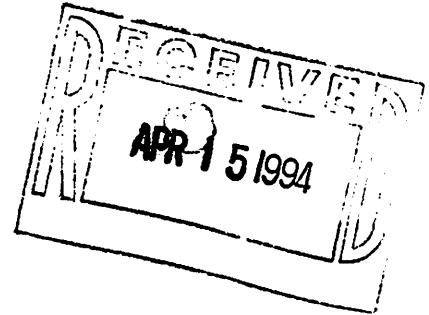
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INTERNATIONAL PACIFIC HALIBUT COMMISSION

ESTABLISHED BY A CONVENTION BETWEEN CANADA  
AND THE UNITED STATES OF AMERICA

April 15, 1994



Mr. Steven Pennoyer  
Regional Director  
National Marine Fisheries Service  
P.O. Box 21668  
Juneau, Alaska 99802-1668

Dear Steve:

The IPHC staff recently learned of your decision to limit the Gulf of Alaska hook & line sablefish fishery to 10 days in an attempt to keep the halibut bycatch within the North Pacific Council's prescribed PSC limit. We support the decision to set a specific season length to limit bycatch, noting that the intensity of the fishery appears to preclude tracking bycatch during the season. Bycatch mortality has always exceeded the limit when inseason monitoring was used.

We are concerned, however, that the short duration for the fishery will exempt the fishery from the observer coverage requirement. Observer coverage in this fishery has always been quite low, but observer requirements usually meant that the larger vessels, with a higher proportion of the catch and bycatch, were monitored.

Observer coverage of this fishery is important due to the amount of bycatch that occurs. Observer data indicates that this fishery catches the largest amount of bycatch of any fishery operating off Alaska, nearly 8,000 mt in 1993 (1,632 mt of bycatch mortality). Without observers in the 1994 fishery, how will bycatch be estimated? The only plausible solution will be to use 1993 fishery data, which we find to be a poor substitute.

The staff urges NMFS to take whatever steps necessary to continue the observer requirement in the 1994 fishery.

Sincerely yours,

for Donald A. McCaughran  
Director

cc: Commissioners  
NPFMC

April 22, 1994

Mr. Richard B. Lauber, Chairman  
North Pacific Fishery Management Council  
605 West 4th Ave.  
Anchorage, Alaska 99501

Re: Seasonal Halibut PSC Rollover in the BSAI Hook-and-Line Cod Fishery

Dear Mr. Lauber:

BSAI Amendment 24 gave the Council authority to apportion fixed gear halibut TAC among trimesters. The Council also has authority to apportion related halibut PSC among trimesters. The Council does not, however, have authority to provide that excess halibut PSC left at the end of the first trimester may be rolled over to the third trimester. This means that leftover halibut PSC is automatically rolled over into the second or summer trimester, when halibut bycatch is high and cod condition is poor.

In order to provide for halibut savings and for cod harvest in the fall, we would like to request that the Council adopt authority to roll all or part of the excess halibut PSC from the first to the third trimester. NMFS staff advises that this must be done by regulatory amendment, and that Council action is necessary at this (April) meeting if the authority is to be in place for the 1995 season.

Thank you for attention to this matter.

Sincerely,

*Thorn Smith*  
NPLA

*Emi Oda*  
FVOA

*Linda Kozak*  
KLVOA

*Jeffrey R. Hepler*  
UFMA