


MEMORANDUM

TO: Council, SSC and AP Members

FROM: Clarence G. Pautzke 
Executive Director

DATE: April 13, 1993

SUBJECT: Pollock Community Development Quotas

ACTION REQUIRED

- (a) Status report on 1992-93 operations.
- (b) Status of CDQ prohibited species catch amendment.

BACKGROUND

(a) Review of Operations

I originally intended to give you a detailed account of how each operation performed in 1992 vis-à-vis its goals and objectives (see overview in item C-3(a)). But having just reviewed the six year-end reports, I now think we ought to wait until later in the year when the State will evaluate each operation to determine their participation in 1994-1995. Combined, the operations harvested 95% of the 101,445 mt allocated. With the compression of the fisheries into a few short weeks at the end of 1992, all operations had their hands full just getting their infrastructure established, managing and monitoring the harvests, and preparing for the 1993 fisheries. While some operations provided training and employment for Western Alaskans, and there was even a vessel purchase or two, most of the reports just describe how well the operations did during the shakedown fisheries and getting their boards of directors and staffs established.

With the programs being so new and there being a lot of bugs to work out, I think it is premature to put much effort into evaluating whether a particular program is up to snuff or not. Attainment of many of the objectives, such as vessel purchases and other investments for the improvement of the region, is a ways out ahead and will be better reviewed along with the 1994-1995 review we will perform in September of this year. I do, however, have the annual reports in a binder at the office. Some of the information may be confidential, so if a Council member wants to review the reports, I will provide the binder to the member individually. I have asked NOAA GC to review the whole matter of confidentiality so that we can provide individual operation data in September if permissible.

Some of the more interesting aspects of the CDQ fisheries lay in their management and reporting of catch. In many ways the CDQ fisheries are providing a good trial run for future IFQs because individual vessel harvests have to be monitored. We will have heard under agenda item B-3 from NMFS on their best blend estimation procedures for groundfish catch which mixes observer data with PRR-based data. Use of these blended catch estimates was a source of concern to some of the CDQ operations, not only in determining whether they had exhausted their quota, but also in reconciling the amount of catch they should be paid royalties for by their partner companies. I have requested

NMFS to review their experience in 1992 and this year, with managing and monitoring harvests in the CDQ operations.

(b) CDQ Bycatch

Item C-3(b) is a letter from Steve Pennoyer concerning Amendment 25 to the BSAI groundfish plan. That amendment partitioned PSCs between CDQ and non-CDQ fisheries in proportion to pollock split (7.5% CDQ, 92.5% non-CDQ). The Council then approved further partitioning the CDQ PSCs to the six individual operations. This presents NMFS with a challenge of having to manage many, very small quantities of PSCs, which recent experience with the monitoring CDQ catches has shown may not be doable under the present data collection systems. NMFS explains these concerns in the letter and requests the Council to reconsider Amendment 25 and adopt just a simple partition of PSC between CDQ and non-CDQ fisheries, but no allocation by operation. Item C-3(c) is an excerpt from the analysis for Amendment 25 explaining the original alternatives.

Summary of 1992 CDQ Applications and Governor's Recommendations

Applicant Group	APICDA	BBEDA	CBSFA	CVFC	NSFDA	YDFDA
Recommendation (Request)	18%, 18260.1 mt (30%)	20%, 20,289 mt (33%)	10%, 10,144.5 mt (33%)	27%, 27,390.15 mt (33%)	20%, 20289 mt (33%)	5%, 5,072.25 mt (17.5%)
Number of communities	5 (7)	14	1	17	15	4
# Community residents	449	3,406 over 16	763	5,786	8,752	1,756
Average income	\$9,992 per capita			\$4,456 per person	median \$16,000/house	\$6,519 per capita
Business Partner	Trident/Starbound	Oceanrawl	American Seafoods & Icicle Seafoods	Golden Age Fisheries	Glacier Fish Co. backup Pacific Orion	Golden Alaska Seafoods
Board of Directors	Qualified	Qualified	Qualified	Qualified	Qualified	Qualified
Managing organizations	Larry Cotter Joe Kyle	Board of Directors & Unspecified	Pribilof Bering Seafoods	Board of Directors	Board of Directors	Ed Glotfelty William Quinlivan
Pay Fish Tax	Yes	No (yes if shore plant built)	No	Equiv paid to a joint manag. fund	Yes	No
Payment Arrangements	\$154/MT B season \$231/MT A season Increased market prices (30% gross)	est. \$190/MT + 60% gross profit over expected	\$265/mt	35% net profit and risk-leveraged funds \$101 match from GAF	Min \$220/MT and 51% net over expected profit range	\$250/MT + 50% profit above baseline
Requires State funds	Yes	Maybe	Yes	No	Some FRED Div	No
Projects (amount, State funds required)	Employment Training Educ. endowment Infrastructure Docks Water Dredging Slaughterhouse	Seafood investment fund (70%) Employment Training Infrastructure Community dev (30%)	Community infra- structure (70%): utility corrd. water supply sewage disposal upgrade electrical Entice new proc- essor. Vessel acquisition & fisheries training (30%): fishermen training job creation vessel enhancement	Purchase F/V Brown Point Purchase longline F/V Barbara Lee Salmon Roe Univ. Salmon processing Extensive training and employment programs Scholarship prog.	Increase salmon & herring processing Loan program Tender purchase Remodel processor Training & education (25%)	Purchase 160' boat (75% ownership) and another similar vessel Employment prog Fish surveys Permit buy-back Finance small boat Two small local processors Marine supply business



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
P.O. Box 21668
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AGENDA C-3(b)
APRIL 1993

April 2, 1993

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

FAX CONFIRMATION
Sent _____ Rec'd 4/2

Dear Rick,

At its December 1992 meeting, the North Pacific Fishery Management Council (Council) took final action on Amendment 25 to the Fishery Management Plan for the Groundfish Fishery of the Bering Sea and Aleutian Islands Area (BSAI). As adopted by the Council, this amendment would authorize the allocation of prohibited species bycatch allowances specified for the BSAI pollock fisheries among the Community Development Quota (CDQ) program fisheries and the non-CDQ pollock fisheries. This allocation would be based on the percentage of the pollock total allowable catch (TAC) allocated to the CDQ and non-CDQ fisheries (7.5 percent and 92.5 percent, respectively). The CDQ allocation of prohibited species bycatch allowances would be further allocated among individual community development plans (CDPs) based on each plan's share of the CDQ pollock reserve. Amendment 25 also would eliminate the primary Pacific halibut bycatch mortality limit for trawl gear, that when reached, closes Zone 1 and 2H. The overall 3,775 halibut metric ton bycatch mortality limit that closes the entire BSAI would be retained.

We are concerned about implementing the Council's recommended action for the allocation of pollock prohibited species bycatch allowances among individual CDPs. Under the Council's recommended action, the number of CDQ allocations that NMFS must monitor, manage, and enforce would increase from six CDP pollock quotas to 36 separate CDP allocations of pollock, halibut, herring, red king crab, Zone 1 C.bairdi Tanner crab, and Zone 2 C.bairdi Tanner crab. The experience gained by NMFS in monitoring the 1992 and 1993 CDQ fisheries showed that successful management of CDP pollock quotas currently is difficult and contentious. We believe that the implementation of prohibited species bycatch restrictions for individual CDPs are largely unnecessary to maintain the integrity of established bycatch limits, and would exacerbate management problems associated with the CDQ pollock fisheries. The reason for these difficulties stem from the inadequacy of total weight measurements for purposes of monitoring the harvest of individual quota amounts and an increased incentive to individual companies to challenge the validity of observer sampling data used by NMFS to manage CDP



allocations. At the April 1993 Council meeting, we will be prepared to present a discussion on the specific difficulties encountered in monitoring the CDQ fisheries and suggestions to address these problems.

Under Amendment 25, as adopted by the Council, prohibited species bycatch restrictions would directly affect fishing activity of individual vessels. We expect, therefore, that vessel crews would take action to reduce observed prohibited species bycatch amounts, and that observer data used to estimate bycatch amounts would be increasingly challenged. To counter this problem and increase the validity of vessel bycatch amounts to allow successful management of CDP bycatch allowances, we believe that changes to our inseason data collection program must be implemented. At a minimum, these changes would include requirements for whole-haul sampling of each haul and two or more observers on each vessel. Furthermore, measurements of total catch weight must be improved to reduce the contentiousness of individual vessel quota monitoring. A draft analysis of alternative management measures intended to support improved total catch weight measurements in the CDQ fisheries will be presented to the Council during its April 1993 meeting.

Given these concerns, we do not believe that the action taken by the Council to allocate prohibited species bycatch allowances to individual CDPs can be implemented at this time. We recommend the Council reconsider its action on Amendment 25 and either adopt management actions that can be implemented by NMFS within current monitoring constraints, or develop analyses for new management measures that would provide NMFS the necessary tools to monitor CDQ bycatch amounts as intended by the Council.

If the Council's objective for implementing prohibited species bycatch restrictions on the CDQ pollock fishery is to account for potential bycatch amounts in these operations, we recommend that the Council adopt a program similar to Alternative 2, option 2 in the draft analysis prepared for Amendment 25. Specifically, we recommend that the prohibited species bycatch allowances apportioned to the pollock fisheries be allocated to the CDQ and non-CDQ fisheries based on the amount of the pollock TAC these fisheries receive, but that the CDQ pollock fisheries would not be closed when a CDQ bycatch allowance is reached.

This program could result in the CDQ allocation of a prohibited species bycatch allowance being exceeded. However, the CDQ bycatch allowance would be a small percentage of the allowance for the pollock fishery as a whole and the pollock fishery allowance is only a fraction of each prohibited species catch limit. Even a 100 percent overage of the CDQ allowance, therefore, would result in less than a 7.5 percent overage of a prohibited species bycatch limit. For example, based on the 1993 halibut bycatch mortality allowance specified for the

pollock/Atka mackerel/"other species" fisheries combined, the resulting halibut bycatch mortality limit overage would be less than 5 percent.

Given the above concerns, we suggest that the Council reconsider its recommendation on Amendment 25. Lacking further action by the Council on Amendment 25, we will prepare a proposed rule that would eliminate the primary halibut bycatch mortality limit.

Sincerely,

A handwritten signature in cursive script that reads "Steve".

Steven Pennoyer
Director, Alaska Region

Summary of Amendment 25 Alternatives

Three alternatives are being considered. The two alternatives to the status quo include several options.

Alternative 1 is the status quo with no explicit allocations of the pollock fishery PSC allowances among the three pollock allocation fisheries. Once a PSC allowance is taken, the appropriate pollock fishery would be closed to all three pollock allocation groups.

Alternative 2 would make three changes to the existing bycatch management regime:

1. Establish separate PSC allowance fisheries for
 - Atka mackerel/other groundfish,
 - bottom trawl pollock, and
 - midwater pollock
2. Establish the authority for the Secretary, in consultation with the Council, to determine whether the attainment of either the halibut or crab PSC allowance for the midwater pollock fishery would trigger a closure of that fishery, and similarly whether the attainment of the halibut, crab or herring PSC allowance for the Atka mackerel/other groundfish fisheries would trigger a closure of those fisheries.
3. Establish an explicit allocation of each pollock fishery PSC allowance among the three pollock allocation fisheries. That is, the onshore processing, at-sea processing, and CDQ pollock fisheries would each receive a fixed percent of the midwater and bottom trawl allowances for crab, halibut and herring. The formula to be used annually to set the percent for each PSC allowance and each pollock allocation fishery would be specified in the regulations. For 1993 and until changed, the PSCs would be distributed in proportion to the expected pollock catch in each fishery.

Alternative 3 is similar to Alternative 2 but would apply only to the herring PSC limit and allowances. It would establish Atka mackerel/other groundfish and bottom trawl pollock as separate PSC allowance fisheries for herring. It would establish explicit allocations of the bottom trawl and midwater trawl pollock fishery herring PSC allowances among the three pollock allocation fisheries.

Options that could be added to Alternative 2 or 3, requested at the September meeting, are listed below.

1. Each CDQ allocation of a pollock fishery PSC allowance would be allocated explicitly among the individual Community Development Programs.
2. Exempt CDQ pollock fisheries from the PSC limit closures.
3. Eliminate the primary halibut PSC limit that closes Zones 1 and 2H, but retain the overall halibut PSC limit that closes the entire BSAI.

1.3 Purpose of and Need for the Proposed Action

As the result of Amendments 16, 16a, 19, and 21 (if it is approved): (1) there are trawl fishery PSC limits for four non-groundfish species; (2) the Secretary, in consultation with the Council, may allocate each limit among PSC allowance fisheries identified in the regulation and apportion the allowances by season; and (3) the PSC allowance fisheries may be changed by a regulatory amendment. The four species with PSC limits are halibut, red king crab, bairdi Tanner crab, and herring. The crab and halibut PSC allowance fisheries are:

1. yellowfin sole;
2. rock sole and other flatfish;
3. turbot, arrowtooth flounder, and sablefish;
4. rockfish;
5. Pacific cod; and
6. pollock, Atka mackerel, and other groundfish.

For the herring PSC limit, the mid-water pollock fishery has a separate allowance. The distribution of each PSC limit into allowances by fishery and the seasonal allocation of each allowance are determined in the September through December specification process. Once a fishery has taken its Zone 1 red king crab or Tanner crab allowance for a season, the fishery is closed in Zone 1 until the next season for which there is an unused apportionment. Similarly, the attainment of the Zone 2 Tanner crab allowance closes Zone 2. For halibut there are primary and secondary allowances for each PSC allowance fishery. Attainment of the primary allowance closes Zones 1 and 2H and attainment of the secondary allowance closes the rest of the BSAI. The attainment of a herring PSC allowance triggers a series of time/area closures. Zones 1, 2, and 2H are identified in Figure 1.1 and the herring time/area closures are identified in Figure 1.2.

There is one exception to these closures. Once the pollock/Atka mackerel/other groundfish allowance is taken, only the bottom trawl pollock fishery is closed, the mid-water trawl pollock, Atka mackerel, and other groundfish fisheries remain open.

If Revised Amendment 18 is approved by the Secretary, there could be eight separate pollock allocation, one each for the onshore and at-sea processing sectors and perhaps six for separate Community Develop Programs (CDPs). The problem being addressed is that the ability to take each of these pollock allocations in a cost effective manner may be affected adversely by PSC limit induced closures that are the result of bycatch by all three pollock allocation fisheries and the Atka mackerel fishery. That is, the benefits that can be obtained from each of the pollock allocations would be determined in part by the PSC bycatch of the other pollock allocation fisheries and the Atka mackerel fishery. The ability of each group to utilize fully its allocation is not limited physically because the PSC closures do not close the BSAI pollock fisheries to all trawl gear in all areas. However, the closure of the entire BSAI to all bottom trawl pollock fisheries and time/area closures of the mid-water trawl pollock fisheries may result in economic barriers that prevent some of the pollock allocations from being used fully or as productively.

1.4 Alternatives

Three alternatives are being considered. The two alternatives to the status quo include several options.

1.4.1 Alternative 1 (status quo)

Alternative 1 is the status quo. There would be no explicit allocations of the pollock fishery PSC allowances among the three pollock allocation fisheries. Bycatch for each PSC allowance fishery which includes pollock would be monitored without regard to whether it is taken in the onshore processing, at-sea processing, or CDQ pollock fishery. Therefore, once a PSC allowance is taken, the appropriate pollock fishery would be closed to all three pollock allocation fisheries. The bottom trawl pollock, mid-water trawl pollock, and Atka mackerel fisheries would continue to share PSC allowances for crab and halibut; the bottom trawl pollock and Atka mackerel fisheries would continue to share a herring PSC allowance; and the attainment of any one of these shared PSC allowances would continue to trigger the closure of only the bottom trawl pollock fishery.

1.4.2 Alternative 2

Alternative 2 would make three changes to the bycatch management regime. First, it would establish Atka mackerel/other groundfish, bottom trawl pollock, and mid-water trawl pollock as separate PSC allowance fisheries for each PSC limit. Second, it would establish the authority for the Secretary, in consultation with the Council, to determine annually whether the attainment of either the halibut or crab PSC allowance for the mid-water pollock fishery would trigger a closure of that fishery and similarly whether the attainment of the halibut, crab, or herring PSC allowance for the Atka mackerel/other groundfish fisheries would trigger a closure of those fisheries. This authority would not be established for other fisheries. Finally, it would establish an explicit allocation of each pollock fishery PSC allowance among the three pollock allocation fisheries. That is, the onshore processing, at-sea processing, and CDQ pollock fisheries would each receive a fixed percent of the mid-water and bottom pollock allowances for crab, halibut, and herring. The formula to be used annually to set the percent for each PSC allowance and each pollock allocation fishery would be specified in the regulations and could be changed by regulatory amendment.

These changes to the bycatch management regime would be in place only until December 31, 1995. This is because the objective of these changes is to facilitate the full and productive use of the pollock allocations of Amendment 18 and Revised Amendment 18, if the latter is approved by the Secretary, and because there is a finite expiration date (December 31, 1995) on these pollock allocations.

For 1993 and until changed by a regulatory amendment, the PSC allowances for the three bottom trawl pollock fisheries would be distributed among the three pollock allocation fisheries in proportion to the expected pollock catch in each of the three bottom trawl pollock fisheries. The same would be done for the mid-water pollock fishery PSC allowances. Therefore, the distribution of PSC allowances among the three pollock allocation fisheries would be proportional to the allocation of pollock among these three fisheries only if each of the three pollock allocations is expected to be

distributed in the same way among the bottom trawl pollock fishery, the mid-water trawl pollock fishery, and all other trawl groundfish fisheries. An example of how the allowances would be allocated if these distributions are expected to be the same as in 1992 is presented in Section 2.2.

When initiating a regulatory amendment to change the formula for allocating the PSC allowances among the three pollock allocation fisheries, the Secretary, in consultation with the Council, would consider information that includes:

1. the level of each pollock fishery PSC allowance;
2. potential impacts on each of the three pollock allocation fisheries;
3. estimated bycatch or bycatch mortality rates by fishery in prior years;
4. expected bycatch requirements by fishery;
5. methods available to reduce bycatch or bycatch mortality by fishery;
6. the cost of reducing bycatch or bycatch mortality by fishery;
7. the cost of inadequate PSC allowance allocations by fishery;
8. the expected distribution of each of the three pollock allocations among the bottom trawl pollock fishery, the mid-water trawl pollock fishery, and all other trawl groundfish fisheries; and
9. other biological and socioeconomic factors that affect the appropriateness of a specific distribution of PSC allowances in terms of the objective to facilitate the full and productive use of the pollock allocations of Amendment 18 and Revised Amendment 18, if the latter is approved by the Secretary.

It is recognized that the availability of data will limit the extent to which some of these items can be considered.

The annual determination, with respect to whether the attainment of the Atka mackerel/other groundfish fishery PSC allowance for crab, halibut, or herring would close the Atka mackerel fishery and whether the attainment of the mid-water pollock fishery PSC allowance for crab or halibut would close the mid-water pollock fishery, would be made during the September through December specification process. The types of information to be considered in making this determination are as follows:

1. the expected effects of exceeding an allowance;
2. the expected effects of a closure; and
3. other biological and socioeconomic factors that affect the appropriateness of requiring a fishery closure upon the attainment of a PSC allowance.

If Revised Amendment 18 is not approved by the Secretary and there are not separate pollock allocations for the onshore processing and at-sea processing pollock fisheries, this alternative would establish explicit allocations of the pollock fishery PSC allowances only between the CDQ and non-CDQ pollock fisheries. The Secretary will have made a decision on the revised amendment by late November, 1992.

1.4.2.1 Options for Alternative 2

Several options that could be added to Alternative 2 were discussed at the September Council meeting. They are listed below.

1. Each CDQ allocation of a pollock fishery PSC allowance would be allocated explicitly among the individual Community Development Programs (CDPs).
2. Exempt CDQ pollock fisheries from the PSC limit closures.
3. Eliminate the primary halibut PSC limit that closes Zones 1 and 2H, but retain the overall halibut PSC limit that closes the entire BSAI.

Options 1 and 2 are mutually exclusive, that is the Council could select one or neither but not both options. Options 3 could be selected by itself or in combination with Option 1 or 2.

1.4.3 Alternative 3

Other than applying only to the herring PSC limit and allowances, Alternative 3 is the same as Alternative 2. It would establish Atka mackerel/other groundfish and bottom trawl pollock as separate PSC allowance fisheries for herring. It also would establish explicit allocations of the bottom trawl and mid-water trawl pollock fishery herring PSC allowances among the three pollock allocation fisheries.

1.4.3.1 Options for Alternative 3

The same options are being considered for Alternatives 1 and 2.

1.4.4 A Regulatory Amendment as an Alternative

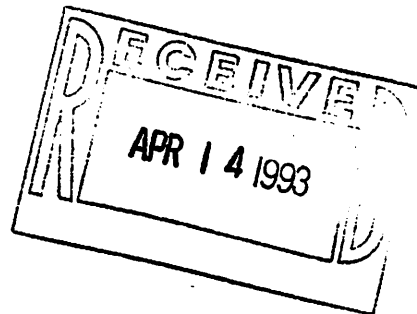
The Secretary has the authority to change the PSC allowance fisheries by regulatory amendment. Therefore, a regulatory amendment could be used to split each of the PSC allowance fisheries that include pollock fisheries into separate PSC allowance fisheries. This would allow the Secretary, in consultation with the Council, to allocate PSC allowances among pollock allocation fisheries during the September through December specification process. However, the potential allocation effects of changing the distributions of the PSC allowances among the three pollock allocation fisheries are sufficient to justify the depth of analysis and opportunity for public review that is only provided for by an FMP amendment or a regulatory amendment. Therefore, this alternative is not considered further.



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
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AGENDA C-3(a)
APRIL 1993
Supplemental

April 13, 1993



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

Dear Clarence,

The North Pacific Fisheries Management Council will review the operations of the Community Development Quota (CDQ) pollock fishery at its April 21-23, 1993, meeting under agenda item C-3(a). The following is a synopsis of these operations to date.

CDQ pollock fisheries occurred during December 1992 and during the 1993 pollock "A" season. Preliminary aggregated catch data presented below summarize the activities of the CDQ fisheries to date. Although the percentage of fish allocated to each Community Development Plan (CDP) is public information, confidentiality guidelines preclude National Marine Fisheries Service's (NMFS) release of catch data except in the format below.

The following Community Development Plan organizations received CDQ under this program during 1992 and 1993:

- APICDA Aleutian Pribilof Island Community Development Assn.
- BBEDC Bristol Bay Economic Development Corporation
- CBSFA Central Bering Sea Fishermen's Assn.
- CVFC Coastal Villages Fishing Cooperative
- NSEDC Norton Sound Economic Development Corporation
- YDFDA Yukon Delta Fisheries Development Assn.

Percentages and amounts of pollock CDQ that each CDP organization received during 1992 and 1993 are summarized in the attached Table 1. In 1993, the available CDQ apportionments by CDP were further apportioned among the BSAI management subareas (Table 2, attached). In addition, both the catch by Area through April 1, 1993 (Table 3, attached), and the bycatch of prohibited species (Table 4, attached) are presented.

1992 CDQ Fishery -- The 1992 CDQ pollock fishery harvested 97,286 metric tons (mt) (Table 3, attached), or 96 percent of the total 101,445 mt of CDQ pollock. The 1992 harvest estimate was based on the best blend data approach and thus represents a combination of both observer data and production data. Nineteen of the thirty-two estimates of total catch by CDQ in this data set are represented by observer data. Within the total harvest



production reports indicated 2,467 mt of pollock were discarded. In addition, 1,344 mt of mixed cod and flatfish were reported caught and discarded by the 18 processors participating in these 1992 fisheries.

1993 CDQ Fishery -- The 1993 CDQ pollock fishery harvested 43,797 mt through April 1 as part of the forty-five percent allowance of 43,875 mt during the pollock "A" season. The remainder of the 1993 apportionment is available for harvest after April 15. This 1993 "A" season harvest number is based on a blend system selecting between observer data and production data with several changes implemented from the 1992 system. The levels for selection were adjusted from 1992 in addition to adjusting the product recoveries for two major products based on information received after the 1992 season. The product recovery rate for skinless boneless fillets was adjusted down from 22 percent to 13 percent, and the product recovery for mince was adjusted down from 34 percent to 15 percent. The blended report from 1993 is far more dependent on observer reports with 14 of the 15 catch records coming from observer data.

Although the discard of pollock appears to have decreased from the 1992 fishery, the bycatch levels of other fish species appears to have increased. Of the amount reported in production reports for the "A" season, 695 mt of pollock was reported as discard. In turn, 1,809 mt of mixed cod and flatfish were caught and discarded, over half of this coming from 2 of the 13 processors participating in the 1993 A season.

As a result of experience gained during management of the CDQ fisheries, we have certain recommendations for Council consideration, which we wish to implement for purposes of improving total weight estimation by the CDQ vessel participants. These recommendations are contained in a draft environmental assessment/regulatory impact Review, which the Council is scheduled to consider under Agenda item D-3(a).

In addition, we are advising the Council about two other regulatory changes that we have initiated. First, we are modifying the final rule implementing CDQ programs for 1994 and 1995. The modification clarifies NMFS's intent for recordkeeping/reporting of the catch, discard, and production amounts of all groundfish species and the discard amounts of prohibited species that occur in conjunction with the CDQ fishery. The final rule will require that this information be recorded and reported as part of that operation. And, second, we are preparing a proposed rule that would require CDQ vessels to provide NMFS a check-in report prior to commencement of CDQ operations. This will facilitate effective enforcement of non-

CDQ directed fishing closures prior to vessels commencing directed fishing in CDQ operations. We will be available to provide additional discussion at the Council meeting.

Sincerely,

A handwritten signature in cursive script, appearing to read "Steve".

Steven Pennoyer
Regional Director

 Table 1. Pollock Apportionments (metric tons) for 1992 and 1993
 by Community Development Plan

<u>PLAN</u>	<u>PERCENTAGE</u>	<u>AMOUNT</u>
APICDA	18 %	18,260
BBEDC	20 %	20,289
CBSFA	10 %	10,144
CVFC	27 %	27,390
NSEDC	20 %	20,289
YDFDA	5 %	<u>5,073</u>
TOTAL		101,445

 Table 2. 1993 Pollock Apportionment (metric tons) for each
 Community Development Plan by season and by management subarea.

<u>PLAN</u>	<u>PERCENT</u>	<u>"A"</u>	<u>"B"</u>	<u>ALEUT</u>	<u>BOGOSLOF*</u>
APICDA	18 %	7,897	9,653	696	13
BBEDC	20 %	8,775	10,725	774	15
CBSFA	10 %	4,388	5,362	387	8
CVFC	27 %	11,846	14,479	1,045	20
NSEDC	20 %	8,775	10,725	774	15
YDFDA	5 %	2,194	2,681	194	4
TOTAL	100 %	43,875	53,625	3,870	75

* Closed to directed fishing throughout the 1993 season.

 Table 3. CDQ pollock apportionments and harvests by management area during 1992 and 1993 (through April 1).

1992

<u>AREA</u>	<u>APPORTIONMENT</u>	<u>EST. HARVEST</u>
Bering Sea	97,500 mt	97,286 mt
Aleutian Islands	3,870 mt	0 mt
Bogoslof	75 mt	0 mt
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TOTAL	101,445 mt	97,286 mt

1993

<u>AREA</u>	<u>APPORTIONMENT</u>	<u>EST. HARVEST</u>
Bering A season	43,875 mt	43,797 mt
Bering B season	53,625 mt	0
Aleutian Islands	3,870 mt	0
Bogoslof	75 mt	0
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TOTAL	101,445 mt	43,797 mt

 Table 4. CDQ prohibited species bycatch during 1992 and 1993 (through April 1).

<u>Species Group</u>	<u>1992 bycatch</u>	<u>1993 bycatch</u>
Halibut	40.02 MT	38.2 MT
Chinook Salmon	7350.0 fish	548.0 fish
Other Salmon	67.0 fish	18.0 fish
Herring	.93 MT	.2 MT
Bairdi Tanner	33,060.0 crabs	17,501.0 crabs
Other Tanner	52,358.0 crabs	21,011.0 crabs
Red King Crab	291.0 crabs	484.0 crabs
Other King Crab	157.0 crabs	0.0 crabs
