



Marine Resources Co., Inc.

AGENDA #11, JUNE 1979

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June 15, 1979

Mr. Harry L. Rietze
Director
National Marine Fisheries Service
Alaska Region
P. O. Box 1668
Juneau, AK 99802

U.S. R. FILE	ACT	INFO	ROUTE TO	INITIAL
Telex: 213434 MRKNHDSU				
			A. Exec. Dir.	
			Admin. Off.	
			Exec. Sec.	
			Training	
			Public Aff.	
			Spec. Inv.	
cc: Gene L. Tullion				
JUN 20 1979				

Dear Harry:

This letter is a follow-up copy to our telex communication of 15 June regarding reserves for the Gulf of Alaska Groundfish Fishery Management Plan. Marine Resources Company, as you know, is interested in this issue, as it has leased 2 Soviet processing vessels to receive U.S.-harvested groundfish this summer and fall. Our correspondence of March 1, 1979 to you expressed concern about earlier releases of the reserves.

We are opposed to the release of reserves of Pacific cod and Pacific ocean perch, particularly in the Shumagin, Chirikof, and Kodiak areas for the reasons stated below. We are not opposed to the releases of the reserves of pollock, so long as sufficient quantities are retained to take care of the incidental amount of this species included in the groundfish catches delivered to our processing vessels.

As for sablefish, we feel there is no reasonable basis for release of the reserves of this species, since, based upon testimony from domestic processors that they will purchase the entire OY for this species, we have been limited to only incidental catches. If it now appears that this original determination was in error, the Secretary must immediately amend our permit applications to take care of the expected deliveries of sablefish by our fishermen before making any re-allocations to TALFF. Please bear in mind that the recent amendment to the FCMA set up a three-tiered allocation system with joint ventures having a higher priority than foreign harvesting operations, not vice-versa.

In discussions with NMFS officials in Alaska, we have received the impression that some demonstration of our intent to carry

Harry L. Rietze
June 15, 1979
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out our proposed project would be useful in withholding the release of reserves. Let me respond by saying that we have every intent to carry out our fishing as proposed and approved by the Council and the Secretary. In fact, this week we completed contract negotiations with the owner of the California Horizon, a 90-foot, 730 HP midwater/bottom trawler, and expect to be receiving deliveries of American-caught groundfish from this trawler by the first week in July. We expect to have a second trawler in operation by early August.

I would point out that the permits for the Soviet vessels were only recently approved, despite early filings of applications. Your release schedule was signed into law before it was known that approval of our permit application would be delayed. This is a circumstance that is virtually out of our control. Thus, it seems only reasonable that our operation should be allowed an appropriate lag-time to get underway following final government approval.

As you know, the system established by the FMP provides for a portion of the optimum yield to be specified as reserve, which is to be utilized by U.S. fishermen harvesting for joint ventures. The amount in the reserve is important to Marine Resources Company as our leased processing vessels have a permit condition which limits the quantity of fish to be received to the reserve amounts for species and fishing area in Table 1 of Section 611.92 (b)(1).

It is the area limitation which is of major concern to us. While the permit does not restrict harvest by management area, Marine Resources has made clear from the beginning that we intend to operate primarily in the Shumagin and Chirikof areas, assuming that sufficient reserve is available and CPUE is high enough to allow an economically successful fishery. A review of the reserve amounts in these areas reveals a startling situation as is shown below.

RESERVES AS OF MAY 1979 RELEASE

SPECIES	MARINE RESOURCE INTENDED HARVESTS	SHUMAGIN	CHIRIKOF	TOTAL (SE + CH)	KODIAK	TOTAL
Pacific Cod	1900 MT	1,384 MT	574 MT	1,958 MT	2,210	4,168
Pacific Ocean Perch	1400 MT	450 MT	450 MT	900 MT	800	1,700

You will note that through the previous release of reserves, reserve amounts for POP in the two western gulf areas have been allowed to fall below the projected catch by Marine Resources Company. Cod reserves are also likely to be insufficient, keeping in mind that the KMIDC joint venture is likely to operate in this area and take delivery of these two species in light of recent changes in their pollock market. The previous release of reserves was made with full knowledge of MRC's intentions and in spite of a warning that such a situation could occur (see letter dated March 1, 1979, MRC to Rietze); and at a time when MRC could not operate because our permit application was being processed.

The Table does indicate that the remaining reserve in the three western areas (including Kodiak) could accommodate our proposed harvests. This, however, is based on two presumptions which are beyond our control:

- (1) That the amendment to the Gulf Groundfish FMP, which combines the Chirikof and Kodiak management areas, will be implemented in time;
- (2) Other joint ventures which are primarily limited to harvesting from the reserve amounts will not harvest POP and cod in any significant quantity.

In summary, we would like to point out that while we recognize that the release of reserves is important to foreign fishing interests, the reserves are critical to the operations of our joint venture. A July release of the reserves to TALFF would obviously terminate our Company's plans for a Gulf of Alaska operations and the associated U.S. trawl fishery. In making your decision, please keep in mind that one of the underlying purposes of the FCMA is to encourage the development of domestic fisheries on underutilized species, including bottomfish off Alaska. It seems to us that the elimination of a market opportunity for American fishermen by releasing the remaining reserves to TALFF, with the exception of pollock as noted above, would obviously not be in conformance with the FCMA.

Sincerely,



Walter T. Pereyra
Vice President and General Manager
for U. S. Operations

Harry L. Rietze

June 15, 1979

Page 4.

cc: C. Tillion
✓ J. Branson
K. Specking
J. Harville
S. Pennoyer
T. Leitzel
L. Sloan
J. Negroponte
Senator T. Stevens
Senator M. Gravel
Senator W. G. Magnuson
Congressman D. Young
Congressman J. Pritchard
Congressman A. Swift
Congressman L. Au Coin
Congressman P. Ruppe
Congressman M. Lowry
Congressman E. Forsythe

MUNDT, MACGREGOR, HAPPEL, FALCONER & ZULAUF

ATTORNEYS AT LAW

JAY H. ZULAUF
 JAMES C. FALCONER
 HENRY HOWARD HAPPEL, III
 WM. PAUL MACGREGOR
 J. CARL MUNDT

June 15, 1979

FILE	ACT	INFO	ROUTE TO	INITIAL
			Exec. Dir.	BANK OF CALIFORNIA CENTER SUITE 1230
			A. Exec. Dir.	SEATTLE WASHINGTON 98164
			Admn. Off.	
			Exec. Sec.	
			Writer/1	
			Writer/2	
			Sec. Regn.	
			JUN 17 1979	
<i>cc: same to Sullivan</i>				

Mr. Harry Rietze
 Director, Alaska Region
 National Marine Fisheries Service
 Box 1668
 Juneau, Alaska 99802

Re: July 2, 1979 Reapportionment of
 Reserves Under the Gulf of Alaska
 Groundfish Fishery Management Plan

Dear Mr. Rietze:

I am writing on behalf of our client, the North Pacific Longline-Gillnet Association (the "NPL-GA" or the "Association"). The Association's members own and operate the 23 Japanese longline vessels which fish in and around the Gulf of Alaska (the "GOA" or the "Gulf"). The purpose of this letter is to comment on the fourth mid-season reapportionment of reserves, which were set aside under the above-referenced fishery management plan (the "FMP"), and to request that all remaining reserves of blackcod, Pacific cod, "other rockfish" and "other species" be released and reapportioned to their respective TALFFs ("Total Allowable Levels of Foreign Fishing") as scheduled on July 2, 1979.^{1/}

Before commenting on the specific question of whether and to what extent the reserves on the above-referenced species should be reapportioned, however, we would like to take this opportunity to make a few observations on the concept of a reserve and on the reserve-release mechanism as embodied in the FMP and its implementing regulations.

First, insofar as a reserve concept is concerned, the NPL-GA has supported and continues to support such a concept on the grounds that it can be an appropriate fishery

^{1/} 3,250 mt. of blackcod (79% of the original reserve amount), 4,996 mt. of Pacific cod (50% of the original reserve amount), 1,750 mt. of "other rockfish" (50% of the original reserve amount), and 2,350 mt. of "other species" (50% of the original reserve amount) remain in reserve and will be eligible for reapportionment to TALFF on July 2, 1979.

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management tool.^{2/} If properly utilized, a reserve--coupled with a viable reserve-release mechanism--can afford an excellent opportunity to assure adequate supplies of fish to U.S. fishermen while, at the same time, promoting the FCMA's full-utilization objective by making excess resources available to foreign fishermen throughout the fishing year.

If improperly utilized, however, use of the reserve concept can result in serious underutilization of fishery resources and can involve unnecessary economic hardship for foreign fishermen as well.^{3/} This is true for two reasons. First, by its very nature, a reserve reduces the amount of fish available to foreign fishermen (TALFFs are reduced by the amount of fish placed in reserve). Second, to whatever extent excess reserves (those not necessary for domestic purposes) are not released in a timely and expeditious manner at regular periods during the fishing year, foreign fishermen will not be able to make the changes in their fishing plans and operations necessary to harvest the reserve reallocations as they become available. This is precisely the situation that occurred last year under the preliminary management plan when large portions of reserves on a number of important species were not released to foreign fishermen until the closing days of the fishing season. By the time those reserves became available for foreign harvest, it was simply too late for the foreign fishermen to take them.^{4/}

^{2/} See comments on the reserve concept and the reserve-release mechanism submitted by this office on behalf of the NPL-GA to Mr. Terry Leitzell, Assistant Administrator for Fisheries, National Oceanic and Atmospheric Administration, by letter of November 15, 1978.

^{3/} The risks involved in managing reserve resources were noted by Mr. James Storer, director, Office of Fisheries Affairs, U.S. Department of State, at a recent meeting of Regional Council Chairmen. Mr. Storer cautioned that "the reserve concept [should] be used carefully and that releases of reserves [should] be made as soon as possible." See Minutes of Third Meeting of Regional Council Chairmen, held on October 24, 25, 1978 in Hawaii, p. 6.

^{4/} As a result of the delayed reallocation of reserves to TALFF, Japanese longliners were only able to harvest 84% of their final blackcod allocation, 53% of their Pacific cod allocation, and 39% of their allocations of "other species" in 1978. Coming at a time when allocations on important species were already severely curtailed, reserve releases which occurred too late for harvest were particularly discouraging to the foreign fishermen involved.

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Thus, in order for the reserve/reserve-release mechanism to be fairly and equitably applied, it is absolutely necessary for reserve reallocations to take place at the regularly scheduled mid-year intervals unless there is clear and convincing proof that those portions of the reserves will be needed for domestic purposes. Otherwise, one of the FCMA's primary objectives--full utilization of fishery resources--will be jeopardized; and economic hardships will be unnecessarily imposed on foreign fishermen.

Second, insofar as joint venture operations are concerned, some confusion has arisen over the inter-relationship of joint venture operations and the reserves. We believe that confusion to stem from the unnecessary restriction of joint venture catches to the amounts held in reserve. As a result of that restriction, joint venture interests have resisted earlier reallocation of reserves to TALFF on the grounds that such reallocations would deplete the amount of fishery resources available to them. This is an unfortunate result since, at least in the case of certain species such as Pacific cod, large portions of the FMP's DAHs are going unharvested. The more appropriate approach, we believe, would be to count joint venture harvest as part of DAH. This approach is consistent with the definition of domestic annual harvest as used by the FCMA--"the extent to which fishing vessels of the United States, on an annual basis, will harvest the optimum yield". Joint venture fishing operations are, after all, conducted by U.S. fishing vessels. The joint venture catch should, therefore, count towards DAH.

The approach which we are suggesting would allow the Regional Director to assess the extent to which domestic annual harvest (including that caught in conjunction with joint venture operations) will meet or exceed the FMP's DAH projections when making his determination of whether and to what extent the reserves will be necessary for domestic purposes. In other words, if joint venture operations, when coupled with traditional domestic fishing operations, will not result in a domestic annual harvest which exceeds the FMP's DAH, then all eligible reserves should be reallocated to TALFF and thereby made available to foreign fishermen. Given the difficulties in amending DAH during the plan year, allowing the Regional Director to consider joint venture harvest as part of DAH is the only way that large-scale shortfalls from OY can be avoided. Otherwise, he may be compelled to withhold reserves (which could be taken by foreign fishermen) in anticipation of possible joint venture activities (which might not materialize), even though large

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portions of the DAH were going unutilized by domestic fishermen.^{5/} This would be a result which is not only contrary to the intent of the FCMA and the FMP, but to the best interests of all competing fishing interests--domestic, foreign, and joint venture.

Finally, with regard to the joint venture operations themselves, we believe that they have had more than ample opportunity to demonstrate their ability to initiate full-scale harvesting activities in the Gulf this year. Time after time, at each mid-season reserve reallocation date to be exact, they have resisted reallocation of the reserves to TALFF on the ground that their fishing operations were about to begin. Those operations have simply not materialized to any significant extent. Foreign fishermen should no longer bear the burden of giving joint venture operations the "benefit of the doubt" insofar as reallocation of reserves are concerned. This is particularly true in view of the fact that actual domestic harvest for most species in the Gulf will be far below the levels projected by the FMP. (See footnote 5.)

Given these general comments about the reserve/reserve-release mechanism in general, we now turn our attention to the question of whether and to what extent the reserves for Pacific cod, blackcod, "other rockfish" and "other species" should be reapportioned to their respective TALFFs on July 2, 1979.

PACIFIC COD

The FMP's DAH on Pacific cod is 15,500 metric tons ("mt."). The amount of Pacific cod presently held in reserve and eligible for reapportionment on July 2, 1979 is 4,996 mt. Unless the total domestic harvest (traditional harvest plus joint venture harvest) will exceed 15,500 mt., the entire amount held in reserve should be reapportioned on July 2, 1979.

An analysis of the domestic Pacific cod catch to date clearly indicates that there is little, if any, possibility that this year's DAH on that species will be exceeded. Indeed, unless some completely unforeseen developments happen, a very significant shortfall will occur. Through

^{5/} The recently released results of a resurvey of domestic processing projections for 1979 indicates that the FMP's overall DAH estimates may be as much as two and one-half times too high (18,242 mt. as opposed to the FMP's estimate of 44,500 mt.). See memorandum from National Marine Fisheries Service, Alaska Region, Operations Branch, of May 11, 1979.

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April of this year, total domestic harvest of Pacific cod in the Gulf amounted to 275 mt., or less than 2% of DAH. Comparison of that figure with comparable figures from 1978 (when 23% of the total domestic catch had been taken by the end of April) indicates a projected U.S. harvest of Pacific cod in the Gulf of Alaska of approximately 1,200 mt. in 1979. This would result in a 90% shortfall from the FMP's DAH figure. The fact that a considerable shortfall from the FMP's DAH can be expected in 1979 is also confirmed by the recent survey of domestic processors which was conducted by your office in the Spring of this year.^{6/} Based on the summary of that survey released on May 11, 1979, it is apparent that domestic processors are anticipating total Pacific cod purchases of less than 4,000 mt. this year.

It would appear, therefore, that actual domestic catch of Pacific cod will be in the neighborhood of 1,200 to 4,000 mt.--not the 15,500 mt. projected in the FMP. This would mean a minimum shortfall from DAH of 11,500 mt. Even considering the projected 4,900 mt. catch by joint venture operations (3,000 mt. by KMIDC and 1,900 mt. by Marine Resources), it is obvious that there is more than twice the amount of resource already set aside in DAH than will be needed for domestic purposes. Since the reserves of Pacific cod will not be necessary for U.S. fishermen, they should be reallocated to TALFF at the very earliest possible date.

BLACKCOD

The DAH for blackcod in those areas of the Gulf which lie outside Southeast (Shumagin, Chirikof, Kodiak and Yakutat) is 1,000 mt.^{7/} 2,550 mt. of blackcod are presently being held in reserve for those areas. Unless domestic catch will exceed the 1,000 mt. DAH in those four regulatory areas, the reserves now being held will not be necessary for domestic purposes and should be released. As of the end of April, more than one-third of the way through the fishing season, domestic catch in those four areas totalled 29 mt., or 2.9% of the projected DAH. With more than 97% of the DAH remaining to be caught, it is difficult to perceive how the reserves would be necessary for domestic purposes. This is true even if Marine Resources' joint venture operations do

^{6/} See footnote 5.

^{7/} The Japanese longliners have voluntarily withdrawn from Southeast in order to avoid gear conflicts with U.S. fishermen. They are not, therefore, eligible to receive reserve reallocations made in the Southeast area.

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get under way and ultimately harvest the 90 mt. of blackcod projected as an incidental catch. The reserves are simply not necessary for domestic purposes and should be released.

Two additional comments should be made with regard to blackcod. First, this species is of particular importance to the NPL-GA's members, as it has been the traditional target species for the vessels they operate in the Gulf. In view of the fact that the Association's members' blackcod allocations have been severely cut back under the FMP, it is extremely important from an economic standpoint for them to have access to as much of the reserve as possible. This is particularly true in view of the fact that the present reserve amounts (2,550 mt.) are such a significant part of the total blackcod resource potentially available for foreign harvest (45% of present TALFF). Second, although there has been some increase in U.S. blackcod harvesting activity in the Gulf, that activity has been concentrated mainly in the Southeastern area. Thus, although DAH projections may be approached in Southeast, the balance of the Gulf has not experienced any significant increase in domestic blackcod harvesting activity, and total U.S. harvest in that area should be far below the FMP's DAH projections. Unless the reserves are released, significant shortfalls from OY on this very valuable species will occur in the areas outside Southeast.

OTHER ROCKFISH AND OTHER SPECIES

While NPL-GA vessels do not target on species aggregated under the "other rockfish" or "other species" categories, certain amounts of fish in those two categories are taken as incidental catch in conjunction with blackcod and Pacific cod longlining operations. Although the incidental catch rates are quite small, the extremely low initial allocations of those two categories, particularly when divided among the five regulatory areas into which the FMP presently subdivides the Gulf, have failed to accommodate even the minimal incidental by-catch requirements of longlining operations. This fact, coupled with unforeseen difficulties encountered in the longliners' incidental take of rattails, has constantly threatened premature closure of longline operations in the Gulf this year. Indeed, on at least one occasion, Japanese longline operations were suspended in the Shumagin and Chirikof areas pending re-allocation of extra fish in these two categories to those regulatory areas. Although earlier reserve releases and an FMP amendment, which establishes a separate OY for rattails, have or will help to alleviate some of the allocation problems involved in the "other rockfish" and "other species"

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categories, it is imperative that the reserves on those two particular categories be released as scheduled on July 2, so that longline operations in the Gulf will not be further jeopardized during the remainder of the year.

With regard to the "other rockfish" and "other species" categories, the members of the NPL-GA are making every effort possible to make sure that their recording and reporting procedures are in full compliance with U.S. guidelines. This has involved some recalculation of the amounts of fish in these categories which are necessary for by-catch purposes.^{8/} As more and better data is compiled, better projections of allocation requirements for incidentally-taken species will be possible. Until that time, however, it is clear that the allocations under the present FMP, particularly the initial allocations (even as supplemented by partial reserve releases), are not sufficient to accommodate continuing longline operations during the remainder of the year.^{9/} It is, therefore, very important for the reserve amounts which will be eligible for reallocation on July 2, to be released at the earliest possible date. Given the fact that only trace amounts of fish in these categories are being taken by U.S. fishermen in that portion of the Gulf outside of Southeast, it is extremely doubtful that DAH levels will be reached, much less exceeded. The reserves are not, therefore, necessary for domestic purposes and should be released.

CONCLUSION

For all the reasons stated herein, including the goals and objectives of the FCMA and the FMP to facilitate full-utilization of fishery resources, as well as the need

^{8/} Incidental catch rates of "other rockfish" may run as high as 5% in blackcod longline operations and 1% in Pacific cod longline operations.

^{9/} This is particularly true if future allocation of reserves is made among the Gulf's various regulatory areas in the same proportions as earlier allocations. For example, after the first reserve release, the total amount of "other rockfish" available to Japanese vessels in each of the Gulf's regulatory areas was as follows: 20 mt. in Chirikof; 15 mt. in Shumagin; 47 mt. in Kodiak; 35 mt. in Yakutat; and 689 mt. in Southeast. Thus, of the total allocation of "other species" available to Japan, 85% was assigned to Southeast, an area closed to foreign longlining, and only 15% was allocated to the other four areas where it was needed for by-catch purposes.

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to avoid unnecessary economic hardship and deprivation to foreign fishermen, we respectfully request that the entire reserve amounts of blackcod, Pacific cod, "other rockfish" and "other species" be reallocated to their respective TALFFs as scheduled on July 2, 1979.

If you have any questions or comments concerning the contents of this letter, or if we can be of any assistance in providing further information and/or data concerning the up-coming reserve release, please do not hesitate in contacting us.

Kindest regards.

Sincerely yours,

MUNDT, MacGREGOR, HAPPEL,
FALCONER & ZULAUF

PAUL MacGREGOR

Paul MacGregor

WPM:dlr

cc: Mr. Clement Tillion
Mr. Jim Branson
Mr. Phil Rigby
Mr. Clem Bribitzer
Mr. James Storer
Mr. Y. Okazaki

JAY D. HASTINGS
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June 15, 1979

FILE	ACT	INFO	ROUTE TO	INITIAL
			Exec. Dir.	
			A. Exec. Dir.	JMH
			Admin. Off.	
			Exec. Sec.	
			Asst. Dir.	JMH
			Asst. Dir.	
			Sec. Asst.	
			Sec. Asst.	
2-31 JUN 17 1979				

Mr. Harry L. Rietze
Director, Alaska Region
National Marine Fisheries Service
P. O. Box 1568
Juneau, Alaska 99802

Re: July 2, 1979 Apportionment of Reserve Amounts under the FMP for Groundfish of the Gulf of Alaska

Dear Mr. Rietze:

On behalf of the Japanese fishing industry, I would like to offer the following comments for your consideration on the July 2 reserve release.

Although the concept of the reserve system and the regulations promulgated for implementing that system have always been accepted by the Japanese and other foreign fisheries as a reasonable solution to the uncertainty in estimating the harvest by U.S. vessels, problems have been encountered in the actual application of the concept. The major problem has been the inability by the foreign fishery to harvest reallocated amounts because of untimely releases. For example, during 1978, the Japanese trawlers and longliners fell far short of their allocations because of a final release which was too late in the season for the industry to efficiently harvest. The unfortunate result, of course, is that foreign fishermen, who have depended on these resources for their livelihood for a number of years, are unable to take advantage of the available resource surpluses and the United States must refund needed foreign fishing fees for unharvested allocations.

The anomaly to this whole problem is that the underlying policy and regulations implementing the reserve concept appear more than adequate to avoid unnecessary results of underutilization. When the Council approved the reserve concept and substantially increased the reserves for potential joint venture operations, the idea was to establish one reserve which could automatically feed into DAF or in the alternative TALFF depending on the progress of the U.S. fishery. 43 FR 56239, December 1, 1978. If joint venture catches were to come from the reserves alone, this would frustrate the objective of the reserve concept to allow for full utilization. In order to assure a timely release of reserves to TALFF when a sufficient quantity still remains in the DAF, a time schedule was established whereby 25% of the reserve would be released every two months beginning with January 2nd. With this schedule, foreign fisheries can properly plan for taking the reserves available.

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In determining whether or not each scheduled release should be apportioned to TALFF, factors to be taken into consideration include reported U.S. catch and effort and fish already purchased by U.S. processors compared with that previously projected and projected U.S. catch and effort and processing capacity for the remainder of the year. However, past experience has proven that mere expression of desire on the part of joint venture operators is simply insufficient justification for withholding a reserve apportionment. Regardless of the desire on the part of U.S. fishermen to harvest a stock, Sec. 303 (a) (4) of the FOMA specifically requires the Council or Secretary to determine what portion of the OY U.S. fishermen "will harvest" on an annual basis. This clearly implies that factors other than desire must be taken into consideration when projecting U.S. catch, effort, and processing capacity; namely, the economic feasibility or infeasibility on the part of U.S. fishermen to harvest the projected amounts.

To date, joint venture operations have been extremely limited and conducted mainly on an experimental basis in the Gulf of Alaska. Projected catches during March, which were the basis for withholding the March reserves, have simply not materialized. Under the current FMP, only four and one-half months remain in the Gulf fishing season. Given the current catch rates of groundfish by U.S. fishermen fishing for both domestic and foreign processors, it can easily be concluded that U.S. fishermen, for economic reasons and otherwise, will not fully utilize the amounts set aside in the DAF during this fishing season. For this reason, the entire amount remaining in the reserves should be apportioned to the TALFF in order to give foreign fishermen sufficient opportunity to plan for the utilization of these surpluses.

Sincerely,

Jay D. Eastings

P.S. These comments were prepared by me and a copy has been filed with the Department of Justice, Washington, D.C. where my registration statement under the Foreign Agents Registration Act as the agent for the Japan Fisheries Association is available for public inspection. Of course, my registration does not indicate approval of the contents of this memorandum by the United States Government.

JDH

pjf

GULF OF ALASKA GROUND FISH FISHERY
 (Metric Tons)

Attachment 2
 Agendas 11
 June 1979

SPECIES	ORIGINAL				JANUARY RESERVE RELEASE			MARCH RELEASE RELEASE			MAY RESERVE RELEASE		
	OY	DAH	RESERVE	TALFF	RESERVE RELEASE	RESERVE BALANCE	REVISED TALFF	RESERVE RELEASE	RESERVE BALANCE	REVISED TALFF	RESERVE RELEASE	RESERVE BALANCE	REVISED TALFF
Pollock	168,800	14,200 (6,100)	133,800	20,800	33,450	100,350	54,250	0	100,350	54,250	33,450	66,900	87,700 (95,800)
Cod	34,800	15,500 (4,000)	10,000	9,300	2,502	7,498	11,802	0	7,498	11,802	2,502	4,996	14,304 (25,804)
Flounders	33,500	7,200 (1,300)	9,700	16,600	2,425	7,275	19,025	0	7,275	19,025	2,425	4,850	21,450 (27,350)
Pacific Ocean Perch	25,000	1,100 (400)	7,900	16,000	1,975	5,925	17,975	0	5,925	17,975	1,975	3,950	19,950 (20,650)
Rockfish	7,600	2,000 (700)	3,500	2,100	875	2,625	2,975	0	2,625	2,975	875	1,750	3,850 (5,150)
Sablefish	13,000	4,000	4,100	4,900	0	4,100	4,900	850	3,250	5,750	0	3,250	5,750
Atka Mackerel	26,800	0	5,500	19,300	1,375	4,125	20,675	0	4,125	20,675	1,375	3,150	23,650
Squid	5,000	0	1,000	1,000	250	750	1,250	0	750	1,250	250	1,100	3,900
Other	16,200	500	4,700	11,000	1,175	3,525	12,175	0	3,525	12,175	1,175	2,350	13,350
Total	325,700	44,500	180,200	101,000	44,027	136,173	145,027	850	135,323	145,877	44,027	92,296	193,904

() bracketed amounts indicate proposed DAH & TALFF amendments.

Agenda Item #11
June 28-29, 1979

MEMORANDUM

To: Council, SSC, and AP
From: Jim H. Branson, Executive Director
Date: June 21, 1979
Subject: Release of reserves, Gulf of Alaska Groundfish FMP

BACKGROUND INFORMATION

The last release of reserves is scheduled for July 2, 1979. Fifty percent of all the reserves have been released to TALFF except sablefish, where 25% has been released.

Marine Resources Company opposes further releases of reserves of Pacific cod and Pacific Ocean perch in the Shumagin, Chirikof, and Kodiak areas. KMIDC has scaled down their requests to 22,500 metric tons of pollock and 13,500 metric tons of other species (primarily cod and sole).

The Japanese fishing industry has requested that the entire amount remaining in reserves be released to TALFF as soon as possible. The North Pacific Longline and Gillnet Association has requested the release of the entire reserve amounts of sablefish, Pacific cod, other rockfish, and other species to TALFF.

This release of reserves probably requires more time for comment and study. An interim final release may be appropriate pending a longer review of the final release.

COUNCIL ACTION

A Council recommendation on the release is needed: both for the amounts and the timing.

Attached are:

1. A summary page.
2. Gulf of Alaska groundfish fishery reserve figures.
3. June 15 letter to Harry Rietze from Jay Hastings.
4. June 15 letter to Harry Rietze from Paul MacGregor.
5. June 15 letter to Harry Rietze from Walter Pereyra.
6. Copy of Federal Register announcement Thursday, May 24, 1979.

SUMMARY PAGE

Attachment 1

July 2 Reserve Release

1. Recapitulation of action to date on reserve amounts:

January, 1979: 25% of reserves (except sablefish) released.
March, 1979 : No reserves released (except 25% sablefish).
May, 1979 : 25% of reserves (except sablefish) released.

2. Remaining reserves consist of: 50% of all species EXCEPT sablefish
75% of sablefish reserves

3. July 2nd is the last scheduled release of reserves. The fishing year ends October 31.

4. Joint venture projections and comments:

	<u>Pollock</u>	<u>Cod</u>	<u>Sablefish</u>	<u>PoP</u>	<u>Other</u>
A. Marine Resources, Inc. (mt)	2,000	1,900	30	1,400	300+
B. KMIDC	22,500	-----	13,500	--(aggregate)--	
<u>TOTAL</u>	24,500 Pollock				17,130 Other

5. Foreign comments: Release all Reserves to TALFF

6. Domestic considerations: The only DAH projection for 1979 exceeding the allotted DAH is sablefish. The survey indicated a DAH of 6,000 mt, equal to all of the DAH now in the FMP + 2/3 of the remaining reserves.