

MEMORANDUM

TO: Council, SSC, and AP Members

FROM: Clarence G. Pautzke  
Executive Director



DATE: November 27, 1990

SUBJECT: Gulf of Alaska Groundfish

**ACTION REQUIRED**

Consider emergency action to delay the start of the second quarter pollock fishery in the Gulf of Alaska until June 1, the start of the Bering Sea non-roe season.

**BACKGROUND**

An industry request was received by the Council office to delay the start of the second quarter pollock season in the Gulf until the non-roe season opening in the Bering Sea. This letter is included as Item D-2(d)(1). This request was discussed during the November 15 Council teleconference, where the Council voted to put this item on the agenda for the December meeting.

There is concern that, if the Gulf of Alaska pollock season is open when the Bering Sea pollock fishery is closed (between the roe and non-roe seasons), a potentially large influx of effort will occur in the Gulf with potentially damaging results to stocks in the Gulf. A surge of effort from the Bering Sea fleet could take the quarterly Gulf pollock quota in a very short time, making in-season management of the fishery very difficult. This potential for overharvest might be mitigated by postponing the Gulf second quarter season to preclude this influx of effort on the fishery.

Additionally, it is likely that without a season delay in the Gulf, this additional effort would occur early enough in the quarter such that the entire second quarter quota would be taken from spawning stocks of pollock. To have this season delay in effect for the 1991 fishery would require an emergency rule.

AGENDA D-2(d)(1)  
DECEMBER 1990

# Alaska Groundfish Data Bank

October 7, 1990

Clarence Pautzke, Executive Director  
North Pacific Fishery Management Council



Sent by fax

- RE: ADDITION TO THE DECEMBER AGENDA OF THE FOLLOWING TWO ITEMS:**
1. Delay start of 1991 Gulf of Alaska second quarter pollock fishery until June, by emergency rule, to synchronize with the opening of the Bering Sea non-roe pollock season.
  2. Simultaneous opening of 1991 Gulf of Alaska first quarter pollock fishery and Bering Sea roe-pollock season.

Dear Clarence:

To conserve the Gulf of Alaska pollock stocks and prevent overfishing, the members of the Alaska Groundfish Data Bank request that the North Pacific Fishery Management Council add the following two items to its agenda for consideration at the December Council meeting.

1. Delay the opening of the second quarter directed fishery for Gulf of Alaska pollock until June to synchronize with the opening of the Bering Sea non-roe pollock season.

During the period that the Gulf of Alaska target pollock fishery is closed, pollock would be a bycatch only species and up to 20% of a vessel's retained catch could be pollock.

We understand from National Marine Fisheries Service that this can be done by regulatory amendment through an emergency rule. We feel this is a high priority issue.

2. Synchronize the opening of the first quarter Gulf of Alaska directed pollock fishery with the opening of the Bering Sea roe-pollock season should the opening of the Bering Sea roe-pollock season be changed by emergency rule to a date other than January 1.

Were a change in the opening date made, Gulf of Alaska pollock would retainable bycatch not to exceed 20% of a vessel's retained catch during the time the target fishery was closed.

We also request that NMFS develop management measures to assure that the Gulf of Alaska quarterly quotas are not overharvested should there be a sudden intense fishing effort on Gulf stocks.

**Gulf pollock opening delay request - page 2****JUSTIFICATION****1. Problem**

Both the quarterly allocation regime implemented for the Gulf of Alaska pollock fishery and the split season regime being implemented for the Bering Sea pollock fishery were designed to prevent the quota from being taken solely from spawning stocks and spread the harvest over time and, presumably, over most of the segments of the stock.

Since little is known about the effect of intense fishing effort on spawning stocks or about stock separation in either the Gulf or Bering Sea, these measures represent important steps toward conservative management intended to benefit the long range health of Alaska's pollock stocks.

However, the Bering Sea/Aleutian roe-fishery is projected to close sometime between the end of January and mid-March, depending on the roe-season quota. The Bering Sea will not open again to pollock fishing until June 1. If there is pollock available in the Gulf of Alaska, which would be the case if the Gulf second quarter pollock season opens April 1, much of the Bering Sea pollock effort can be expected to move into the Gulf of Alaska.

**2. Conservation of Stocks**

Gulf of Alaska pollock stocks are still aggregated in April, which allows high catch rates. The quarterly quota is expected to be somewhere between 20,000 and 25,000 MT.

In 1990 less than a third of the second quarter quota was taken out of spawning stocks. However, in 1991 the sudden influx into the Gulf of Alaska of a fleet capable of taking 50,000 to 75,000 MT a week insures that the second quarter quota would be taken in only a few days and that the entire second quarter Gulf quota would be taken out of spawning stocks.

This is contrary to the conservation rationale behind the quarterly allocation regime and further, while increasing the conservation of the Bering Sea pollock stocks, decreases the conservation of the Gulf of Alaska pollock stocks.

We do not feel it is the Council's intent to conserve the stocks in one fishery at the cost of stocks in another fishery.

We see no way at present to prevent the abuse of the Gulf of Alaska pollock stocks except to open the second quarter in June when, or just after, the Bering Sea non-roe season opens.

Because there will be some bycatch of pollock in the Pacific cod and flounder fisheries, we feel that during April and May pollock taken as bycatch should be retainable and no more than 20% of retained catch be pollock. To discard pollock is a waste of the resource.

### 3. Prevent Overfishing

The above section assumes that National Marine Fisheries will be able to manage the Gulf pollock fishery to assure that the quota each quarter is not exceeded and that the target pollock fishery is closed in time to allow enough quota for retainable bycatch.

However, considering the amount of effort which could be expected in the Gulf of Alaska after the Bering Sea roe-pollock fishery closes, this assumption is probably optimistic.

This year the Bering Sea closed October 13. A small number of Bering Sea vessels (small number compared to the total Bering Sea pollock fleet) moved into the Gulf of Alaska. The catch for the week October 13 through October 19 was triple the previous week's catch and the fourth quarter harvest of 17,500 MT was exceeded by 9,580 MT -- a 55% overharvest.

Or, looked at another way, 15,621 MT of a 17,500 MT quota was taken in six days. The influx of effort from the Bering Sea appears to have been only a small portion of the potential effort as about two-thirds of the pollock fleet appear to have gone to the Aleutians -- an option which will not be available in 1991 during the closure between the roe and non-roe seasons.

### 4. Economic Concerns

According to local processors Gulf pollock in April are over-ripe and watery, which means a low recovery rate for all processing operations. Economically April and May are probably the worst months to take pollock in the Gulf of Alaska.

Further, if the recovery rate is lower than that estimated by NMFS' Product Recovery Rates, which are used to back calculate round weight, the actual harvest may end up greater than the estimated harvested. This only exacerbates the problem of conserving the stocks and avoiding overfishing.

### 5. Management of Intense Effort

Even if the second quarter opening of the Gulf of Alaska pollock season is delayed until June, there may still be times when the Gulf pollock fishery is open and the Bering Sea pollock fishery closed. During these times a surge of effort can be expected in the Gulf of Alaska as happened in October 1990.

When a fleet believed capable of taking in one week the entire Gulf of Alaska pollock quota moves into the Gulf, we feel it is imperative that NMFS be prepared to take whatever measures are necessary to assure that the quarterly quotas are not exceeded.

Gulf pollock opening delay request - page 4

We suggest such measures as daily reporting and/or 24 hour fishing periods followed by 24 hour closures or other scheme which allows close tracking of the catch and time to close the fishery before the quarterly quota is exceeded.

We appreciate the Council's consideration of this serious conservation problem.

Sincerely,



Chris Blackburn, Director  
Alaska Groundfish Data Bank