


MEMORANDUM

TO: Council, SSC and AP Members

FROM: Clarence G. Pautzke 
Executive Director

DATE: June 1, 1998

SUBJECT: Bycatch Reduction Amendments

ESTIMATED TIME 6 HOURS (all D-1 items)
--

ACTION REQUIRED

- (a) Final review of amendment to prohibit bottom trawl gear for BSAI pollock.

BACKGROUND

The Magnuson-Stevens Act amendments emphasized the importance of bycatch effects on achieving sustainable fisheries. National Standard 9 mandates that conservation and management measures shall, to the extent practicable: (1) minimize bycatch; and (2) to the extent bycatch cannot be avoided, minimize the mortality of such bycatch. In addition, Section 303 of the Act was amended to add bycatch reduction incentives as a discretionary provision of FMPs. This provision reads that any FMP may "include, consistent with the other provisions of this Act, conservation and management measures that provide harvest incentives for participants within each gear group to employ fishing practices that result in lower levels of bycatch or in lower levels of the mortality of bycatch."

To comply with these provisions of the Act, the Council highlighted the need for additional bycatch management measures during the 1997 call for proposals. At the September meeting, the Council initiated development of several of the proposals received. One of these proposals was to eliminate non-pelagic trawling for pollock in the BSAI to reduce halibut bycatch, and examine measures for reducing bycatch in the GOA pollock fishery. This proposal was submitted by the Alaska Marine Conservation Council. There are two parts to the proposal: (1) a plan amendment proposal to prohibit the use of non-pelagic trawls in the directed pollock fisheries of the Bering Sea and Aleutian Islands, and (2) a regulatory amendment to split out pollock from the pollock/Atka mackerel/other species fishery PSC category. Although the action to prohibit bottom trawl gear for pollock fisheries could be taken annually as part of the BSAI TAC specification process, this proposed plan amendment is to make this prohibition a permanent regulation. The alternatives for each amendment are listed below:

Plan Amendment

Alternative 1: No Action. Allocation of BSAI pollock quota among pelagic and non-pelagic trawl gear types can be established for the next fishing year during the annual specification process.

Alternative 2: Prohibit the use of non-pelagic trawls in the BSAI pollock fishery (including CDQ fishery). Only pelagic trawl gear as defined in regulations (together with the performance-based standard) could be used by vessels when engaged in a directed pollock fishery. Total bycatch limits for

Prohibited Species (including 7.5% CDQ apportionment) would be reduced to reflect this gear prohibition.

- Option 1: Reduce PSC limit for halibut only (50 mt).
- Option 2: Reduce PSC limit for halibut (50 mt), red king crab (1,000), C. bairdi crab (5,000), and C. opilio crab (25,000).
- Option 3: Reduce PSC limit for halibut (75 mt), red king crab (3,000), C. bairdi crab (50,000), and C. opilio crab (150,000).

Regulatory Amendment

Alternative 1: Status Quo. Maintain PSC accounting for the pollock fishery within the pollock/Atka mackerel/other species category. Pollock and Atka mackerel fisheries would be exempted from being closed when the PSC limits are attained, as specified in 50 CFR Part 675.21.

Alternative 2: Split out pollock from the pollock/Atka mackerel/other species category and account for PSC bycatch separately. The pollock fishery would be closed from fishing in specified areas when PSC limits are reached. *Atka, Halibut, PSC*

An executive summary of the analysis is attached as Item D-1(a)(1).

Executive Summary

The Magnuson-Stevens Act amendments emphasized the importance of bycatch effects on achieving sustainable fisheries. National Standard 9 mandates that conservation and management measures shall, to the extent practicable: minimize bycatch; and to the extent bycatch cannot be avoided, minimize the mortality of such bycatch. This Environmental Assessment/Regulatory Impact Review/Initial Regulatory Flexibility Analysis (EA/RIR/IRFA) addresses: (1) a plan amendment proposal to prohibit the use of non-pelagic trawls in the directed pollock fisheries of the Bering Sea and Aleutian Islands, and (2) a regulatory amendment to split out pollock from the pollock/Atka mackerel/other species fishery PSC category.

Plan Amendment

Alternative 1: No Action. Allocation of BSAI pollock quota among pelagic and non-pelagic trawl gear types can be established for the next fishing year during the annual specification process.

Alternative 2: Prohibit the use of non-pelagic trawls in the BSAI pollock fishery. Only pelagic trawl gear as defined in regulations (together with the performance-based standard) could be used by vessels when engaged in a directed pollock fishery. Total bycatch limits for Prohibited Species (including 7.5% CDQ apportionment) would be reduced to reflect this gear prohibition.

- Option 1: Reduce PSC limit for halibut only (50 mt).
- Option 2: Reduce PSC limit for halibut (50 mt), red king crab (1,000), C. bairdi crab (5,000), and C. opilio crab (25,000).
- Option 3: Reduce PSC limit for halibut (75 mt), red king crab (3,000), C. bairdi crab (50,000), and C. opilio crab (150,000).

A prohibition on non-pelagic trawling for BSAI pollock, under Alternative 2, would reduce PSC bycatch as directed for the option chosen. Options 1 and 2 were based on estimated savings using data from gear specific bycatch rates. Option 3 was based on estimated savings using bycatch rates from pelagic gear only when the performance based standard was in effect. Under Option 1, the overall BSAI halibut bycatch limit would be reduced from 3,775 mt to 3,725 mt. Under Options 2 and 3, PSC limits for crab would also be reduced. Crab PSC limits would be first determined based on crab abundance, as currently regulated, and then reduced by the numbers indicated above. For example, if this regulation had been in place for 1998, the PSC limit for zone 1 red king crab would have been 99,000 animals under Option 2, and 97,000 animals under Option 3.

Option 3 may provide more realistic estimates of bycatch savings, if Alternative 2 were adopted. Data indicated that fishermen were clearly able to alter their behavior by fishing off the bottom and catching less crabs and halibut. Because Alternative 2 would include a performance based standard as part of the pelagic trawl only regulation, these rates are likely indicative of what the fleet can do within a pelagic only fishery.

Another effect of Alternative 2 is a reduction in the bycatch of groundfish other than pollock in directed pollock fisheries. Much of this groundfish catch would be available to other fisheries. Analysis suggests that under Alternative 2, approximately 1,581 mt of groundfish would not be harvested incidental to BSAI pollock fisheries. Most of this unused catch would be composed of Pacific cod, with smaller amounts of rock sole, arrowtooth flounder, yellowfin sole, and other species. However, slightly higher incidental catches of Greenland turbot, POP, Atka mackerel, and squid in the BSAI pollock fishery would be expected under Alternative 2.

The benefits of reducing halibut and crab bycatch would need to be weighed against the costs to the groundfish trawl and processing industry. Large costs could be incurred if vessels were unable to harvest the pollock TAC

None of the alternatives are expected to have a significant impact on endangered, threatened, or candidate species, and none of the alternatives would affect takes of marine mammals. Actions taken to prohibit the use of bottom trawls in the directed pollock fishery will not alter the harvest of groundfish, scallops, or salmon, but will reduce the incidental bycatch of halibut (and crab under Option 2).

Summary of EA/RIR Impacts

One potential drawback of having a separate allocation of PSC to the pollock fishery as specified under Alternative 2 is that, once the PSC limit is met, the pollock fishery is closed from fishing the applicable zone. This could have major economic consequences if the fishery is completely shut down from the BSAI, due to attainment of the halibut PSC limit. This analysis indicates that the pollock fishery generates about \$1 million per metric ton of halibut bycatch mortality. To avoid the possibility of risking losses to this high value fishery, more PSC than required may be apportioned to the pollock category, and hence there may be impacts on other groundfish fisheries as well.

The alternative of splitting out pollock and having a separate category seems to be a straightforward method of accounting and monitoring of bycatch. In 1998 for example, the pollock/Atka mackerel/other species category was allocated 350 mt of halibut, 155 mt of herring, 7,500 red king crab, 29,408 baitd in zone 1, and 470,000 baitd in zone 2. Under Alternative 2, a split of the category would indicate that PSC limits for Atka mackerel/other species could be reduced, and the pollock fishery could then be allocated PSC based on what was predicted for a pelagic trawl only fishery. Under plan amendment Alternative 2, option 2, PSC limits for a pelagic trawl only pollock fishery would then be in the order of 175 mt of halibut, 30,000 baitd, and 1,500 red king crabs.

Alternative 2: Split out pollock from the pollock/Atka mackerel/other species category and account for PSC bycatch separately. The pollock fishery would be closed from fishing in specified areas when PSC limits are reached.

Alternative 1: Status Quo. Maintain PSC accounting for the pollock fishery within the pollock/Atka mackerel/other species category. Pollock and Atka mackerel fisheries would be exempted from being closed when the PSC limits are attained, as specified in 50 CFR Part 675.21.

This document also analyzes a regulatory amendment to split the pollock/Atka mackerel/other species category for purposes of allocating the PSC limits among fisheries. Two alternatives were examined:

Regulatory Amendment

The effects of combining Alternative 2 with the IR/IT program are not completely predictable at this time. Nevertheless, anecdotal information suggests that the H&G fleet has not encountered high incidental catch rates of pollock this year. Hence, under Alternative 2, it is not likely that fishermen using non-pelagic gear targeting other groundfish species would have to discard pollock above the maximum retainable bycatch amount (20%).

due to halibut bycatch constraints. Additionally, based on the data available, additional operational costs could be incurred by catcher/processor vessels using non-pelagic gear. There may be costs associated with buying new trawls, upgrading horsepower in some cases, and unquantified yet substantial costs in terms of product production (particularly those vessels targeting larger pollock for fillet production) and markets. This analysis did show that larger pollock are taken with bottom trawl gear, and prohibiting this gear type would result in smaller pollock being taken, on average.

None of the alternatives is expected to result in a "significant regulatory action" as defined in E.O. 12866.

None of the alternatives are likely to significantly affect the quality of the human environment, and the preparation of an environmental impact statement for the proposed action is not required by Section 102(2)(C) of the National Environmental Policy Act or its implementing regulations.

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INTERNATIONAL PACIFIC HALIBUT COMMISSION

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

AGENDA D-1(a)
JUNE 1998
Supplemental

SEATTLE, WA 98145-2009

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June 1, 1998

Dr. Clarence Pautzke, Executive Director
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252

RECEIVED
JUN - 2 1998
N.P.F.M.C.

RE: June 1998 Meeting - Agenda Item D-1(a) BSAI Pollock Non-Pelagic Trawl Ban

Dear Clarence:

The staff of the International Pacific Halibut Commission (IPHC) has reviewed the EA/RIR for BSAI Amendment 57 which examines a prohibition on non-pelagic trawl gear in the BSAI trawl fishery for pollock. We have the following recommendations and comments.

For the plan amendment, we recommend the Council adopt Alternative 2, Option 3 for the following reasons.

(1) Halibut bycatch reduction. The analysis indicates that halibut bycatch would be reduced by requiring the cleaner gear type, and Option 3 provides for lowering the BSAI halibut bycatch limit by 75 mt. This is not a large amount, but would meet the goals of the Magnuson-Stevens Act and of IPHC's Halibut Bycatch Work Group.

(2) Pelagic trawl gear provides more pollock per kg of halibut. All trawl fisheries operate within a bycatch limit and the cleaner pelagic gear has a much lower bycatch rate than non-pelagic gear, thereby providing more pollock to be harvested for the same amount of halibut bycatch.

(3) Minimal impact on trawl fishery. Tables 8 and 9 (page 20 of EA/RIR) indicate that only 1.4% and 4.0% of the 1996 and 1997 pollock catch in the directed pollock fisheries were taken in non-pelagic trawls.

Regarding the proposed regulatory amendment to split out a separate halibut bycatch limit for the pollock fishery, we recommend the Council adopt Alternative 1 (Status quo) for the following reasons.

We agree with the analysis that the most effective means of monitoring and controlling bycatch is to have separate limits for each target fishery. However, in this instance we find several factors which we believe preclude a change from status quo for the pollock fishery, at least for the short term.

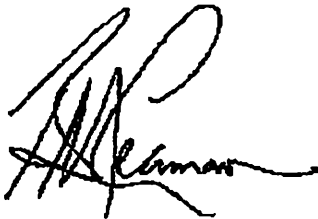
First, the impact of the non-pelagic gear prohibition, should it be adopted, on halibut bycatch is difficult to precisely quantify. Halibut bycatch should decline, but the interaction with IR/IU, the fishery's discard mortality rate, and the effect of a performance standard on the halibut bycatch rate makes an estimate difficult to derive. Thus, setting an appropriate bycatch limit during the fall specification process would be difficult.

Second, industry will likely seek to avoid a halibut bycatch-related closure by setting a liberal bycatch limit. This would be to the detriment of other fisheries, whose limits would be reduced in order to keep the pollock fishery open. If fishermen believe that halibut bycatch could cause the pollock fishery to close, then we anticipate a race for bycatch that would increase the amount of halibut bycatch mortality used by the pollock fishery. Such a race for bycatch could offset or exceed savings from bycatch reallocation to the pollock fishery.

For these reasons, we suggest the Council adopt Alternative 1 (Status quo). After the industry has some experience over the next 2-3 years with IR/IU and possibly new performance standards and gear requirements, the Council would have better information on which to base a pollock fishery halibut bycatch limit.

A member of my staff will be at the June meeting and will be able to address questions the Council may have on these recommendations.

Sincerely yours,



Bruce M. Leaman
Director

cc: Commissioners

Alaska Groundfish Data Bank

P.O. Box 2298 • Kodiak, Alaska 99615

TO: RICK LAUBER, CHAIRMAN
NORTH PACIFIC FISHERY MANAGEMENT COUNCIL

RE: COMMENTS ON THE PROPOSED BAN ON POLLOCK BOTTOM TRAWLING
AGENDA ITEM D-1a

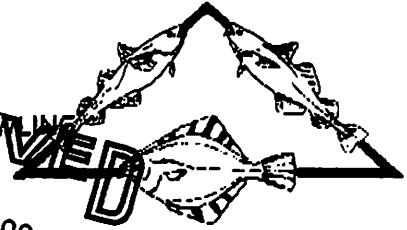
DATE: JUNE 2, 1998

SENT BY FAX: 1 PP

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JUN - 2 1998

N.P.F.M.C



COMMENTS ON BANNING BOTTOM TRAWLING FOR POLLOCK IN THE BSAI (AGENDA ITEM D-1a)

SUBMITTED BY ALASKA GROUND-FISH DATA BANK

GULF OF ALASKA

First AGDB wants to emphasize that the Gulf of Alaska is not part of this proposed action. Seventy-five percent of the Gulf pollock fishery is taken during periods when halibut bycatch is not available and by necessity must be pelagic trawl only. Halibut mortality estimated for the Gulf pollock fisheries was 18 MT in 1996 and 6 MT in 1997. Eliminating the 25% allocation of the pollock in the first trimester which may be taken by bottom trawl also eliminates the small vessels without adequate horsepower to use pelagic trawls.

BERING SEA/ALEUTIANS

AGDB has no comments on how bottom trawling for pollock in the Bering Sea/Aleutians should be managed.

However, we do have great concerns about reducing the halibut cap in the Bering Sea by banning bottom trawling. This proposal does not appear to be a proposal to improve fisheries, but a proposal to reduce the Bering Sea halibut cap by some small amount even though the value of a pound of halibut used as bycatch in the pollock fishery is worth \$383/lb and only \$2/lb in the directed fishery.

AGDB feels the fisheries would be much better served by a floating halibut cap which is adjusted according the number of halibut of the size taken in the trawl fisheries than by some arbitrary reduction in the Bering Sea halibut cap.

Thank you for the opportunity to comment on this issue.

Chris Blackburn, Director
Alaska Groundfish Data Bank

April 18, 1998
Winter address:
Box 343
Talkeetna, AK 99676

RECEIVED
MAY 14 1998

N.P.F.M.C

Rick Lauber, Chairman
North Pacific Fisheries Management Council
605 West 4th Ave., Suite 306
Anchorage, AK 99501

Dear Chairman Lauber;

I am writing to encourage prompt and aggressive action to eliminate bottom trawling and reduce bycatch in the Bering Sea. In particular I urge the Council to drastically reduce the Chinook bycatch allowance by the October 1998 statutory deadline under the Magnuson-Stevens Act.

The inshore fisheries of Western Alaska are of vital importance to local residents and many other rural Alaskans. Most of us involved in these fisheries are totally reliant on them for our cash income. Other jobs are virtually nonexistent in this region.

The commercial Chinook catch in the lower Yukon averages around 100,000 which is divided among 700 permit holders. No one gets rich in this fishery, but the uniqueness of this fish has guaranteed us a niche market despite the increasing market dominance of farmed and hatchery salmon.

With a reported bycatch in the range of 40,000 Chinooks and the fact that the majority of this bycatch are Yukon Chinooks, it is clear that this unconscionable waste of the resource has real and direct impacts on every Yukon fisherman.

I wish you and other council members could come stand on the river bank at Emmonak at the end of June when ADF&G is forced to close the Chinook season to ensure adequate escapement. I wish you could look into the weathered face of a Yupik fisherman who has missed getting a good catch in any of the five or six (total) fishing periods we are allowed and is facing a winter with very little cash to take care of his family.

If you could, you would realize what a difference it could make for many families if their nets were given an opportunity to harvest the 30,000+ Yukon Chinooks that are currently swept up by the factory trawlers.

The lawyers and lobbyists for the corporate fleet will be well represented, but you won't see very many Yukon fishermen at your deliberations. I hope that you will remember that the small boat-based livelihoods of many in Western Alaska are dependent upon your decisions.

Regards,



Paul H. Bratton, Acting President - Yukon Salmon Cooperative

5/14/98

Dear Rick Lauber, Chair
North Pacific Fisheries Management
Council,

This is in support of the proposal
to drastically reduce the Chinook
Salmon bycatch in the Bering Sea
by the October 1998 Magnuson Stevens
Act deadline

As a rural Alaskan resident
who owns and operates a tender boat
on the lower Yukon during the commercial
fishery, I am disturbed that the
majority of the 40,000 bycatch, 30,000 are
Yukon Kings. I am disturbed that
there are loopholes that allow the
pollock bottom trawling fleet to exceed
the present cap, (that is too high anyway).

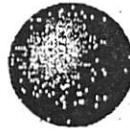
What is at stake here are the
livelihoods of the small boat based
Yukon & Western Alaska King
commercial fisheries fleets, both
fishers & tenders

Our fish are being wasted. Our
voices are not being heard.

Drastically reduce Chinook King
salmon bycatch cap & ban
bottom trawling.

From: R.A. Long
FIV SUNDOG
P.O. BOX 1088
Talkeetna AK 99676

cc: Senator Ted Stevens



AMERICAN OCEANS CAMPAIGN

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Executive Director

June 10, 1998

North Pacific Fishery Management Council
 605 West 4th Avenue
 Room 306
 Anchorage, AK 99501

Dear Council Members:


On behalf of American Oceans Campaign (AOC), a national environmental organization dedicated to the restoration and protection of marine ecosystems, we would like to express strong support for the proposal put forth by the Alaska Marine Conservation Council (AMCC) to prohibit on-bottom trawling in the directed pollock fisheries of the Bering Sea and Aleutian Islands (BS/AI), Amendment 57.


AOC is currently involved in regional and national efforts to ensure the minimization of bycatch, the protection of fish habitat, and the prevention of overfishing in U.S. fisheries through the implementation of the Sustainable Fisheries Act (SFA). Amendment 57 is a critical step toward achieving the conservation goals of the SFA mandated by U.S. Congress to be implemented into fishery management plans by October 1998.

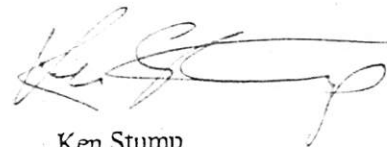
We are confident that conversion to a pelagic-only pollock fishery in the BS/AI will achieve ecological and economic gains for North Pacific fisheries and coastal communities if implemented in a way such that reductions in bycatch in the fishery are not reallocated as bycatch for another fishery, but are left in the ecosystem. Specifically, a pelagic-only fishery would enable fishermen to catch the full quota of pollock; would minimize waste of halibut, crab, and other valuable species commonly caught and wasted as bycatch in the on-bottom pollock fishery in the BS/AI; would offer greater protection of bottom habitat; and would better serve the greater ecosystem of the North Pacific.

In closing, AOC appreciates the opportunity to comment on Amendment 57 and the consideration it is being given by the North Pacific Fishery Management Council. We look forward to working with Alaska coastal communities to develop and implement this and other proposals aimed at ensuring the protection and long-term sustainability of the North Pacific marine ecosystem.

Sincerely,


 Barbara Jeanne Polo
 Political Director


 Tanya Dobrzynski
 Fisheries Program Coordinator


 Ken Stump
 North Pacific Program Lead

A non-profit organization
 dedicated to safeguarding
 the sustainability of the nation's
 and coastal

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UNITED FISHERMEN OF ALASKA

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RESOLUTION#98-01

A United Fishermen of Alaska resolution to the North Pacific Fishery Management Council to support regulating by-catch in the Bering Sea and Aleutian Islands directed pollock fishery.

WHEREAS, hundreds of millions of pounds of marine life are dumped overboard in the Bering Sea and Gulf of Alaska every year as unwanted by-catch in the trawl fisheries including millions of pounds of halibut, tens of thousands of salmon, and millions of crabs; and

WHEREAS, National Marine Fishery Service observer data shows that these by-catch numbers for crab and halibut can be significantly reduced by prohibiting the practice of "bottom trawling" in the directed pollock fishery; and

WHEREAS, the quota of pollock can be harvested without "bottom trawling" (in 1995 approximately 90 % of the pollock quota was harvested with "pelagic trawl" gear); and

WHEREAS, United Fishermen of Alaska Members are adversely affected by the by-catch of halibut, salmon, and other marine life; and

WHEREAS, United Fishermen of Alaska recognizes that each and every state managed salmon and herring fishery in Alaska has mandatory gear restrictions due in part to conservation reasons; and

WHEREAS, the United States Congress overwhelmingly passed the Magnuson-Stevens Act with strong, new national mandates to minimize by-catch and waste;

NOW, THEREFORE BE IT RESOLVED by the United Fishermen of Alaska that the North Pacific Fishery Management Council take action now to prohibit "bottom trawling" in the Bering Sea and Aleutian Islands directed pollock fishery; and

FURTHERMORE, be it resolved that the prohibition of "bottom trawling" in the Bering Sea and Aleutian Islands directed pollock fishery be accompanied by an overall reduction in the Bering Sea and Aleutian Islands halibut and crab by-catch quotas to ensure that by-catch is reduced, not reallocated; and

FINALLY, be it resolved that the North Pacific Fishery Management Council take action now to adopt gear regulations for the Bering Sea and Aleutian "pelagic trawl" fishery for pollock so that the by-catch of salmon and herring is minimized.

ADOPTED FEBRUARY 21, 1998 BY A UNANIMOUS VOTE OF THE BOARD OF DIRECTORS

MEMBER ORGANIZATIONS

Alaska Crab Coalition • Alaska Longline Fishermen's Association • Alaska Trollers Association • Bristol Bay Drifters Association • Concerned Area "M" Fishermen
 Cook Inlet Aquaculture Association • Cordova District Fishermen United • Kenai Peninsula Fishermen's Association • Kodiak Regional Aquaculture Association • Kodiak Seiners Association
 North Pacific Fisheries Association • Northern Southeast Regional Aquaculture Association • Northwest Seiners Association • Peninsula Marketing Association
 Petersburg Vessel Owners Association • Prince William Sound Aquaculture Corporation • Purga Seiner Vessel Owners Association • Seafood Producers Cooperative
 Southeast Alaska Seiners Association • Southern Southeast Regional Aquaculture Association • United Cook Inlet Drift Association • United Southeast Alaska Gillnetters

Nunagpet

Chugachmiut Environmental Protection Consortium

4201 Tudor Centre Drive, Suite 210, Anchorage, Alaska 99508 (907) 562-4155 • Fax (907) 563-2891

Nunagpet/Chugachmiut Environmental Protection Consortium Resolution 98-01

A Nunagpet/Chugachmiut Environmental Protection Consortium (Nunagpet/CEPC) resolution to the North Pacific Fishery Management Council to support regulating by-catch in the Bering Sea and Aleutian Islands directed Pollock fishery.

WHEREAS Nunagpet/CEPC includes representatives of federally recognized tribes in the Chugach Region in south central Alaska; and

WHEREAS Nunagpet/CEPC is a Tribal organization designed to facilitate the development of tribal environmental health and protection programs; and

WHEREAS hundreds of millions of pounds of marine life are dumped overboard in the Bering Sea and Gulf of Alaska every year as unwanted by-catch in the trawl fisheries including millions of pounds of halibut, tens of thousands of salmon, and millions of crabs; and

WHEREAS National Marine Fishery Service observer data shows that these by-catch numbers for crab and halibut can be significantly reduced by prohibiting the practice of "bottom trawling" in the directed Pollock fishery; and

WHEREAS the quota of Pollock can be harvested without "bottom trawling" (in a 1995 approximately 90% of the Pollock quota was harvested with "pelagic trawl" gear); and

WHEREAS Nunagpet/CEPC member tribes and tribal representatives of the Chugach region are adversely affected by the by-catch of halibut, salmon, and other marine life; and

WHEREAS Nunagpet/CEPC recognizes that each and every state managed salmon and herring fishery in Alaska has mandatory gear restrictions due in part to conservation reasons; and

WHEREAS the United States Congress overwhelmingly passed the Magnuson-Stevens Act with strong, new national mandates to minimize by-catch and waste;

Promoting a Healthy Environment for the Chugach Region

NOW, THEREFORE BE IT RESOLVED by Nunagpet/Chugachmiut Environmental Protection Consortium that the North Pacific Fishery Management Council take action now to prohibit "bottom trawling" in the Bering Sea and Aleutian Islands directed Pollock fishery; and

FURTHERMORE, be it resolved that the prohibition of "bottom trawling" in the Bering Sea and Aleutian Islands directed Pollock fishery be accompanied by an overall reduction in the Bering Sea and Aleutian Islands halibut and crab by-catch quotas to ensure that by-catch is reduced, not reallocated; and

FURTHERMORE, be it resolved that the North Pacific Fishery Management Council take action now to adopt gear regulations for the Bering Sea and Aleutian "pelagic trawl" fishery for Pollock so that the by-catch of salmon and herring is minimized.

FINALLY, the Nunagpet/Chugachmiut Environmental Protection Consortium represents a native population within the Chugach region, which is between 15% and 20% of the whole population, who still practice their subsistence way of life and depend on a healthy marine ecosystem also urges the North Pacific Fishery Management Council to take action now to reduce by-catch in bottom trawl fisheries operating in the Gulf of Alaska.

SIGNED:



Glenn Ujioka, Chair.

Nunagpet/Chugachmiut Environmental Protection Consortium

DATE: 4/9/98

**Qutekcak Native Tribe
Resolution # 9805**

A Qutekcak Native Tribe of Seward Alaska resolution to the North Pacific Fishery Management Council to support regulating by-catch in the Bering Sea and Aleutian Islands directed pollock fishery.

WHEREAS, hundreds of millions of pounds of marine life are dumped overboard in the Bering Sea and Gulf of Alaska every year as unwanted by-catch in the trawl fisheries including millions of pounds of halibut, tens of thousands of salmon, and millions of crabs; and

WHEREAS, National Marine Fishery Service observer data shows that these by-catch numbers for crab and halibut can be significantly reduced by prohibiting the practice of "bottom trawling" in the directed pollock fishery; and

WHEREAS, the quota of pollock can be harvested without "bottom trawling" (in a 1995 approximately 90% of the pollock quota was harvested with "pelagic trawl" gear); and

WHEREAS, the Qutekcak Native Tribe and its tribal members are adversely affected by the by-catch of halibut, salmon, and other marine life; and

WHEREAS, the Qutekcak Native Tribe recognizes that each and every state managed salmon and herring fishery in Alaska has mandatory gear restrictions due in part to conservation reasons; and

WHEREAS, the United States Congress overwhelmingly passed the Magnuson-Stevens Act with strong, new national mandates to minimize by-catch and waste;

NOW, THEREFORE BE IT RESOLVED by the Qutekcak Native Tribe of Alaska that the North Pacific Fishery Management Council take action now to prohibit "bottom trawling" in the Bering Sea and Aleutian Islands directed pollock fishery; and

FURTHERMORE, be it resolved that the prohibition of "bottom trawling" in the Bering Sea and Aleutian Islands directed pollock fishery be accompanied by an overall reduction in the Bering Sea and Aleutian Islands halibut and crab by-catch quotas to ensure that by-catch is reduced, not reallocated; and

FURTHERMORE, be it resolved that the North Pacific Fishery Management Council take action now to adopt gear regulations for the Bering Sea and Aleutian "pelagic trawl" fishery for pollock so that the by-catch of salmon and herring is minimized.

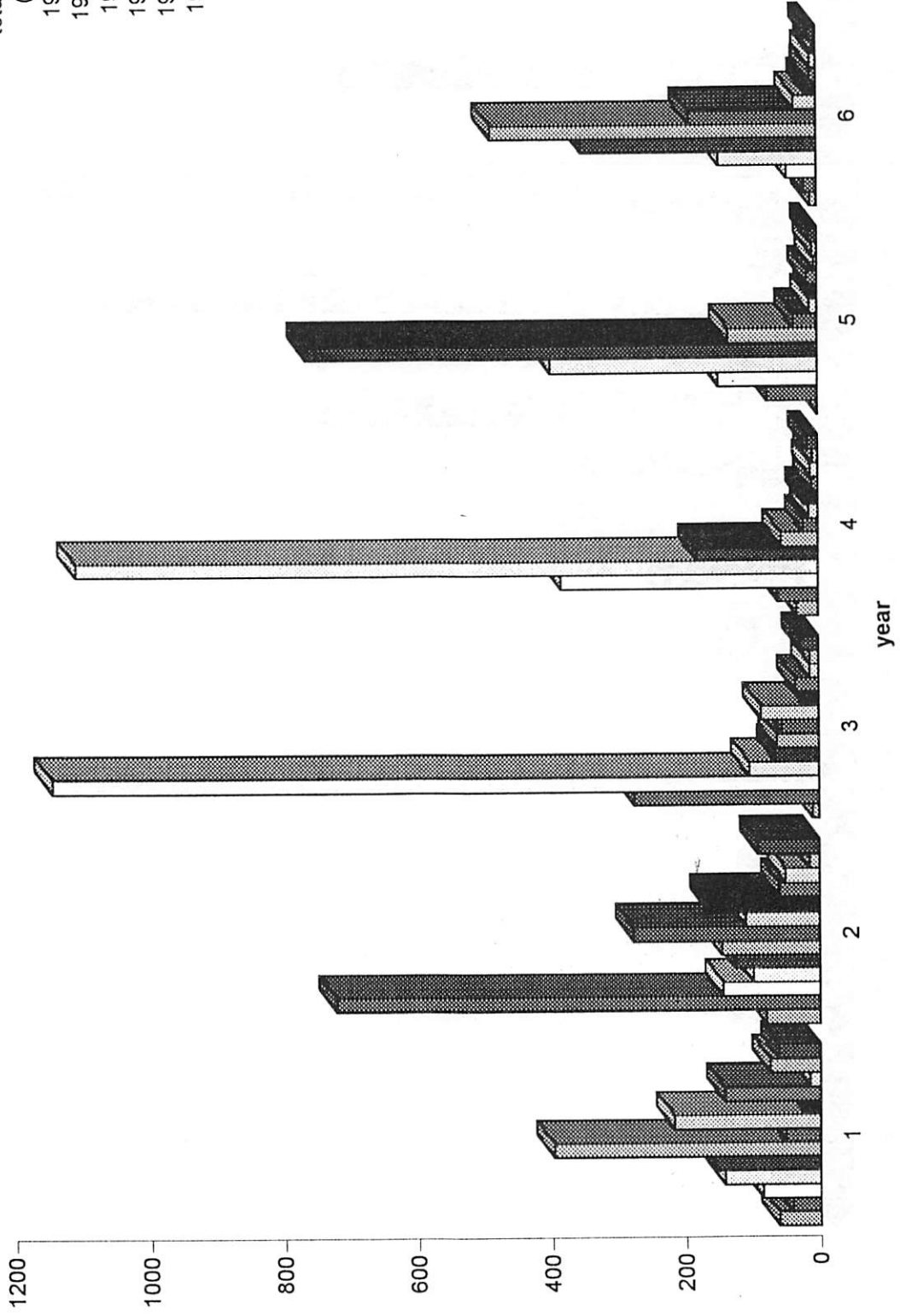
FINALLY, the Qutekcak Native Tribe represents the native population, which is 15% of Seward's population, who still practice their subsistence way of life and depend on a healthy marine ecosystem also urges the North Pacific Fishery Management Council to take action now to reduce by-catch in bottom trawl fisheries operating in the Gulf of Alaska.

Arne A. Statch
Signatures Vice Chair

4-13-98
Date

pollock catch by age in millions

total #s by year
(millions)
1991 - 1439
1992 - 2079
1993 - 1905
1994 - 1917
1995 - 1607
1996 - 1326



D. Fraser
D-1a

pollock catch by age in millions

