


MEMORANDUM

TO: Council, AP, and SSC Members

FROM: Clarence G. Pautzke 
Executive Director

DATE: June 20, 1991

SUBJECT: Groundfish: Plan Amendments and Regulatory Actions

ACTION REQUIRED

- (c) Consider industry request to increase TAC for deepwater flatfish in the Central Gulf.
- (d) Initial consideration of any proposed changes in groundfish seasons and recordkeeping and reporting requirements for 1992.
- (e) Consider schedule for analyzing quarterly cod allocations in the Bering Sea/Aleutian Islands.

BACKGROUND

(c) Central Gulf flatfish TAC request

In December, 1990 the Council set the TAC for deepwater flatfish in the Central Gulf at 10,000 mt, well below the ABC of 38,900 mt. As with the other flatfish categories, the TAC was set well below the ABC to minimize impacts on halibut bycatch while still meeting the needs of the processors as could be estimated at the time.

However, Pacific cod, Pacific ocean perch, and shortraker/rougheye quotas have been taken during the first half of 1991, and little else is available for harvesters and processors except flatfish. An industry request to have the TAC for deepwater flatfish in the Central Gulf increased to 35,000 mt is included in your notebook as Item D-1(c)(1).

Available bycatch data indicate that the remaining halibut PSC, for the third and fourth quarters, is probably sufficient to support this increase in deepwater flatfish TAC. The Gulf groundfish plan authorizes the Regional Director to make such inseason adjustments based on relevant fishery resource information.

(d) Framework/Housekeeping/Technical Amendments

Typically at this time of year, out-of-cycle amendments are initiated which may affect fishing seasons and recordkeeping/reporting requirements for the upcoming fishing year. The FMPs for both the Gulf of Alaska and the Bering Sea/Aleutian Islands contain framework measures that authorize the Council, through the Secretary of Commerce, to establish all fishing seasons by regulations that implement the FMP to accomplish the goals and objectives of the FMP, the Magnuson Act, and other applicable law. Existing season openings will remain in effect unless amended by regulations implementing the FMP. The Council must consider the following factors when recommending such regulatory amendments: biology, bycatch, exvessel and wholesale prices, product quality, safety, other fisheries, coordinated season timing, enforcement and management costs, and allocational effects. Additional recordkeeping and reporting requirements must be contained in regulations implementing the FMPs as well.

Examples of such previous actions include the delay of the sablefish season opening until April 1 for the 1991 fishing year and the delay of flatfish seasons in the Bering Sea/Aleutian Islands until May 1 for the 1991 fishing year. These regulatory actions were initiated in 1990. Regarding potential changes in fishing seasons for the 1992 fisheries, there have been suggestions in earlier meetings that groundfish seasons begin in February and that rockfish seasons in the Gulf commence no earlier than July 15. Additional recommendations may surface from the Bycatch Committee's report to the Council at this meeting. This committee is currently refining a bycatch amendment which may include some recommended season changes for specific species to control bycatch of prohibited species.

In terms of potential changes to recordkeeping and reporting requirements, NMFS staff is available to offer their recommendations, if any, on possible changes for 1992. One issue we've received periodic comment on is the use of product recovery rates to estimate catch.

(e) BSAI Quarterly Pacific Cod Allocation

In December, 1990 the Council recommended emergency action to seasonally allocate the Pacific cod harvest in the BSAI as follows: 35% to the first quarter, 25% to the second quarter, and the remaining 40% upon expiration of the emergency rule, which was then anticipated to be about the beginning of the third quarter. In January, 1991 the Regional Director requested additional discussion and rationale for this emergency rule request.

While some Council members felt there was no emergency, the majority thought that without seasonal allocations most of the cod TAC would be taken in the first half of the year leading to gear conflicts, increased bycatch, loss of product quality, and safety problems. The Council let stand their earlier request for emergency action and requested that a plan amendment be initiated sometime this year pending staff availability. This item was on the April agenda, but the Council chose to defer this issue to June.

Under Item D-1(e)(1) are industry letters requesting the Council to begin the appropriate analysis of an amendment to provide authority for such a quarterly allocation. For the 1991 fishing year, the quarterly apportioned halibut PSC caps for the 'other species' category (which includes cod) in the BSAI in fact served to effect a quarterly allocation of the harvest.

Alaska Groundfish Data Bank

TO: CLARENCE PAUTZKE, EXECUTIVE DIRECTOR
NORTH PACIFIC FISHERY MANGEMENT COUNCIL

RE: INCREASE IN CENTRAL GOA DEEP FLOUNDER TAC

DATE: MAY 14, 1991

SENT BY FAX: 1 pp



Dear Clarence:

We are requesting that the TAC for Deep Water Flounder in the Central Gulf be increased by 25,000 MT, for a total TAC of 35,000 MT. The ABC is 38,900 MT.

We have sent the formal request to Steve Pennoyer, NMFS Regional Director for the Alaska Region. A copy of that request is attached.

We assume that this should be an agenda item at the June Council meeting and request that it be put on the agenda if our assumption is correct.

Sincerely,

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

Chris Blackburn, Director
Alaska Groundfish Data Bank

Alaska Groundfish Data Bank

Steve Pennoyer, Regional Director
 Alaska Region
 National Marine Fisheries Service
 NOAA
 P.O. Box 21668
 Juneau, Alaska 99802-1668



SENT BY FAX: 4 PP

RE: 25,000 MT INCREASE IN THE CENTRAL GULF DEEP WATER FLOUNDER
 TAC

Dear Steve:

We request that the quota for Deep Water Flounder in the Central Gulf of Alaska be increased by 25,000 MT for a total 1991 quota of 35,000 MT. The 1991 ABC for Deep Water Flounder adopted by the Council in December 1990 is 38,900 MT.

STATUS OF CENTRAL GULF DEEP WATER FLATS THROUGH 5/12		MT-TOTAL		REMAINING
MT	MT	MT	MT	TAC
ABC	TAC	RETAINED	DISCARD	CATCH
38900	10000	4763	863	5928
				4374

In December 1990 the 1991 TAC for deep water flounder was set, at industry request, close to the published processor capacity and intent to prevent uncontrolled growth in the flounder fishery from competing for halibut bycatch against the established Pacific cod and rockfish fisheries (the pollock fishery has not been a major user of halibut bycatch and can be conducted entirely with midwater gear).

STATUS OF BOTTOM TRAWL TARGETS
 The Pacific cod, Pacific Ocean Perch and Shortraker/Rougheye quotas were taken during the first half of 1991. This leaves only other rockfish and flounder for the bottom trawl fleet for the remainder of 1991.

Deep Flounder Increase - page 2

TARGET BOTTOM TRAWL FISHERIES AND HALIBUT PSC
FOR CENTRAL/WESTERN GULF IN MT AS OF MAY 12

(This assumes the Eastern Gulf will be closed to trawling either by emergency regulation or lack of demersal shelf rockfish)

AREA	SPECIES	REMAINING QUOTA
W.GLF	O.RKFSH	1012
	DEEP FLATS	1314
	SHALLOW FLATS	1630
	FLATHEAD	1920
C.GLF	O.RKFSH	4369
	DEEP FLATS	4374
	SHALLOW FLATS	5255
	FLATHEAD	4709
TOTAL		24583

HALIBUT PSC AVAILABLE

There is also about 600 MT of halibut PSC (about 200 MT of halibut PSC for 3rd quarter and 400 MT for 4th quarter) remain for the bottom trawl fisheries for the last half of the year.

POTENTIAL GROUND FISH HARVEST UNDER AVAILABLE HALIBUT PSC

Six hundred metric tons of halibut will allow for a harvest of 40,000 to 60,000 MT of groundfish at a halibut bycatch rate of 3 to 2% (mortality rate of 1.5 to 1%).

The average halibut bycatch rate in the deep water flounder target, as of 5/2 according to NMFS data, ranges from .349% to 3.358%, depending on area and processing mode; the rate in the shallow water flounder averaged 2.693% and the average rate in the rockfish fishery ranged from 1.08% to 12.821%, depending on area.

A review of the rates by vessel published with the pin numbers indicates all of these average bycatch rates can be reduced with proper bycatch management.

In short, halibut bycatch rates between 2 and 3% are reasonable rates to expect. At these rates all the remaining flounder and rockfish quotas could be taken plus an additional 15,500 to 25,500 MT of groundfish.

Therefore, there is enough halibut PSC available to support additional flounder quota.

Deep Flounder Increase - page 3

REASONS FOR SPECIFYING DEEP WATER FLOUNDER

The Deep Water Flounder Fishery will have the least impact on other fisheries since the bycatch of other fully utilized species such as Pacific cod and pollock, will be minimized. This is not true of shallow water flounder or flathead sole.

Also, during the summer months the deep water sole fishery is the flounder fishery with the least halibut bycatch. Given the opportunity we feel the fleets will choose their target fisheries to minimize halibut bycatch.

SHORTRAKER/ROUGHEYE

As of 5/12 there were 980 MT of shortraker/rougheyeye remaining in the Gulf. At a 1 to 2% bycatch rate this would allow for 90,000 to 45,000 MT of deep water flounder.

There is some uncertainty about the natural bycatch rate of shortraker/rougheyeye, but the fleets understand that avoidance of shortraker/rougheyeye will be necessary to assure continued fishing.

Shortraker/rougheyeye should not be a bycatch in the Other rockfish, shallow water flounder or flathead sole fisheries.

BYCATCH CONTROL

A voluntary bycatch control program will be necessary to assure that the bottom trawl fishery makes maximum use of its available halibut PSC.

We anticipate there will be two major shorebased plants processing flounder and several other small operations experimenting with flounder. The shorebased catcher boat fleet is estimated to be about 12 vessels.

We also anticipate a number of factory trawl operations.

We have discussed this with Phil Chitwood at Arctic Alaska Seafoods (which plans to have vessels present in the Gulf for deep water flounder).

At this point we can guarantee that the major shorebased operations and Arctic Alaska Seafoods will cooperate in the development and implementation of a voluntary bycatch control program similar to that used in the Bering Sea for Pacific cod and flounder. We anticipate cooperation from the other catcher vessels and factory trawl operations which may fish Gulf flounder.

Deep Flounder Increase - page 4

WASTE

The two major shorebased operations are buying and will continue to buy all commercial species delivered by the vessels. Product unsuitable for food will be processed into meal.

IN CLOSING

Over the past several years the Kodiak fleet has worked toward the goal of controlling halibut bycatch in its other fisheries so that the flounder fishery could be developed. This year that goal was achieved; without an increase in the deep water flounder TAC it is unlikely there will be quota of any bottom trawl target to fish 4th quarter.

With an increased deep water flounder TAC and careful bycatch control the fleets have the opportunity to continue fishing until near the end of the year.

Thank you for considering our request.

Chris Blackburn, Director
Alaska Groundfish Data Bank



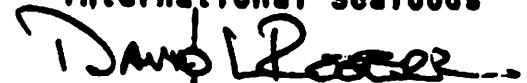
Phil Chitwood
Arctic Alaska Seafoods
(Signature authorized by phone)



Gary Taylor
All Alaskan Seafoods



Dave Rogers
International Seafoods



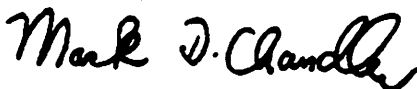
Dave Harville
KWT



Kent Helligson
F/V Pacific Star



Mark Chandler
F/V Topaz



NORTH PACIFIC LONGLINE COALITION

- VIA FAX -

April 15, 1991

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

**RE: Tasking of Amendment to Seasonally Apportion
BSAI Pacific Cod**

Dear Mr. Lauber:

Attached please find a copy of a petition from all of the longline associations whose fishermen fish for Pacific cod in the Bering Sea Aleutian Islands Area. We are requesting that the Council direct its staff to begin work on the plan amendment it recommended in January of this year, to provide authority for the seasonal apportionment of BSAI Pacific cod TAC. There is no need to review the purposes of this amendment at length, but the petition contains certain information which was not available earlier. We hope that you can take a minute to review it.

The primary purpose of the proposed amendment is to protect spawning cod from an uncontrolled pulse fishery. Such a fishery raises obvious concerns of overharvesting and possible disruption of the spawning process. Spawning cod stocks deserve the same sort of protection which has been provided for spawning pollock stocks. The negative market implications of a sudden glut of cod product are of course obvious.

Please note that the proposed amendment is not allocative, per se. If it is drafted like BSAI Amendment 14 it will merely provide the Council the option to apportion cod TAC seasonally. Please note also that this authority may be necessary even if an ITQ system is implemented for halibut bycatch. If those interested in conducting a pulse fishery on cod have the ability to purchase enough halibut ITQ to cover their halibut bycatch, they could still harvest all of the cod in a very short time. The Council should have the authority to prevent this. Finally, please recognize that this amendment stands alone and is not meant as a substitute for any allocations the Council may elect to implement at a future date.

The proposed amendment should be easily approvable after analysis and public comment.

FROM SEATTLE

4.15.1991 12:22

P. 2

We feel as the Council does that spawning cod deserve the same protection provided for spawning pollock. We hope that the Council will remain consistent in its management philosophy and true to its policy decision by tasking the proposed amendment.

Sincerely,

Kodiak Longline Vessel Owners' Association
 Fishing Vessel Owners' Association
 Alaska Longline Fishermen's Association
 Freezer-Longliner Group
 Petersburg Vessel Owners' Association

NORTH PACIFIC LONGLINE COALITION

- VIA FAX -

April 15, 1991

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

RE: Plan Amendment to Seasonally Apportion BSAI
Pacific Cod TAC

Dear Mr. Lauber:

As you know the North Pacific Fishery Management Council (Council) has repeatedly recommended regulatory action to provide authority for the seasonal apportionment of Pacific cod in the Bering Sea/Aleutian Islands Area (BSAI). The Council approved an emergency rule to achieve this goal in December of 1990, and again in January of 1991. At the January meeting it also approved development of an out-of-cycle permanent plan amendment, by a nearly unanimous vote of 9-2; a very clear policy decision.

The emergency rule was not approved, apparently because of some reluctance to "allocate" without going through the full amendment process. The National Marine Fisheries Service (NMFS) has since reversed its position on allocating by emergency rule (see IV below). In our view the proposed rule was based on conservation concerns, with possible allocative side-effects (see II below). The undersigned associations now respectfully request that the Council direct staff to commence preparation of this amendment package at the earliest practical date.

The Council has heard considerable testimony on this topic from all affected elements of the groundfish industry, has developed a substantial administrative record, and has recommended action. There is no reason to review again the merits of the proposal. Since January, however, certain events have taken place and certain information has become available which demonstrate its approvability.

I. Bycatch Considerations

In February halibut bycatch problems in the BSAI Pacific cod fishery put an end to the use of bottom trawls during the remainder of the first quarter of 1991 - only "pelagic" trawls could be used. These trawls took almost as many halibut as the bottom trawls, and the NMFS Alaska

Region may close the bottom trawl fishery for cod by emergency rule when the halibut PSC cap is reached. While these occurrences have prevented an intense pulse fishery on spawning cod aggregations and thus may have averted an emergency, directed fishery closures due to halibut bycatch are irrelevant to the long-term rational management of the cod fishery. Management of the cod fishery requires regulations which address problems of the cod fishery directly - such as the proposed amendment. We do not manage directed fisheries by bycatch.

The major purpose of seasonal TAC apportionment is avoidance of excessive fishing on spawning stocks. Any number of schemes have been suggested to alleviate the bycatch problems of the bottom trawl industry. It is likely that one or more of these proposals will ultimately prove successful, but that will lead back to the same problem - spawning cod stocks left vulnerable to a pulse fishery. The Council must have authority to address this problem.

Longliners also catch halibut in the BSAI Pacific cod fishery. The mortality inflicted upon the halibut is much less than that inflicted by cod trawlers, however. Longliners account for a far lesser proportion of the actual number of halibut killed in the BSAI cod fishery, as they take larger halibut. They do not have serious bycatch problems with bairdi or king crab, herring, or chinook salmon. From the standpoint of prohibited species conservation, longlining is clearly a preferable way to prosecute the cod fishery.

II. Protection of Spawning Stocks

In written and oral testimony on seasonal apportionment of BSAI Pacific cod TAC, longliners have stressed the need to offer protection to the declining cod stocks - protection similar to that afforded spawning pollock stocks in the Gulf of Alaska and the Bering Sea. Citations were offered to Canadian precedent for this protection. Recently two NMFS documents have affirmed the need to protect spawning cod and pollock stocks.

The first is the BSAI 1991 TAC specifications, at 56 FR 6292. This document highlights the need to protect spawning pollock through seasonal apportionment of Bering Sea pollock TAC, as follows:

"The Secretary finds also that the roe-season catch limit may help prevent adverse effects on the ecosystem and on future pollock productivity from intensive fishing mortality during the roe season. Although the environmental assessment of alternatives considered for Amendment 14 indicated no clear evidence of significant negative impacts on the ecosystem from intensive fishing during a compressed

season, there is uncertainty about the actual effects of such fishing. The complexity of the ecosystem can easily mask any statistical relationship between the abundance of pollock eggs and larvae, and the future abundance of various pollock predators (including the threatened Stellar sea lion) and of harvestable stocks of pollock. Given this uncertainty, conservative limitation of the roe-season pollock harvest is reasonable. (emphasis added)

The second document, the DRAFT ENVIRONMENTAL ASSESSMENT for the inshore/offshore proposal, makes it clear that spawning cod stocks deserve the same protection. It states at Section 2.3.2, Effects of fishing on aggregated stocks, that "Concentration of effort on aggregated stocks raises concerns of overharvesting...and possible disruption of the spawning process." With regard to cod it observes that much less is known about spawning aggregations and related seasonal movements of cod than of pollock, and cites the author quoted by longline interests in December regarding the uncertainty surrounding intense fishing on cod populations. The Section concludes: "This admonition is equally appropriate to the evaluation of concentrated fishing on aggregations of pollock and cod of the Bering Sea/Aleutian Islands and Gulf of Alaska."

The Council and the Secretary are fully justified in their concerns regarding intense fishing on spawning stocks of pollock and cod. If Amendments 14/19 were approvable, an amendment seasonally apportioning BSAI Pacific cod is approvable.

III. The Proposed Amendment Is Not Necessarily Allocative

BSAI Amendment 14, which provides for the seasonal apportionment of Bering Sea pollock, is not allocative per se. The amendment simply gives the Council authority to recommend seasonal apportionments based on a series of criteria. A well-framed cod amendment would provide that same authority. The Council could choose to adopt an apportionment similar to that of the prior year, as it did with pollock in 1991, or could alter the apportionment based on specified considerations. Should the Council decide to apportion the harvest in a manner which guaranteed a steady supply of cod product to markets throughout the year, shoreside delivery longliners and trawlers, freezer-longliners, head-and gut factory trawlers and shoreside processors would all benefit. In any event the tools would be at hand to manage the cod fishery in a rational manner.

IV. NMFS Policy on Allocations

In a letter to Senator Stevens dated March 7, 1991, Dr. William W. Fox, Assistant Administrator for Fisheries, NOAA,

made it clear that NMFS has no policy what would preclude approval of any management action, emergency or otherwise, on the grounds that it deals with allocation. Any allocative potential of the proposed amendment should not be an impediment to approval - especially if the full amendment process is followed.

Conclusion

Spawning BSAI Pacific cod deserve the same protection provided for spawning pollock in the Gulf and the Bering Sea. The Council has made this policy decision repeatedly, and it is time to move forward with an amendment giving the Council and the Secretary authority to seasonally apportion BSAI Pacific cod TAC. Such action will promote conservation of both cod and prohibited species. Further, recent publications of the National Marine Fisheries Service make it clear that such an amendment is approvable.

Thank you for your attention to this important matter.

Sincerely,

Kodiak Longline Vessel
Owners' Association

By Linda Kozak

Alaska Longline
Fishermens' Association

By Arda Behrken

Petersburg Vessel Owners'
Association

By Kris Novosy

Fishing Vessel Owners'
Association

By Eric Olson

Freezer-Longliner Group

By Thom Smith



D-1

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE

Alaska Fisheries Science Center
Resource Ecology and Fisheries
Management Division
Bin C15700; Building 4
7600 Sand Point Way NE.
Seattle, WA 98115-0070

May 31, 1991

F/AKC2:GT

MEMORANDUM FOR: Rich Marasco, REFM
FROM: *gt* Grant Thompson, REFM
SUBJECT: KLVOA concern regarding early-season cod harvest

At your request, I have reviewed the letter from the Kodiak Longline Vessel Owners' Association (KLVOA) regarding the potential impacts of "frontloading" the Pacific cod harvest in the eastern Bering Sea and Aleutian Islands. As you know, the KLVOA is concerned that concentrating the harvest during the spawning period could have implications for conservation of the stock.

This problem is very similar to that of the pollock roe fishery, which we dealt with in Amendment 19/14. During the analysis of that amendment, we failed to find any empirical evidence of stock collapse (here or elsewhere in the world) that could clearly be linked to harvest frontloading, and most members of the Plan Teams and the SSC expressed little concern that this was a serious conservation problem. Nevertheless, a few members (myself included) suggested that harvest frontloading could have some implications for management of the stock.

I think that this issue can be looked at from a number of different perspectives. First, there is the question of whether harvest frontloading can lead to a reduction in stock size. Second, there is the question of whether harvest frontloading can lead to a reduction in catch. Third, there is the question of whether either of these phenomena poses a conservation problem.

The first two questions are addressed in an appendix I wrote for Amendment 19/14 (attached). Although a number of strong assumptions are employed, I think that the results are useful. As far as I know, no one has addressed these questions in a more general fashion. The model treats the length of the fishing season as the management variable of interest (i.e., it assumes that the target survival rate is given). The main conclusions are that harvest frontloading does tend to reduce equilibrium stock size, while equilibrium catch can either increase or decrease, depending on parameter values (I should point out that the model measures both stock size and catch in terms of numbers, not biomass). Interestingly, the model indicates that where a



decrease in equilibrium catch is possible, the worst strategy in all cases is to set the end of the fishing season equal to the time of spawning.

The third question (the conservation issue) revolves mostly around the extent to which harvest frontloading is predictable. In the model used to assess the eastern Bering Sea cod stock, for example, intraannual effort distribution is incorporated explicitly. So long as harvest is frontloaded consistently, no difficulty is presented, since this pattern of effort distribution will be incorporated in the estimation of ABC. The main potential for harm comes when the pattern of effort distribution is skewed suddenly and dramatically relative to the previous years' pattern. Personally, I doubt that even a very dramatic shift toward frontloading would be truly dangerous (in the sense of posing a danger to the long-term health of the stock), although it could certainly be suboptimal in the short run.

In summary, I tend to feel that harvest frontloading does have the potential for reducing stock sizes and catches, and that this is a valid concern for management. However, should frontloading become an established pattern, I am confident that our assessments will be able to incorporate this factor into the process of estimating ABC, so that it will not pose a long-term conservation problem.

NORTH PACIFIC FIXED GEAR COALITION

Testimony
North Pacific Fishery Management Council
June, 1991

Petition for Fixed Gear Preference, BSAI Groundfish

Ten years ago Council Document #13 suggested that if fixed gear were used to harvest demersal fish like cod in the BSAI, and off-bottom trawl gear were used to harvest other species, dramatic prohibited species savings would be realized. The North Pacific Fixed Gear Coalition requests that the Council examine this policy during the 1992 amendment cycle, and consider the gradual implementation of a fixed gear preference for certain species to begin in 1993.

Prohibited species savings is only one advantage of this proposal. It is now recognized that fishing has a significant impact on the dynamics of fish populations, that mobile and passive fishing gears have different abilities to fish selectively for fish of particular size or species, and that proper management should be based not only on recommendations on total catch quotas, but also on how the quotas are taken. These concepts are referred to collectively as "CONSERVATION-ORIENTED FISHING".

Please consider the following:

1. If longline rather than trawl gear had been used to harvest all of the cod taken in the BSAI this year through May 26, 1,530 mt of halibut bycatch mortality could have been saved (FIS);

2. At current halibut bycatch mortality rates optimum yield (TAC) for cod in the BSAI could be achieved by longline gear with the loss of only 520 tons of halibut. As of May 26, the trawl fishery on BSAI cod had already killed 1,752 mt of halibut; halibut mortality in the trawl fishery for cod was nearly eight times higher (by weight) than halibut mortality in the longline fishery over this period, per ton of groundfish caught;

3. Significant savings of other prohibited species (crab, salmon, herring) can be achieved through the use of fixed gear, as can savings of other discards. NMFS estimates that nearly 30% of the catch in the BSAI trawl fishery for cod is pollock, which is discarded;

4. From a conservation perspective - species selectivity, size selectivity, product quality, possible environmental impacts, possible negative impacts of intense

fishing on spawning stocks - fixed gear is clearly preferable to trawling for the harvest of demersal species like cod;

5. Line-caught fish are generally of the highest quality, and generally command the highest prices. Markets demand a steady supply of high quality product throughout the year;

6. Harvest takes place slowly on longliners, making data gathering easier than on trawlers; longliners fish slowly throughout the year, so data can be gathered throughout the annual life cycle and geographic range of the target species;

7. The micromanagement made necessary by the catching capacity and bycatch impacts of the massive trawl fleet places considerable economic burdens on government, industry and the public. Intense management of longliners in the BSAI is not necessary;

8. Trawl operations externalize the true biological, regulatory, enforcement and social costs of their fishery, which are borne by other fishermen, taxpayers, and consumers. If these costs are factored in, trawl operations are likely to appear considerably less "efficient"; and

9. The overriding duty of fishery managers is to protect and conserve the fishery resources which produce jobs, food, and profits. Where one gear type has substantial conservation advantages over another, preferential treatment should be accorded to the conservation-oriented gear.

In our view, the many problems posed by bottom trawling are not "an economic reality", nor are they "just a cost of doing business". They can be avoided.

For the above reasons the undersigned associations respectfully request that the Council recommend analysis of a fixed gear preference for some demersal species in the BSAI groundfish fishery to be analysed during the 1992 bycatch amendment cycle, for possible implementation in 1993.

Thank you for your attention.

Sincerely,

Kodiak Longline Vessel Owners' Association
Alaska Longline Fishermen's Association
Fishing Vessel Owners' Association
Petersburg Vessel Owners' Association
Freezer-Longliner Group

Data employed:

Fisheries Information Services has provided the following data on the 1991 BSAI directed cod fishery, through May 26. Halibut mortality factors employed are 0.85 for trawlers, 0.16 for longliners.

		<u>Trawl</u>	<u>Hook-and-Line</u>
Groundfish	(mt)	97,852	23,777
Halibut	(mt)	2,061	338
Halibut mortality	(mt)	1,752	54



**UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration**

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

D-1(a)

JUNE 1991

SUPPLEMENTAL

June 21, 1991

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

Dear Rick,

The North Pacific Fishery Management Council (Council) recommended at its April 23-26, 1991, Kodiak meeting that the Secretary of Commerce prohibit trawling for rockfish in the Gulf of Alaska by emergency rule. The Council made this recommendation to address the problem of high bycatch rates of chinook salmon. Other concerns associated with the rockfish fishery pertain to overfishing problems with the shortraker/rougeye rockfish complex (SR/RE) and high rates of halibut bycatch in the rockfish fisheries.


We have not yet implemented this emergency rule. Most of the chinook salmon bycatch problems justifying this action were experienced by trawl fishermen conducting directed fishing for Pacific ocean perch in the Central Regulatory Area. That fishery has been closed since April 8, 1991. Bottom trawling for groundfish will commence on July 1 when additional halibut bycatch allowance is made available. We intend to closely monitor the rockfish trawl fishery and initiate emergency action if high chinook salmon bycatches occur again in the rockfish fishery.

Enclosed is a figure showing monthly chinook salmon bycatch in 1990 trawl fisheries as well as monthly bycatch through May of 1991. Most of the 1990 chinook salmon bycatch occurred during April. Most of the 1991 bycatch occurred during March and April. During both of these years chinook salmon bycatch decreased markedly in May. In 1990, chinook salmon bycatch was very small during the remaining months June - December. If 1990 is representative, chinook salmon bycatch may not be problem when the bottom trawl fishery reopens on July 1. The figure was based on the data enclosed. To address chinook salmon and halibut bycatch problems in the trawl rockfish fishery, the Bycatch Committee may recommend that a regulatory amendment be implemented to delay the Gulf of Alaska rockfish trawl fishery until later in a fishing year, e.g. July 15. If implemented, such a season delay could be implemented by 1992.



With respect to bycatches of Pacific halibut, the bottom trawl fishery is constrained by quarterly bycatch allowances. Our information through June 16 shows that the total halibut bycatch is 1486 mt, which would leave only 114 mt remaining of the third quarter allowance of 400 mt. With respect to bycatches of SR/RE, we have closed all fishing for this species complex. Through June 16, a balance of 954 mt of shortraker/rougheye rockfish remain in the combined Gulf of Alaska total allowable catch. We have authority to close any of the fisheries as necessary to prevent overfishing. Should the bycatch of SR/RE approach the TAC balance, we will close fisheries under our inseason management authority to prevent overfishing.

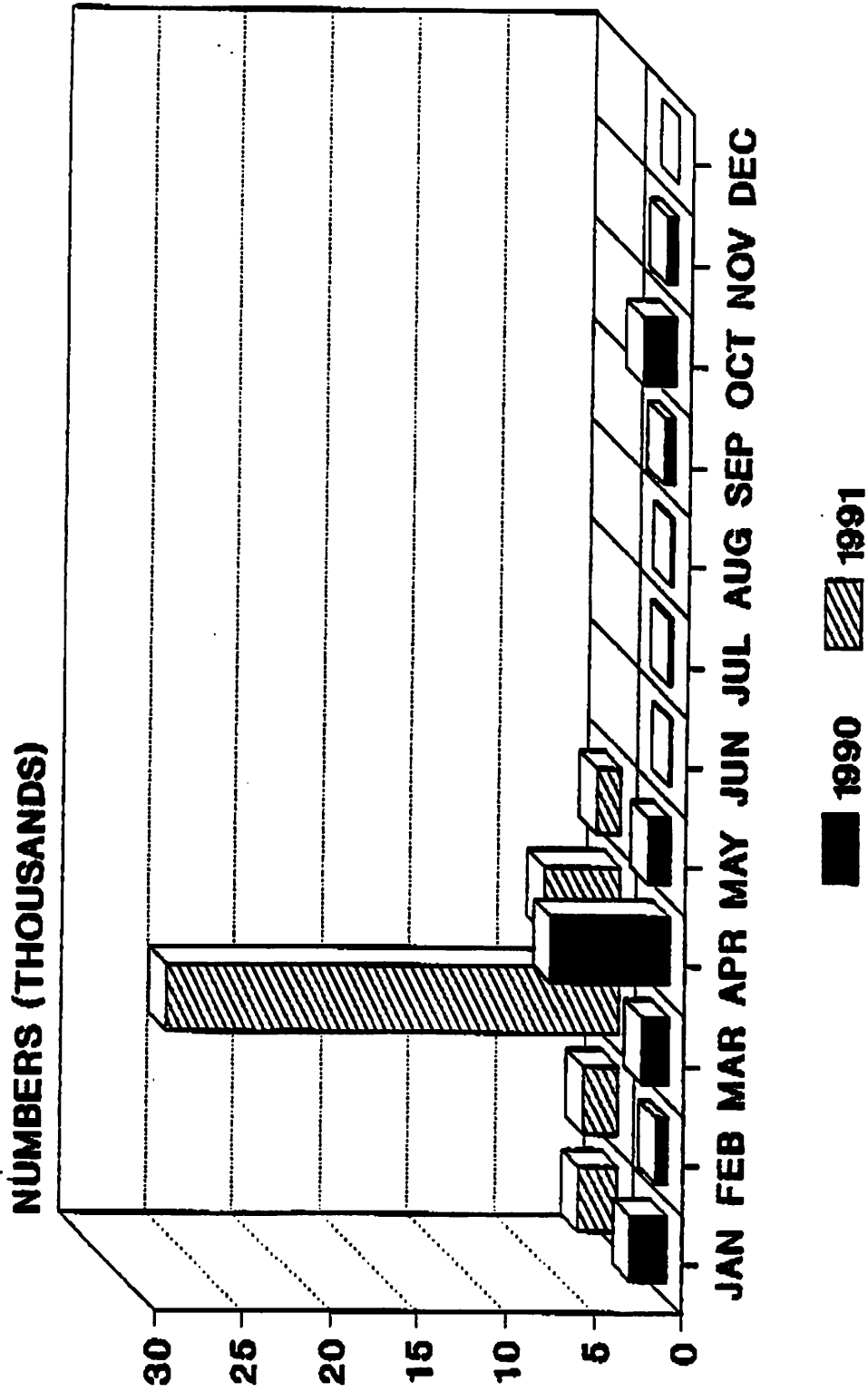
Sincerely,


SAR Steven Pennoyer
Director, Alaska Region

Comparison of 1990/1991 Chinook Salmon Bycatch by Trawl Gear
in the Gulf of Alaska.

Month	1990	1991
January	2085	2206
February	653	2237
March	1529	25801
April	6710	4208
May	1251	1359
June	130	
July	241	
August	165	
September	559	
October	1869	
November	570	
December	<u>1</u>	
Total	15763	<u>35808</u>

1990/91 COMPARISON OF CHINOOK BYCATCH USING TRAWL GEAR IN GOA



6/14/91



June 14, 1991

JUN 21 1991

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

re: Proposed changes in Groundfish Seasons.
(agenda item D1 - (d) June, 1991)

Dear Sir,

This Association supports a commencement of the fishing season for all species in all areas (BSAI and GOA) February 1.

The reasons relate to bycatch of halibut in the cod fishery, chinook bycatch in January; more efficient use of PSC relative to attainment of OYS and avoidance of inequitable allocative effects of not applying the measure across all fisheries in all areas. A social spin-off would enable fishermen to be with their families during the holiday season.

Further, we ask that on a case by case basis the date of February 15 apply to vessels entering the fishery under the moratorium if the season commences February 1. or some date other than January 1. The moratorium presently fixes recognition for consideration, the date of January 15 for such vessels to be in a fishery and have delivered fish.

Thank you for considering this request.

Sincerely,

Douglas B. Gordon
Executive Director

NORTH PACIFIC FIXED GEAR COALITION

Testimony
North Pacific Fishery Management Council
June, 1991

Petition for Fixed Gear Preference, BSAI Groundfish

Ten years ago Council Document #13 suggested that if fixed gear were used to harvest demersal fish like cod in the BSAI, and off-bottom trawl gear were used to harvest other species, dramatic prohibited species savings would be realized. The North Pacific Fixed Gear Coalition requests that the Council examine this policy during the 1992 amendment cycle, and consider the gradual implementation of a fixed gear preference for certain species to begin in 1993.

Prohibited species savings is only one advantage of this proposal. It is now recognized that fishing has a significant impact on the dynamics of fish populations, that mobile and passive fishing gears have different abilities to fish selectively for fish of particular size or species, and that proper management should be based not only on recommendations on total catch quotas, but also on how the quotas are taken. These concepts are referred to collectively as "CONSERVATION-ORIENTED FISHING".

Please consider the following:

1. If longline rather than trawl gear had been used to harvest all of the cod taken in the BSAI this year through May 26, 1,530 mt of halibut bycatch mortality could have been saved (FIS);
2. At current halibut bycatch mortality rates optimum yield (TAC) for cod in the BSAI could be achieved by longline gear with the loss of only 520 tons of halibut. As of May 26, the trawl fishery on BSAI cod had already killed 1,752 mt of halibut; halibut mortality in the trawl fishery for cod was nearly eight times higher (by weight) than halibut mortality in the longline fishery over this period, per ton of groundfish caught;
3. Significant savings of other prohibited species (crab, salmon, herring) can be achieved through the use of fixed gear, as can savings of other discards. NMFS estimates that nearly 30% of the catch in the BSAI trawl fishery for cod is pollock, which is discarded;
4. From a conservation perspective - species selectivity, size selectivity, product quality, possible environmental impacts, possible negative impacts of intense

fishing on spawning stocks - fixed gear is clearly preferable to trawling for the harvest of demersal species like cod;

5. Line-caught fish are generally of the highest quality, and generally command the highest prices. Markets demand a steady supply of high quality product throughout the year;

6. Harvest takes place slowly on longliners, making data gathering easier than on trawlers; longliners fish slowly throughout the year, so data can be gathered throughout the annual life cycle and geographic range of the target species;

7. The micromanagement made necessary by the catching capacity and bycatch impacts of the massive trawl fleet places considerable economic burdens on government, industry and the public. Intense management of longliners in the BSAI is not necessary;

8. Trawl operations externalize the true biological, regulatory, enforcement and social costs of their fishery, which are borne by other fishermen, taxpayers, and consumers. If these costs are factored in, trawl operations are likely to appear considerably less "efficient"; and

9. The overriding duty of fishery managers is to protect and conserve the fishery resources which produce jobs, food, and profits. Where one gear type has substantial conservation advantages over another, preferential treatment should be accorded to the conservation-oriented gear.

In our view, the many problems posed by bottom trawling are not "an economic reality", nor are they "just a cost of doing business". They can be avoided.

For the above reasons the undersigned associations respectfully request that the Council recommend analysis of a fixed gear preference for some demersal species in the BSAI groundfish fishery to be analysed during the 1992 bycatch amendment cycle, for possible implementation in 1993.

Thank you for your attention.

Sincerely,

Kodiak Longline Vessel Owners' Association
Alaska Longline Fishermen's Association
Fishing Vessel Owners' Association
Petersburg Vessel Owners' Association
Freezer-Longliner Group

Data employed:

Fisheries Information Services has provided the following data on the 1991 BSAI directed cod fishery, through May 26. Halibut mortality factors employed are 0.85 for trawlers, 0.16 for longliners.

		<u>Trawl</u>	<u>Hook-and-Line</u>
Groundfish	(mt)	97,852	23,777
Halibut	(mt)	2,061	338
Halibut mortality	(mt)	1,752	54



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE

Alaska Fisheries Science Center
Resource Ecology and Fisheries
Management Division
Bin C15700; Building 4
7600 Sand Point Way NE.
Seattle, WA 98115-0070

May 31, 1991

F/AKC2:GT

MEMORANDUM FOR: Rich Marasco, REFM
FROM: ^{gt} Grant Thompson, REFM
SUBJECT: KLVOA concern regarding early-season cod harvest

At your request, I have reviewed the letter from the Kodiak Longline Vessel Owners' Association (KLVOA) regarding the potential impacts of "frontloading" the Pacific cod harvest in the eastern Bering Sea and Aleutian Islands. As you know, the KLVOA is concerned that concentrating the harvest during the spawning period could have implications for conservation of the stock.

This problem is very similar to that of the pollock roe fishery, which we dealt with in Amendment 19/14. During the analysis of that amendment, we failed to find any empirical evidence of stock collapse (here or elsewhere in the world) that could clearly be linked to harvest frontloading, and most members of the Plan Teams and the SSC expressed little concern that this was a serious conservation problem. Nevertheless, a few members (myself included) suggested that harvest frontloading could have some implications for management of the stock.

I think that this issue can be looked at from a number of different perspectives. First, there is the question of whether harvest frontloading can lead to a reduction in stock size. Second, there is the question of whether harvest frontloading can lead to a reduction in catch. Third, there is the question of whether either of these phenomena poses a conservation problem.

The first two questions are addressed in an appendix I wrote for Amendment 19/14 (attached). Although a number of strong assumptions are employed, I think that the results are useful. As far as I know, no one has addressed these questions in a more general fashion. The model treats the length of the fishing season as the management variable of interest (i.e., it assumes that the target survival rate is given). The main conclusions are that harvest frontloading does tend to reduce equilibrium stock size, while equilibrium catch can either increase or decrease, depending on parameter values (I should point out that the model measures both stock size and catch in terms of numbers, not biomass). Interestingly, the model indicates that where a



decrease in equilibrium catch is possible, the worst strategy in all cases is to set the end of the fishing season equal to the time of spawning.

The third question (the conservation issue) revolves mostly around the extent to which harvest frontloading is predictable. In the model used to assess the eastern Bering Sea cod stock, for example, intraannual effort distribution is incorporated explicitly. So long as harvest is frontloaded consistently, no difficulty is presented, since this pattern of effort distribution will be incorporated in the estimation of ABC. The main potential for harm comes when the pattern of effort distribution is skewed suddenly and dramatically relative to the previous years' pattern. Personally, I doubt that even a very dramatic shift toward frontloading would be truly dangerous (in the sense of posing a danger to the long-term health of the stock), although it could certainly be suboptimal in the short run.

In summary, I tend to feel that harvest frontloading does have the potential for reducing stock sizes and catches, and that this is a valid concern for management. However, should frontloading become an established pattern, I am confident that our assessments will be able to incorporate this factor into the process of estimating ABC, so that it will not pose a long-term conservation problem.

National Marine Fisheries Service
Fisheries Management Division
June 19, 1991

PROPOSED CHANGES TO THE 1992 RECORDKEEPING AND REPORTING PROGRAM

I. Logbooks.

- A. Require shoreside processors to record landed weight of groundfish and prohibited species.
 - 1. Landed weights of groundfish (whole, bled, or headed and gutted fish) and catcher vessel discard amounts will be used to monitor groundfish quotas.
 - 2. Existing requirements to record species product weights would be maintained for enforcement and other purposes.
- B. Provide processors with a choice of recording either employee hours or number of employees.
- C. Revise instructions and incorporate minor format changes to facilitate accurate recordkeeping.

II. Weekly Production Report

- A. Require shoreside processors to report landed product type and weight (round weight in most fisheries), catcher vessel discard amounts, and finished product weights.
 - 1. Standard product recovery rates will be applied against landed product weights reported by shoreside processors and finished product weights reported by at-sea processors for purposes of quota monitoring.
- B. Require shoreside and mothership processors to report the ADF&G numbers of catcher vessels delivering to them during each weekly reporting period.
 - 1. Identification of catcher vessels will be used for inseason compliance monitoring of the observer and logbooks programs. Number of catcher vessels delivering groundfish each week will enhance inseason fishery and closure projections.
- C. Require processors to indicate intended target species for the upcoming week.
 - 1. Indication of intended target operations will enhance inseason fishery effort and closure projections.
- D. Revise instructions and incorporate minor format changes to facilitate accurate recordkeeping.

III. Daily Production Report

- A. Revise instructions and incorporate minor format changes to facilitate accurate recordkeeping.

IV. Permit applications

- A. Add fields for ADF&G registration number and Telex number.
- B. Require information on whether vessel is leased as a bare boat charter.
- C. Require name of responsible person if other than vessel owner.
- D. Revise instructions and incorporate minor format changes to facilitate accurate recordkeeping.

V. Check in Reports

- A. Require processor vessels to specify intended target species.
 - 1. Indication of intended target operations will enhance inseason fishery effort and closure projections.

VI. Product Transfer Log

- A. Add field for ADF&G registration number.

VII. Groundfish Utilization Surveys

- A. Revise regulations to update the intent of surveys and allow surveys to be conducted at the discretion of the Regional Director, but not more than twice a year.

VIII. New Reports

- A. Quarterly Product Value Report (extends Alaska State collection to EEZ operations, see attached example).
 - 1. This report would replace the Monthly Product Value Report that was repealed last year. Alaska State regulations require processors under its jurisdiction to submit this report on an annual basis. The proposed action would extend the collection of this information to at-sea processing operations, many of which already voluntarily comply with the State's collection.

IX. Miscellaneous changes

- A. Redesignate GOA reporting areas as 3-digit reporting areas.
- B. Designate new reporting areas for internal waters of the State of Alaska.
- C. Possibly add additional reporting area in Shelikof Strait to split out pollock west and east of 154° W.

ALASKA DEPARTMENT OF FISH AND GAME
 Commercial Fisheries Division
 Computer Services Section
 P.O. Box 3-2000
 Juneau, Alaska 99802

(907)789-6160

ALASKA COMMERCIAL OPERATOR'S ANNUAL REPORT - 1990
 STATEWIDE GROUND FISH PRODUCTION INFORMATION

CONFIDENTIAL

Return completed form by April 1, 1991

Please correct the following information:

Company Name, address

*Contact Person
 Phone number*

ADF&G Processor #

Federal Tax #

CERTIFICATION: Please be sure that you have reviewed all information in the remaining pages of this report before signing the following statement:

I, _____, certify under penalty of perjury that I have reviewed all information contained in this report, that it is true and complete to the best of my knowledge, and that I am the owner / authorized agent.

Your name (Printed or typed)	Your Title	Date	Telephone Number(s)
Contact Party if you are not available (Printed or typed)		Company FAX Number	Telephone Number(s)

Monthly Groundfish Processing Employment

List by month the number of groundfish processing employees that worked during the payroll period that included the 12th of each month:

Jan	Feb	Mar	Apr	May	Jun
Jul	Aug	Sep	Oct	Nov	Dec

If this processing operation produced pollock or Pacific cod fillets, please indicate the percentage of the fillets used for each of the following product forms:

Cod	Blocks	%	IQF	%	Shatterpack	%
Pollock	Blocks	%	IQF	%	Shatterpack	%

A "block" is a frozen block or slab of fillets or pieces of fillets cut or sliced from fish. Fillet blocks are used to make fish sticks or portions.

Completed by recipient

AREA	GEAR	SPECIES	PRODUCT CODE	QUARTER	METRIC TONS	POUNDS (1000)	CORRECTED MTRC TONS	% FRESH	% FROZEN	% CURED	% INDUSTRIAL	PRICE SOURCE	\$/LB FRESH	\$/LB FROZEN	\$/LB CURED	\$/LB INDS	
G	JIG	DEMS	08	3	1.08	2.4											
G	JIG	PELS	08	3	↓	↓											
G	LGL	DEMS	05	2	↓	↓											
G	LGL	DEMS	08	2													
G	LGL	DEMS	08	3													
G	LGL	DEMS	08	4													
G	LGL	OTHR	08	2													
G	LGL	PELS	08	2													
G	LGL	PELS	08	3													
G	LGL	PELS	08	4													
G	LGL	SABL	08	2													
G	LGL	SABL	08	3													
G	LGL	SLRO	08	2													
G	LGL	THDS	08	2													
G	LGL	THDS	08	3													

sample

Product amounts are filled in with our data
 To be completed by recipient.