#### MEMORANDUM

TO:

Council, AP and SEC Members

FROM:

Jim H. Bransoh

Executive Director

DATE:

December 5,

SUBJECT: Gulf of Alaska Fishery Management Plan

#### ACTION REQUIRED

Review status of FMP rewrite. Consider and approve revised work schedule for 1986.

#### **BACKGROUND**

The Gulf of Alaska Groundfish Plan Team met with the Council's GOA Groundfish Workgroup on October 29-30 and November 19, 1985 to continue development of the framework FMP. The Team has developed several approaches using computer modeling and spreadsheets for the setting of Total Allowable Catch (TAC). Draft framework measures have been prepared and presented to the Workgroup for apportioning TAC among DAP and JVP; for setting fishing seasons; for setting prohibited and fully-utilized species bycatch limits; and for making inseason adjustments. However, given other responsibilities of the Plan Team and the absence of specific management objectives, it has become increasingly difficult to meet deadlines.

The Council originally instructed the Team to revise the plan using the annual amendment cycle as shown on the left below.

<u>Original</u>	Event	Workgroup Proposal
January 1986 March	Council initially reviews draft FMP Council reviews & approves draft	March 1986 June
i	FMP, RIR, etc., to go to public review.	
April-May	Public Review	July-September
June	Council gives final approval.	September
July-November	Secretarial Review	October-January
January 1	New FMP takes effect	mid-February 1987

The team and workgroup propose the cycle at the right which would mean a oneto two-month delay in implementing the plan in early 1987. The original schedule is just too tight to allow for adequate analysis and review given such a massive overhaul of the plan.

Chairman James O. Campbell North Pacific Fishery Management Council 411 W. 4th Suite 2D Anchorage, Alaska 99510

#### Dear Jim:

Individuals from the trawl industry have sat through several meetings of the Gulf of Alaska Plan Development Team concerning the development of a framework plan for the Gulf groundfish fishery.

We believe this attempt to understand bycatch target species relationships is good and long overdue. The concept of a well-functioning multi-year plan for the Gulf is also desired by the trawl industry.

We do have a problem, however, with the apparent desire to create, document, and install this complex plan with in the time limits established for the new plan amendment cycle in 1986. We are concerned that in the interest of achieving the schedule set by the plan amendment cycle, important aspects of the plan will not be understood or may be ignored. We are concerned that impacts of the plan on the industry will not have been analyzed as they should. The Council has yet to define goals and objectives for the Gulf framework plan. This process, we feel, should involve all segments of the domestic industry in a deliberate process. At this point no one has any idea where the Council is headed. It is simply looking at a management tool (the matrix) which could be applied in a number of different ways.

We have tried to be constructive in attending the plan meetings and think that our contribution has aided the process. However, in doing so, we have become aware of the multitude of issues which require a resolution before the framework plan is considered by the Council. Many of us in the industry are faced with a myriad of problems

Chairman James O. Campbell November 15, 1985 Page 2

in running our businesses that prevent our total focus on this particular issue. We think this important planning needs time for reflection, for information dissemination, and for debate. Putting this framework plan amendment (Amendment 15) through the upcoming plan amendment cycle would not allow for this. The trawl industry therefore requests that the Council place the plan amendment on a later cycle.

Thank you.

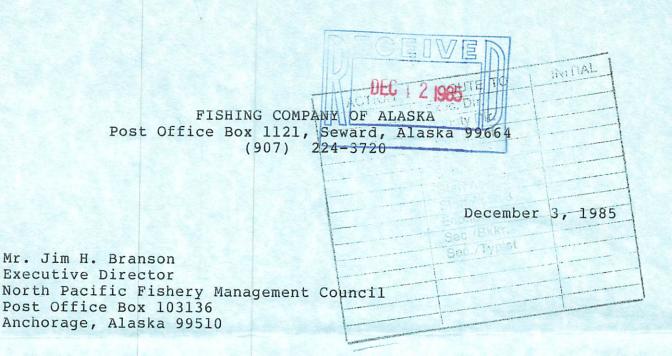
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Chairman James O. Campbell

November 15, 1985

Page 3



Dear Mr. Branson:

My objective is to receive a fair share of the annual quotas allocated by the North Pacific Fisheries Management Council in the following areas.

- I. We seek to catch a total of (A) 4,800 tons of rockfish in 1986, of which 4,400 tons in the Gulf of Alaska and remaining 400 tons in Aleutians, respectively. The North Pacific Fishery Management Council has in its (1) preliminary estimate of allowable catch allocated 5,452 tons of Rockfish in the Bering Sea and Aleutians to the foreign fishing interests and only 155 tons to the domestic interests in the same location, (2) this is a grossly unfair allocation, depriving American wholly-owned and managed fishing companies the right to make an economically viable catch during the year.
- II. We wish to catch a total of (A) 3,600 tons of <u>Sablefish</u>. The proposed allocation of sablefish is 11,500 tons for domestic fishing interests. However, (1) our gear type, trawling, is only allowed a 5% of 3,000 tons allocated to domestic operations in the Eastern area (i.e., 150 tons against our desired 500 tons), a 20% in the Central and Western areas (i.e., 1,180 tons against our desired 1,600 tons), and a zero % in the Southern area against our desired 500 tons.
- III. We must catch also, a total of 960 tons of <u>Pacific Ocean</u> <u>Perch</u>, 510 tons of <u>Flounders</u>, 160 tons of <u>Squid and Octopus</u>, and 300 tons of <u>Thornyheads</u> all in the Gulf of Alaska, Bering Sea and Aleutians in order to economically survive.

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In following the hearing procedure - my public comments - at the North Pacific Fishery Management Council meetings since April, 1985 - left me feeling quite frustrated from the treatment I received. This feeling has been reinforced by the continual rejection of my letter writing attempts to be considered by the Council.

As a new Alaskan Company with a state-of-the-art catching and processing operation we began fishing in Alaska this year. And, we are a local company in Alaska that pays taxes, procures a large amount of fuel and foodstuff, employs seamen etc., locally.

Since being informed that my Rockfish quota was seriously cut, I have spent a great deal of time, money and people on research in preparing for this upcoming December meeting. It appears to me, and I feel, that the Council has no intention of recognizing my efforts or needs.

Under the provisions of the Magnuson Act, this grossly unfair allocation, is depriving American wholly-owned and managed fishing companies of the right to make an economically viable catch during the year.

In order to meet the requirements of the Magnuson Act, I feel that the (1) groundfish workgroup of the FMP promote fair and equitable allocation of identified available resources in a manner such that no particular group acquires an excessive share of the privileges, (2) and provide for limited foreign participation in the groundfish fishery; consistent only with the three following objectives, to take the portion of the quota not utilized by domestic fishermen; (1) Provide for rational and optimal use, in a biological and socioeconomic sense, of the region's fishery resources as a whole; (2) Minimize the impact of groundfish fisheries on prohibited species and continue the rebuilding of the Pacific halibut resource; (3) Provide for the opportunity and orderly development of domestic groundfish fisheries, consistent with (1) and (2) above.

The Councils recommended measure reflects a predispositon to phase trawl gear out of specific fisheries, i.e., Rockfish. This proposition was recently proposed by the Council staff.

The measure unjustifiably discriminates, favoring longline gear over other gears and favoring shoreside processing over atsea processing. The unstated objectives of bestowing economic advantges on these segments of the industry is illegal.

We believe that the measure thwarts a national policy for the development of groundfish. For example; the Council's Scientific and Statistical Committee, which is statutorily charged with assisting the Council "in the development, collection, and evaluation of such statistical, biological, economic, and social as is relevant to the amendment of any fishery management plan" so advised the Council in its May meeting.

We will attend the December meeting in an attempt to be

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recognized, make needed public input to avoid indiscriminate hardship on Alaskan trawl owners.

Sincerely,

Welen Marie Davis

On habit

on behalf of

Karena Adler, President Fishing Company of Alaska

CC: President of the United States Secretary of State Department of Commerce Senator Frank Murkowski Senator Ted Stevens Congressman Don Young Governor Bill Sheffield James O. Campbell Sara Hemphill John Winther Oscar Dyson Al Burch John Peterson Dr. John Harville Dr. Donald E. Bevan and All Council members

# FISHING COMPANY OF ALASKA Post Office Box 1121, Seward, Alaska 99664 (907) 224-3720

December 3, 1985

North Pacific Fishery Management Council Post Office Box 103136 Anchorage, Alaska 99510

Members of the Council:

On September 6, 1985, a letter was sent to Mr. Robert W. McVey, Director of the Alaska Region, of the National Marine Fisheries. In that letter, you were advised of specific issues and complaints that area Trawlers have regarding management action which will have a direct impact on U.S. Trawlers operating in the Gulf of Alaska, and the Bering Sea.

It appears that the Council has neglected the fact that the U.S. Trawler industry is a growing concern and that the FISHING COMPANY OF ALASKA is not only a leader in this area of fisheries but is also an Alaskan owned and operated corporation. It appears that the Council has favored only the longline fishing concerns when directing their interests toward the SABLEFISH fishery.

The FISHING COMPANY OF ALASKA, requests on its own behalf, and on behalf of all other U.S. Trawlers, the Council reconsider its position in the following areas:

- 1. The 5%-20% allowances to Trawl gear regarding Sablefish.
- 2. The denial of a reasonable Bycatch for other species.
- 3. Arguments for the gear conflict between pot and longline gear, that are extended 1500 miles to the West without analysis to justify it.

Although there are several more areas that we can address concerning issues the Council has neglected to research, prior to putting its plan into effect, we feel that these are the most important to the FISHING COMPANY OF ALASKA.

In summation, regarding the three aforementioned subjects, the FISHING COMPANY OF ALASKA sees the situation like this:

I. The FISHING COMPANY OF ALASKA believes that the various gear types can co-exist. We strongly believe that there is a serious inbalance in the allocation issue for SABLEFISH and ROCKFISH and it is completely unfair to Trawlers.

- II. It is probably too late by now, however, by adopting Amendment 14 in its present form, we also feel the Council has shown beyond any doubt that it favors the Longline gear over Trawlers. It also shows a bias against sea processing. (We can only conclude that due to the obvious conflict of interests of members of the Council, (WHICH WE ARE PREPARED TO PRESENT IF NECESSARY), the Council cannot render a fair and equitable management plan by maintaining its present attitude towards Trawlers and the bottomfish industry.
- The Council has also failed to produce any positive contributions delivered by Trawlers to the fishing industry, once again showing its obvious and deliberate intent to eliminate Trawling in favor of Longliners. It has failed to show that Bycatch mortality also exists among Longliners. It has failed to show that very few Trawlers fish specifically for Sablefish. The Council has also failed to make any attempt to gather information about the impact on Trawl gear and the development of the groundfish resource after being advised to do so by its own legal counsel. The Council has also failed to produce any up to date scientific or statistical information for the Trawler industry.

In addition, the Council shows a predisposition to phase Trawl gear out of other fisheries. The Council's plan unjustifiably discriminates against the FISHING COMPANY OF ALASKA and other Trawlers in favor of Longline gear and shoreside processing, thus giving Longline gear a clear and obvious economic advantage. All of which is beyond the Council's scope and authority, not to mention illegal.

The FISHING COMPANY OF ALASKA, hereby requests that in view of all the aforementioned issues, the following ANNUAL QUOTAS be granted to them, for the 1986-87 fishing season.

We also request that before any further Quotas are set, or any other action is taken that may in any way effect the Trawlers of U.S. origin, the Council ask for and take into consideration their opinions and concerns, on any matters that may effect any part of their operations.

We at the FISHING COMPANY OF ALASKA do not wish to pursue legal avenues on these matters. However, rest assured, we have done our homework on every issue and will, if necessary, present our evidence for Presidential investigation, which not only covers the NORTH PACIFIC FISHERY MANAGEMENT COUNCIL actions, but those of its members as to their individual business interests both in the United States fishing industry and the foreign fishing interests of those members.

Sincerely.

Helen Marie Davis

on behalf of

Karena Adler, President Fishing Company of Alaska

CC: President of the United States Secretary of State Department of Commerce Senator Frank Murkowski

## CC: Continued

Senator Ted Stevens
Congressman Don Young
Governor Bill Sheffield
James O. Campbell
Sara Hemphill
John Winther
Oscar Dyson
Al Burch
John Peterson
Dr. John Harville
Dr. Donald E. Bevan
and all Council members

Amal as approved

GULF OF ALASKA GROUNDFISH 1986 ABCs, DYS, DAPs, JVPs, TALFF, and PSCs (MT)

Species	Area	1986 ABC	1986 OY	Reserves 20% OY	1986 DAP	1986 JVP	1986 DAH	TALFF !
Pollock	Western/Central	100,000	100,000	20,000	40,000	40,000	80,000	0 1
	Out.Shel.(1/15-4/10)	50,000	50,000	10,000	5,000	35,000	40,000	ōi
	Eastern	16,600	16,600	3,320	1,841	11,439	13,280	οi
	Total	166,600	166,600	33, 320	46,841	86,439	133,280	Ŏ į
Pacific Cod	М	37,500	29,951	5,990	9,800	2,521	12,321	11,640
	C	76,000	33,049	6,610	19,600	2,959	22,559	3,880
	<b>E</b>	22,500	12,000	2,400	5,600	4,000	9,600	0 1
	Total	136,000	75,000	15,000	35,000	9,480	44,480	15,520
Flounders	W	23,000	5,360	1,072	3,252	1,036	4,288	0 1
	C	101,000	5,000	1,000	2,916	1,084	4,000	ŏi
	E	17,000	4,020	804	332	2,10.	332	ŏi
	Total	141,000	14,380	2,876	6,500	2,120	8,620	ŏi
Pacific ocean	W	2,800	1,316	٥	1,316	0	1,316	0 1
perch	C	3,300	1,511	ō	1,511	ŏ	1,511	ŏi
·	E	4,400	875	ŏ	875	ŏ	875	ŏi
	Total	10,500	3,702	_		_	0.0	ĭ
Sablefish	W	2,500	2,850	0	2,850	0	2,850	0 1
	C	11,600	6,150	ō	6,150	ŏ	6,150	ŏi
	W. Yakutat	2,200	2,550	ō	2,550	ŏ	2,550	ŏi
	E. Yakutat	800	1,104	ō	1,104	ŏ	1,104	ŏi
	S.E.Outside	1,700	2,346	Ŏ	2,346	õ	2,346	ŏi
	Total	18,800	15,000	_	15,000	•	_,	ĭ
Atka Mackerel	<b>W</b> :	4,700	4,678	936	0	3,742	3,7 <del>1</del> 2	٥
	c ·	0	0	٥	0	•		_ !
	E	ŏ	ŏ	ŏ	ŏ	0	0	0 !
	Total	4,700	4,678	v	v	v	U	0
Rockfish	S.E.Central							ļ
	Outside	n/a	600	0	600	0	600	o i
	Remaining Gulf	n/a	4,400	ŏ	4,400	ŏ	4,400	ŏi
	Total		5,000	_	5,000	-	,,	i
Thornyhead	GM	n/a	3,750	750	0	o	0	3,000
Squid	6M	n/a	5,000	1,000	0	0	0	4,000
Other Species	GM	n/a	14,656	2,931	0	200	200	11,524
TOTAL	;		307,766	61,553	220,384	200,020	420,404	 

December 9, 1985

Mr. James O. Campbell

-Chairman-----

North Pacific Fishery Management Council

P.O. Box 103136

Anchorage, AK | 99510

Dear Jim:

In the fall of 1979 I sent the attached letter to the Council. I suggest that the Council ask its working group on Gulf groundfish to consider this suggestion for the Gulf of Alaska DAP. It is my view that it could be an incentive to Americanization if those that initiate DAP operations are able to stake a claim to protect their investments. I would specifically suggest that shares equal to some multiple of actual tonnage processed be awarded in equal proportions to both harvestor and processor.

-Sincerely,

Donald E. Bevan

Attachment

Years plan revision process

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## UNIVERSITY OF WASHINGTON SEATTLE, WASHINGTON 98195

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OEC 4 1979

College of Fisheries
WH-10

December 11, 1979

The Honorable Clem Tillion, Chairman North Pacific Fisheries Council P.O. Box 3136DT Anchorage, Alaska 99510

Dear Clem:

As you well know the Fishery Conservation and Management Act of 1976 under which our Council operates has, as one of its goals, the encouragement of development of fisheries which are currently underutilized or not utilized by United States fish industry, including bottomfish off Alaska.

The largest underutilized resource in U.S. waters is the pollock of Bering Sea.

I suggest that we ask our Plan Development Team and the Scientific and Statistical Committee to develop a plan to provide an increased incentive to the U.S. fishing industry to harvest Bering Sea pollock.

If we look back into our country's history, the methods for encouraging the development of the land area and the mineral resources of the West was by grants of land for homesteads or for building railroads and the system of filing claims for private ownership by prospectors who had located and proved the existence of mineral resources.

I suggest we establish this system to allow fishing claims or "seastead" rights to Bering Sea pollock.

The first question will be, "Is this a Limited Entry Program?" I believe it is and we must look to the Law to see what the Council and the Secretary must take into account.

The Law, in Section 303, is quite specific in its requirements to a system for limited access to a fishery in order to achieve Optimum Yield. The Council and the Secretary must take into account (a) present participation in the fishery, (b) historical fishing practices in and dependence on the fishery, (c) the economics of the fishery, (d) the capability of fishing vessels

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used in the fishery to engage in other fisheries, (e) the cultural and social framework relevant to the fishery and (f) any other relevant considerations. Since there is no present fishery, the major item to be considered is item f. and the other relevant considerations are the need to encourage the development of fisheries, which are currently underutilized or not utilized by the U.S. fish industry, including bottom-fish off Alaska.

There are a number of ways such a program could be established. The following are only examples. I believe it very important that the exact details of a number of alternatives be worked out by the Council and tested in the public hearing process.

For example, an individual, partnership, or corporation would be eligible for the right to take one percent of the total allowable catch per month for Bering Sea pollock for each metric ton of pollock caught and processed each year for a two-year period. There are obviously all kinds of alternatives for the amount of leverage or the multipliers applied to what is caught during the proving up period to the later right of fishing.

Another possibility is to provide the right to utilize a certain amount of fishing effort. For example, an individual, partnership, or corporation that caught a metric ton of pollock which was processed could be allowed the application of one tillion of fishing effort in perpetuity with the right to sell or lease that right.

May I suggest that this topic be added to our Agenda for discussion and, that with approval of the Council, it be referred to the Plan Development Team and the Scientific and Statistical Committee.

Sincerely yours,

Donald E. Bevan Associate Dean

DEB/aw

cc: Charles Fullerton
D. L. Alverson
Steve Penoyer

1/ A tillion is that amount of fishing effort which will provide one percent of the monthly catch of Bering Sea pollock.

#### Council Workgroup Meeting on Gulf of Alaska Groundfish November 18-19, 1985

#### Draft Minutes

The Council Workgroup met in Seattle on November 18-19, 1985 to consider management of Gulf of Alaska groundfish fisheries. In attendance were:

<u>Council</u>	<u>AP</u>	SSC	<u>Others</u>
Sara Hemphill	Ron Hegge	Don Bevan	Steve Davis
John Harville	Al Burch		Terry Smith
John Peterson			Joe Terry
John Winther	1		Fred Gaffney
Oscar Dyson	;		Clarence Pautzke
			Paul MacGregor
			Mark Lundsten
i			Ray Olson
i		•	Susan Blanding

Sara Hemphill chaired the meeting and the workgroup considered two main items:
(1) goals and objectives, and (2) guidance to the Plan Team on revising the FMP.

#### Goals and Objectives

The workgroup reviewed what little progress has been made so far in setting specific goals and objectives for the Gulf of Alaska groundfish fisheries. When faced with a choice of the Council continuing to manage reactively, or taking the initiative to design a long-range plan that would give guidance to the industry, the workgroup strongly recommends that the Council choose the latter approach. At the suggestion of John Peterson, the workgroup chose the following statement as the overriding goal against which to judge all management decisions:

"Fish resources of the Gulf of Alaska will be managed in such a manner as to produce the maximum economic benefit to this nation."

The workgroup then reviewed the major issues concerning future management of the groundfish fisheries and recommended the goals statement in Attachment 1 for Council consideration. In defining "maximum economic benefit to this nation," the workgroup recommends that the Council first determine an economic value for each species and by gear group if necessary. This economic value would be determined by multiplying a total annual catch of each species (by gear type if necessary) by the average dockside or shipside price paid to the harvesters. The product value would be further increased by appropriate multipliers reflecting the value of the end product at retail level when sold in the U.S. or the F.O.B. dock value when sold export. The economic values so determined will be the basis for making management decisions so that the maximum economic benefit for the entire complex of species is achieved.

The workgroup realizes that the appropriate multiplier may be very difficult to determine. It will depend on the product market form. They recommend that whatever approach is taken to establish economic benefit, it be as simple as possible.

If the Council agrees with the workgroup's recommendations in Attachment 1 as a starting point, they can go on to consider more specific goals and objectives for the fisheries.

#### Revisions to the FMP

<u>Schedule</u>. The workgroup reviewed the revision schedule with members of the Plan Team. The Council originally instructed the Team to revise the plan using the annual management cycle as shown on the left below:

<u>Original</u>	Event	Workgroup Proposal
January 1986	Council initially reviews draft FMP	March 1986
March	Council reviews & approves draft	June
	FMP, RIR, etc., to go to public	
1	review.	
April-May	Public Review	July-September
June	Council gives final approval.	September
July-November	Secretarial Review	October-January
January 1	New FMP takes effect	mid-February 1987

The workgroup proposes the cycle at the right which would mean a one-to-two-month delay in implementing the plan in early 1987. The original schedule is just too tight to allow for adequate analysis and review given such a massive overhaul of the plan.

Economic approach to setting TACs. The workgroup reviewed three different approaches to setting TACs in the revised plan. The first two had been reviewed previously and are discussed in Attachment 2 which summarizes the workgroup's meeting of October 29-30, 1985. Method 1 sets target quotas on the basis of how much bycatch will be taken in that fishery. Method 2 is used by IPHC in setting halibut quotas and first accounts for the bycatch needs in other fisheries. Whatever remains is apportioned to the target fisheries. The third approach is an economic approach developed by Grant Thompson and Jim Balsiger which maximizes revenues from the fishery. It was explained to the workgroup and is summarized in Attachment 3. The workgroup recommended that the Plan Team and economists more fully develop this particular approach for Council review at a later date. The three methods being developed by the Plan Team will henceforth be known as Method 1, Bycatch-driven Target Quotas; Method 2, IPHC Accounting Method; and Method 3, Revenue Optimization Strategy.

Team Questions and Workgroup Responses. At the late October meeting the workgroup had requested the Team to identify various issues and pressure points on which Council advice would be needed. The Plan Team prepared a list of problems and questions with emphasis on the setting of TACs and the

Council workgroup gave some preliminary responses. At this meeting the Council further considered their responses as follows:

(1) Does the Council intend to allocate groundfish harvests by gear group, e.g. hook and line, trawls and pots?

Response: Yes.

(2) Does the Council intend to framework procedures for allocating harvests among gear groups or establish allocations by plan amendment?

Response: Everything that can be frameworked should be.

(3) Does the Council intend to constrain the target groundfish fisheries by controlling bycatch levels? If so, what are the criteria for determining these bycatch levels? (Historical levels? Maximum revenues? Other?)

Response: This question is premature. We really shouldn't talk about target fisheries or bycatch fisheries but rather mixed fisheries over a whole array of stocks.

(4) Does the Council intend to regulate bycatches of all species or just those that are now fully utilized by the U.S. fisheries, i.e., pollock and sablefish.

Response: The Council intends to manage all species but not necessarily regulate all of them.

(5) Should traditional fisheries receive priority to resources that they are fully harvesting, or should some accommodation to developing fisheries be made?

Response: The Council should give due consideration to maintaining traditional fisheries while maximizing economic benefit to the nation.

(6) Should wastage be allowed by adopting the prohibited species catch concept for halibut, crab, salmon and those groundfish species which have been fully harvested, or should retention be mandated?

Response: Wastage cannot be tolerated but we don't have a better way right now to manage the fishery.

(7) Should long-lived species, e.g. rockfish and POP continue to be a part of the management unit if their conservation and management impose substantial costs on other target fisheries?

Response: Again, we need to determine whether that protection produces the maximum economic benefit to the nation.

#### Next Meeting of Workgroup

The workgroup will meet again sometime during the week of the Council meeting in December, possibly on Wednesday, December 11, early in the morning. The workgroup wants to review its draft recommendations before they go forward to the Council.

#### <u>Draft Goals Statement</u> for Management of Gulf of Alaska Groundfish Fisheries

#### Preamble

The North Pacific Council is committed to develop long-range plans for the Gulf of Alaska groundfish fisheries that will create financial stability in industry investment and will maintain the health of the resource and environment. In developing solutions to allocation and harvesting schemes, the Council will give overriding consideration to maximizing economic benefits to the nation. However, such management will:

- (1) Conform to the National Standards;
- (2) Be designed to assure that to the extent practicable:
  - a. a supply of food and other products may be taken and that recreational and subsistence benefits may be obtained on a continuing basis.
  - b. irreversible or long-term adverse effects on fishery resources and the marine environment are minimized;
  - c. there will be a multiplicity of options available with respect to future uses of these resources; and
  - d. give due consideration to traditional fisheries.

Principle Management Goal: Groundfish resources of the Gulf of Alaska will be managed in such a manner as to produce the maximum economic benefit to this nation.

In pursuit of this overriding goal, the Council establishes the following objectives:

Objective 1: The Council will establish annual harvest guidelines for each major groundfish fishery or species complex in the Gulf of Alaska.

Objective 2: The Council will consider all fishery-related removals for each groundfish species in setting annual harvest guidelines.

Objective 3: The Council will manage the fisheries to minimize waste by:

- (a) developing alternative schemes to the existing PSC tool to address enforcement and covert targeting issues; and
- (b) developing management schemes that encourage gear and fishing technique modifications to minimize the catch of non-targeted species.

Objective 4: Harvest guidelines for major Gulf of Alaska fisheries will include allocations for target and non-target species. These target species harvest levels will be set to allow the target fishery to proceed while minimizing bycatch of non-target species.

Objective 5: The Council will manage groundfish resources of the Gulf of Alaska to give priority to fully domestic fishery operations.

Objective 6: The Council will seek to develop effort control measures for Gulf of Alaska groundfish fisheries which enhance the opportunity to maximize their economic benefits from those fisheries and which extend harvest seasons or otherwise enhance the processing and marketing of fish products for the benefit of the fish industry and consumers.

# DRAFT

# Gulf of Alaska Groundfish FMP Council Workgroup and Plan Team Workgroup Meeting Report

#### INTRODUCTION

The Council's Gulf of Alaska and plan team subgroups met in Anchorage on October 29-30, 1985 to review preliminary results of the plan team's efforts to develop a computer spreadsheet accounting system for calculating bycatch and total allowable catches based on the TAC approach introduced by Don Bevan at the August Council meeting and further developed by Gary Stauffer and Steve Davis. The subgroups also reviewed progress in rewriting and frameworking the FMP. In attendance were:

Council Subgroup	Plan Team Workgroup	Other
Sara Hemphill John Peterson John Harville Don Bevan Oscar Dyson John Winther Al Burch	Ron Berg Terry Smith Jim Balsiger Will Barber Ron Rogness	Jim Branson Steve Dickinson Ted Evans Paul MacGregor Ron Hegge Clarence Pautzke H. Hirai Fred Gaffney

### BACKGROUND

The plan team and Council subgroup met initially on October 3-4 in Seattle and discussed how to account for and control directed and bycatch fishery removals of groundfish species, halibut, salmon, and crabs in the groundfish fisheries. A plan team subgroup was assigned to develop a catch accounting system based on a computer spreadsheet such as Lotus 1-2-3, that would be capable of using bycatch rates observed in the fishery and specified bycatch ceilings to calculate directed TACs using the Bevan-Stauffer-Davis approach noted above (hereafter Method I). The subgroup reported back at this meeting with an example using Pacific cod and sablefish.

Method I: ABC for cod = 500,000 mt

TAC for sablefish = 10,000 mt

Expected bycatch rate of sablefish

in the cod fishery = 1%

Acceptable sablefish bycatch = 2,000 mt

Target Quota = Acceptable Bycatch/Bycatch Rate

= 2,000 mt / 0.01= 200,000 mt cod

Method I is based on the premise that the Council wants to account for and control the bycatch of less abundant groundfish species (e.g. sablefish, rockfish, POP, and Atka Mackerel) and halibut, crab, and salmon in major directed groundfish fisheries for much more abundant species such as pollock, Pacific cod, and flounders. The method assumes that bycatch rates developed from previous fisheries will apply to the next year's fishery. Then given a bycatch limit acceptable to the Council, the method back calculates TACs for

with the second second

major species. These TACs may or may not be less than the respective ABCs. A computer spreadsheet program is used to facilitate these calculations.

A second method was introduced that is patterned after IPHC's system for setting halibut quotas. An example was presented using sablefish.

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Method II: Sablefish ABC = 16,000 mt

Sablefish PSC = True bycatch mortality + Rebuilding
= 6,000 mt
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```
Sablefish TAC = ABC - PSC
= 16,000 mt - 6,000 mt
= 10,000 mt
```

The major difference between the methods is that Method II gives first priority to bycatches in other4 Wsheries by subtracting them away from ABC. The directed fishery for sablefish is what's left over. In contrast, Method I first establishes a bycatch ceiling and then constrains the other target fisheries via the bycatch rate.

A second difference is that in Method II, bycatch is treated as a prohibited species and cannot be retained. This has important regulatory, enforcement, and economic implications.

RESULTS

The subgroups reviewed both methods and Terry Smith and Jim Balsiger presented the results of the computer model based on Method I. Bycatch rates were based on the 1985 fishery and a 1,000 mt bycatch cap was specified for each species. TACs for directed fisheries were calculated for the following species and gear types:

Species	Gear Types
Pollock Pacific cod Flounders POP Sablefish Atka Mackerel Rockfish	Bottom trawl (BT), Mid-water trawl (MT) BT, Longline (LL) BT BT BT, LL, Pot BT BT

The Council subgroup suggested that the approach be modified by (1) using preliminary ABCs for 1986 as initial TACs; (2) calculating expected bycatches by fishery and distributing them the same as was observed in the 1985 fishery; and (3) making the following allocations between gear types:

```
Pollock 1/3 bottom trawl and 2/3 mid-water trawl Pacific cod 85% bottom trawl; 15% longline 20% trawl; 55% longline; 25% pot (After amendment 14)
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Using this approach reveals that the directed fisheries for some species is zero because the species total TAC is dissipated as bycatches in other fisheries. The Council subgroup then recommended using expected 1986 catches instead of ABCs because there may be a large difference between the two for

such species as flounders. They also recommended that when presenting the computer model to the full Council, the team also provide an example of the model's output, a summary of problem areas, and a thorough explanation of how the model operates and its underlying assumptions.

The Council subgroup scheduled their next meeting for November 18-19 at the NWAFC in Seattle, the same week the plan team will meet to prepare the final Status of Stocks report. They will meet jointly at 4:00 pm, November 18 to review progress.

### OTHER BUSINESS

FMP Rewrite: Steve Davis' draft outline and text was presented. The draft has four main framework sections including (1) setting harvest levels; (2) apportionments to DAP and JVP; (3) PSC limits and inseason adjustments; and (4) setting fishing seasons. Ron Berg discussed NOAA's guidelines for frameworking management measures, and noted that the most optimal measure is one that allows adjustments without OMB review. The adjustment would have to fall within bounds previously established and analyzed through the amendment process. He also presented a draft paper on modifying the Regional Director's authority to make inseason time/area adjustments for socioeconomic reasons as well as for conservation. Will Barber distributed a list of draft goals and objectives which he derived from the existing FMPs. The Council subgroup will provide comments on these documents by November 11 for the Plan Team to use at its November 18 meeting.

Request for Council Guidance: The Council subgroup noted that the plan team in the past has requested Council guidance in preparing amendments. Conversely, the Council has requested that the team inform them of trouble areas or pressure points on which Council advice would be needed. On the request of the Council subgroup, the plan team prepared a list of current problems and questions with emphasis on the setting of TACs using Method I and the computer spreadsheet model. The questions and the Council subgroup's preliminary responses follow:

 Does the Council intend to allocate groundfish harvests by gear group, e.g. hook-and-line, trawls, and pots?

Response: Conceivably the Council could promote a "free-for- all"; other methods, eg. time and/or area divisions may be adopted when stocks are fully utilized.

2. Does the Council intend to framework procedures for allocating harvests among gear groups or establish allocations by plan amendment?

Response: The nature of the framework mechanism must be looked at; whatever should be frameworked should be; stressing the system will be continued, OMB objections not withstanding.

3. Does the Council intend to constrain the target groundfish fisheries by controlling bycatch levels? If so, what are the criteria for determining these bycatch levels? (historical levels? maximum revenues? other?)

Response: This question should be a part of Question 1. Determining allocations is really the issue; the target species itself may be limiting; one must consider the interrelationship of all species.

4. Does the Council intend to regulate bycatches of all species or just those that are now fully utilized by the U.S. fisheries, i.e., pollock and sablefish.

Response: This question should be rewritten as follows: "Does the Council intend to manage all species or just those being fully utilized?"

5. Should traditional fisheries receive priority to resources that they are fully harvesting, or should some accommodation to developing fisheries be made?

Response: The conjunction "or" should be changed to "and"; The answer is "yes"; this question is already addressed by two Council objectives; see Council goal #6.

6. Should wastage be allowed by adopting the prohibited species catch (PSC) concept for halibut, crab, salmon, and those groundfish species which have been fully harvested, or should retention be mandated?

Response: This question is not relevant to developing the model. Wastage is economic; the PSC tool is the ultimate lever to prevent covert targetting if it is the only tool; alternatives to the PSC tool are better, if possible.

7. Should long-lived species, eg. rockfish and POP, continue to be a part of the management unit if their conservation and management impose substantial costs on other target fisheries?

Response: This question should be rewritten as follows: "Should long-lived species be managed?" Benign neglect and accepting loss is part of management.

NOTES ON A LINEAR PROGRAMMING APPROACH TO THE MANAGEMENT OF GROUNDFISH IN THE GULF OF ALASKA

Grant G. Thompson and James W. Balsiger

Resource Ecology and Fisheries Management Division Northwest and Alaska Fisheries Center 7600 Sand Point Way NE, Seattle, WA 98115-0070

A program has been developed which prescribes harvest allocations to directed groundfish fisheries in the Gulf of The program makes use of the three management areas currently used for most species in the Gulf of Alaska: western, central, and eastern. Within each area, catch is looked at in terms of 10 species or species groups and 16 fisheries (the number of fisheries exceeds the number of species because some species support target fisheries by more than one gear type).

The program prescribes harvest allocations to the involved fisheries by a process of constrained maximization, i.e. it attempts to maximize a given quantity subject to the condition that certain restrictions not be violated. In this case, the objective chosen was the maximization of total revenue from all fisheries in each area. The constraints imposed are as follow:

- 1) For each species, total catch from all fisheries (i.e. both directed catch and bycatch) must be less than or equal to the pre-determined TAC for that species in the area.
- 2) For each species, the harvest allocations prescribed for the fisheries which target on that species must be proportionate to a pre-determined ratio. For example, if the Council wished to set the harvest allocation of the pollock mid-water trawlers equal to that of the pollock bottom trawlers, an input ratio of 50:50 would be used. This set of constraints is optional; if the Council does not wish to use pre-determined ratios between gear types, input ratios of 0:0 will nullify these constraints.
- 3) For each fishery, the harvest allocation must be greater than or equal to a pre-determined minimum allocation. Care must be taken in excercising this type of constraint, because if minimum allocations are set too high, it may be impossible to find a feasible solution. This is because high minimum allocations may cause bycatches of some species to exceed TAC. As with the constraints described in (2) above, the minimum allocation constraints are optional; using minimum allocations of zero will nullify these constraints.

Sample output from the program (western area) is shown on the attached sheet. This output is offered purely for discussion purposes; different results could be obtained by using different The first table lists catch by fishery (row) and species (column). Species totals are compared with TAC's on the bottom two rows of the upper table.

The second table lists revenue (in thousands of dollars) by fishery and species. The bottom two rows compare total revenue for each species with the revenue which would have resulted from harvesting TAC for that species. The second table also shows total revenue for all species combined, compared with the revenue that would result from harvesting TAC for all species.

	U	0,10					<u>.</u>	•				* .
100	L <sub>o</sub>	1	POL	COD	FLO	POP	SAB	ATK	ROC	CRA	HAL	SAL
200	' POL	BT	16282	456	1856	993	651	293	78	0	179	<u>م</u>
, 300	POL	MT	8129	114	171	33	33	0	8	0	16	0
400	COD	BT	124	2703	343	5	0	0	0	0	14	- Q
500	COD	LL	92	15317	123	0	378	0	0	0	858	0
600	FLO	BT	4	9	160	1	10	0	0	O	6	0
700	POP	BT	5	7	4	100	3	4	12	0	6	. 0
800	SAB	BT	40	4	10	81	690	0	2	0	3	0
900	SAB	LL	0	2	2	1	251	0	5	3	4	Ō
1000	SAB	PO	0	1	2	0	553	0	0	0	0	. 0
1100	ATK	BT	324	495	114	1086	44	4378	83	0	79	Ō
1200	ROC	BT	0	9	41	313	7	3	551	0	9	0
1300	CRA	PO	0	2530	0	0	0	0	0	1861	0	0
1400	HAL	LL	0	18	0	0	1	0	0	0	100	0
1500	SAL	TR	0	0	0	0	0	0	0	0	0	8970
1600	SAL	GN	0	0	Q	0	0	0	0	0	0	8970
1700	SAL	SE	0	0	0	0	0	0	0	0	0	8997
1800												
1900	SUM		25000	21664	2766	2613	2640	4678	759	1864	1273	26937
2000	TAC		25000	37500	23000	3500	2640	4678	759	1864	1273	26937
2100												
2200												
2300	RES	JLTS	IN 1000	o's of	\$: (T	DTAL =	14497	'6, POT	ENTIAL	_ = 152	562)	
2400												
2500			POL	COD	FLO	POP	SAB	ATK	ROC	CRA	HAL	SAL
2600	POL	BT	1547	121	286	307	356	45	30	0	296	0
2700	POL	MT	772	30	26	10	18	0	3	0	27	_0
2800	COD	BT	12	716	53	2	0	0	0	0	. 22	
2900	COD	LL	9	4059	19	0	218	0	0	0	1419	` 0
3000	FLO	BT	0	2	15	0	5	0	0	0	11	
3100	POP	BT	0	2	1	31	2	1	4	0	10	0
3200	SAB	BT	4	1	1	25	378	0	1	0	5	0
3300	SAB	LL	0	1	, 0	0	137	0	2	17	6	0
3400	SAB	PO	0	0	0	0	302	0	0	0	0	0
3500	ATK	BT	31	131	18	336	24	674	26	0	130	0
3600	ROC	BT	0	2	6	97	4	0	170	0	15	0
3700	CRA	PO	0	·· 670	0	0	0	0	0	12314	0	0
3800	HAL	LL	0	5	0	0	1	0	0	0	165	0
3700	SAL	TR	0	0	0	0	0	0	0	0		39558
4000	SAL	GN	0	0	O	0	O	0	0	0		39558
4100	SAL	SE	0	0	0	0	0	0	0	0		39677
4200												,
4300	SUM		2375	5741	426	807	1444	720	234	12330	2106	18792
4400	TAC		2375	7738	3542	1082	1444	720	234	12330		18792