M E M O R A N D U M

TO: Council, AP and SSC Members

FROM: Jim H. Branson
Executive Director

DATE: January 16, 1987

SUBJECT: Bering Sea/Aleutian Islands Groundfish Fishery Management Plan

ACTION REQUIRED

Review submitted proposals and decide which proposals to include in Amendment 11.

BACKGROUND

In April 1984 the Council adopted an annual cycle for amending groundfish FMPs that provides specific deadlines for proposals, preparation of amendments, and final decisions. The current cycle began in September 1986 with a preliminary review of the status of stocks, the needs of the U.S. industry, and a call for proposals. At the December 1986 meeting the Council took action on quotas and their apportionment among users; it was also the deadline for submission of amendment proposals.

Scheduled for the January 1987 meeting is a Council review of the 1987 proposal package and selection of proposals to be included in this year's amendment cycle. The Gulf of Alaska and Bering Sea/Aleutian Islands groundfish plan teams have met jointly to review the proposals and prioritize them. The team's recommendations and a summary of BSAI proposals and are provided here as items D-2(a) and D-2(b), respectively. Item D-2(c) is a table showing the proposals and the team's recommendations. Also included, as item D-2(d), is a late proposal concerning prohibition of pollock roe-stripping in the joint venture fishery. Disposition of this proposal should be considered, as recommended by the Interim Action Committee.

Proposals selected by the Council will be developed by the plan team as amendments to the FMP. A draft amendment with the accompanying environmental and economic analysis will be available for review at the March Council meeting. As has been discussed in the past, the development of numerous proposals and the complexity of the issues can easily overwhelm staff and team capabilities to prepare an amendment package by the required March deadline. A possible solution would be to separate submitted proposals into the three following categories:

(1) Immediate Attention - proposals warranting action by emergency rule; or receiving the Council's top-most priority. These proposals would be identified for this year's amendment cycle.

(2) High Priority - proposals recognized by the Council as addressing important problems but either do not rank as emergencies or require more time to thoroughly develop. These proposals would be developed by the plan team or special workgroups during the year with the objective to include them in next year's cycle.

(3) Low Priority - proposals in this category would not be worked on by the plan team during 1987. They could be resubmitted by the public, team and management agencies during the 1988 call for proposals if still needed.

Proposals falling into Category 1 would be placed on the following schedule:

March 16-20, 1987	Council reviews draft decision documents; sends package out for public review.
May 18-22, 1987	Council reviews public comments; makes final decision on amendment package.
June	Amendment submitted to Secretary of Commerce.
November	Amendment implemented.

MEETING REPORT OF THE GULF OF ALASKA AND BERING SEA/ALEUTIAN ISLANDS GROUNDFISH PLAN TEAMS

January 12-13, 1987
Juneau, Alaska

The Gulf of Alaska and Bering Sea/Aleutian Island Groundfish plan teams met during January 12-13, 1987 to review and evaluate management proposals submitted for the 1987 groundfish amendment cycle, and to discuss the future of both groundfish plans and better understand their strengths and weaknesses. In attendance were Gulf plan team members Jim Balsiger, Sandra McDevitt, Jeff Fujioka, NWAFC; Ron Berg, NMFS; Barry Bracken and Fritz Funk, ADF&G; Lew Haldorson, UA; and Steve Davis, NPFMC. Also present were Bering Sea team members Loh-Lee Low, Vidar Wespestad, NWAFC; Jay Ginter, NMFS; Ole Mathisen, UA; and Denby Lloyd, NPFMC. Supporting both teams were Terry Smith, NPFMC, Dave Clausen, John Karinen, and Mike Sigler, NWAFC-Auke Bay; Bill Robinson and Janet Smoker, NMFS; and John Pollard, NOAA-GC. Public in attendance included Steve Dickinson, Japan Deep Sea Trawlers Assn. and Bill Orr, Alaska Factory Trawlers Assn.

The meeting began with a review of past methods used in evaluating management proposals. A more simplified procedure was developed where both the perceived management problem and the proposed solution (proposal) were rated. The revised procedure with problem and proposal rating criteria is described below. The plan team reviewed ten Gulf of Alaska proposals and the deferred amendment topics (from Amendment 15) and twelve Bering Sea proposals using these criteria.

The plan teams began their review of submitted proposals by first identifying the management problem which the proposal attempts to solve. This was necessary so that not just the proposed solutions were ranked but also the importance of the problem. Sometimes the problem was specifically stated in the proposal (as requested by the Council), in other cases the problem was not explicit and the team had to determine the apparent problem. Next, the teams evaluated whether or not the problem was best addressed by plan amendment or rather through longer-term consideration by a Council workgroup, or more simply through just a regulatory amendment, conditions on permits, or emergency regulation. Then, the teams jointly ranked those problems which seemed most appropriately addressed by plan amendment: the implicit problem was ranked as high, medium, or low priority and the proposed solution was ranked as being of high, medium, or low value in solving the problem. Finally, based on the relative ranking of each proposal requiring plan amendment as well as other considerations such as feasibility and ease of analysis, the teams agreed upon a recommended course of action for each proposal. The proposals and perceived management problems are summarized in agenda items D-1(b) and D-2(b), and the plan team rankings are provided in Tables D-1(c) and D-2(c) for the Gulf of Alaska and Bering Sea/Aleutian Islands, respectively.

Gulf of Alaska

The plan team recommends that three of the previously deferred items and five of the new proposals be included in Amendment 16 (GOA-16). They are: (1) fishing seasons framework; (2) an expanded bycatch framework to include all traditional prohibited species; (3) a rewrite of the plan's text; (4) expanded reporting requirements to include at-sea transfer of catches; (5) expand economic data requirements; (6) a revised definition of ABC; (7) a clarified prohibited species definition; and (8) the authorization to allow the retention and sale of resource survey catches if needed. The team believes that these eight amendment topics can be fully developed and analyzed prior to the March Council meeting.

The team recommends that two items, sablefish limited entry and a comprehensive management program for groundfish bycatch in groundfish fisheries be investigated and developed further by specific Council workgroups during the year. Both of these management measures are extremely complex and cannot be adequately addressed in this amendment cycle. Both items were rated very highly by the team; if sufficient progress can be made on these items they could be included in next year's amendment cycle.

Four other proposals either scored low or were not believed relevant given the current plan's ability to address those problems. They were: sablefish size limits; a harvest ceiling on bottom trawling in the eastern Gulf; a fixed sablefish quota distribution; and a bottom trawl closure scheme around Kodiak to protect juvenile halibut. The team recommends that they be dropped and considered again in the future should the problems either remain unaddressed or continue.

Bering Sea/Aleutian Islands

Following a review of 12 management proposals, the plan team recommends that six proposals be included in this year's amendment (BS-11). They are: (1) raise the OY range to 2.4 million mt; (2) add a prohibited species definition; (3) revise the definition for ABC; (4) expand the reporting requirements to include at-sea transfers; (5) expand economic data requirements; and (6) allow for the retention and sale of resource survey catches as a method of funding surveys. The team believes that these amendment topics can be fully analyzed and developed into a public review package prior to the March Council meeting.

The team recommends that four proposals be deferred to Council workgroups or NMFS for work during the year. Specifically the DAP priority access question and the development of a comprehensive bycatch management program should be delegated to Council workgroups. These issues are too complex for the team to address alone and cannot be fully analyzed in the time allowed in this year's amendment cycle. The issue of prohibiting joint venture pollock fishing in the Bering Sea during the period May-June can be addressed by the Council at any time with time/area restrictions placed on permits if necessary. No plan amendment is necessary. The team recommends deferring this question to the Council's permit review committee for consideration. And finally, the team noted that the proposal to implement a single-species TAC for TALFF fisheries is already being developed as a regulatory amendment by NMFS.

Two proposals rated low were the sablefish size limit and the proposed closure of Statistical Area 514 to trawling during May-July. These proposals may warrant future consideration but do not warrant inclusion into BS-11. The team recommends dropping these proposals at the present time.

Other Business

The teams discussed the possibility of merging the two groundfish plans and how best to standardize the terms and measures used in managing these two areas. The obvious advantages of a merger are to provide an economy in administration, the elimination of duplicity, a standardization of terms and definitions, and a standardization of management measures. While both teams are in favor of such a combination, they are unclear as how best to accomplish this task. It was pointed out that with recent amendments to both plans, there is really little difference between the two management plans. The primary difference exists in the TAC/Reserve procedure. During the upcoming year, both teams plan to meet together to examine both FMPs in detail to determine where differences occur. It is hoped that beginning with next year's amendment cycle, the Council can begin standardizing the two FMPs. The plan teams intend to submit management proposals for next years amendment to meet this objective.

There was also a discussion of the recent concern over roe-stripping that is reportedly taking place in the pollock fisheries. The teams agreed that this is an overcapitalization problem where, due to high effort, fishermen and processors are seeking the highest short-term profits (i.e. roe-stripping reduces their processing costs by allowing retention of just the most valuable part of the fish; the processors can then process more fish per unit time). If the fishery were slower paced, fishermen and processors could more completely utilize the resource by producing both roe and fillet/surimi products. The plan team learned however that roe-stripping may no longer be of concern due to the large amount of pollock roe product currently available in Japan. It is likely that the market demand for pollock roe will be significantly lower in 1987 compared to recent years, which should have a slowing effect on the fishery.

SUMMARY OF 1987 BERING SEA/ALEUTIAN ISLANDS MANAGEMENT PROPOSALS

1. Establish priority access for DAP vessels to pollock and Pacific cod fisheries within 100 miles of Unalaska (City of Unalaska/City of Akutan). By excluding joint ventures and foreign fishing vessels, DAP fishermen will presumably bring at least the majority of their harvest to processing plants in Unalaska and Akutan, greatly contributing to the local economy. [Allocation problem: inequitability in competition between foreign floating processors and domestic shorebased processors.]

2. Develop a comprehensive framework for management of bycatch (International Pacific Halibut Commission). The IPHC is particularly concerned that the domestic bycatch of halibut is open-ended, and recommends a more comprehensive management framework be proposed to coordinate bycatch controls for all affected species. [Conservation problem: inadequate control over bycatch.]

3. Prohibit joint venture trawling for pollock during May and June (Japan Deep Sea Trawlers/Hokuten Trawlers). Intense competition for the resource will force operators to fish during 'unprofitable' time periods (May-June); post-spawning pollock are considered low quality and the fish cannot be found in suitably dense concentrations. Prohibition of J/V trawling during May-June will force displacement of operations to more profitable months. [Allocation problem: inefficient use of pollock resource in rapid, competitive fishery.]

4. Permanently implement the NMFS single-species TAC emergency rule for TALFF fisheries, so that not all fisheries for groundfish are closed if a single TAC is attained (Japan Deep Sea Trawlers/Hokuten Trawlers). [Management problem: inability to continue target fisheries after bycatch species' TACs are reached.]

*5. Raise the upper limit of the OY range to 2.4 million metric tons (Mid-Water Trawlers Co-op). The current limit of 2.0 million metric tons is an artificial constraint that prevents the Council from setting TACs for all species at levels up to ABC. Since the sum of ABCs for the groundfish complex should exceed 2.0 million metric tons for the next several years, and the MSY for BS/A groundfish has been estimated up to 2.4 million metric tons in the FMP, extension of the OY range to 2.4 million metric tons appears to be a reasonable limit but lessens constraints on the Council to expand TACs. Japan Deep Sea Trawlers/ Hokuten Trawlers recommend an OY range to 2.5 million metric tons. [Allocation problem: current OY range unnecessarily constrained.]

* = Plan team recommendation for inclusion in BS Amendment 11.

*6. Change definitions of "prohibited species" to specifically list each species to be prohibited, rather than relying on references to species prohibited under other FMPs (National Marine Fisheries Service). Also, provisions for including fully utilized groundfish species as prohibited should be considered. [Management problem: current definition cumbersome and inadequate, particularly in absence of king and Tanner crab FMP.]

*7. Revise definition of ABC (Scientific and Statistical Committee). Minor revisions to the definition will make it consistent with that used by the Pacific Council. [Management problem: current definition is not consistent with newer definition used by Pacific Council.]

*8. Establish reporting requirements for at-sea transfer of processed catch from foreign vessels to U.S. transport vessels, as well as require DAP catch production and transfer logs (National Marine Fisheries Service). [Management problem: current catch reporting system inadequate.]

*9. Expand economic data requirements (Bering Sea/Aleutian Plan Team). [Management problem: currently, insufficient economic data are required.]

*10. Allow retention and sale of resource survey catches taken by research charter vessels (Northwest & Alaska Fisheries Center). [Management problem: current lack of survey funding.]

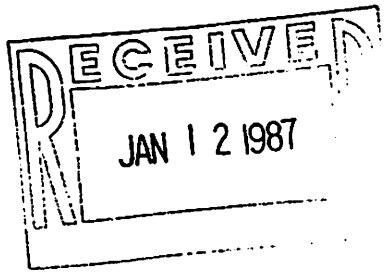
11. Establish a legal size limit for sablefish at 22 in. (or 16 in. from origin of dorsal fin to tip of tail) (Fishing Vessel Owners' Assn). Larger fish bring a better price and have contributed to spawning; these proposed size restrictions are identical to those used by the Pacific Council. FVOA is concerned about long-term conservation and the reproduction capabilities of sablefish to maintain sufficient commercial-sized fish in the population. This regulation has also been proposed for the Gulf of Alaska. [Conservation problem: protection of small sablefish.]

12. Close the Bering Sea statistical area 514 to trawling from May through July of each year (Qaluyaat and Kokechik Fishermen's Assn). Recent increases in bycatch of Pacific cod in the J/V yellowfin sole trawl fishery in 514 are coincident with reduced CPUE of Pacific cod in Etolin Strait by local fishermen. Local markets for Pacific cod may be improving and area 514 comprises only a small portion of the yellowfin sole fishery, therefore local fishermen are requesting this protection to give preference to DAP. [Allocation problem: interception of Pacific cod prior to entry to Etolin Strait.]

BERING SEA/ALEUTIAN ISLANDS PLAN TEAM EVALUATION OF MANAGEMENT PROPOSALS FOR 1987

Management Proposal	Appropriate Forum of Action	Ranking of Potential Plan Amendments		Plan Team Recommendation
		Problem Priority	Proposal Value	
1. Priority DAP access within 100 miles of Dutch Harbor	Council consideration			Defer to Council workgroup
2. Comprehensive bycatch framework	Council consideration			Defer to Council workgroup
3. Prohibit JV pollock fishing May-June	Permit condition			Defer to Council and Committee consideration
4. Implement single-species TAC for TALFF fisheries	Regulatory amendment			Defer to NMFS
5. Raise OY range to 2.4 million mt	Plan amendment	M	H	Analyze amendment
6. Prohibited species* definition	Plan amendment	H	H	Analyze amendment
7. Revise definition* of ABC	Plan amendment	L	L	Analyze amendment
8. Reporting requirements* for at-sea transfers	Plan amendment	H	H	Analyze amendment
9. Expand economic data*	Plan amendment	H	H	Analyze amendment
10. Retention and sale of* survey catches	Plan amendment	H	H	Analyze amendment
11. Sablefish size limit* of 22 inches	Plan amendment	M	L	Defer for future PT consideration
12. Closure of Statistical Area 514 to trawling May-July	Plan amendment	M	L	Defer for future PT consideration

*Similar proposals for GOA.



January 9, 1987

Mr. Jim H. Branson
Executive Director
North Pacific Fishery Management Council
P.O. Box 103136
Anchorage, Alaska 99510

Re: Plan Amendment Proposal to Prohibit Pollock Roe-stripping in the Joint Venture Fisheries Off Alaska

Dear Mr. Branson:

We are vessel owners who participate in the joint venture pollock fisheries. Enclosed you will find our proposal for amendments to the Bering Sea/Aleutians and Gulf of Alaska groundfish FMPs to prohibit the practice of pollock roe-stripping in the joint venture fisheries. We are aware that the normal deadline for amendment proposals for this amendment cycle was the last day of the December Council meeting. However, the potential for a significant increase in pollock roe-stripping operations was not apparent until after TAC, DAP and JVP specifications for pollock were established at the December Council meeting. Since we believe that this is a significant issue that requires prompt attention by the Council and action before the 1988, we ask that the Interim Action Committee review our proposal for inclusion on the agenda at the January Council meeting and that the Council consider our proposal during the 1987 amendment cycle.

As described more fully in the attached proposal, roe-stripping is an extremely wasteful processing method in which roe is removed from the fish and the body of the fish (about 97% of the fish by weight) is simply discarded. The pollock which is wasted under this process would otherwise be used in fillet and surimi operations. We believe that roe-stripping constitutes an unconscionable waste and should be prohibited.

As a result of the specifications set at the December Council meeting, only about 1.0 million m.t. of pollock will be available to satisfy the estimated 1.5 million metric ton joint venture demand in 1987. Since the demand for joint venture pollock far exceeds the supply, it is probable that roe-stripping operations in the Bering Sea will increase significantly in 1987 and subsequent years. We believe that the potential for such an increase in roe-stripping operations in 1987 and for a concommitant increase in the waste of the pollock resource would justify immediate action by the Council to prohibit pollock roe-stripping; certainly the issue should be considered and appropriate action taken before 1988.

We ask that the Interim Action Committee consider our proposal for inclusion on the Council's January agenda as one of the proposals for further action during the 1987 amendment cycle. At the January meeting, we hope that the Council will instruct the plan teams to include our proposal in the 1987 amendment packages for both groundfish FMPs.

Thank you for considering our request at this time.

Very truly yours,

American High Seas Fisheries Association

By _____
Henry Swasand
(F/V Starlite, F/V Starward, F/V Starfish)

By _____
Einar Pedersen, Jr.
(F/V Vesteraalen)

By _____
Joe Gnagey
(F/V Half Moon Bay, F/V Sunset Bay, F/V Viking F/V
F/V California Horizon, F/V Westward I)

on behalf of

Joe Wabey (F/V American Eagle)

Wilburn Hall (F/V Argosy)

Gunnar Ildhuso (F/V Gun Mar, F/V Mar Gun)

Frank Bohannon (F/V Neahkahnie)

Harold Clausen (F/V Nordic Star)

Oscar Dyson (F/V Peggy Jo)

Vern Hall (F/V Progress)

Fred Yeck (F/V Seadawn)

Konrad Engeset (F/V Silver Sea)

Barry Ohai (F/V Starlite)

Cary Swasand (F/V Starward)

Bernt Bodal (F/V Starfish)

Wilhelm Jensen (F/V U.S. Dominator)

John Dooley (F/V Sharon Lorraine)

Bob Dooley (F/V Hazel Lorraine I)

Bob Watson (F/V Seawolf)

Larry Garrison (F/V Ocean Dynasty)

Hal Ostebovik (F/V Great Pacifici)

Don Johnson (F/V Margaret Lynn)

William B. Hayes (F/V Vaerdal)

Jeff Hendricks
(Alyeska Ocean, Inc.)

on behalf of

F/V Aldebern, F/V Arcturus, F/V Alyeska,
F/V Andrew McGee

Proposal for Amendments to the Bering Sea/Aleutian Islands and Gulf of Alaska Groundfish FMPs

Purpose:

To prohibit joint venture pollock roe-stripping operations, which retain only the roe and waste the valuable flesh of pollock which would otherwise be used in operations producing surimi, fillet and pollock block products.

Rationale:

Roe-stripping is a processing method in which pollock roe is removed from the fish and the body of the fish simply discarded. In addition, since these operations target exclusively on roe, males and immature females are also discarded. By using this method a processor can handle up to three times as much fish per day as in a normal surimi or fillet operation, where the entire fish is utilized. When demand for fish exceeds supply, the common pool or "Olympic" system creates an enormous incentive to engage in roe-stripping.

Subsequent to the December Council meeting, it has become clear that the 1987 joint venture demand for pollock far exceeds the available supply. Data presented at the Council meeting indicate that joint venture demand exceeds 1.5 million m.t., while the initial JVP established by the Council is only 1.0 million m.t. Under the "common pool" or "Olympic" system, the pollock JVP quota is available to all joint ventures equally on a "first come, first served" basis. This means that there will be a tremendous incentive for joint ventures to harvest as much pollock as they can, as soon as they can (i.e., before the quota is taken by others). Thus, given the advantages of roe-stripping for processing a large amount of pollock in a short period of time, it is likely that an unusually large percentage of the joint venture pollock catch will simply be stripped of its roe and thrown over the side in 1987.

Roe-stripping is enormously wasteful. The average recovery rate in a roe-stripping operation is about 3.5%. Thus, for every 100 tons of fish taken in a roe-stripping operation, 96.5 tons will be discarded. An average roe-stripping processing vessel can process about 400 tons of pollock per day. Such a vessel would therefore discard about 386 tons of pollock per day. Over a roe season of 50 days, a single vessel would discard over 19,000 tons of pollock. If not discarded in this manner, this pollock would otherwise be utilized in surimi, fillet or pollock block operations.

If only 5 processing vessels engage in roe-stripping in 1987, this would result in the waste of almost 100,000 tons of pollock, about 10% of the available joint venture supply. To allow the waste of such enormous quantities of valuable fish protein that would otherwise be processed for human consumption is simply unconscionable.

Such enormously wasteful processing practices should not be permitted as a matter of public policy. Numerous jurisdictions, including the State of Alaska, have taken this position. See Alaska Statutes §16.10.173(a), prohibiting the waste of herring. The Alaska statute prevents the roe-stripping of herring, which the Alaska legislature has declared "is wasteful and does not constitute utilization of [the herring] resource for the maximum benefit of the people." Alaska Statutes §16.10.172. The State of California prohibits the waste of food fish taken or brought into the waters of the state. See California Code §7704. This prohibition is intended to prevent the use of sardines and anchovies, which would otherwise be processed for human consumption, in rendering plants for conversion into industrial products such as fertilizer or animal feed. See People v. Monterey Fish Products Co., 234 P. 398 (Cal. 1925). The State of Oregon similarly prohibits the intentional waste or destruction of food fish. See Oregon Statutes §509.112.

These statutes reflect a fundamental public policy against waste of food fish. Roe-stripping of pollock is a classic example of the type of waste that should be prohibited under this policy.

Roe-stripping is also inconsistent with the requirements of the MFCMA and the Council's own policy concerning discards. The MFCMA requires the Council to manage fishery resources to achieve "the greatest overall benefit to the Nation, with particular reference to food production . . . ." 16 U.S.C. §1802(18)(A), §1851(a)(1) Pollock roe-stripping, which could involve the waste of tens of thousands of tons of pollock that would otherwise be used for food products is clearly inconsistent with the basic management goals of the MFCMA. Furthermore, a processing technique such as roe-stripping which wastes far more of a fish than it uses is inconsistent with the Council's frequently stated policy to reduce discards in the fisheries within its jurisdiction. See, e.g., Goals and Objectives, Gulf of Alaska Groundfish FMP.

Preferred Solution:

The Bering Sea/Aleutian Islands and Gulf of Alaska groundfish FMPs should be amended to prohibit pollock roe-stripping by joint venture operations. The FMPs should be amended to provide that pollock may be taken only in operations that utilize the entire fish.

AGENDA D-2
JANUARY 1987
SUPPLEMENTAL

Great Land Seafoods, Inc.

15110 N.E. 90th Street
P.O. Box 97019
Redmond, WA 98073-9719
(206) 881-8181

January 13, 1987

Mr. James O. Campbell, Chairman
North Pacific Fishery Management Council
P.O. Box 103136
Anchorage, Alaska 99510

Dear Jim:

As you know, our shore plant in Dutch Harbor has experienced problems purchasing enough fish to run economically. In the first 9-1/2 months of 1986 the plant operated at only 30% of capacity. The JV allocation was caught by December, so two of Alyeska Ocean's vessels fished for us during December and early January. During this period we received all the fish we could process and the plant operated efficiently. The vessels averaged about 250 tons/delivery. They were fishing approximately 80 miles from Dutch Harbor which made for an eight hour run to the plant. We unloaded their catch in about 10 hours, so the fish was approximately 24 hours old at the time of processing, which made for a high quality product.

Our current price for this fish is $.08 per pound, which is about 38% greater than the reported foreign joint venture price for 1987. Even with this significant price differential we are unable to obtain firm commitments for deliveries from any vessel once the major foreign processors start buying fish. The outlook then for the balance of the joint venture fishery in 1987 is rather bleak for Great Land Seafoods.

It would appear that the present system leaves us little choice but to own and control our own fishing vessels. This is rather unfortunate because the harvesting sector of the groundfish industry is already approaching over capitalization, and any fleet development by the processors will only accelerate this development.

The other obvious course is to change the system to provide priority time and area access by DAP operations. I therefore wish to again reiterate my complete support for the domestic fisheries zone as proposed by Unalaska Mayor Paul Fuhs at the December Council meeting. I trust that you and members of the Council will agree.

Sincerely,
GREAT LAND SEAFOODS, INC.

J. Richard Pace
President

/pb

NORTH PACIFIC FISHERY MANAGEMENT COUNCIL

Testimony Regarding the Formation of Area 4F in Alaska

Presented By:
Mark Snigaroff
Atka Fishermen's Association
Atka Rural Branch
Atka, Alaska 99502
(907) 839-2249

January, 1987

Mr. Chairman, my name is Mark Snigaroff. I am the President of the Atka Fishermen's Association (AFA) which is a non-profit cooperative of fishermen residing on Atka Island in the Aleutian Islands of Alaska.

The fishermen of Atka have been fishing commercially for halibut since 1984. Our activities have been restricted to the waters directly surrounding Atka Island. Our total catch since the start of operations is as follows:

YEAR	GROSS WEIGHT
1984	46,565
1985	72,188
1986	7,886

We did not fare well during 1986 because the halibut season was cut short. The quota for Areas 4A and 4B are combined. During the second opening of the season in late June and early July a large fleet of approximately one hundred vessels operating in Area 4A caught the combined quota limit of the two areas. Area 4B was closed for the duration of the season even though the majority of halibut was not caught in the area.

Atka fishermen had been looking forward to fishing during 1986. Many went into debt to purchase new equipment, larger boat motors, and build new fishing boats. Poor weather during the two openings made it difficult to fish. The longer opening in August of 1984 and 1985 made it possible for Atka fishermen to land a reasonable amount of the halibut. This enabled AFA to pay expenses and give settlements to members. There was no opening in August, 1986. AFA was able to make just enough from the sale of processed halibut to meet expenses; the fishermen received nothing.

The Atka Fishermen's Association is requesting that the North Pacific Fishery Management Council support the formation of a new regulatory area within Area 4B entitled Area 4F. Area 4F would include all waters in the Bering Sea and Gulf of Alaska North of Latitude 151 degrees 00'00'N., South of Latitude 153 degrees 00'00'N., East of Longitude 177 degrees 00'00'W. and West of Longitude 172 degrees 00'00"W. Area 4F would be allocated a quota of 400,000 pounds which would be harvested on a 'day on, day off' basis starting June 1st and continuing until the entire quota is harvested.

We are not requesting an exclusive registration area at this time. We just want a restricted access area similar to that of Area 4C. Boats coming into Area 4F from other areas should be required to return to Dutch Harbor

after each 24 hour opening for hold inspections before returning to Area 4F.

The community of Atka has an unemployment rate of 38%. Of those persons employed, 85% can be considered to be unemployed (see appendix A). The cost of living in Atka is extremely high. Gasoline obtained from AFA which is used for fishing is $2.55 per gallon. Gasoline for other purposes costs $3.65 per gallon at the local store. Oil for heat costs $209 per month. The average residential electric bill is approximately $150 per month. Food is expensive. Meat can be hunted for but it takes gasoline and ammunition at a cost of $15 a box.

The residents of the community need a cash economic base in order for the community to continue to survive. Fisheries is one of the few resources that are available that would enable the residents of Atka to develop a local economic base.

The residents and organizations of the community are committed to developing the economy. The village corporation, Atxam Corporation, which was established by the Alaska Native Claims Settlement Act provided a long term loan in the amount of $117,000 to start AFA. The local store contributed use of a freezer/cold storage building as a temporary processing facility. Local fishermen has donated their labor each year to prepare for fishing. The Atka Village Council has committed eighty percent of a tribal settlement toward construction of a permanent processing facilities. A joint application for funding to construct a freezer has been submitted to the U.S. Department of Commerce Economic Development Administration by AFA and the Atka Village Council. The new facility consists of an 86'x40'x10' building containing a processing area, a blast freezer, and a 400,000 pound holding freezer. It will cost approximately $326,000.

As you gentlemen are aware, the Atka fishermen has proved that they can catch halibut if they are given a decent chance. The progressive improvement during the first two years of operation shows a 65% increase in halibut caught.

Your support in the establishment of Area 4F is essential to Atka's efforts to develop a stable viable economy. Atka is in the midst of some of the richest commercial fishing waters in the state. All we are asking for is a small portion of the vast resources that are available to commercial fishermen that fish the Bering Sea and the Aleutian Islands.

EMPLOYMENT STATUS OF ATKA ADULTS

	No. Persons
Retired	4
Unemployed	16
Employed Full Time Jobs	4
Employed 1 or More Part Time Jobs	22

UNEMPLOYMENT RATE - 38% OF WORK FORCE

ATKA EMPLOYERS

	Hours	No. Positions
Atka Village Council		
Recreation Leader	8/wk.	1
Bingo Supervisor	12/wk.	1
Pull Tab Seller	12/wk.	1
Maintenance Man	20/wk.	1
Clinic Janitor	20/wk.	1
Community Building Janitor	15/wk.	1
Pre-School Instructor	7/wk.	1
Garbage Man	4/wk.	1
Mail Truck Driver	4/wk.	1
Administrator	30/wk.	1
Atka Native Store		
Manager	30/wk.	1
Store Helper	30/wk.	1
Atxam Corporation		
President	25/wk.	1
Office Clerk	15/wk.	1
Janitor	10/wk.	1
Andreanof Electric Corporation		
Generator Operators	10/wk.	2
Bookkeeper	8/mo.	1
Meter Reader	3/mo.	1
Atka Fishermen's Association		
Coordinator	37.5/wk.	1
Bookkeeper	6/wk.	1
Aleutian Region School District*		
Teacher	40/wk.	1
Teacher's Aide	20/wk.	1
Maintenance Man	25/w	1
Aleutian/Pribilof Islands Association		
Village Public Safety Officer	37.5/wk.	2
Health Aides	15/wk.	2
Community Health Rep.	25/wk.	1

Atka Employers (continued)

U.S. Postal Service		
Postmistress	9/wk.	1
State Department of Transportation		
Airport Maintenance	Varies	1
Island Store		
Store Clerk	6/wk.	1

TOTALS	
Less than 12 hours a week	13
12-20 hours a week	8
20-30 hours a week	6
30 or more hours a week	4
Total Jobs in Atka	31

*Aleutian Region School District also employes two full-time from outside of Atka. The figures shown above are for local people working in the school.

From: Overall Economic Development Plan for Atka, Alaska
Prepared by Atka Village Council, July 1986
Revised January, 1987

COMMISSIONERS:

SIGURD BRYNJOLFSON
DELTA, B.C.
RICHARD ELIASON
SITKA, AK
D[illegible]D MC LEOD
[illegible]OUVER, B.C.
RO[illegible]T W. MC VEY
JUNEAU, AK
ROBERT MORLEY
VANCOUVER, B.C.
GEORGE WADE
SEATTLE, WA

INTERNATIONAL PACIFIC HALIBUT COMMISSION

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

DIRECTOR
DONALD A. MC CAUGHRAN

P.O. BOX 95009
SEATTLE, WA. 98145-2009

TELEPHONE
(206) 634-1838

December 8, 1986

Mr. Jim Branson, Executive Director
North Pacific Fishery Management Council
PO Box 103136
Anchorage, AK 99510

Dear Jim:

Enclosed is a proposal for amendment to the Bering Sea-Aleutian Islands Groundfish Fishery Management Plan. The proposal recommends a comprehensive by-catch management plan for prohibited species, including a by-catch limit for Pacific halibut. We request that the council evaluate this proposal during the January, 1987 meeting. If you need any additional information concerning our proposal, please contact Bob Trumble.

Sincerely,

Donald A. McCaughran
Director

DAM:jdf

enc

Proposal for Amendment to Bering Sea-Aleutian Islands

Groundfish Fishery Management Plan

International Pacific Halibut Commission Staff

12/5/86

Problem to address

Uncontrolled and inadequately accounted halibut mortality caused by incidental catch in foreign fishing significantly contributed to the rapid and severe decline of halibut during the 1960's and 1970's. Control of foreign fishing since passage of the Magnuson Fishery Conservation and Management Act helped set the stage for recovery of the halibut resource.

Domestic fishing has increased rapidly during the past several years, and is taking increased quantities of halibut as by-catch. By-catch limits placed on the foreign fisheries caused by-catch rates to decrease. By-catch limits would similarly provide incentive for domestic fishermen to fish as cleanly as possible. The existing BS-AI Groundfish FMP has incomplete mechanisms to control or limit by-catch. Increase in halibut mortality from domestic by-catch is currently open-ended. Increased by-catch mortality in the Bering Sea causes a reduction in the traditional longline fishery, which is a fully developed, high unit value, low volume fishery. Alternatively, reductions in by-catch mortality may decrease the groundfish fishery - a developing, low unit value, high volume fishery. Changes in the quantity of halibut available to the directed longline fishery are important to U. S. fishermen, but also to Canadian fishermen. An

international treaty requires halibut management for optimum yield for both countries.

Currently by-catch mortality in the Bering Sea is approximately equal to the direct longline catch of halibut. Defacto allocation of by-catch in this magnitude raises conservation questions on the value of halibut as by-catch or as directed catch. Conservation of the halibut resource would be improved by establishing a mechanism to control by-catch. Such control would preferably balance the tradeoffs between allocating halibut to by-catch or to the directed longline fishery, and would fulfill the requirement of the halibut treaty between the U. S. and Canada.

Management of halibut by-catch is a primary concern of IPHC. However, we recognize that other prohibited and fully utilized species may also constrain domestic groundfish fishing. Coordination of by-catch control among the species would be preferable to a series of management actions independently for each species.

Objective

We request that the Council develop a comprehensive scientifically-based by-catch management program in the Bering Sea, including a prohibited species catch limit for halibut. Such a management program would allow full accounting of total halibut mortality, and provide the IPHC with improved control of total halibut removals.

Preferred Solution

We recommend that the Council amend the BS-AI Groundfish FMP to establish a comprehensive framework for by-catch management. The

framework would need to be sufficiently specific to allow industry to determine probable effects of the management procedures. We recommend that the halibut portion of a comprehensive plan contain two important components: 1) the best scientific evaluation of allocating halibut to by-catch or to the traditional longline fishery; and 2) a procedure for input of nonscientific information. Even though some portions of the domestic fishery are currently very small and may have limited impact on total by-catch, we recommend that the plan cover the entire groundfish fishery. As the domestic fishery grows, it will grow within the context of a management regime that balances the needs of all segments of the industry.

AGENDA D-2
SUPPLEMENTAL

United States Department of State

Bureau of Oceans and International Environmental and Scientific Affairs

Washington, D.C. 20520

RECEIVED JAN 16 1987

ACTION	ROUTE TO	INITIAL
	Exec. Dir.	
	Deputy Dir.	
	Admin. Off.	
	[illegible]	
	[illegible]	
	[illegible]	
	[illegible]	
	[illegible]	
	[illegible]	
	[illegible]	

December 23, 1986

Dr. William Evans
National Marine Fisheries Service
Universal Building South, Room 1008
1825 Connecticut Avenue, NW
Washington, D.C. 20520

Dear Bill:

I am writing with regard to the recent meeting of the North Pacific Fisheries Management Council.

As you know, the Council has set an initial total allowable level of foreign fishing (TALFF) of about 54,000 metric tons (MT), compared with a TALFF this year of nearly 600,000 MT. We understand this decrease is the result mainly of a significant increase in U.S. harvests of fish for both domestic processing and joint venture purposes. In response to the encouragement of the Magnuson Act's provisions, the U.S. industry has greatly increased its capability for both harvesting and processing the available fisheries resources off Alaska.

However, because the sharp decrease in the level of TALFF over the past two years will cause sudden and severe dislocations in the foreign fishing industries, we feel that all possible efforts should be made to determine whether the quantity of fish in TALFF can be increased. As you know, U.S. and foreign industry representatives have reached agreements recently on means of increasing cooperative efforts which will assist in the development of the U.S. industry. In connection with those agreements, the U.S. industry said it would support the Japanese industry getting maximum allocations. In light of this cooperation, we believe that determinations should be made at the earliest possible date with regard to the availability of resources which are surplus to the needs of the U.S. industry.

We look forward to working with you on these and other allocations issues.

Sincerely,

Ed

Edward E. Wolfe
Deputy Assistant Secretary
Oceans and Fisheries Affairs

Bill,
Have a safe & happy holiday season.
All the best for the New year!
Ed

C-4

MARINE RESOURCES COMPANY INTERNATIONAL
A Washington Partnership

January 19, 1987

Jim H. Branson, Exeutive Director
North Pacific Fishery Management Council
P.O. Box 103136
Anchorage, AK 99510

Dear Jim:

Further to the discussions of the Council's Workgroup on Priorty Access (ie. the 100-mile development zone around Unalaska), I would like to illustrate the difference between a fisherman delivering his catch on the fishing grounds versus delivering to a shoreside processor; catcher-processors are not included.

1) Assume a catcherboat that operates 200 days per year net of weather, maintenance, and logistical down time; has an average pollock catch of 100 MT/day; packs 100 MT; delivers its catch on the fishing grounds; and receives $127/MT ($0.057/lb) for pollock:

200 fishing days (fishing days=operating days)
x100 MT/day
20,000 MT/year
$127/MT
$2,540,000 gross stock/year

2) Assume the same catcherboat with the same catch rate but delivering ashore, which requires, say, an 8 hour run in, 8 hours unloading, and 8 hours back out. However, during the frequent port calls some of the logistical and maintenance activities can be piggy-backed during the off-loading process. This might result in an increase in operating days to 220 per year. In this case, half of the operating days are devoted to fishing, and the annual catch will be only 11,000 MT (ie., 220 operating days minus 110 running/offloading days times 100MT/day). To put in the same gross stock would require a price of:

$2,540,000 gross stock/year
÷ 11,000 MT
$230.90/MT ($0.105/lb)

U.S.A.
192 Nickerson
Suite 307
Seattle, WA 98109
Tel: (206) 285-6424
Telex: 277115 MRC UR
FAX: (206) 282-9414

Mail Pouch 704
Dutch Harbor, AK 99692
Tel: (907) 581-1886

U.S.S.R.
National Hotel
Suite 450
Moscow
Tel: 2203-5466
Telex: 413 052 SOVAM

Vostochnaya
dom 13;
Nakhodka 17
Primorski Krai
Tel. 25-290
Telex: 213818 MRK SU

The difference between 5.7 and 10.5 cents/lb is simply the cost to the catcherboat of transporting its catch to the shore plant. Whether or not there is a "development zone" does not change the mathematics. If a shoreside plant will pay the higher price, it will get fish delivered to it; if a shoreside plant arranges to pick up its fish on the fishing grounds it will only have to pay the lower price. Given the same annual gross stock potential, there is no doubt in my mind that most U.S. trawlers will sell "American"--they have so testified time and again.

If, however, there is an expectation on the part of shoreside processors that a development zone will result in their being able to buy at their dock for the lower price, then clearly they are expecting the fishermen to subsidize those shoreside operations. Surely, that cannot be an acceptable fix, either on the part of the Council or under the terms of MFCMA.

Unless documentation can be shown of significant competitive effects on CPUE within any proposed zone, and if there is no intent to force U.S. fishermen to absorb the transportation cost from the grounds to the beach, then I fail to see how a "development zone" of any dimension can benefit shoreside processors or local communities.

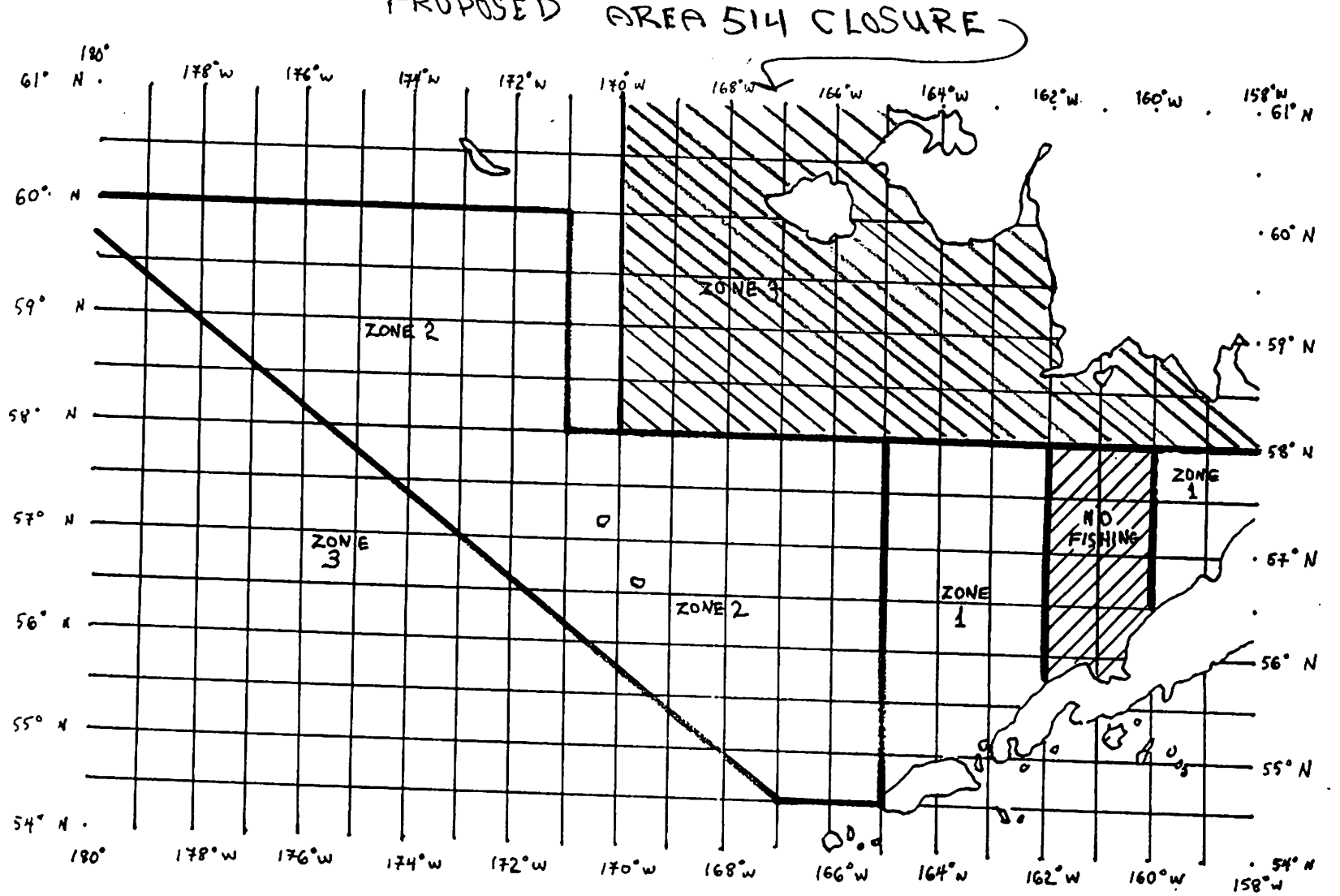
One final note regarding the "level playing field". In MRCI's joint fisheries, the cost of Federal observers, as billed to the USSR, now averages about $4.00/MT. This is about 3 percent of the ex-vessel value of our joint-venture catch, and about the same as the State of Alaska landing tax which applies to shoreside landings.

Best personal regards,

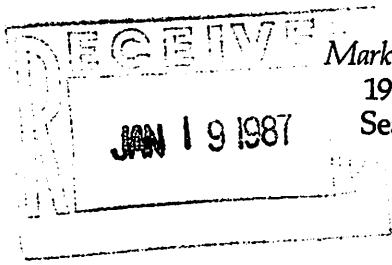
H.A. Larkins
Vice President & General Manager

cc: NPFVOA
Reilly
Block
Pereyra
Tasker

HAL/fst


PROPOSED AREA 514 CLOSURE
180°
178°W
176°W
174°W
172°W
170°W
168°W
166°W
164°W
162°W
160°W
158°W
61° N
60° N
59° N
58° N
57° N
56° N
55° N
54° N
ZONE 3
ZONE 2
ZONE 1
NO FISHING
ZONE 3
ZONE 2
ZONE 1

AGENDA C-2
SUPPLEMENTAL



F/V MASONIC
Mark S. Lundsten, Owner/Operator
1939 Eighth Avenue West
Seattle, Washington 98119
(206) 284-9158

January 9, 1987

James O. Campbell
Chairman
North Pacific Fishery Management Council
P.O. Box 103136
Anchorage, Alaska 99510

Dear Mr. Campbell:

In response to the two requests for exclusive halibut fishery zones for the residents of Atka Island and for a select number of Bristol Bay salmon permit holders, I encourage you to deny both requests. The first is unnecessary and the second is unjustified.

In the case of Atka, the complaint is that the 4B quota in 1986 was tied to the 4A quota. The latter was overharvested; therefore the former was cut off with a severe underharvest. As a longliner who fishes both halibut and black cod in the Bering Sea, I have a similar complaint about the situation. But the solution to the problem is not necessarily an exclusive area. The first step should be the management of areas as discrete units, something I urge the IPHC to do in the Bering Sea. By allowing the fish caught in 4A to apply only to the 4A quota, and likewise for 4B, the problem will be addressed. Relative to all other fishermen, the Atka residents will have a full share of fishing time.

Opening the Bristol Bay Halibut Nursery Grounds to a select group of fishermen is totally opposed to all the principles and history of fisheries conservation practiced by the IPHC. Proven to be the most critical spawning ground for the Gulf of Alaska, British Columbia and West Coast stocks, this area's protection is vital to the health of the whole resource. Besides, as I understand the laws, the Council may further restrict existing halibut regulations but may not make them less restrictive. I am amazed that such a proposal ever has appeared before the Council.

In both of these cases, what strikes me is the simple fact that nobody is getting much fishing time anywhere. If any special accomodations are ever to be made, they should be done: 1) with the whole fleet in mind, 2) with due consideration of the impact on other fisheries and fleets, and 3) always with conservation the first priority. The Atka problem is something best dealt with by the Conference Board of the IPHC. The Bristol Bay proposal should be denied.

Sincerely,

Mark S. Lundsten

A.P. MINORITY REPORT-PROPOSED DUTCH HARBOR DAP PREFERENCE ZONE

Joint venture operators have made a positive and practical business offer to resolve the shoreside delivery problem-they will provide fish to DAP processors on the grounds, and on a priority basis, under contracts incorporating normal commercial terms and conditions. There are many incentives towards this co-operative approach:

U.S. JOINT VENTURE HARVESTERS NEED NEW MARKETS

JVP will diminish as the DAP factory trawl fleet grows, and factory trawlers are not buying fish at sea; JV seasons are growing shorter, and year-round shoreside markets are attractive; the JV fleet has tremendous harvesting capacity (4 or 5% of its daily output will meet the demands of the Surimi Plants), but cannot process at sea.

U.S. SHORESIDE PROCESSORS NEED THE HARVESTING CAPACITY OF THE JV FLEET

No alternative harvesting fleet is available; there are few vessels now capable of shoreside delivery; factory trawlers do not deliver raw fish ashore; short of new trawler construction or conversion, there is nowhere else to go-there is great incentive to work together.

TRANSPORTATION IS THE MISSING LINK

Most of the JV harvesters are converted crabbers, borrowed from the crab fleet; the added weight of trawl gear above deck makes them unstable if their holds are filled; they do not have adequate hold capacity; most lack cooling systems to hold fish during long trips; they are worth $3-4 million, and harvest very efficiently- but they are not designed for transportation and storage.

TENDERS ARE THE SOLUTION

They are used successfully in anchovy and men haden fisheries; they are relatively inexpensive
-oil mud boats are available for conversion at relatively low prices;
-salmon tenders may be refitted (Westward trawlers plans to supply the Alyeska seafood plant this way);
-Tampa ship plans to build tenders to supply its Surimi barges; processors, harvesters, or third parties are free to supply transportation, which is a normal cost of doing business.

THE PROPOSED CLOSURE WON'T WORK

It will not force U.S. fishermen now engaged in joint ventures to deliver to shoreside plants-it will drive harvesting capacity away, to large joint venture markets. The 8,000 square mile proposed closure is excessively burdensome- it would cause substantial economic harm to U.S. fishermen, without a corresponding benefit to processors.

THERE IS A STRAIGHTFORWARD SOLUTION TO A BUSINESS PROBLEM (OR OPPORTUNITY)-FEDERAL REGULATION IS NOT NEEDED

The current demands for shoreside delivery can be met by transporting a small portion of JV output to the plants. Businessmen are now taking the initiative, planting the seed-the council should let it grow. Adoption of a closure would send the wrong signal to industry-that it should come to the council and seek artificial

constraints on competition, rather than develop practical solutions to business problems... a dangerous precedent.

CONCLUSION

It is our hope that the council will turn down this proposal, and encourage the U.S. industry to take the next step towards full development co-operatively- the elements of a prompt resolution are at hand.

RESPECTFULLY,

Thom Smith

Cameron Shanick (TK)

Alvin R Burch

1/21/89

AFTA
JAN 1987

BERING SEA/ ALEUTIAN ISLAND AMENDMENT PROPOSALS

1. DAP priority-access zone around Unalaska - AFTA believes that the problems experienced by shoreplants in obtaining product needs further study and that alternative methods of solving those problems need to be explored. AFTA supports efforts to promote Americanization of the groundfish industry, but does not support the practice of drawing exclusive zones throughout the fishing grounds. AFTA believes that such zones will be employed to restrict factory trawler access to fishing grounds.

2. Comprehensive bycatch management proposal by Halibut Commission staff - AFTA recommends that this proposal be referred to the Council's bycatch work group. A system which was negotiated by the industry as a part of Amendment 10 has yet to be put in place and tried.

3. Prohibit JV trawling for pollock during May and June - No comment.

4. Implement single species emergency rule for TALFF - AFTA supports going forward with this proposal.

5. Raise OY limit to 2.4 million mt. - AFTA opposes going forward with this proposal. This proposal has been reviewed and rejected in recent amendment cycles, and to expend the limited resources available for preparing these amendments on this proposal would be unwise. Futhermore it is inconsistent with the effort to Americanize the fisheries as the immediate beneficiary of the the change would be foreign processing ships.

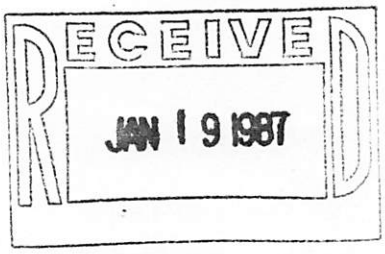
In the event that this proposal is considered for inclusion in the amendment cycle, AFTA requests that the Council direct the plan team to include a mesh size restriction for the directed pollock trawl fishery as part of the proposal (see attached letter).

6.,7.,8.,9.,10 & 11 - See recommendations for the similar GOA proposals.

12. Area 514 closure - Same response as to Unalaska proposal.

13. Roe Stripping - This appears to be an allocation battle between joint venture factions and/or foreign nations. The wastage issue appears to be a vehicle to the allocation argument. AFTA recommends that this matter not be addressed by the Council as a plan amendment.

AGENDA D-2
JANUARY 1987
SUPPLEMENTAL



ALASKA FACTORY TRAWLER ASSOC.
180 NICKERSON
SUITE 110
SEATTLE, WA 98109
206/285-5139

January 15, 1987

Mr. Jim H. Branson
Executive Director
North Pacific Fishery Management Council

Re: Proposed mesh size limit in directed pollock fishery

Dear Mr. Branson:

The Alaska Factory Trawler Association (AFTA) has reviewed the proposed amendments to the FMPs and has identified several proposals aimed at management of the pollock fishery, including proposed time closures, a prohibition on roe stripping and an increase in the overall BS/AI OY. AFTA, which heavily depends on pollock for the development of the DAP industry, is also concerned with the problem of wisely managing this fishery. Extreme pressure is currently being placed on small-sized pollock, and increased quotas following from an increased BS/AI OY would only magnify the problem. Something must be done to conserve small-sized pollock so as to insure a productive fishery in the future, which would encourage continued development of the DAP industry.

To protect small-sized pollock, AFTA proposes that a minimum trawl mesh size of 90 mm be implemented for the directed pollock fishery. Restrictions would also be placed on lining and layering of cod ends. This management tool is used in trawl fisheries throughout the world to allow increased escapement of small-sized fish. AFTA urges the Council to consider this proposal when evaluating proposals regarding pollock management problems.

Sincerely,

Edward D. Evans

Edward D. Evans
Executive Director

JUSTIFICATION FOR THE DOMESTIC FISHERY ZONE WITHIN 100-MILES OF UNALASKA

A Supplementary Report
to
James Campbell, Chairman
North Pacific Fishery Management Council

by

The City of Unalaska
Paul Fuhs, Mayor
(907) 581-1251

and

The City of Akutan
Erika Tritremmel, Administrator
(907) 279-9245

The proposed 100-mile zone
around Unalaska is intended for
all DAP fishermen of all gear types.

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INTRODUCTION

In Unalaska and Akutan, fish is our future. No fish, no future. During 1986, our processors had difficulty buying a steady supply of pollock and cod, even though they were paying 25% more than joint venture motherships offered.

To help us overcome this shortage, we request that the North Pacific Council set aside the grounds inside a 100-mile radius of Unalaska, not just for us, but for all DAP fishermen and processors.

The time-area closure concept of fishery management and allocation is the essence of our proposal.

When Congress was deciding how to stimulate the American fishing business ten years ago, it chose the time-area closure as its preferred instrument of change.

Congress drew the 200-mile boundary line and notified the world that access to the fish inside that line would be granted on a clearly-stated, priority basis: DAP fishermen and processors first, JVP fishermen second and TALFF last.

Our proposal is a legitimate descendant of the 200-mile limit line.

Congress anticipated that Americans like us would request such lines in the future as the domestic fishing business developed.

Our proposal seems to have given JVP fishermen boundary anxiety, though. They claim that drawing lines in the ocean is impractical and that it sets a dangerous precedent.

This is peculiar for two reasons. First, if Congress had not drawn a 200-mile line along the American coast in 1976, many of these people would not be in the groundfish business today. There would be no incentive for foreign fishing companies to participate in joint ventures. Directed foreign fishing would still dominate the Bering Sea and Gulf of Alaska. Second, many JVP fishermen who oppose the 100-mile line around Unalaska did not oppose, nor seek to repeal, the boundary lines that kept foreign fishermen out of the Shelikof Strait pollock fishery, where many JVP fishermen made their first, big money.

There's an obvious double standard here where there shouldn't be.

We all understood the rules under the Magnuson Act. Competition for the pollock and cod in the Bering Sea and Aleutian Islands should be conducted according to those rules. To suddenly deny the rules or to thwart them suggests an unwillingness to share the wealth from these fisheries.

Those who have already profited from priority access cannot reasonably deny DAP fishermen and processors the same advantage.

This paper will describe how much pollock and cod has been harvested from this area in 1983, 1984 and 1985, how that amount compares to the DAP processing capacity in the area, and if JVP fishermen could find pollock and cod in commercial abundance elsewhere.

CONGRESSIONAL MOTIVE

Why did Congress pass the 200-mile limit law in 1976?

On page 3 of the Magnuson Act, Congress describes exactly why it passed that law.

(1) To prevent overfishing;

(2) to rebuild overfished stocks;

(3) to insure conservation;

(4) to realize the FULL POTENTIAL of the nation's fishery resources; and

(5) to assure that our citizens benefit from the EMPLOYMENT, FOOD SUPPLY and REVENUE which could be generated by a national program for the development of fisheries.

Congress had a clear commercial motive. It intended to stimulate new jobs and new sales for American fishing companies, American fish processing companies, American shipyards, companies that supply hardware and services to the American fishing industry, American companies that transport processed fish to market, secondary fish processors throughout America and American fishing towns, too.

How much of the potential employment, food supply and revenue did Congress intend domestic fishermen and processors to capture?

". . . The full potential of the nation's fishery resources." One hundred percent.

Full potential is unambiguous. It means everything. No holdbacks.

That's the goal of our proposal. To capture the full potential of the BSAI pollock fishery for domestic fishermen, domestic processors and domestic businesses associated with the fishing industry.

We think there will be many benefactors of the 100-mile zone around Unalaska in addition to processors and fishermen. Our proposal will boost the volume of pollock and cod handled by DAP processors. That will generate new demand for the services of other Americans such as those listed below.

(1) Shipyard workers in Washington, Oregon, California, Louisiana, Alabama and Florida.

(2) Longshoremen and truck drivers in Alaska, Washington, Oregon and California.

(3) U. S. merchant seamen and ship owners transporting processed fish from Western Alaska to the Orient or the West Coast.

(4) Processing workers from Anchorage, the Pacific Northwest and California who will come to Unalaska, Akutan and King Cove for the new jobs.

(5) Airlines serving Seattle to Anchorage and Anchorage to Cold Bay and Unalaska.

(6) Surimi analog manufacturers around Puget Sound and in California.

(7) Cold storage owners and workers around Puget Sound.

HOW CONGRESS JUDGES THE VALUE OF THE FISHING INDUSTRY TO AMERICA'S ECONOMY

How important does Congress think a totally domestic fishing industry is to our nation?

Congress says just how important on page 2 of the Magnuson Act.

> "Commercial and recreational fishing constitutes a major source of employment and contributes significantly to the economy of the Nation."

Unalaska is one of the capitol cities of the domestic fishing industry. If commercial fishing "contributes significantly to the economy of the Nation", then Unalaska should contribute significantly, too.

To make that significant contribution to the American economy, Unalaska needs priority access for DAP fishermen and processors. That appears to be the most cost effective and reliable way to improve the odds of getting fish to our processors and our town.

We are not asking for any guarantees. All we need is a level playing field on which to compete with other DAP processors for the fish. For several reasons, stated

elsewhere in this paper, we contend that DAP processors need the priority access advantage Congress enacted for them.

Priority access will counter-balance the DAP processor's disadvantage of competing on a playing field tilted against him.

WHY DAP PROCESSORS NEED PRIORITY ACCESS.

DAP processors are at a distinct competitive disadvantage with joint venture processors in the Bering Sea and Aleutian Islands.

(1) The joint venture product enjoys virtually free access to some important Asian and European markets. DAP product faces public and hidden trade barriers abroad.

(2) Where the joint venture product is subject to import quotas and duties, DAP product commonly faces stiffer ones. In Japan, for example, we understand JVP surimi enjoys a 5¢ to 8¢ per pound lower import duty than DAP surimi does.

(3) The social costs of producing DAP product are much higher than they are for JVP product.

In the process of becoming one of the most civilized nations on earth, the United States has adopted some of the highest human rights standards, sanitation standards, environmental quality standards, occupational, safety and health standards and pure food standards in the world.

Meeting these standards is a direct cost to American manufacturers; in our case, DAP processors.

Most JVP processors enjoy a much lower cost of compliance with these standards. In many cases, the JVP processor is not required by its government to meet many of these standards.

This difference is obvious if you compare the DAP cost of production to the JVP's.

(4) DAP product faces unfair price competition on international markets from some JVP processors. The USSR, Poland and the PRC are command economies whose state enterprises are not required to sell their products at a price that would be break-even or profitable for DAP processors. Top priority for these countries may often be hard currency generation, not profit.

(5) JVP processors pay no user fees for the fish they acquire in the 200-mile zone. If those same processors were receiving deliveries under TALFF, they would be paying permit and user fees to the U. S. government.

DAP shore processors pay a raw fish tax to the State of Alaska, local resource taxes on landed fish and numerous conventional business and sales taxes in their communities.

(6) DAP processors must comply with certain federal laws that do not restrict JVP processors. American fishermen have the option of selling to domestic processors or JVP

processors. Domestic processors do not have the same flexibility. They can only receive direct deliveries from domestic fishermen. The Nicholson Act obstructs foreign deliveries to domestic processors.

The Jones Act effects the DAP processors in many ways. It does not seem to restrict the JVP processor at all.

U. S. federal anti-trust laws isolate DAP processors and promote auction-style pricing in the U. S. Many JVP processors are not subject to anti-trust laws in their homelands. In fact, most of the countries represented in the JVP processing fleet assume that the sale price of their products will not be determined by American-style competition, but by consultation and planning between producers.

(7) We have been told by businessmen in the American fishing industry that JVP processors may enjoy some national subsidies for their fuel, labor and marketing expenses, preferential interest rates on their business loans and distinct tax preferences and deferrals. The magnitude of these advantages to JVP processors is hard to determine.

We suspect that magnitude is greater for JVP processors than it is for DAP processors. If any evidence to the contrary is available, we'd like to see it.

PURSUING THE FULL-POTENTIAL OF THE BERING SEA-ALEUTIAN ISLANDS POLLOCK FISHERY

How close are domestic fishermen and processors to capturing the "full potential" of the Bering Sea-Aleutian Islands pollock fishery?

Let's concentrate on determining the "full potential" wholesale value, first.

To estimate the "full potential" wholesale value of the 1987 pollock fishery we must make several conservative assumptions.

(1) The recovery rate of surimi from raw pollock is at least 20% annually.

(2) The average wholesale price of surimi produced in Alaska by foreign motherships and domestic plants and factory trawlers is $1 per pound.

(3) American joint venture operating companies earn the equivalent of $10 per ton for their services.

(4) All of the DAP pollock is processed into surimi and consumed domestically. (This is assumable because pollock fillet recovery rates are similar to surimi recovery rates. Likewise, wholesale pollock fillet prices approximate surimi wholesale prices.)

(5) Approximately 150 million pounds of surimi will be consumed in the U. S. during 1987. Domestic processors will provide 30 million tons (if they can get the fish). Imports will provide 120 million pounds, or 54,000 tons.

The "full potential" wholesale value of this pollock fishery to the American economy in 1987 will be approximately $568 million.

DAH BS	1,200,000	MT
DAH AI	88,000	MT
TOTAL	1,288,000	MT
	X 20%	surimi recovery
	257,600	MT surimi
	X $2,205	MT wholesale value ($1 per pound)
TOTAL	$568,000,000	

How much of this will DAP fishermen and processors earn in 1987, if processors can acquire the fish?

DAP BS	190,000	MT
DAP AI	57,000	MT
TOTAL	247,000	MT
	X 20%	surimi recovery
	49,400	MT surimi
	X $2,205	wholesale value ($1 per pound)
TOTAL	$108,927,000	DAP wholesale value (includes ex-vessel price paid DAP fishermen)

To this amount, we must add the amount likely to be earned by JVP fishermen and JVP company operators from the 1987 JVP allocation.

BS	Final JVP	1,010,000	MT
AI	Final JVP	30,790	MT
TOTAL		1,040,790	MT

JVP fishermen will be paid approximately $125 per ton for their catch this year.

1,040,790	MT
X $125	per MT
$130,000,000	JVP fishermens' income

American JVP companies will earn approximately $10 per ton for their services. (If there is a better estimate, we welcome it.)

1,040,790	MT
X $10	per MT
$10,040,790	JV operators' income

The total domestic income from this pollock fishery in 1987 will be approximately $248 million.

$108,927,000	wholesale DAP value
130,000,000	JVP fishermens' income
10,041,000	JVP operators' income
$248,968,000	TOTAL

Is this $248 million the net wholesale value to the American economy in 1987?

No, because American importers are projected to pay $120 million for U. S. surimi imports in 1987.

By subtracting the cost of the imports from the value to DAP processors, JV fishermen and JV operators, we can estimate the net wholesale value of Bering Sea-Aleutian Islands pollock fishery to the American economy.

$249,000,000	domestic pollock income
-$120,000,000	cost of imports
$129,000,000	net wholesale value to U. S. economy

In the Findings Section of the Magnuson Act, Congress writes --

> (7) A national program for the conservation and management of the fishery resources of the U. S. is necessary . . . to realize the full potential of the Nation's fishery resources.

How close is the Nation to realizing the full potential of this pollock fishery in 1987?

Based on our assumptions, we can calculate that.

$568 million is the "full potential" wholesale value of the 1987 pollock fishery.

$129 million is the net wholesale value to the U. S. economy.

$$\frac{\$129 \text{ million}}{\$568 \text{ million}} = 23\%$$

That's how much of the "full potential" of this pollock fishery is being captured by the domestic economy in 1987.

This means the U. S. economy will receive less than one-quarter of the wholesale value generated by that pollock fishery in 1987.

How much motivation is there for the United States to fully utilize that pollock business as soon as possible?

$439 million worth of motivation in 1987 alone, and that's just wholesale value.

By establishing a priority access zone within 100-miles of Unalaska, the North Pacific Council will send a clear signal

to DAP processors and investors:

> "Gear up and compete for the $439 million wholesale value the U. S. economy hasn't yet captured from this pollock fishery. We recognize the DAP processor's competitive disadvantage against JVP processors. To counter-balance that, we've set aside productive fishing grounds where DAP fishermen and DAP processors can compete for the fish."

This policy will lead America to the full potential of the Bering Sea and Aleutians pollock fishery faster than any other.

POLLOCK MIGRATION AND THE 100-MILE ZONE AROUND UNALASKA

"Since pollock are ectotherms, with body temperatures in equilibrium with their surroundings, on- and off-shelf migrations appear to be an adaptive response to the extremely cold temperatures (0.0° to -1.7° C) of the shelf domain during winter. Along the shelf edge at depths of 200-300 m, water temperatures are relatively constant -- 3°-5° C throughout the year, providing a warm winter refuge (i.e., freezing avoidance) layer. Dispersal from this layer out onto the continental shelf during summer presumably maximizes the exploitation of different food resources by different size and age classes."

NWAFC Processed Report 79-20
Fisheries Oceanography-
Eastern Bering Sea Shelf
Felix Favorite
October 1979

Pollock and codfish are born with tails. They move around the Bering Sea and Aleutian Islands all their lives. Attempts to corral them are futile. Their behavior is not exactly predictable. But fishermen have developed some ideas about where to find them during the spring, summer, fall and winter. See Appendix I - IV.

One of the best places fishermen find pollock and cod is along the 100-fathom curve near Cape Sarichef. The curve comes up from the Aleutians toward Sarichef, makes a sharp turn to the west and runs up towards the Pribilof Islands. This area

is known as the Horseshoe, because the 100-fathom curve is shaped like one there. Foreign and domestic fishermen have noticed that pollock and cod school up in this hot spot during several months of the year. Later they disperse and the majority of them apparently move to other grounds.

How valuable has this area been to pollock and cod fishermen lately?

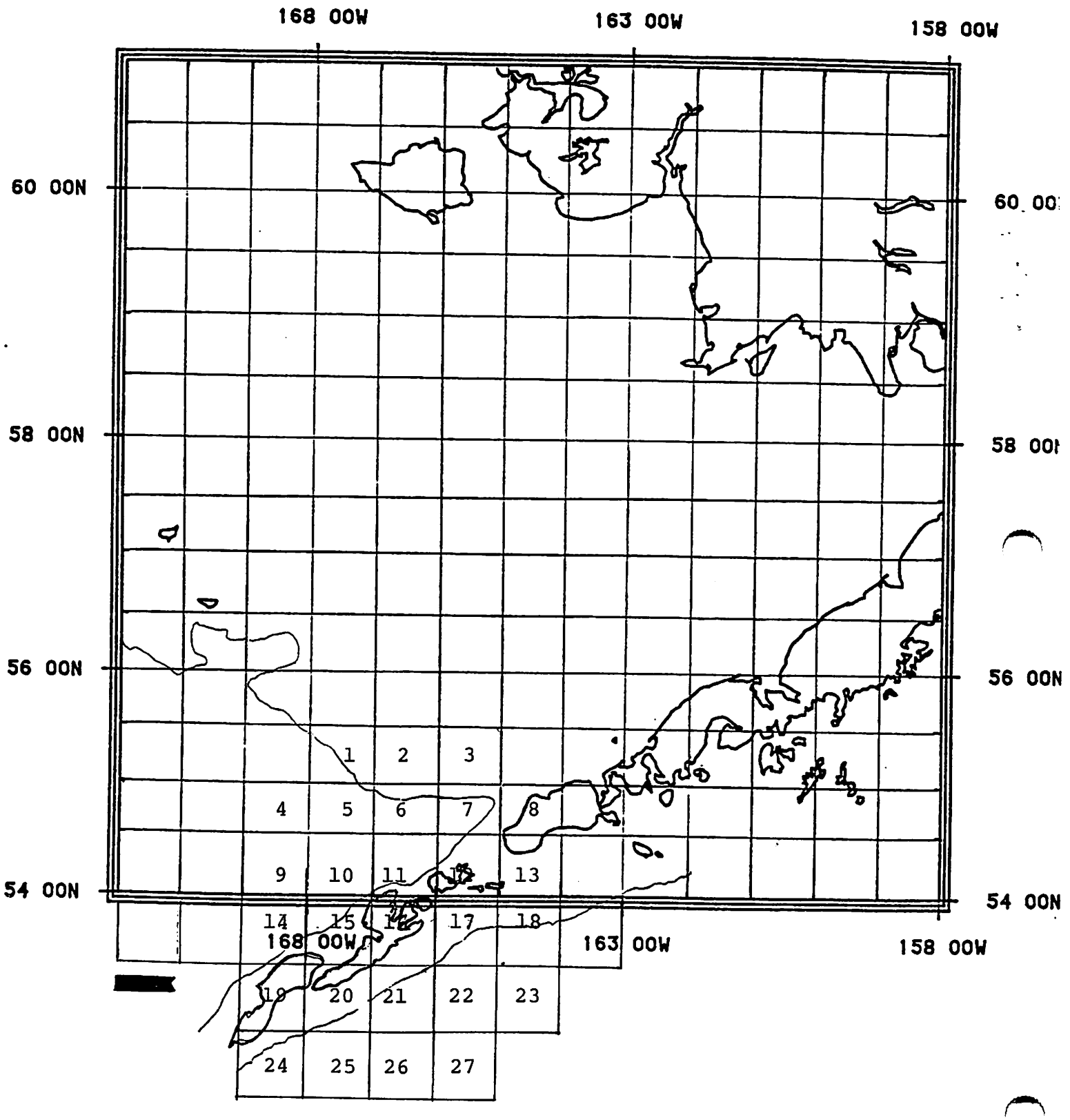
We calculated that by drawing a 100-mile radius around Unalaska, then comparing the monthly catch by foreign and JVP fishermen inside the zone to their total monthly catch of pollock and cod.

From NMFS Foreign Fishery Observer Office in Seattle, we received monthly catch data by one-degree longitude, half-degree latitude blocks in the Bering Sea and Aleutian Islands.

After drawing the 100-mile radius on a navigation chart, we determined which blocks were within the area.

Some blocks were not completely inside the radius. Those that appeared to be mostly-inside the area we added to the blocks that were entirely inside the radius.

The chart on page 21 shows which blocks we judged to be inside the radius and mostly-inside the radius.



BLOCKS INCLUDED IN THE 100-MILE RADIUS

Using NMFS data, we determined the monthly observed JVP catches in 1983, 1984 and 1985. Then we calculated what percent of JVP pollock and cod was caught inside the 100-mile radius. Table I shows those figures.

Table II combines the three annual JVP catches and shows that 36% of the observed JVP pollock catch and 31% of the observed JVP Pacific cod catch came from inside the 100-mile radius.

"Observed" is the key word here. Table III shows what percent of the annual JVP pollock and cod catch was actually observed by NMFS in 1983 - 1985.

Any conclusions drawn from Table I must be refined by data in Table III. For example, Table III shows that there was 100% observer coverage of the JVP pollock catch in 1984 and only 44% observer coverage in 1985. Any conclusions about the monthly pattern of JVP pollock and cod fishing in 1984 are probably more valid than those for 1985. Fuller observer coverage allows us to be more certain about exactly where the JVP catch came from.

Table IV shows the monthly observed foreign harvest of pollock and cod in the Bering Sea and Aleutian Islands. It also shows what percent was harvested within 100 miles of Unalaska.

Table V combines the three annual foreign catches and shows that overall 15% of the pollock and 6% of the Pacific cod was taken inside the 100-mile zone. This implies that JVP fishermen need not fish inside the 100-mile zone to catch their pollock and cod allocations. There are commercial abundances elsewhere that supported the foreign fleets. Since there's very little TALFF anymore, JVP fishermen will not have to compete against foreign fishermen outside of the 100-mile zone.

Table VI shows what percent of the foreign directed pollock and cod fishery was observed by NMFS in 1983-1985.

TABLE I

PERCENT OF THE MONTHLY
BSAI OBSERVED JVP HARVEST TAKEN
WITHIN A 100-MILE RADIUS OF UNALASKA

		WALLEYE POLLOCK		PACIFIC COD	
		Total Observed JV Catch MT	Percent Harvested Inside 100-mile Radius	Total Observed JV Catch MT	Percent Harvested Inside 100-mile Radius
Jan	1983	0	0	0	0
	1984	50	82	293	97
	1985	12	90	16	44
Feb	1983	74	96	455	94
	1984	478	95	2,957	97
	1985	601	12	1,331	96
Mar	1983	300	15	322	63
	1984	28,314	23	5,562	78
	1985	22,178	7	2,965	92
Apr	1983	4,207	89	571	10
	1984	39,653	45	2,896	48
	1985	20,373	21	1,544	39
May	1983	10,677	28	1,250	1
	1984	1,437	3	1,961	3
	1985	2,989	11	1,100	1
Jun	1983	20,247	18	1,251	2
	1984	30,123	34	3,745	1
	1985	9,682	3	2,083	0
Jul	1983	24,133	48	3,142	3
	1984	72,514	4	4,032	3
	1985	46,063	29	2,578	0
Aug	1983	19,995	55	2,019	2
	1984	41,578	5	2,631	8
	1985	31,912	49	2,208	4
Sept	1983	10,038	100	120	100
	1984	10,111	97	1,991	5
	1985	19,335	74	1,508	15
Oct	1983	116	100	34	100
	1984	5,457	94	192	84
	1985	7,895	85	722	17
Nov	1983	0	0	0	0
	1984	260	27	0	0
	1985	1,963	93	79	89
Dec	1983	0	0	0	0
	1984	0	0	0	0
	1985	0	0	0	0

TABLE II

SUMMARY

	WALLEYE POLLOCK			PACIFIC COD		
	Observed JVP Harvest MT	Observed JVP Harvest Inside 100-Mile Radius MT	Percent of JVP Harvested Inside 100-Mile Radius	Observed JVP Harvest MT	Observed JVP Harvest Inside 100-Mile Radius MT	Percent of JVP Harvested Inside 100-Mile Radius
3-year Total	482,765	174,876	36	51,558	15,874	31

Source: NMFS Foreign Fishery Observer Program
(206) 526-4194

TABLE II

TABLE III

OBSERVED BERING SEA-ALEUTIAN ISLAND
JVP HARVEST AS A PERCENTAGE
OF ACTUAL JVP HARVEST

	WALLEYE POLLOCK			PACIFIC COD		
	Observed MT	Actual MT	% of JVP Observer Coverage	Observed MT	Actual MT	% of JVP Observer Coverage
1983	89,787	146,000	61	9,110	9,662	94
1984	230,025	230,314	100	26,260	24,382	107
1985	162,991	370,000	44	16,134	35,634	45
Average			68			82

** Since not all of the JVP harvest during these three years was observed by NMFS, it is useful to determine how much coverage NMFS did get. This will help the Council assess the validity of the monthly numbers in Table I and Table II.

Source: Resource Assessment Document for Bering Sea-Aleutian Groundfish, 1986
Pages 20 & 29

TABLE III

TABLE IV

PERCENT OF THE MONTHLY
BSAI FOREIGN DIRECTED HARVEST TAKEN
WITHIN A 100-MILE RADIUS OF UNALASKA

		WALLEYE POLLOCK		PACIFIC COD	
		Total Foreign Directed Catch MT	Percent Inside 100-Miles	Total Foreign Directed Catch MT	Percent Inside 100-Miles
Jan	1983	12,330	0	1,375	0
	1984	14,558	0	617	31
	1985	11,219	0	741	0
Feb	1983	49,061	0	2,514	0
	1984	63,845	0	2,671	0
	1985	11,877	0	8,646	0
Mar	1983	36,113	0	3,007	0
	1984	14,328	0	1,514	0
	1985	11,682	0	1,322	0
Apr	1983	36,810	0	3,080	0
	1984	6,568	0	2,381	1
	1985	1,352	0	2,265	0
May	1983	34,670	0	2,700	0
	1984	21,681	0	511	8
	1985	4,053	0	1,504	0
Jun	1983	113,391	7	2,563	0
	1984	80,125	2	5,265	0
	1985	46,209	0	877	0
Jul	1983	147,794	13	3,802	6
	1984	144,687	1	3,437	0
	1985	126,887	0	1,732	0
Aug	1983	154,005	16	3,602	15
	1984	142,637	4	4,649	1
	1985	156,396	0	4,026	0
Sept	1983	129,233	31	2,690	28
	1984	156,224	14	4,654	4
	1985	135,110	0	3,749	0
Oct	1983	87,167	60	3,300	42
	1984	97,058	35	6,633	8
	1985	137,171	36	9,027	6
Nov	1983	42,162	49	4,223	42
	1984	93,507	51	11,108	7
	1985	93,254	68	9,625	4
Dec	1983	20,153	0	5,128	17
	1984	67,841	0	11,839	5
	1985	74,651	0	8,945	1

TABLE V

SUMMARY

	WALLEYE POLLOCK			PACIFIC COD		
	Observed Foreign Harvest MT	Observed TALFF Harvest Inside 100-Mile Radius MT	Percent Harvested Inside 100-Mile Radius	Observed Foreign Harvest MT	Observed TALFF Harvest Inside 100-Mile Radius MT	Percent Harvested Inside 100-Mile Radius
3-year Total	2,575,809	389,231	15	145,722	9,028	6

Source: NMFS Foreign Fishery Observer Program
(206) 526-4194

TABLE V

TABLE VI

OBSERVED BERING SEA-ALEUTIAN ISLAND
FOREIGN HARVEST AS A PERCENTAGE
OF ACTUAL FOREIGN HARVEST

	WALLEYE POLLOCK			PACIFIC COD		
	Observed MT	Actual MT	% of Foreign Observer Coverage	Observed MT	Actual MT	% of Foreign Oberver Coverage
1983	862,889	982,363	88	37,984	93,167	41
1984	903,059	1,093,783	83	52,279	133,161	39
1985	809,861	1,179,787	69	52,459	145,426	36
Average			80			39

Source: Resource Assessment Document for Bering Sea-Aleutian Groundfish, 1986
Pages 20 & 29

TABLE VI

OBSERVATIONS ON THE DATA

(1) In all three years, the observed JVP pollock and cod catch was low during the months of November, December, January and February. We think that's because JVP trawlers were in the shipyard in November and December and in Shelikof Strait in January and February. Since Shelikof is closed to JVP fishing this year, we expect much more JVP effort in the Bering Sea and Aleutians.

(2) That increased JVP pollock and cod fishing need not come from within 100-miles of Unalaska, though. In 1983-85, only 15% of the total observed foreign pollock harvest was taken inside the 100-mile radius. See Table V. The areas where TALFF was taken in the past are wide open now that the Council has nearly eliminated foreign fishing. JVP fishermen can catch their pollock allocation outside of the 100-mile zone and JVP processors can cruise with them to those alternative hot spots. Our shore plants cannot. They are much more dependent on the catch from the 100-mile zone around Unalaska.

(3) DAP processing capacity in Unalaska and Akutan is approximately 930 MT per day or 26,040 MT per 28-day operating month. We estimate that DAP floating capacity is approximately 700 MT per day. If the Council has a better estimate, we welcome it.

Estimated 1987 total DAP processing capacity in our area is 1,630 MT per day or 45,640 MT per 28-day operating month.

Table I shows that from January through August, the total observed monthly JVP catch exceeded the current DAP capacity only once in 1983-1985.

We recognize that JVP catch capacity has risen since then. But we think that DAP processors would use many tons of pollock and cod from the 100-mile zone if they could get priority access to it.

Is that just wishful thinking?

Not after what happened in Unalaska last December.

POLLOCK FOR CHRISTMAS

By December 1986, all joint venture fishing was over for the year. Two large American trawlers, the Aldebaron and the Arcturus from Anacortes, Washington, agreed to deliver pollock and cod to Great Land Seafoods in Unalaska. During the previous 11 months, Great Land was unable to buy enough fish for surimi production because most American trawlers preferred delivering to joint venture motherships.

From December 9 to December 16, Great Land processed 2.7 million pounds of pollock delivered by these two trawlers. That's 153 tons per day processed by approximately thirty people. One of the managers at Great Land told us that if they could count on pollock deliveries like that all year, they'd put in another filet line and boost daily production substantially. (They already have the plant space for it.) That would put an additional fifteen to twenty people to work processing surimi.

Great Land did receive more deliveries from these trawlers during the two weeks right after Christmas. The problem is that the Great Land managers were notified that the two trawlers will return to joint-venture fishing later in January.

The shortage of pollock in Unalaska is inhibiting new investment in the plant and the creation of new jobs there, too.

We're looking for a practical way to get pollock and cod to Unalaska in the same magnitude it arrived just before Christmas. Our whole town was excited about those first eight days of prosperity. With the North Pacific Council's help we'll have many more days like them, soon.

It's not pleasant being low man on the fishery allocation totem pole -- especially when the Magnuson Act says DAP processor needs should be provided for first, not last.

CONCLUSION

There's been a serious shortage of pollock and cod in Unalaska and Akutan during 1986. Most American trawlers have delivered all of their catch to joint venture processing ships at sea. Even though one Unalaska processor offered a 25% higher price for pollock, he wasn't able to attract many deliveries last year. Consequently, DAP shoreplants will be deploying several tenders in 1987; hoping to buy pollock and cod on the grounds from U. S. fishermen. Even if they can acquire some fish this way, creation of a 100-mile domestic fishery zone around Unalaska will still be vital to them. It will give all DAP fishermen and processors several important competitive advantages over their JVP counterparts (as the Magnuson Act intended.)

(1) The DAP fishermen's CPUE within the zone will be maximized in the absence of simultaneous JVP fishing nearby. DAP fishermen will be able to load up faster, thereby maximizing their catch per month.

(2) The fuel cost and running time for DAP fishermen will be minimized since most of the hot spots within the 100-mile zone are only 10 hours from Unalaska and Akutan. Minimizing run time helps maximize deliveries and income per month.

(3) Pacific cod bycatch in DAP pollock deliveries will be maximized by the absence of the JVP fleet. Cod filet sales really improve the DAP processor's monthly income statement. They make him more competitive with JVP processors.

For these reasons, we ask the North Pacific Council to accept our proposal as Amendment 11 to the Bering Sea - Aleutian Islands Groundfish Management Plan for 1988, send it out for public review and adopt it at the May meeting.

The Council may receive other proposals to solve the pollock shortage in Unalaska and Akutan.

We only request that they not be substituted for ours in the amendment cycle.

APPENDIX I

CATCH PER UNIT EFFORT
IN THE SUMMER SURVEY

These following three CPUE charts show the relative abundance of pollock during the NMFS summer surveys.

In 1983 and 1984, all ten best CPUE's were outside the 100-mile radius of Unalaska.

In 1985, only two of the ten best CPUE's were inside the 100-mile radius of Unalaska.

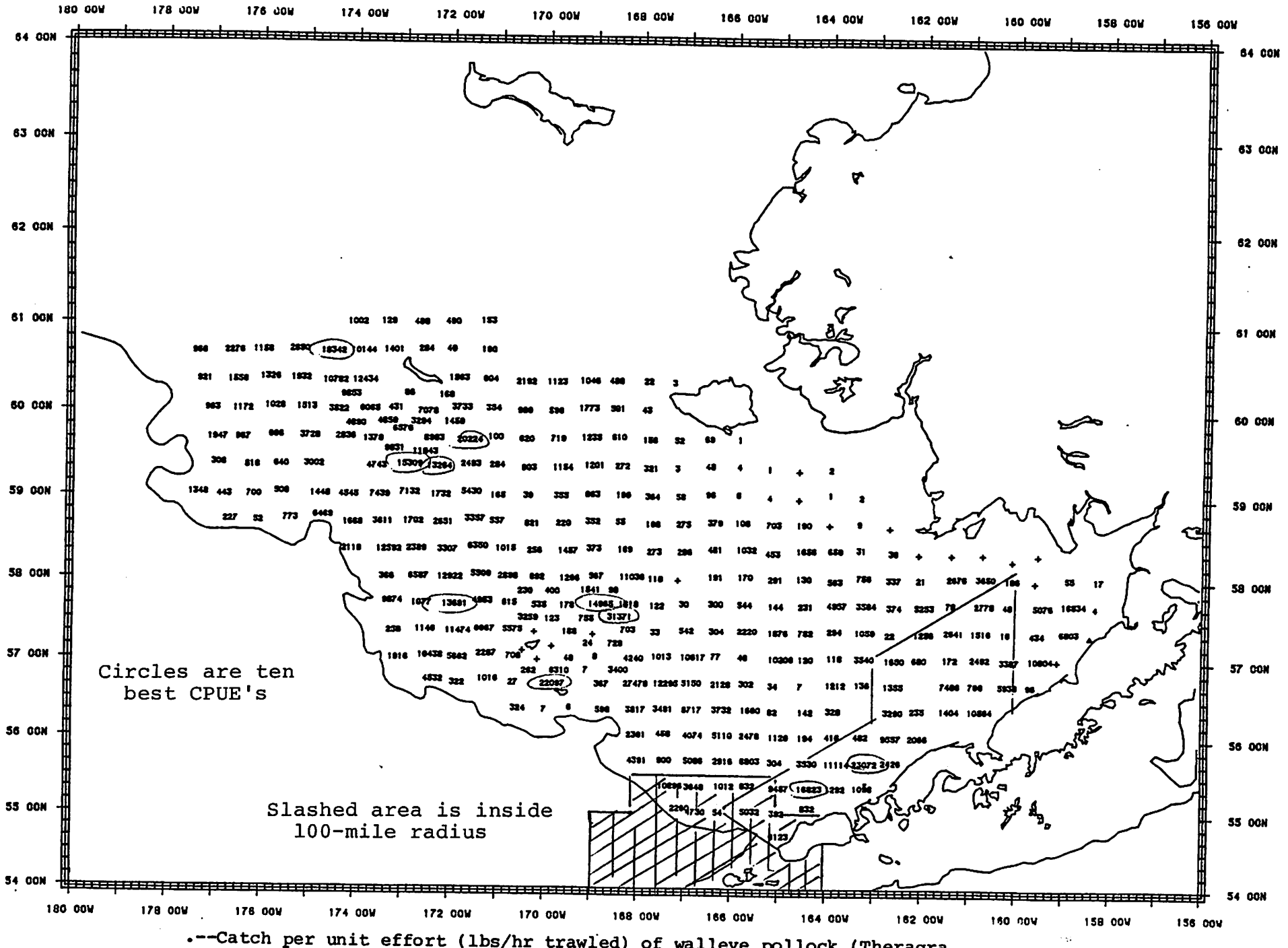
Most of the best summer pollock fishing appears to be outside the 100-mile radius of Unalaska.

In 1983 and 1984, several of the ten best CPUE's were just beyond the 100-mile radius of Unalaska.

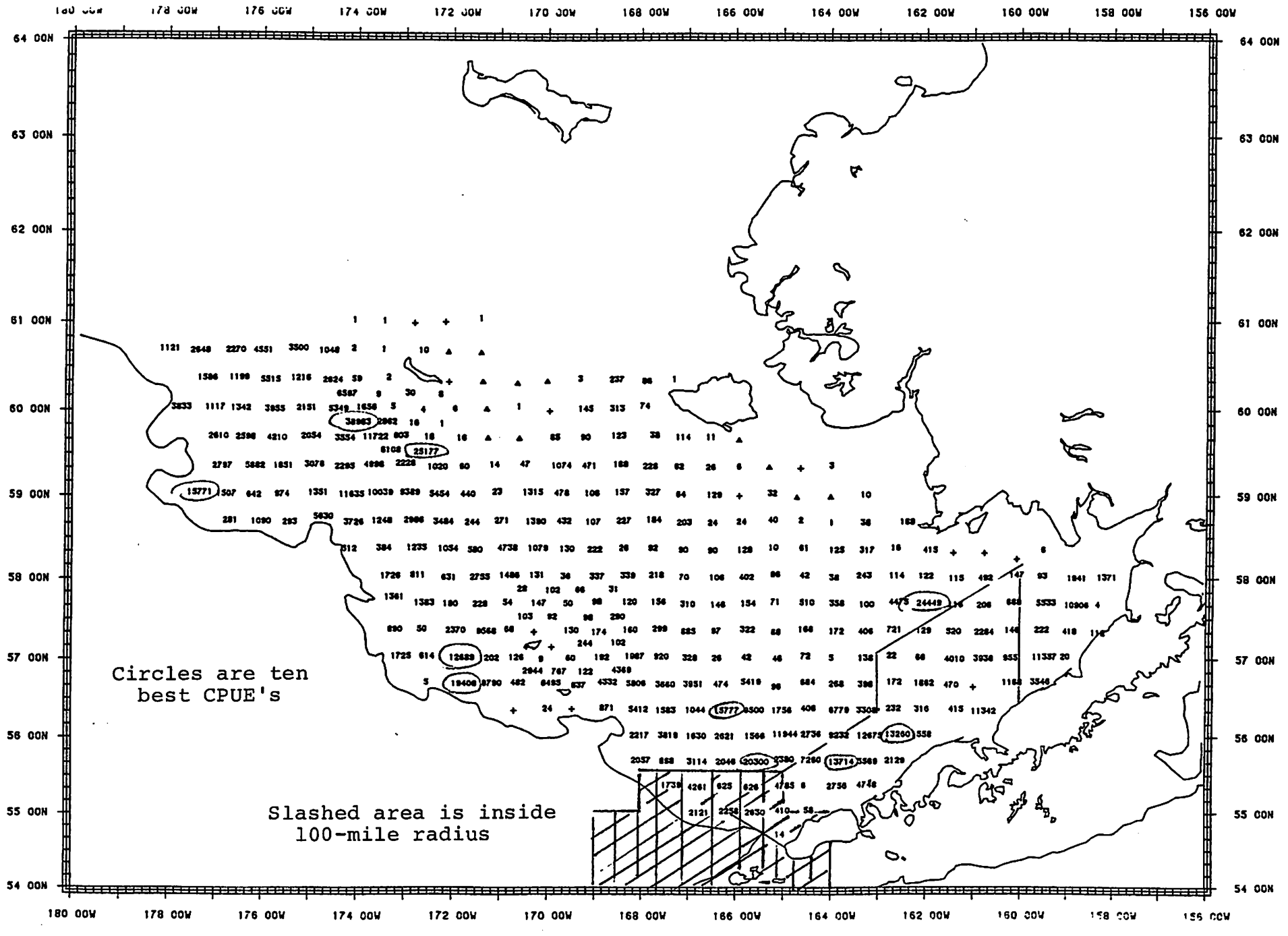
CPUE's change from month to month. Like many fishermen, we believe some of the best January to May and September to December CPUE's for pollock and cod are probably found inside the 100-mile radius or just beyond it.

Those CPUE's can be maximized by allowing DAP fishermen only inside the zone. Simultaneous fishing by JVP fishermen in the same area will probably reduce the CPUE for the DAP fleet.

During the spring months, Pacific cod school up inside the 100-mile radius. Cod is very valuable to DAP processors in our area. Receiving pollock deliveries with a high



•--Catch per unit effort (lbs/hr trawled) of walleye pollock (Theragra chalcogramma) from 1983 research survey data.



.--Catch per unit effort (lbs/hr trawled) of walleye pollock (Theragra chalcogramma) from 1984 research survey data.

percentage of Pacific cod bycatch is a bonus to them. Large-scale JVP trawling inside the 100-mile zone will probably diminish the Pacific cod tonnage delivered to DAP processors.

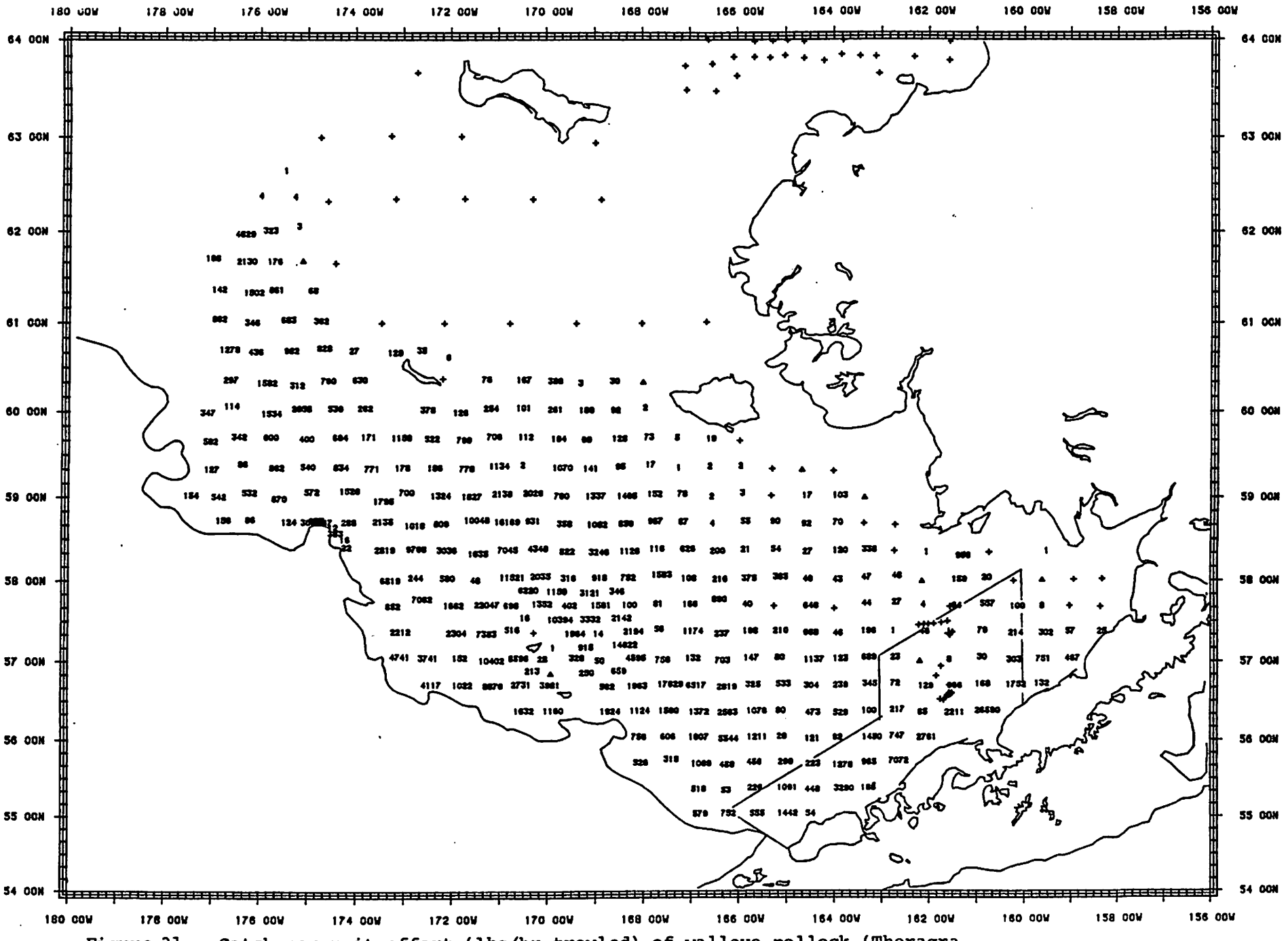
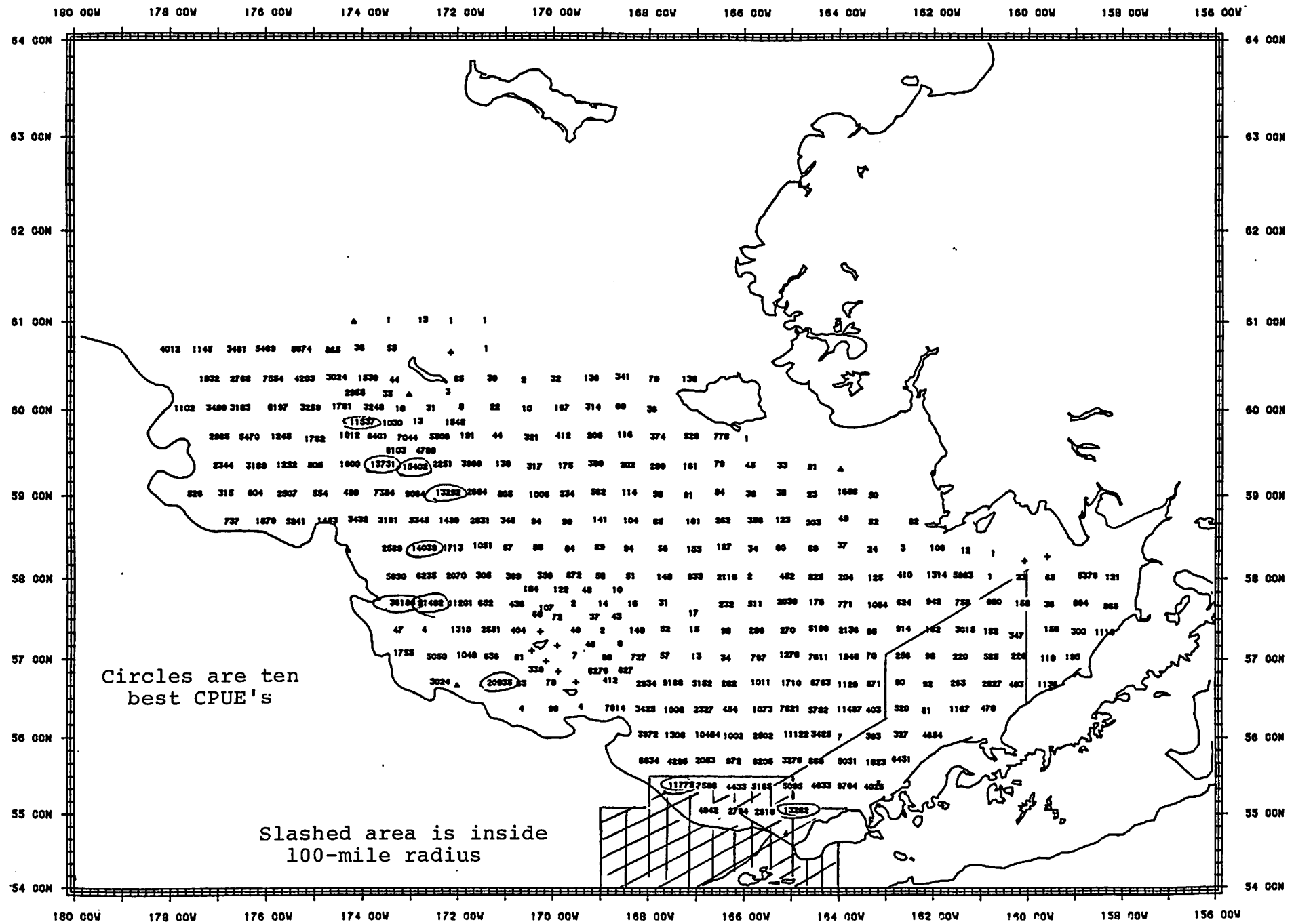


Figure 31.--Catch per unit effort (lbs/hr trawled) of walleye pollock (Theragra chalcogramma) from 1982 research survey data.



.--Catch per unit effort (lbs/hr trawled) of walleye pollock (Theragra chalcogramma) from 1985 research survey data.

APPENDIX II

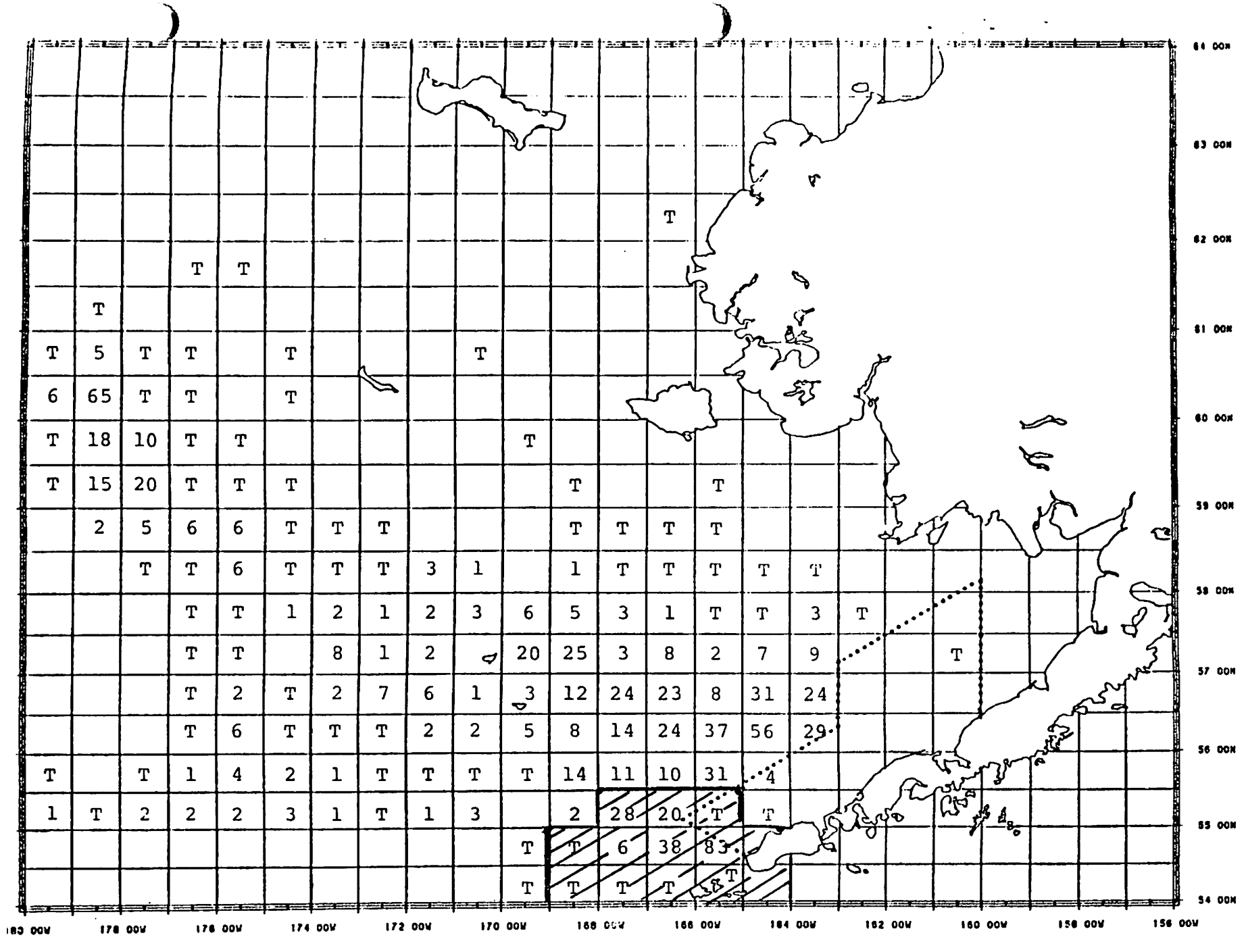


Figure 8.--Foreign-reported catch (thousands of metric tons) of walleye pollock in 1982.
T = less than 500 t.

SLASHED AREA INSIDE 100-MILE ZONE

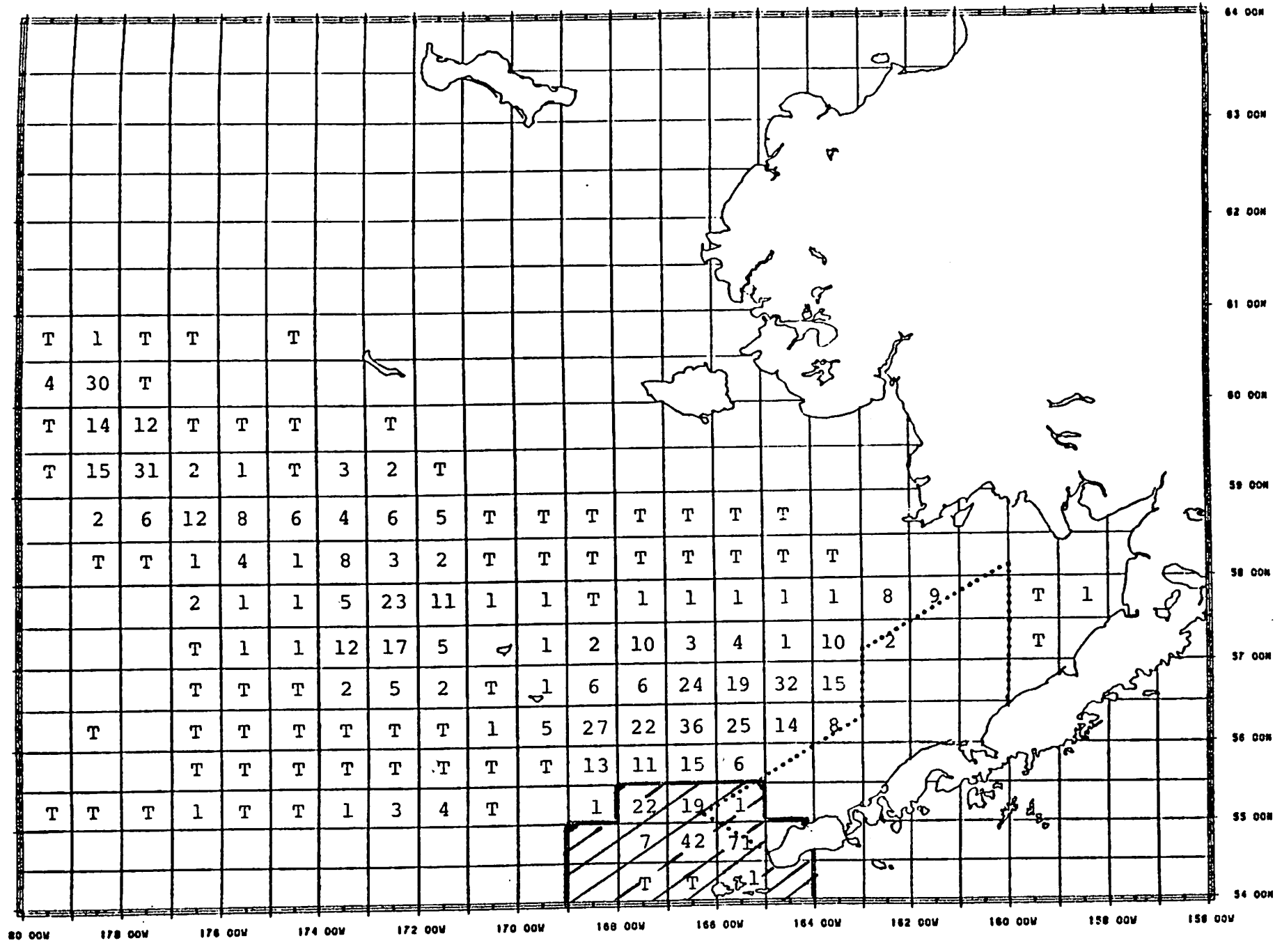


Figure 9.--Foreign-reported catch (thousands of metric tons) of walleye pollock in 1983.
T = less than 500 t.

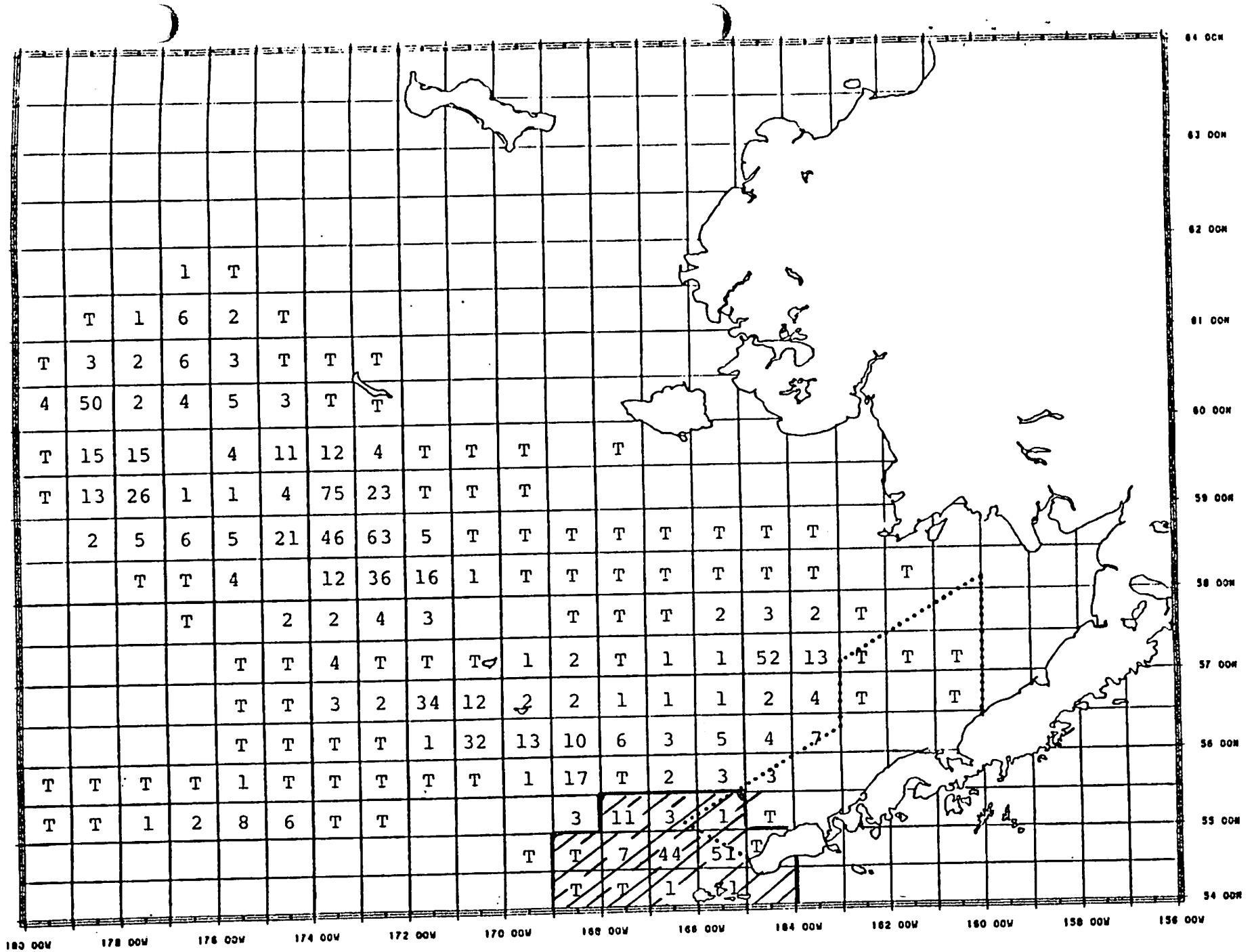


Figure 10.--Foreign-reported catch (thousands of metric tons) of walleye pollock in 1984.
T = less than 500 t.

SLASHED AREA INSIDE 100-MILE ZONE

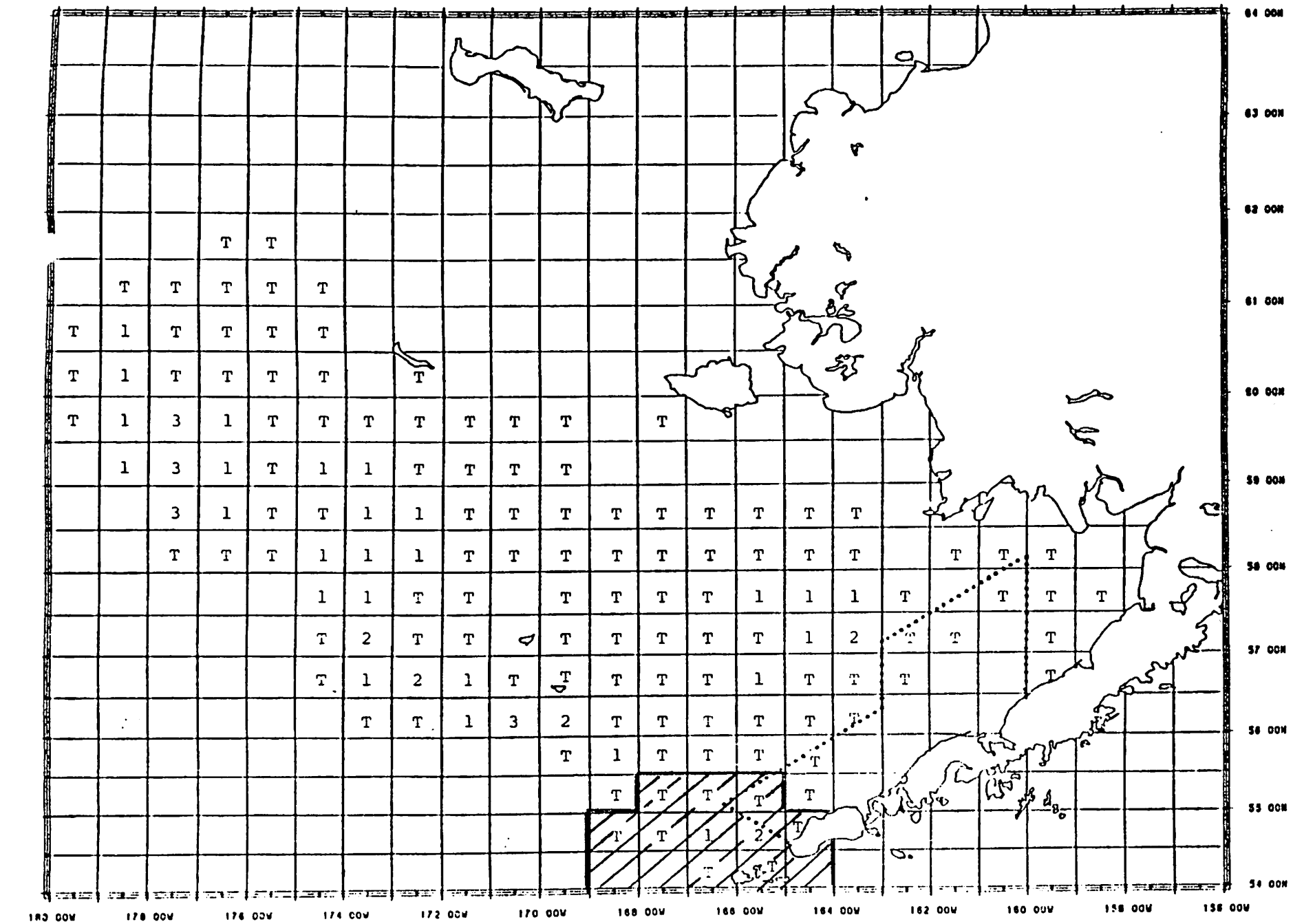


Figure 15. -Foreign-reported catch (thousands of metric tons) of Pacific cod in 1984.
T = less than 500 t.

SLASHED AREA INSIDE 100-MILE ZONE

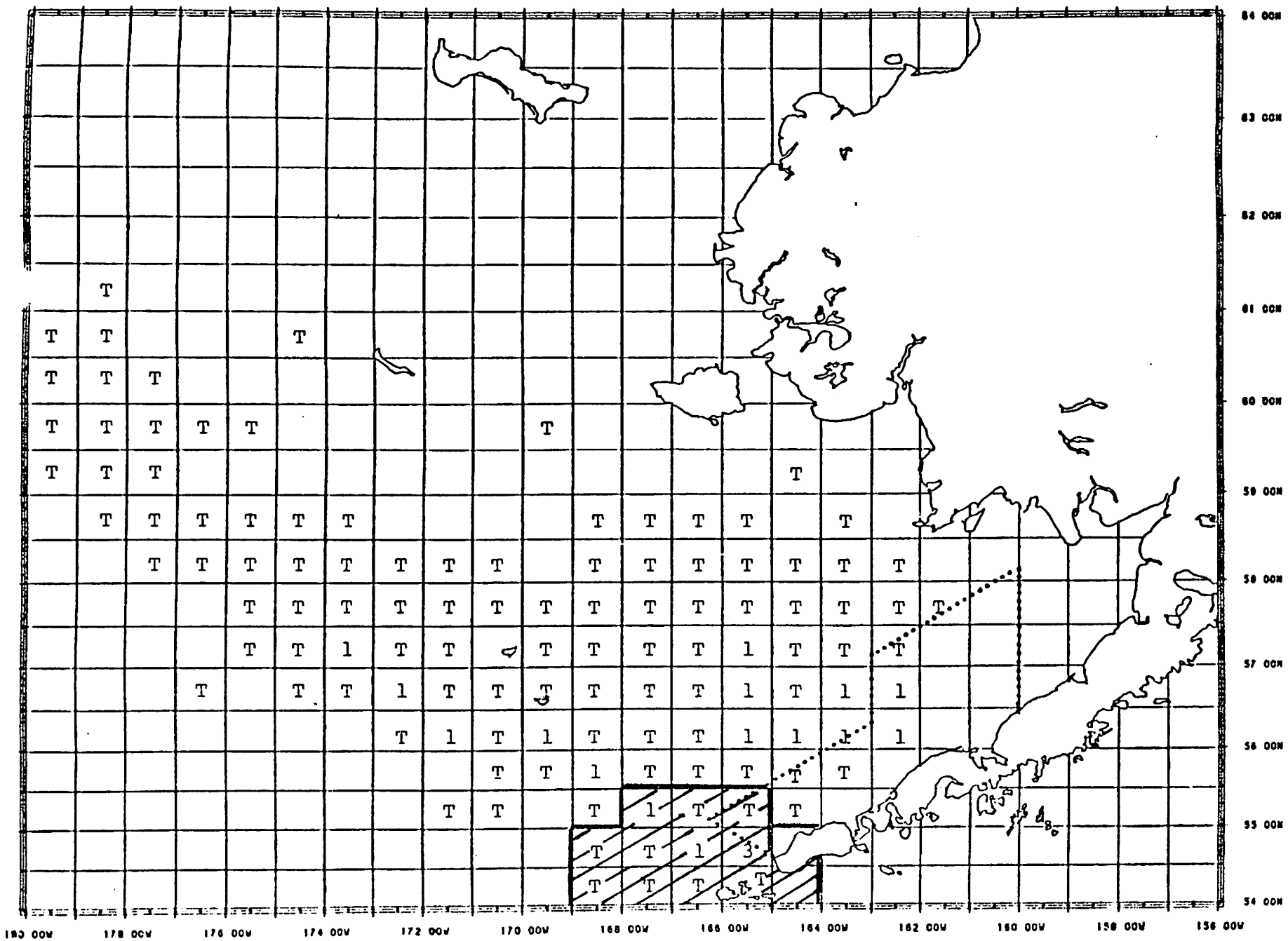


Figure 13.-Foreign-reported catch (thousands of metric tons) of Pacific cod in 1982.

SLASHED AREA INSIDE 100 MILE ZONE

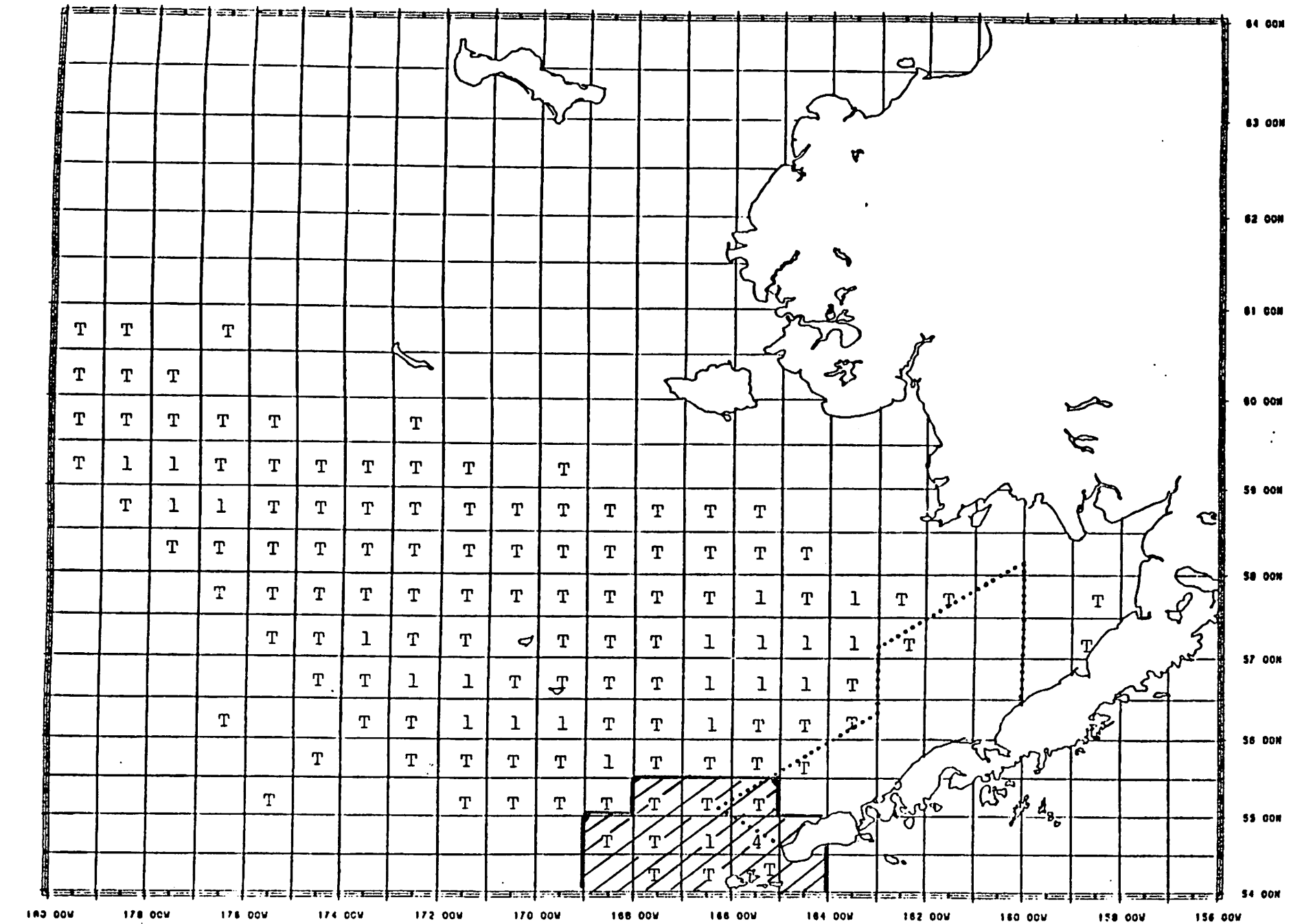


Figure 14. -Foreign-reported catch (thousands of metric tons) of Pacific cod in 1983.
T = less than 500 t.

SLASHED AREA INSIDE 100-MILE ZONE

APPENDIX III

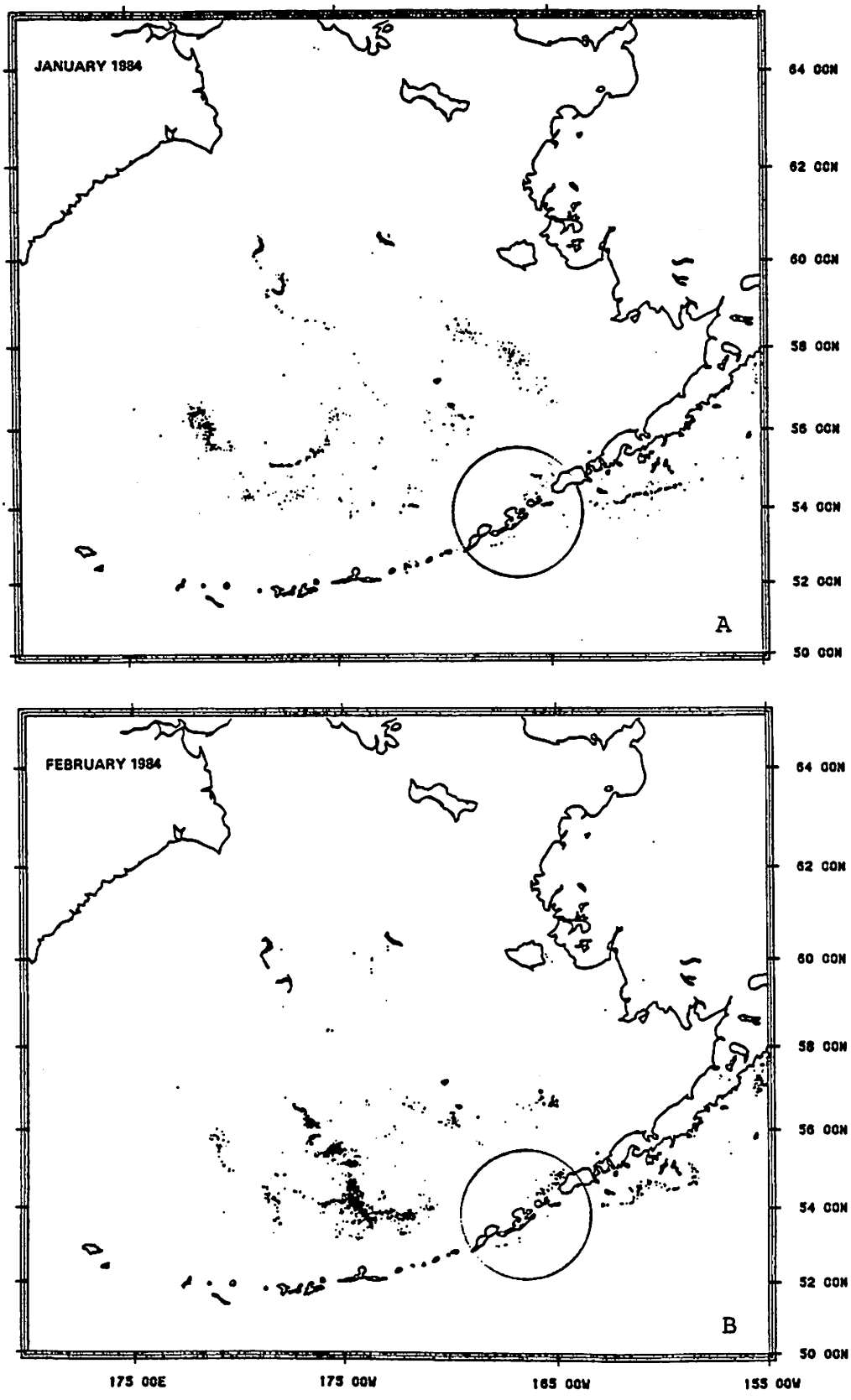


Figure 3.--Total distribution of fishing effort in 1984, by month.

Circle is 100-mile radius from Unalaska

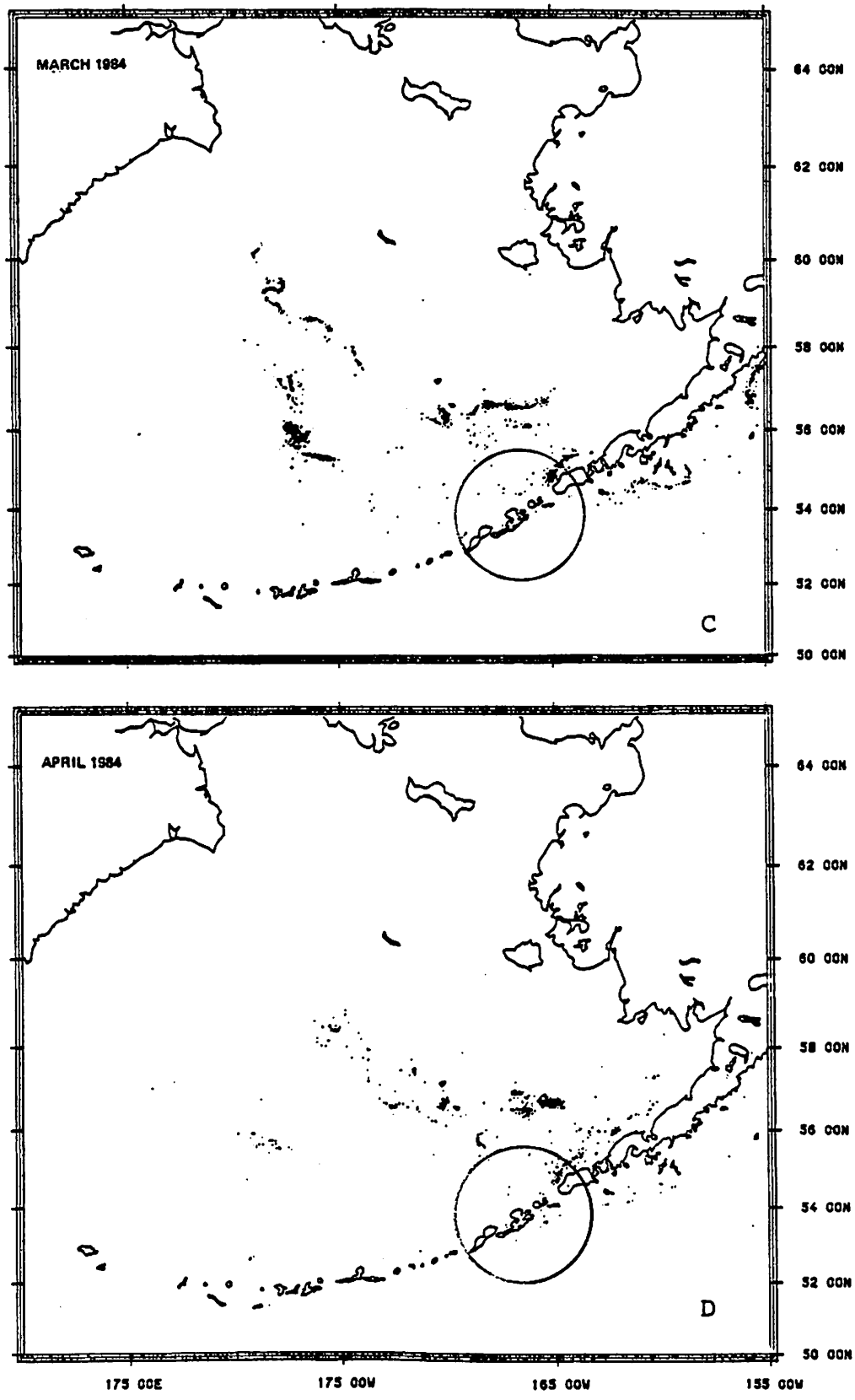


Figure 3(cont.)--Total distribution of fishing effort in 1984, by month.

Circle is 100-mile radius from Unalaska

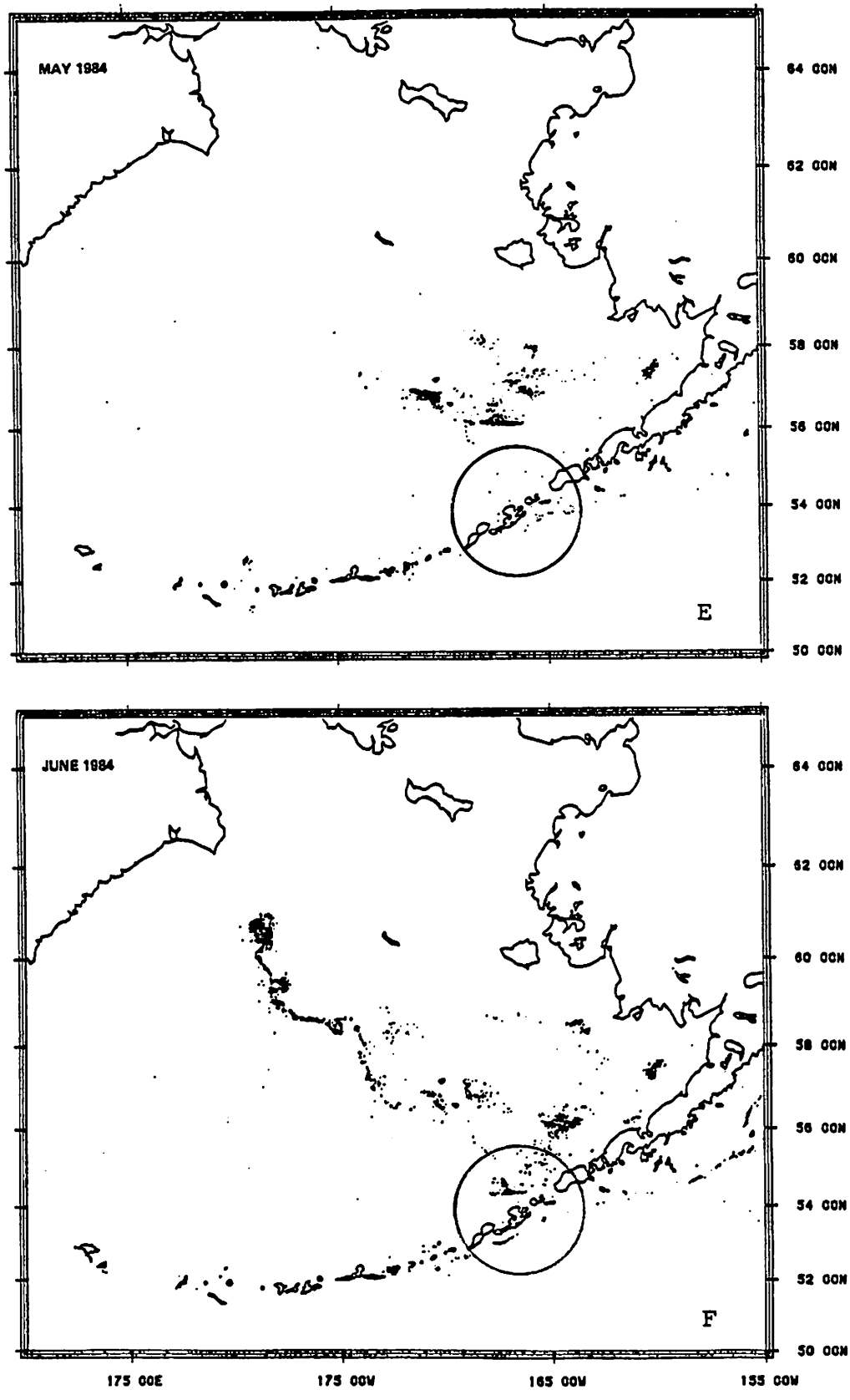


Figure 3(cont.)—Total distribution of fishing effort in 1984, by month.

Circle is 100-mile radius from Unalaska

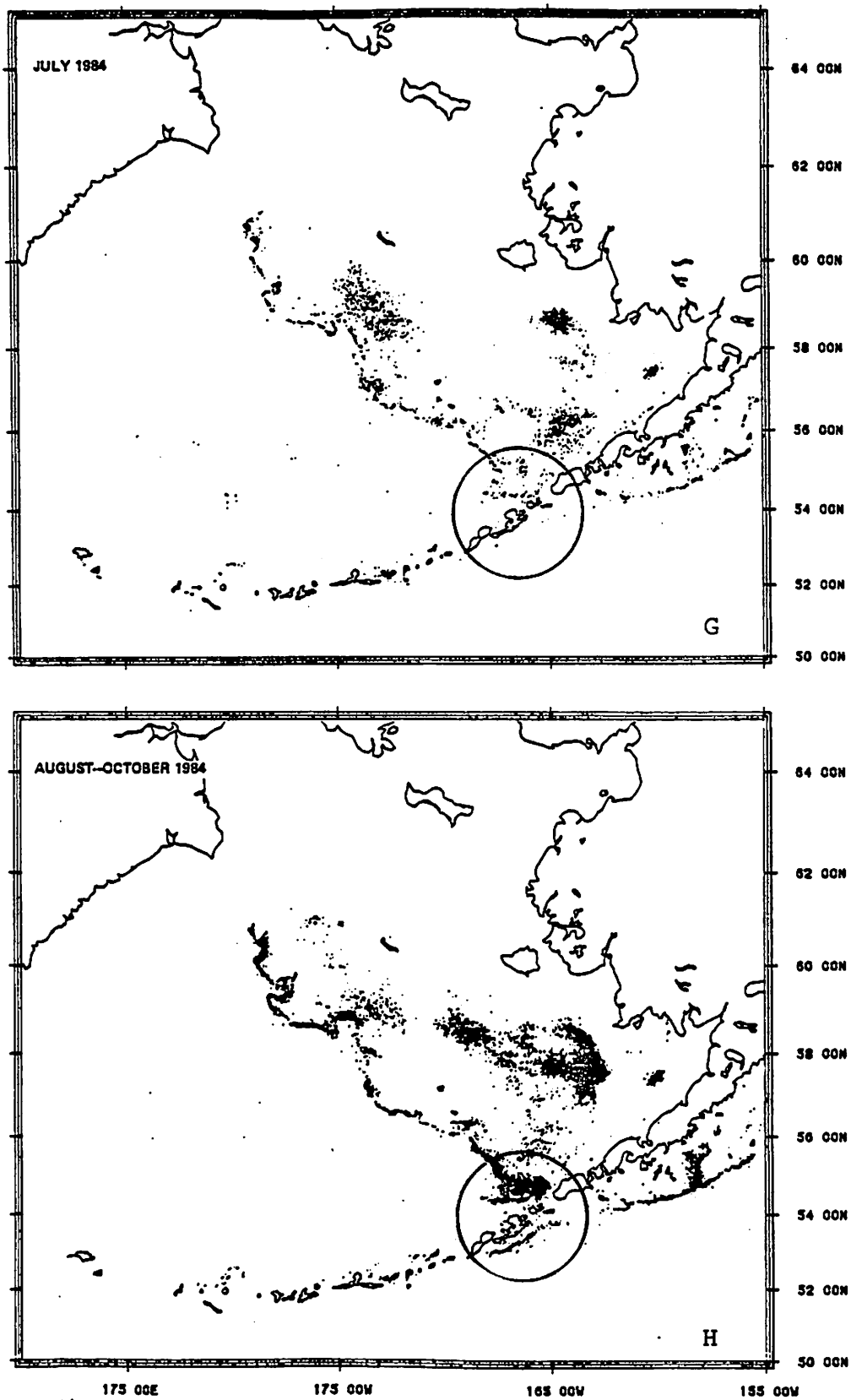
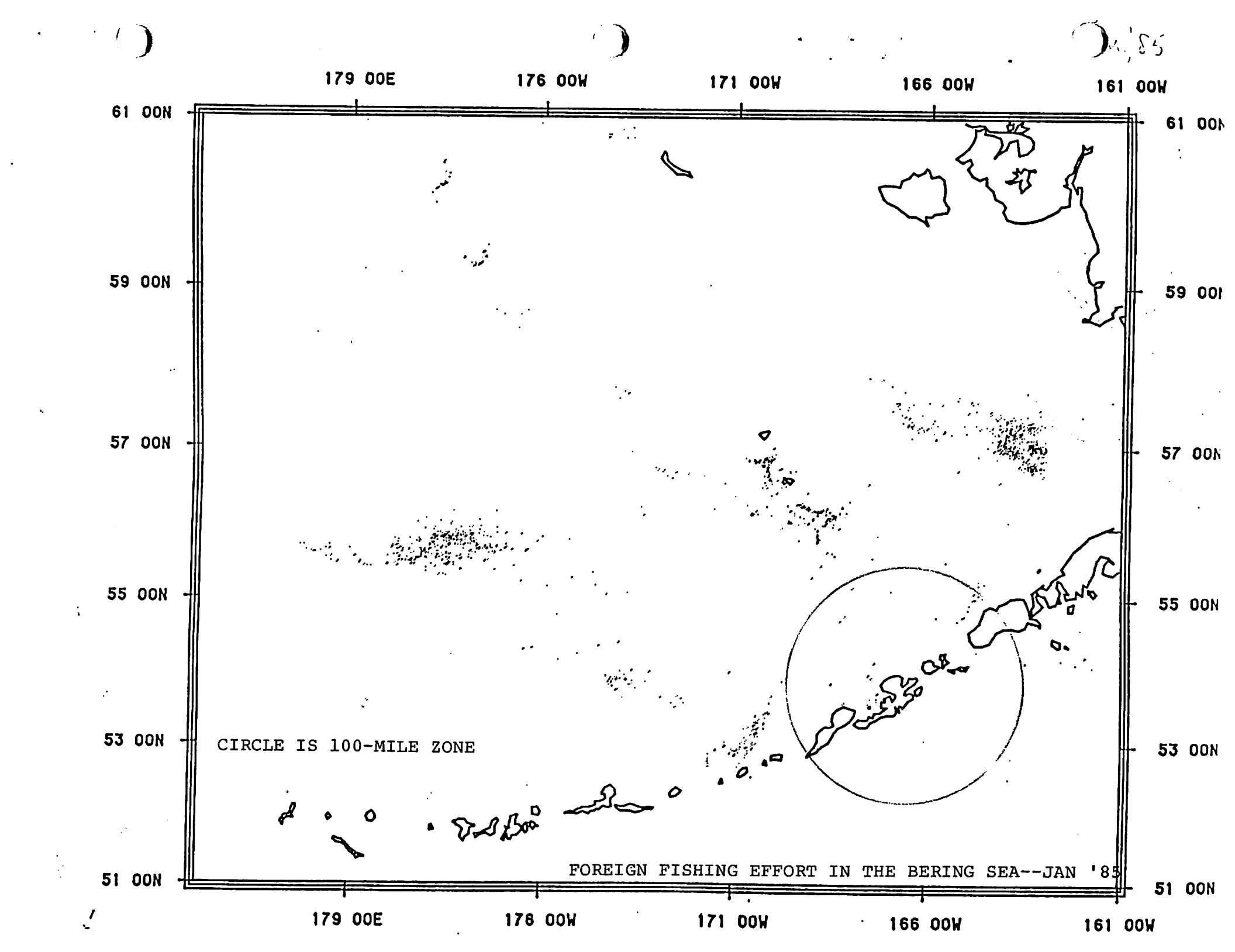


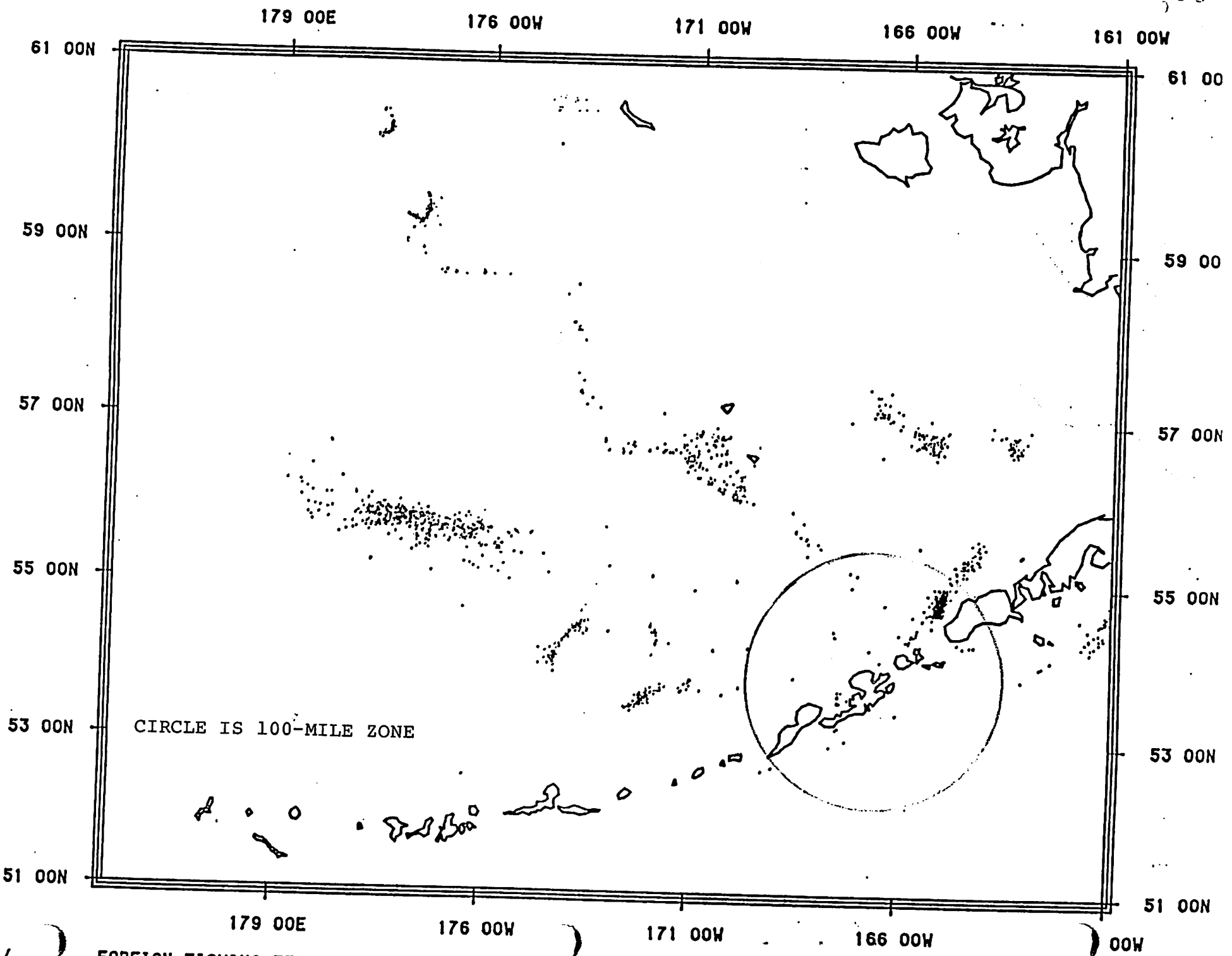
Figure 3(cont.)--Total distribution of fishing effort in 1984, by month.

Circle is 100-mile radius from Unalaska

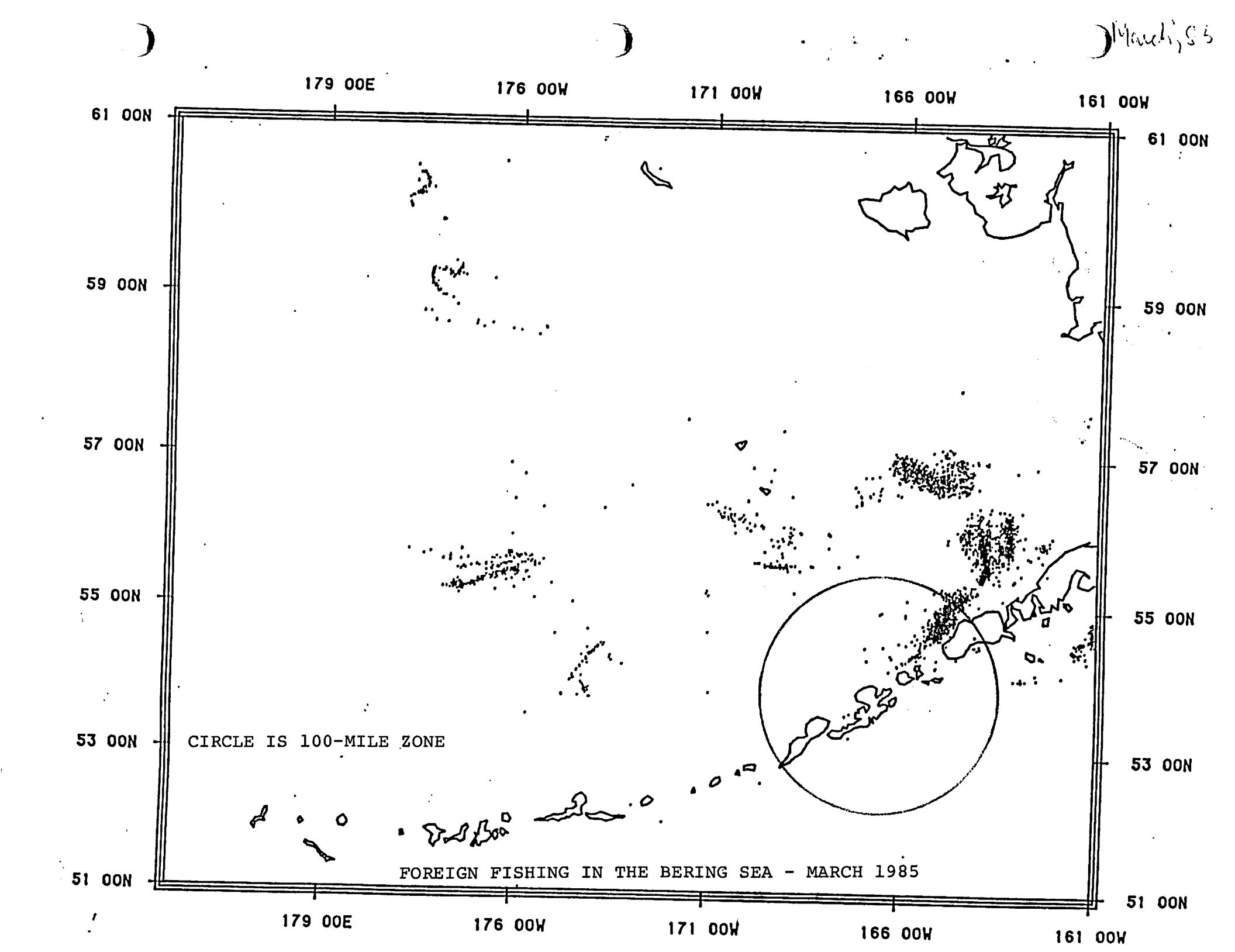
APPENDIX IV


179 00E
176 00W
171 00W
166 00W
161 00W
61 00N
59 00N
57 00N
55 00N
53 00N
51 00N
CIRCLE IS 100-MILE ZONE
FOREIGN FISHING EFFORT IN THE BERING SEA--JAN '85

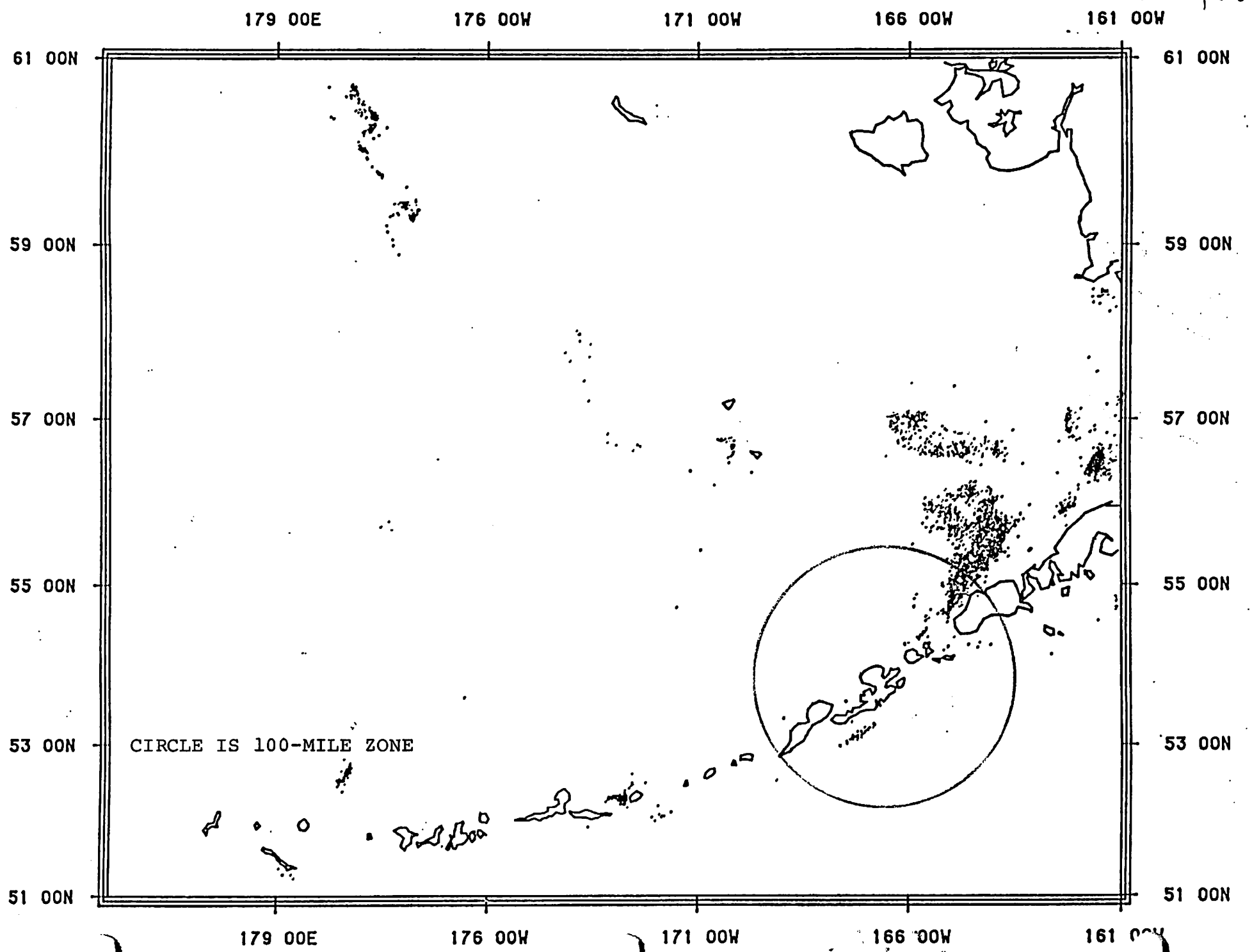
Feb. '85



FOREIGN FISHING EFFORT IN THE BERING SEA - FEBRUARY, 1985


179 00E
176 00W
171 00W
166 00W
161 00W
61 00N
59 00N
57 00N
55 00N
53 00N
51 00N
CIRCLE IS 100-MILE ZONE
FOREIGN FISHING IN THE BERING SEA - MARCH 1985

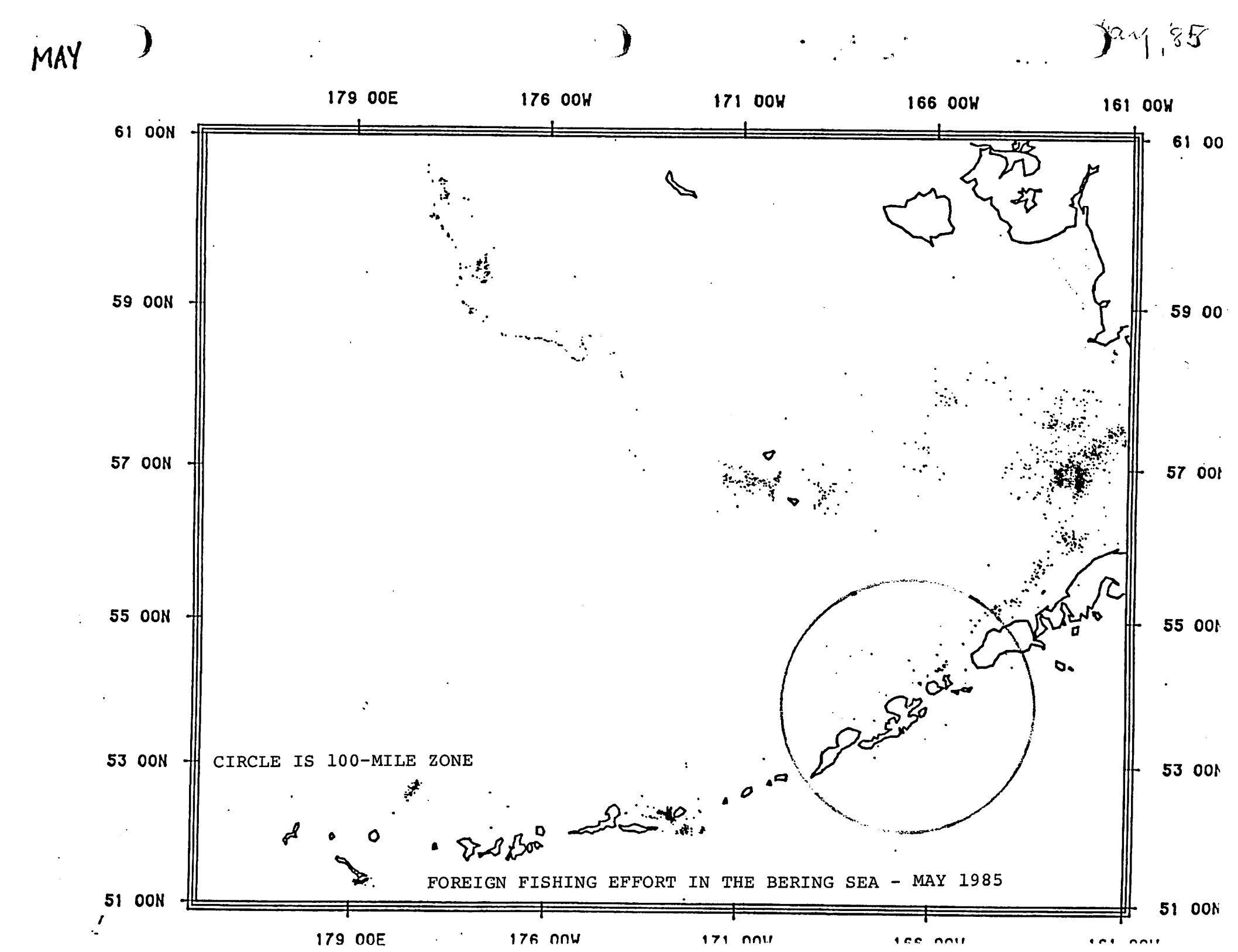
April '85



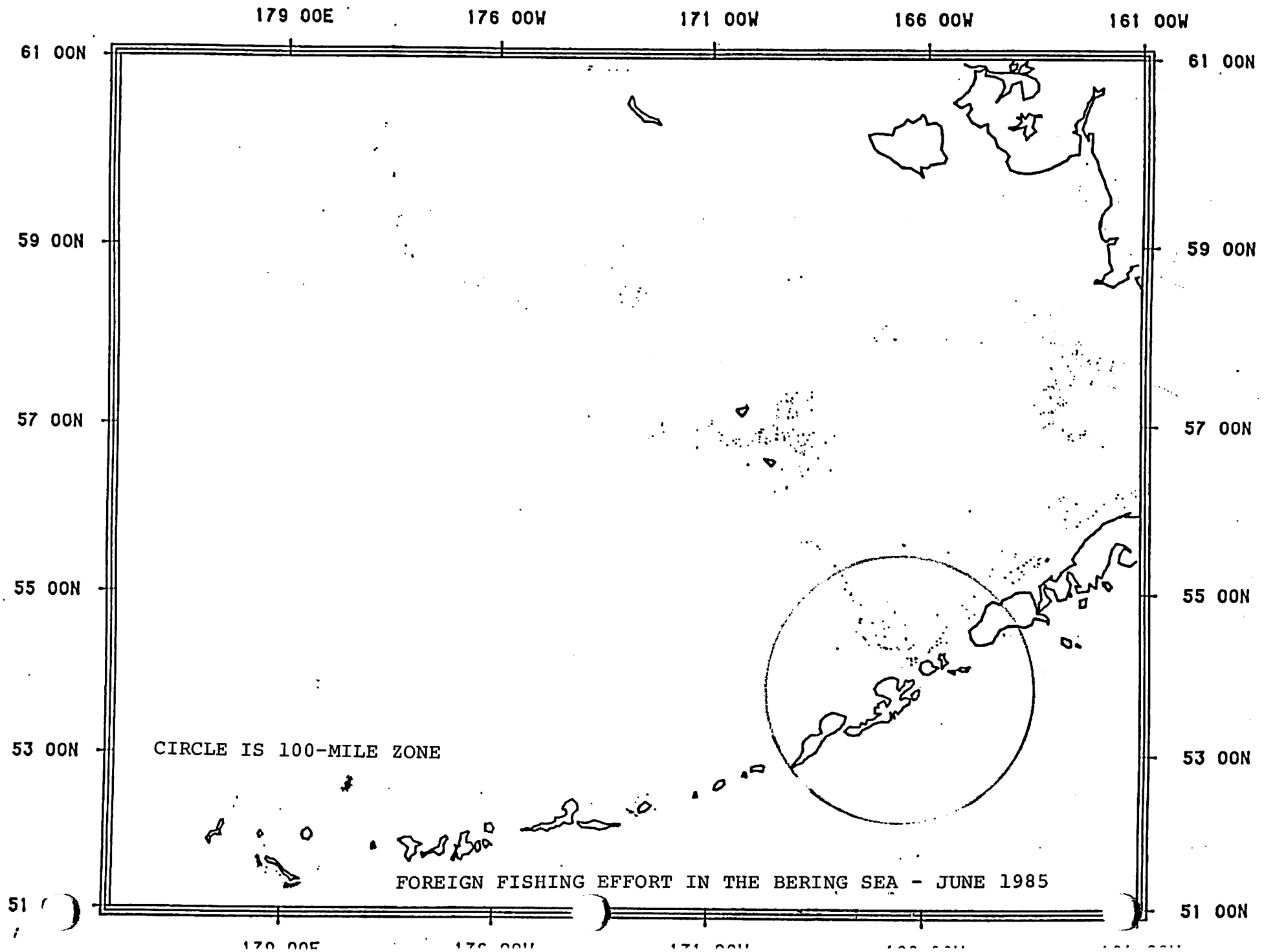
FOREIGN FISHING EFFORT IN THE BERING SEA - APRIL, 1985

MAY

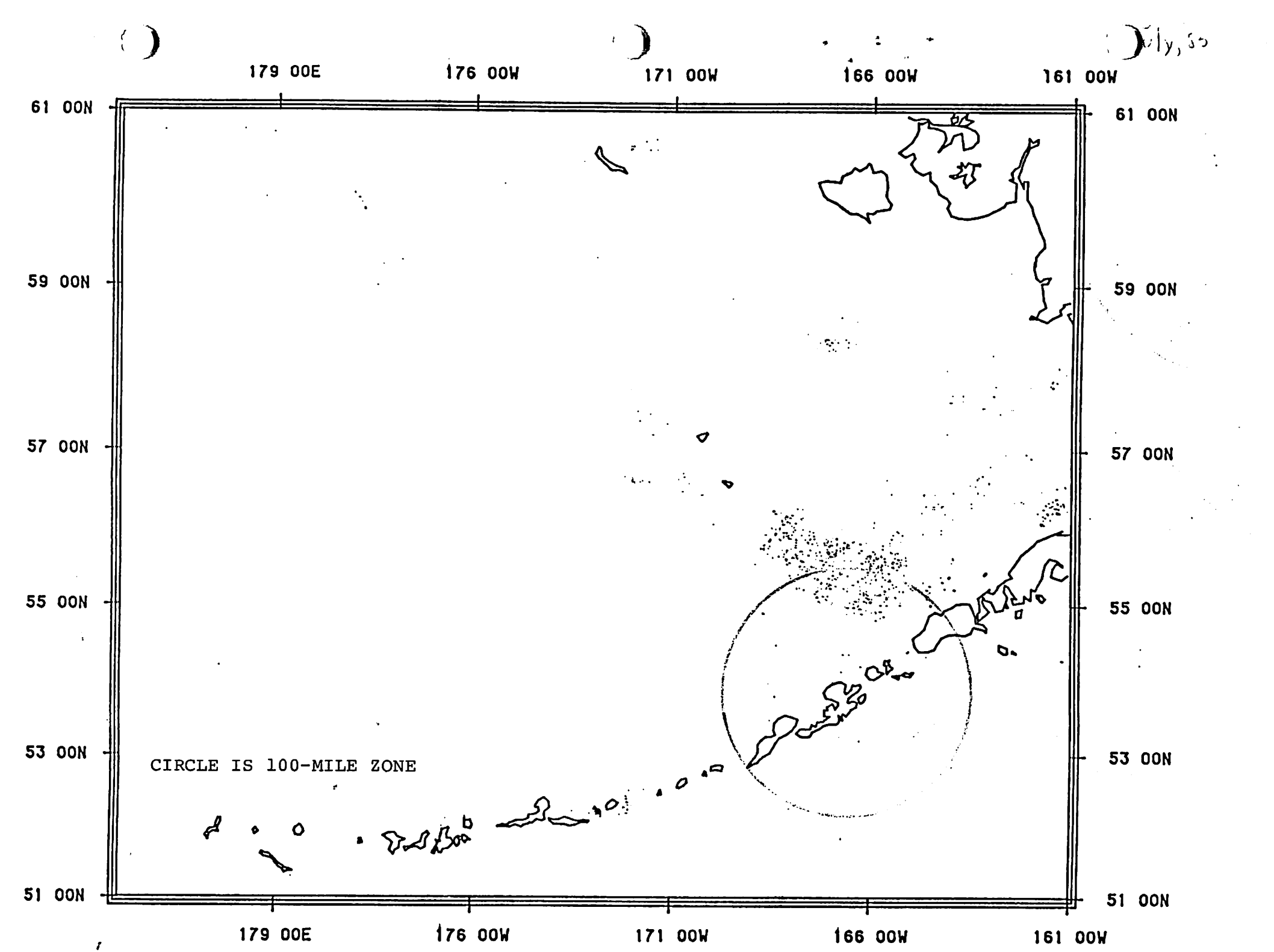
Jan. 85


179 00E
176 00W
171 00W
166 00W
161 00W
61 00N
59 00N
57 00N
55 00N
53 00N
51 00N
CIRCLE IS 100-MILE ZONE
FOREIGN FISHING EFFORT IN THE BERING SEA - MAY 1985

JUNE '85

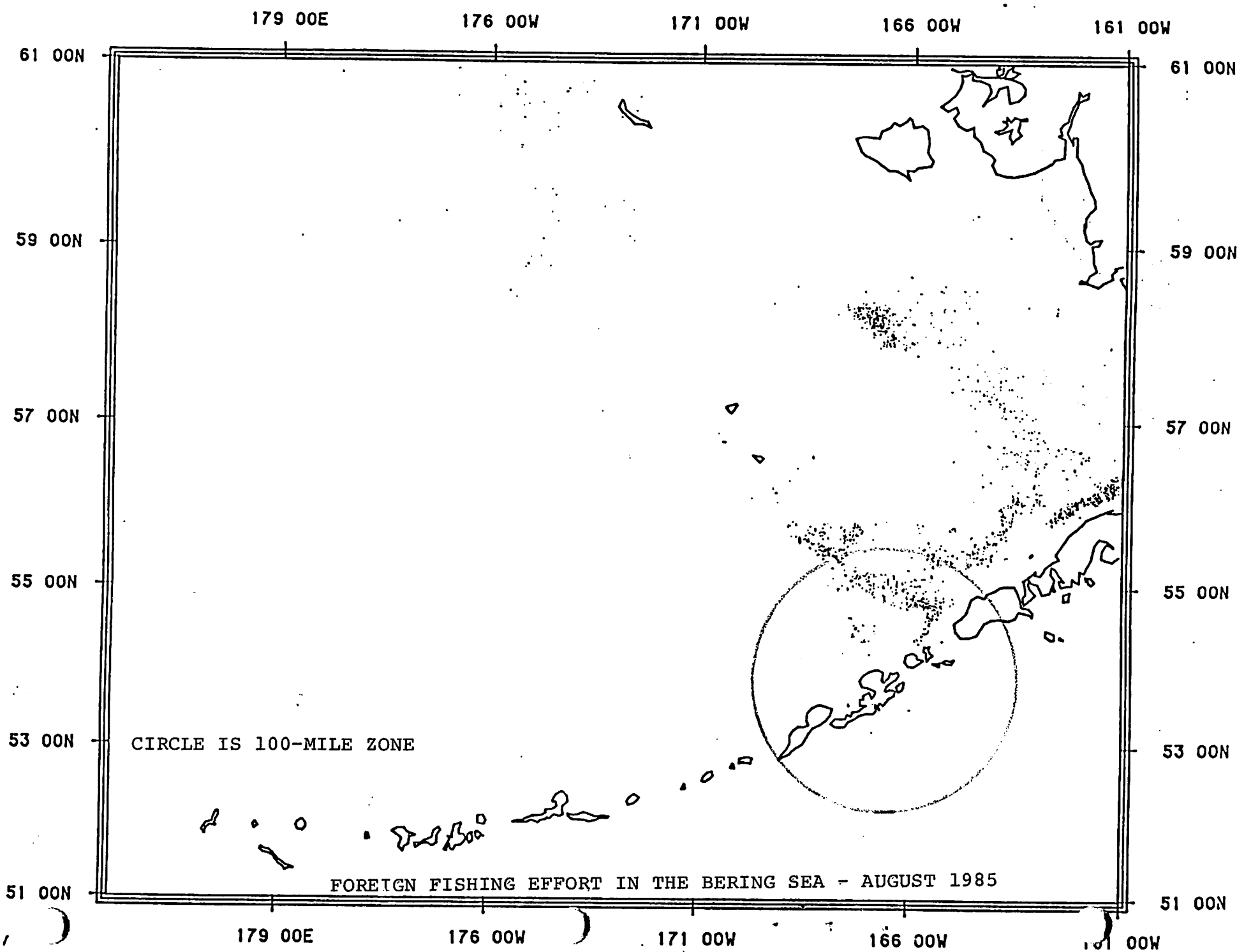


FOREIGN FISHING EFFORT IN THE BERING SEA - JUNE 1985



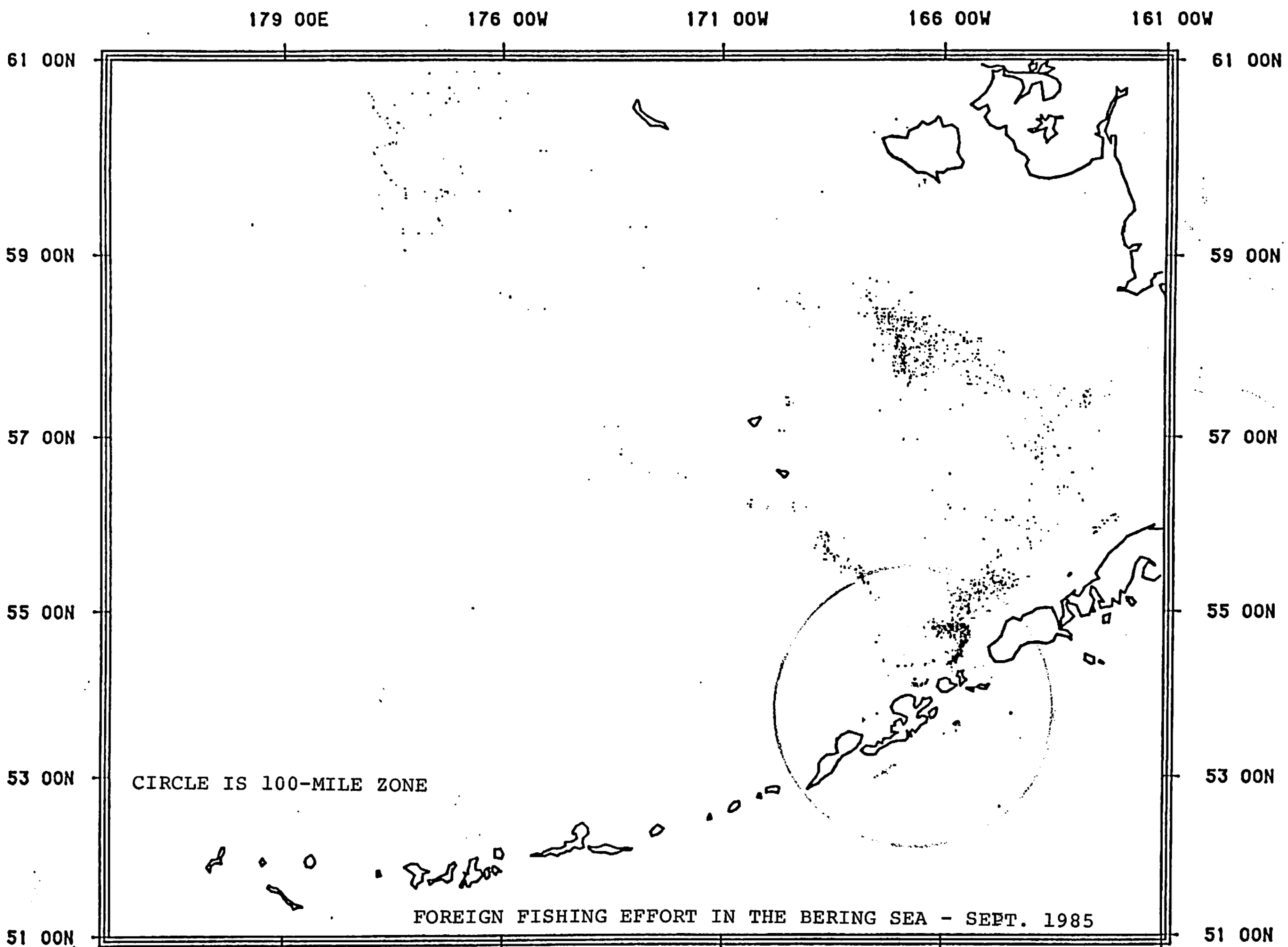
FOREIGN FISHING EFFORT IN THE BERING SEA - JULY 1985

August, '85

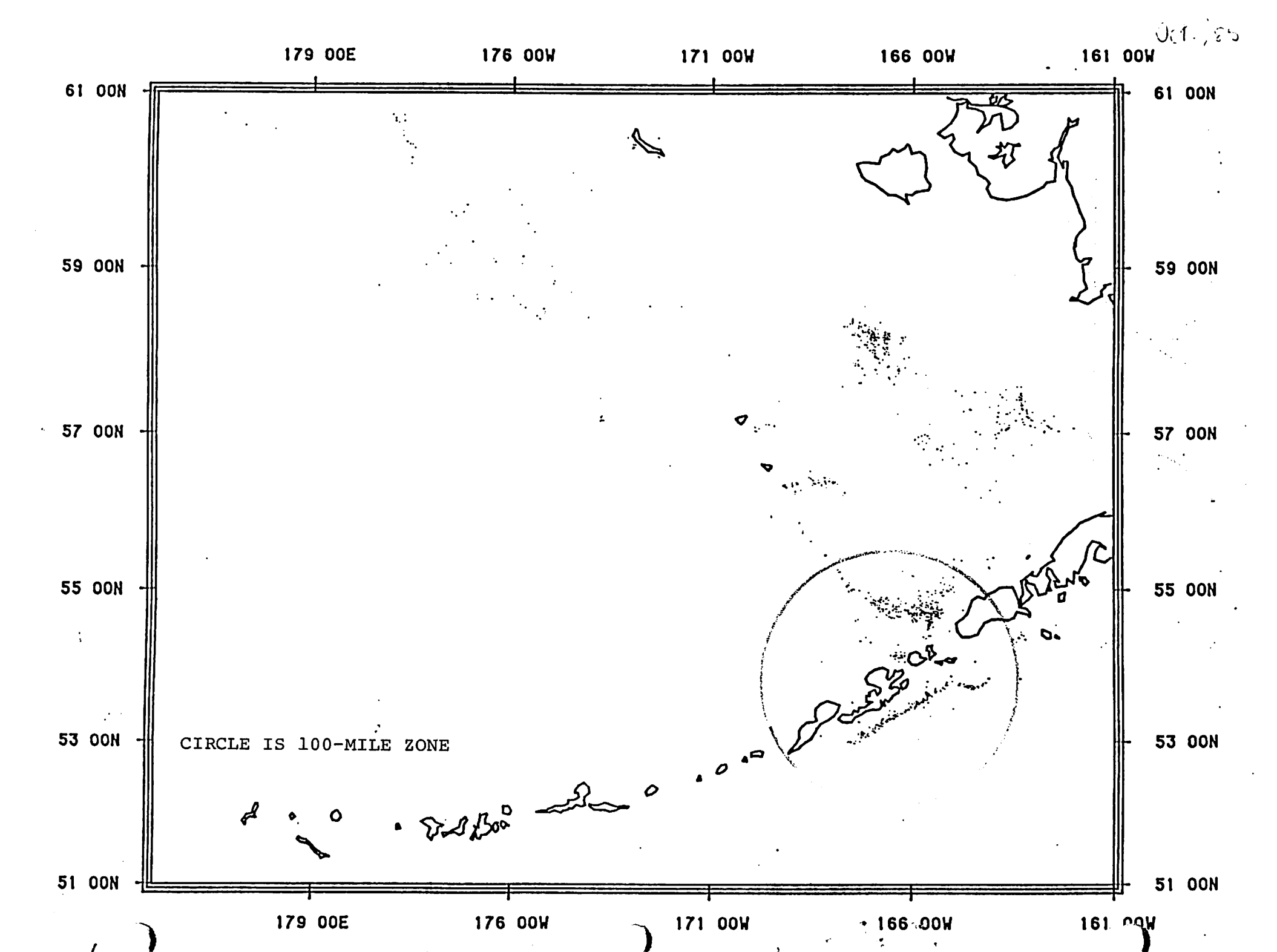


FOREIGN FISHING EFFORT IN THE BERING SEA - AUGUST 1985

SEPTEMBER

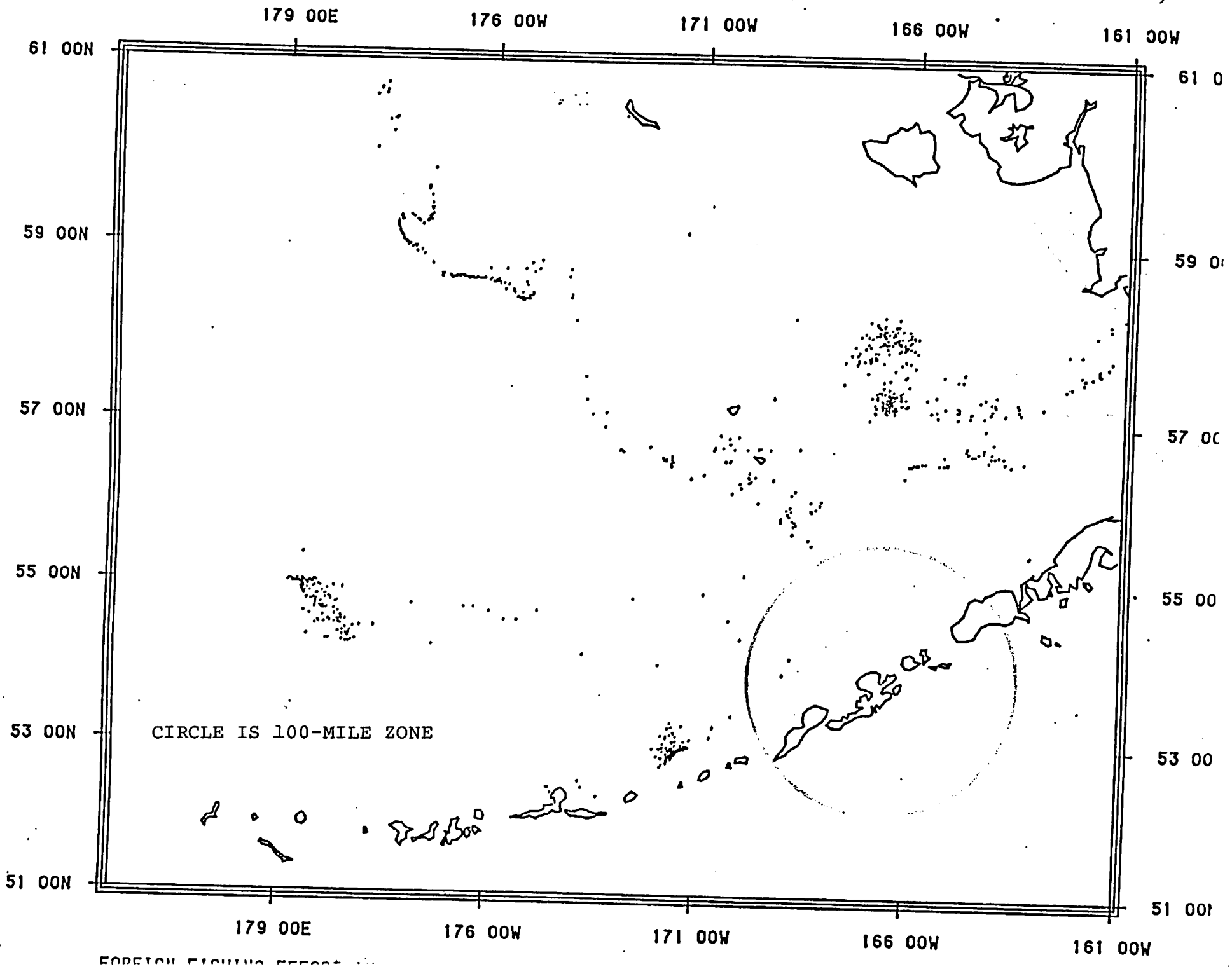


FOREIGN FISHING EFFORT IN THE BERING SEA - SEPT. 1985



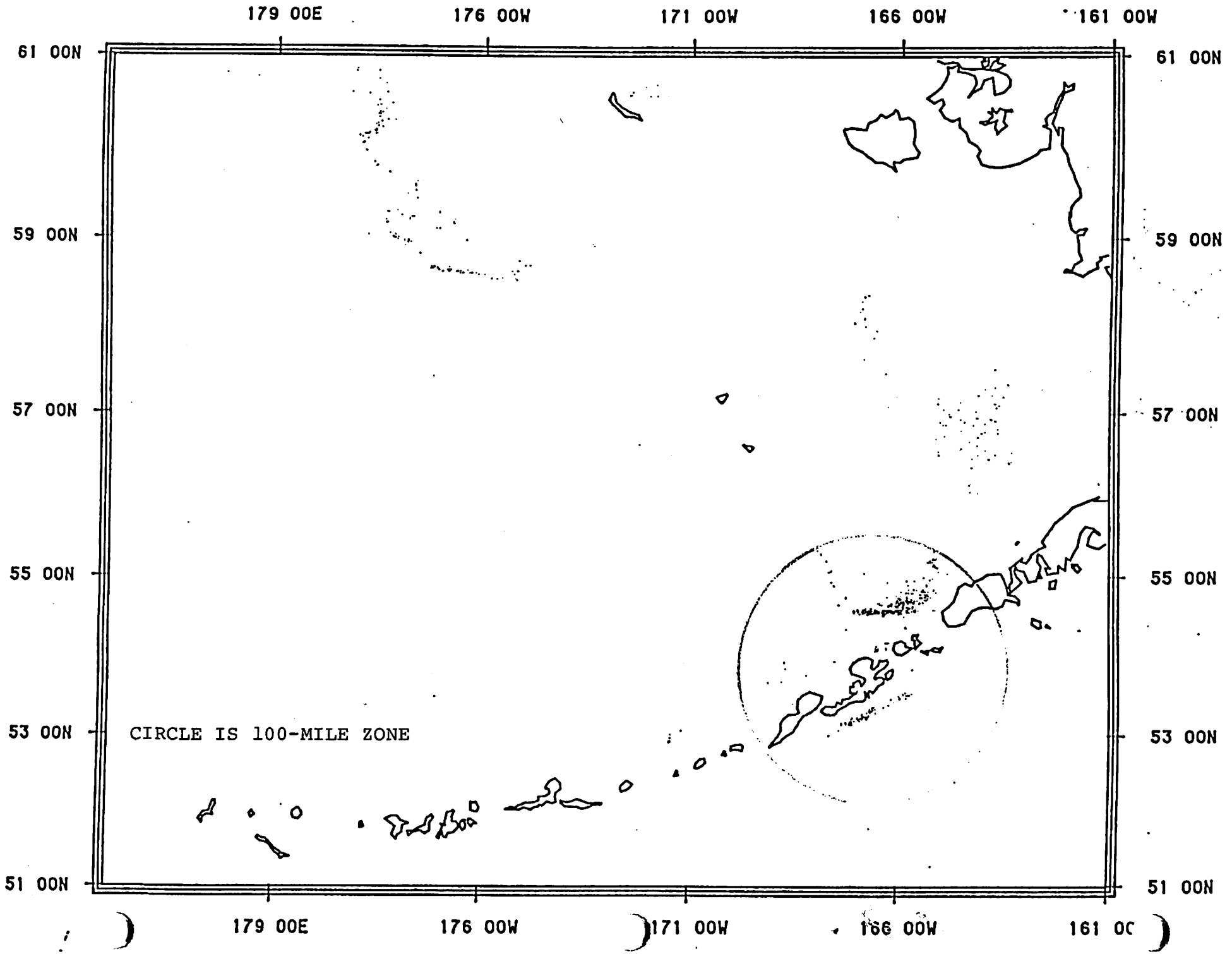
FOREIGN FISHING EFFORT IN THE BERING SEA - OCTOBER, 1985

Dec, 85



FOREIGN FISHING EFFORT

Nov. 85



FOREIGN FISHING EFFORT IN THE BERING SEA - NOVEMBER 1985