

M E M O R A N D U M

TO: Council, SSC and AP Members
FROM: Jim H. Branson
Executive Director
DATE: November 28, 1984
SUBJECT: Gulf of Alaska Groundfish Fishery Management Plan

ACTION REQUIRED

- I. Review 1985 DAP and JVP estimates.
- II. Identify groundfish species categories where DAP and/or JVP estimates exceed biological quotas.
- III. Set Council policy as to management of 0-TALFF and 0-JVP species.

BACKGROUND

Due to the complexity of this agenda item the briefing materials have been organized by specific parts to assist in progressing through the steps required for decision making.

- I. Review 1985 DAP and JVP estimates.

During the September 1984 meeting, you received 1985 DAP and JVP estimates based on 1984 groundfish harvests and the results of a NMFS industry survey. Those estimates were approved for public review and are included here as item D-2(b)(1). Since then NMFS has revised its DAP estimates. The new estimates and changes in total DAH are item D-2(b)(2).

The Council's estimates of 1985 DAP, JVP and TALFF were sent out for public review on October 18, 1984. The review period closed on November 21. Copies of comments received are included in your materials as item D-2(b)(3).

- II. Identify groundfish species where DAP and/or JVP estimates exceed biological quotas.

The Council needs to determine semi-final DAP and JVP estimates. A worksheet has been provided [item D-2(b)(4)] as an aid. Following the listing of DAP and JVP, the Council should examine the estimates in light of the tentative OY levels selected under Part I (the Council staff will provide assistance).

From that review it should be clear as to what groundfish resources are insufficient to fulfill U.S. and foreign requests. Gulf of Alaska groundfish species in this category will certainly include POP, sablefish and Atka

mackerel. Other species may fall into this category as a result of your decisions on OY, DAP and JVP values. A table presenting DAP and JVP deficits for POP, sablefish and Atka mackerel is item D-2(b)(5).

III. Set Council policy for management of O-TALFF and O-JVP species.

Pacific ocean perch, sablefish and Atka mackerel have, or will shortly, become fully utilized by American fishermen. The Council must decide how to manage these species to provide for full domestic utilization. The staff prepared several issues statements over the last eight weeks which focused on this subject and identified possible solutions. These statements have been sent to you in special mailings.

In reference to TALFF and a fully utilized species, Issues Statement 84-1 presented three options: (1) continue to permit a minimal TALFF for fully utilized species; (2) reduce TALFF to zero; or (3) make fully utilized species a prohibited species in foreign fisheries.

Some of the issues pertaining to these three alternatives are:

1. Continue to permit a minimal TALFF for fully utilized species.

Providing bycatch allocations for fully utilized species so foreign directed fisheries for other species can continue will impose costs on the U.S. industry. Earnings will be foregone by those involved in harvesting, processing, and distributing the fully utilized species, since any foreign bycatch will reduce the amount available for American harvest. Fees received in exchange for permitting foreign fishing cannot be considered either a gain or a loss because they just recover costs of managing and enforcing the foreign fishery. It has been argued that by permitting foreign directed fishing, the United States receives "fish and chips" benefits in the form of cooperation on research, participation in joint ventures, technology transfer, etc.

If the Council permits a TALFF for a fully utilized species, it could be set at current levels (some feel they allow hidden targeting by foreigners), or at the true technical minimum amounts required to sustain foreign directed operations on other species (if those minimum amounts can be identified).

Allowing a foreign bycatch of a species will require identifying some of that species as TALFF. In the case of a fully utilized (by the U.S.) species, such as sablefish in the Central Gulf of Alaska, that may not be legal under the MFCMA.

2. Reduce TALFF to zero.

Reducing TALFF for fully utilized species to zero would permit foreign fleets to continue fishing for other species provided they could avoid catches of zero-TALFF species. Practically, it would probably reduce or eliminate most foreign fishing in the Gulf. The benefits include increased U.S. harvest of the fully utilized species; costs might include

a reduced willingness by foreigners to participate in joint ventures or other forms of cooperation. The Council could recommend offsetting allocations in the Bering Sea for foreign fleets displaced from the Gulf.

3. Make fully utilized species a prohibited species in foreign fisheries.

This is now used to deal with foreign interceptions of salmon, crab, and halibut. Foreign catches of a prohibited species have the same practical effect on DAH as permitting a TALFF: reducing the earnings of Americans who would otherwise have utilized the amounts taken by foreign fleets. Additionally, it raises questions of waste of resources harvested but thrown back, with or without a limit on foreign catches of prohibited species.

In reference to JVP and a fully utilized species; Issues Statement 84-2 presented similar options: (1) continue to permit a JVP for fully utilized species with or without specific amounts; (2) reduce JVP to zero; or (3) make fully utilized species a prohibited species in joint venture fisheries.

Some of the issues pertaining to each of these three alternatives are:

1. Continue to permit a JVP for fully utilized species.

Providing bycatch allocations for fully utilized species so joint venture fisheries for other species can continue will impose costs on the U.S. industry. Earnings will be foregone by those involved in harvesting, processing, and distributing the fully utilized species, since any joint venture bycatch will reduce the amount available for DAP harvest. On the other hand, providing bycatch allocations for joint ventures targeting on other species will result in benefits to joint venture fishermen and those dependent on joint venture harvests by permitting them to continue operating.

If the Council permits a JVP for a species which could be taken entirely as DAP, it could be set at current levels, or at the technical minimum bycatches required to sustain joint venture operations on other species. It should be noted that identifying these technical minimums may be very difficult, given the available data.

It may be necessary to weigh the benefits and costs of providing different amounts of JVP bycatch on an operation-specific basis, since there are various kinds of joint ventures in the Gulf which may require differing amounts of bycatch.

The Council may find it necessary to allocate specific amounts of JVP bycatch to each joint venture operation to avoid a single operation closing all others down by taking all the JVP for a species. It might be possible to continue joint ventures in the Gulf, even with low JVP bycatch limits, through the use of area and season adjustments.

Allowing a joint venture bycatch of a species will require identifying some of that species as JVP. In the case of a species fully utilized by American fishermen and processors, such as sablefish in the Central Gulf of Alaska, it may raise some legal questions under the MFCMA.

2. Reduce JVP to zero.

Reducing JVP for fully utilized species to zero would permit joint venture fleets to continue fishing for other species provided they could avoid catches of zero-JVP species. This course of action would probably reduce or eliminate most joint venture fishing in the Gulf. The benefits include increased U.S. harvest of the fully utilized species; costs include a reduction of earnings and employment by domestic fishermen participating in joint venture operations.

What the Council establishes as "policy" in regard to O-TALFF may influence the approaches to the O-JVP problem. For example, if they chose to provide a minimal TALFF of sablefish as a bycatch to the foreign directed fisheries, then its unlikely a O-JVP option for sablefish would be considered.

3. Make fully utilized species a prohibited species in joint venture fisheries.

This is now used to deal with joint venture interceptions of salmon, crab, and halibut. Joint venture catches of a prohibited species would have the same practical effect on DAP as foreign catches of prohibited species: reducing the earnings of American fishermen (DAP) who would otherwise have utilized the amounts taken by joint venture fleets. Additionally, it raises questions of waste of resources harvested but thrown back, with or without a limit on joint venture catches of prohibited species.

Issues Statement 84-4 described the problems of allocating bycatch of fully-utilized species to joint venture operations. Not allocating even minimal amounts of these species to joint ventures for bycatches would cause tremendous operational problems in the joint ventures and would probably shut them down. Several options were presented to the Council. They were: (1) establish an amount of JVP for each bycatch species which is then fished out of a common pool by all joint venture operations; (2) allocate to each joint venture an amount for each bycatch species; or (3) establish a total amount of JVP for each bycatch species and instruct NMFS to assign appropriate amounts to each joint venture.

Issues Statement 84-5 presented some of the legal questions surrounding the options discussed in the previous issues statements. NOAA General Counsel believes that the current regulations for the Gulf of Alaska groundfish fishery require that the 1985 DAP for sablefish be set equal to OY (at least in the Eastern and Central areas, and probably in the Western area) and that JVP and TALFF must equal zero. This opinion is based on the fact that 1984 DAP exceeded the 1984 OY in the Central area. A similar opinion is also likely for POP. NOAA General Counsel is currently analyzing all the proposed options and will report to the Council during the meeting.

The Gulf of Alaska Plan Team met on November 14-16 to discuss the issue of O-TALFF/O-JVP. They reviewed the available management options and recognized only two: (1) reduce TALFF and/or JVP to zero (i.e., maintain

FMP status quo); and (2) provide for some bycatch thereby allowing joint ventures and foreign fisheries targeting on other species to continue. Following the advice of NOAA General Counsel, the Plan Team concluded that there were no legal problems with option (1). However, Option (2) providing for a bycatch had numerous legal questions, depending on the method the Council chooses.

For example, the Gulf of Alaska Groundfish FMP states that DAP ". . . shall equal the amount of those species harvested by domestic fishermen during the previous year plus any additional amount the Regional Director finds will be harvested by the growing domestic fishery." It appears a plan amendment would be necessary to allow a bycatch of a fully-utilized species by a joint venture or foreign fishery. Such an amendment would require a redefinition of DAP and/or OY. The Team was told that such an amendment may be illegal under federal law.

The Plan Team investigated an alternative approach where a bycatch amount could be set aside outside of OY, but when added to OY, the total value would not exceed EY. NOAA General Counsel's analysis is to provide information as to whether this approach would be legal and a viable option for the Council to consider. Details of this approach and other topics are provided in the Plan Team's meeting report included as item D-2(b)(6).

If the Council should decide to allow a bycatch of fully-utilized species for joint ventures and foreign fisheries, a bycatch rate to be applied against the target species, or a bycatch amount for each fishery will need to be determined. The Gulf of Alaska Plan Team examined NMFS observer data and developed a procedure for calculating rates and amounts of bycatch. This procedure and calculated bycatch are provided in the Team's report. Due to problems with the available data, a Team workgroup was formed to obtain a better data base and compute rates and amounts of bycatch following the procedure developed by the Team. The workgroup, led by Joe Terry, NWAFC, will provide this information if needed during the meeting.

And finally, the Plan Team recommends that if bycatches are allowed that a maximum bycatch ceiling be designated. Fisheries reaching those ceilings would close. As with halibut, a prohibited species catch (PSC) can be provided to serve as this ceiling.

October 18, 1984

TABLE 1

GULF OF ALASKA GROUND FISH
PROPOSED 1985 DAPS AND JVPS, 1984 OYS (MT)

<u>Species</u>	<u>Area</u>	<u>1984 OY</u>	<u>1985 DAP</u>	<u>1985 JVP</u>	<u>Reserves</u>	<u>TALFF</u>
Pollock	Western/Central	400,000	2,023	190,000	80,000	127,977
	Eastern	16,600	5	0	3,320	13,275
Pacific cod	W	16,560	600	5,965	3,312	6,683
	C	33,540	8,691	8,200	6,708	9,941
	E	9,900	120	0	1,980	7,800
Flounders	W	10,400	400	800	2,080	7,120
	C	14,700	1,486	3,000	2,940	7,274
	E	8,400	300	0	1,680	6,420
Pacific ocean perch	W	2,700	2,160	0	540	0
	C	7,900	6,320	0	1,580	0
	E	875	136	0	175	564
Sablefish	W	1,670	1,336	0	334	0
	C	3,060	2,448	0	612	0
	W. Yakutat	1,680	1,344	0	336	0
	E. Yakutat	1,135	1,135	0	0	0
	S.E. Outside	1,435	1,435	0	0	0
Atka Mackerel	W	4,678	0	3,400	936	342
	C	20,836	0	500	4,167	16,169
	E	3,186	0	0	637	2,549
Rockfish	Gulf-wide	7,600	2,947	1,765	1,520	1,368
Thornyhead	GW	3,750	40	10	750	2,950
Squid	GW	5,000	100	10	1,000	3,890
Other Species	GW	<u>28,780</u>	<u>150</u>	<u>1,400</u>	<u>5,756</u>	<u>21,474</u>
TOTAL		604,385	33,176	215,050	120,363	235,796

November 28, 1984

REVISED 1985 Gulf of Alaska Groundfish
Industry Survey of DAP and JVP (mt)

<u>Species</u>	<u>Area</u>	<u>DAP</u> ^{1/}	<u>JVP</u> ^{2/}	<u>DAH</u>	<u>Δ DAH</u>
Pollock	W/C	9,371	190,000	199,371	+7,348
	E	2	0	2	-3
Pacific cod	W	2,460	5,965	8,425	+1,860
	C	8,624	8,200	16,824	-67
	E	766	0	766	+646
Flounders	W	400	800	1,200	---
	C	1,781	3,000	4,781	+295
	E	627	0	627	+327
Pacific ocean perch	W	3,045	0	3,045	+885
	C	7,278	0	7,278	+958
	E	1,136	0	1,136	+1,000
Sablefish	W	1,862	0	1,862	+526
	C	15,040	0	15,040	+12,592
	W. Yakutat	1,680	0	1,680	---
	E. Yakutat	1,135	0	1,135	---
	S.E. Outside	1,435	0	1,435	---
Atka mackerel	W	0	3,400	3,400	---
	C	0	500	500	---
	E	0	0	0	---
Rockfish	Gulfwide	4,633	1,765	6,398	+1,686
Thornyhead	Gulfwide	0	10	10	-40
Squid	Gulfwide	0	10	10	-100
Other species	Gulfwide	<u>69</u>	<u>1,400</u>	<u>1,469</u>	<u>-81</u>
Total		61,344	215,050	276,394	27,832

1/ Revised estimates from NMFS, Nov. 27, 1984

2/ JVP from SSC Minutes, September 1984

DECEMBER 1984

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RECEIVED NOV 13 1984

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CAL ALASKA UD

7 November 1984

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

Dear Jim:

According to current catch records made available to us by the Alaska Department of Fish & Game, as of 23 October the purely domestic fishery has caught no Pacific Ocean Perch in the Central Gulf of Alaska and only 85.5 mt in the Western Gulf of Alaska. Suggested 1985 allocations of 6,320 mt and 2,160 mt in the Central and Western Gulf, respectively, and suggested JVP allocations of zero in the same areas at the very least raise the possibility that the 1985 POP catches in those areas will be substantially below OY.

While obviously the JV fishing should be phased out of fisheries for particular species as the domestic fishery capability and production approaches OY, we believe that this should be done in such a manner as to ensure that (1) the resource is fully utilized and (2) the JV's (which are, after all, a part of the U.S. industry) have a reasonable opportunity to adjust their operations. Therefore, we hope that the Council will evaluate the 1985 Industry Survey of DAP and JVP in the light of the actual production records and request that 1,000 mt of POP be allocated to JVP in the Western Gulf for 1985. If this is not possible for whatever reason, we request that the Council make provision for adequate bycatch of POP in the Western Gulf to allow the targeting of other species, which in our case would be Atka Mackerel.

Thank you for your consideration. We look forward to your response.

Sincerely,

CAL-ALASKA FISHERIES, INC.

John C. Marr
John C. Marr
Chairman

JCM:sor

FISHING VESSEL OWNERS' ASSOCIATION
INCORPORATED

ROOM 232, C-3 BUILDING
 FISHERMEN'S TERMINAL
 SEATTLE, WASHINGTON 98119

(206) 284-4720

November 1, 1984

Chairman James Campbell
 North Pacific Fishery
 Management Council
 P.O. Box 10136
 Anchorage, Alaska 99510

Chairman Campbell:

This letter is in response to the Council's request for comments concerning Total Allowable Foreign Fishing Joint Venture Processing and Domestic Available Processing for the Bering Sea/Aleutians and the Gulf of Alaska as they apply to blackcod.

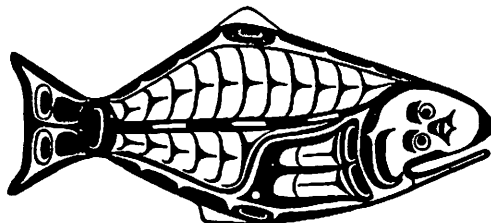
The listed DAP values for sablefish for the areas of the Central, Western Yakutat and Western Areas represent the height of annoyance from both the Scientific and Statistical Committee and the Council itself. It almost seems that the Council can not stand to accept that longline fishermen went out and caught the DAP for 1984. The proposed DAP values for the 1985 season are less than what the U.S. Industry caught and processed in both the Western Yakutat and Central Areas during 1984. The Council's proposal is basically to reduce DAP by 20% in the Central and West Yakutat Areas for "by-catch in joint venture and foreign fisheries".

The proposal is to allow 1,282 metric tons of the Gulf of Alaska quota in the Western, Central and West of Yakutat Areas for joint venture operations. It would seem that the Council is attempting to second-guess the law (MFCMA). According to the law, once the U.S. fishermen and processors catch and process the resource, the amount available for joint venture or foreign allocation is zero or zip or "nada" (Spanish for "nothing"). The Senate comments on amendments to the FCMA of June 14, 1978, state the following:

"Reception of species fully utilized by the U.S. Fishing Industry should be very limited and retention of such species should not be permitted."

The footnote on the Gulf of Alaska proposals from the Council says:

"DAP is set equal to the greater of the NMFS survey results



or the projected NMFS 1984 catch, but less than or equal to 80% of the optimum yield.

This redefinition of DAP results in a reduced harvest from 1984 to U.S. processors and those U.S. fishermen dependent on shorebound processors. According to NMFS, Montlake, there was no joint venture harvest of blackcod in the West Yakutat Area and only 140.8 tons harvested by joint ventures in the Western Area and 138 tons in the Central Area. (Numbers good through September 1984)

The Scientific and Statistical Committee and Council proposals suggest a 500% increase in joint venture allocations in the Gulf of Alaska equaling 20% of the quota in the Central, West Yakutat and Western fisheries, plus a redefinition of DAP. The Council has proposed this even though the total optimum yield in the Central Area and West Yakutat Areas were harvested by U.S. fishermen and shore-based processors in 1984.

We recognize that there is a problem with declaring a resource totally domestic as there may be an unavoidable amount taken in the joint ventures. The proposal to allow 1,282 metric tons for incidental catch is not acceptable to us in light of the joint venture harvest in 1984 of less than 300 metric tons. We would suggest no more than this amount be placed in reserve for joint venture trace catches for 1985 in the Gulf of Alaska.

We further request that no joint venture or foreign allocations be allowed in the Western District of the Gulf of Alaska, other than the trace amount mentioned above.

With regards to the Bering Sea/Aleutian Island Areas, there should not be any TALFF available in either area. There is adequate new fishing and processing capability intending to operate in the Aleutians and Bering Sea Areas.

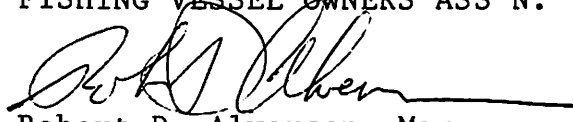
There are numerous new pot vessels and longline vessels gearing up to participate in the Aleutian and Bering Sea and no further allocations to foreign interests should be permitted. The Scientific and Statistical Committee's, Councils and NMFS's interpretation of the 1984 season were inaccurate last year and resulted in an 800 metric ton allocation in the Kodiak Area to foreign interests. It was not used by foreign interest only due to accelerated U.S. effort last year. I believe NMFS to be inaccurate for 1985 as well. The harvest will come from the Aleutians which has the better habitat where blackcod are generally found. The Council's mailing suggests the Bering Sea is where the domestic production is going to come from. I think

Page three. . .
Chairman Campbell/Request for comments

this could be embarrassing to the NMFS survey program if the DAP numbers published were actually put into quotas. We recommend no foreign allocations in the Bering Sea or Aleutians based on the accelerated interest and growth in vessels intending to operate in these two areas.

We have included ADF&G charts showing the short duration of time that the U.S. industry took the blackcod harvest in 1984. This should stress to the Council the need for no joint venture processing or foreign allocation of blackcod during 1985 in either the Gulf of Alaska or Aleutians.

Very truly yours,
FISHING VESSEL OWNERS ASS'N.


Robert D. Alverson, Mgr.

RA/jd
Enc.

TABLE 1
1985 PROPOSED BERING SEA/ALEUTIAN ISLANDS GROUND FISH

<u>SPECIES</u>	<u>TAC</u>	<u>DAP</u>	<u>JVP</u>	<u>DAH</u>	<u>RESERVE</u>	<u>TALFF</u>
POLLOCK/BS	1,100,000	6,826	274,500	281,326		653,674
POLLOCK/AI	100,000	300	10,000	10,300		74,700
POP/BS	680	578	0	578		0
POP/AI	3,800	100	2,310	2,410		820
ROCKFISH/BS	1,120	600	20	620		332
ROCKFISH/AI	5,500	5	535	540		4,135
SABLEFISH/BS	2,600	1,979	100	2,079		131
SABLEFISH/AI	3,360	100	417	517		2,339
P. COD	210,000	62,940	40,000	102,940		75,560
YELLOWFIN SOLE	288,700	3,076	57,000	60,076		185,319
TURBOTS	50,000	0	2,000	2,000		40,500
FLATFISH	139,840	907	22,000	22,907		95,957
ATKA MACKEREL	37,700	0	32,045	32,045		0
SQUID	10,000	0	30	30		8,470
OTHER SPECIES	46,700	1,000	2,800	3,800		35,895
TOTAL	2,000,000	78,411	443,757	522,168	300,000	1,177,832

1985 GULF OF ALASKA GROUND FISH

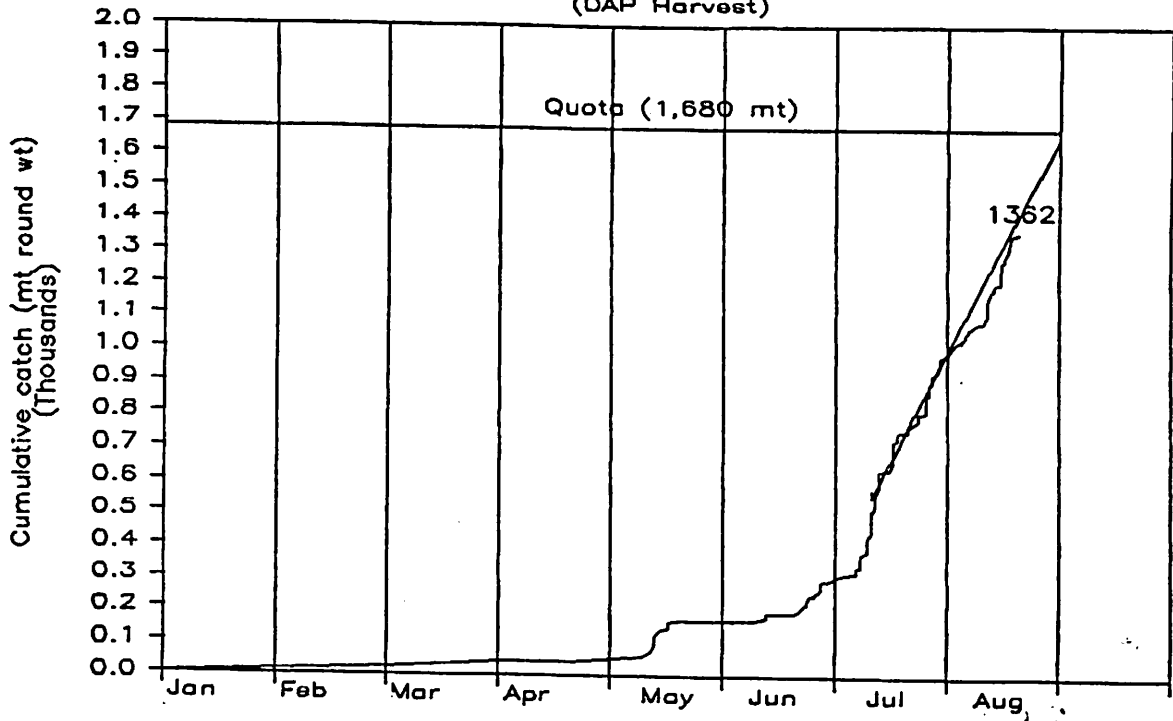
<u>SPECIES</u>	<u>AREA</u>	<u>OY</u>	<u>RESERVE</u>	<u>DAP^{2/}</u>	<u>JVP^{3/}</u>	<u>DAH</u>	<u>TALFF</u>
POLLOCK	W/C	400,000	80,000	2,023	190,000	192,023	127,977
	E	16,600	3,320	5	0	5	13,275
	TOTAL	416,600	83,320	2,028	190,000	192,028	141,252
PACIFIC COD	W	16,560	3,312	600	5,965	6,565	6,683
	C	33,540	6,708	8,691	8,200	16,891	9,941
	E	9,900	1,980	120	0	120	7,800
	TOTAL	60,000	12,000	9,411	14,165	23,576	24,424
FLOUNDERS	W	10,400	2,080	400	800	1,200	7,120
	C	14,700	2,940	1,486	3,000	4,486	7,274
	E	8,400	1,680	300	0	300	6,420
	TOTAL	33,500	6,700	2,186	3,800	5,986	20,814
P. OCEAN PERCH	W	2,700	540 ^{1/}	2,160 ^a	0 ^a	2,160	0
	C	7,900	1,580 ^{1/}	6,320 ^a	0 ^a	6,320	0
	E	875	175	136	0	136	564
	TOTAL	11,475	2,295	8,616 ^a	0 ^a	8,616	564
SABLEFISH	W	1,670	334 ^{1/}	1,336 ^a	0 ^a	1,336	0
	C	3,060	612 ^{1/}	2,448 ^a	0 ^a	2,448	0
	W.YAK	1,680	336 ^{1/}	1,344	0	1,344	0
	E.YAK	1,135	0	1,135	0	1,135	0
	S.E.OUT	1,435	0	1,435	0	1,435	0
	TOTAL	8,980	1,282	7,698 ^a	0 ^a	7,698	0
ATKA HACKEREL	W	4,678	936	0	3,400	3,400	342
	C	20,836	4,167	0	500	500	16,169
	E	3,186	637	0	0	0	2,549
	TOTAL	28,700	5,740	0	3,900	3,900	19,060
ROCKFISH	GW	7,600	1,520	2,947	1,765	4,712	1,368
THORNYHEAD	GW	3,750	750	40	10	50	2,950
SQUID	GW	5,000	1,000	100	10	110	3,890
OTHER SPECIES	GW	28,780	5,756	150	1,400	1,550	21,474
TOTAL		604,385	120,363	33,176	215,050	248,226	235,796

*Indicates of downward adjustment of results obtained from the NMFS Regional office survey.

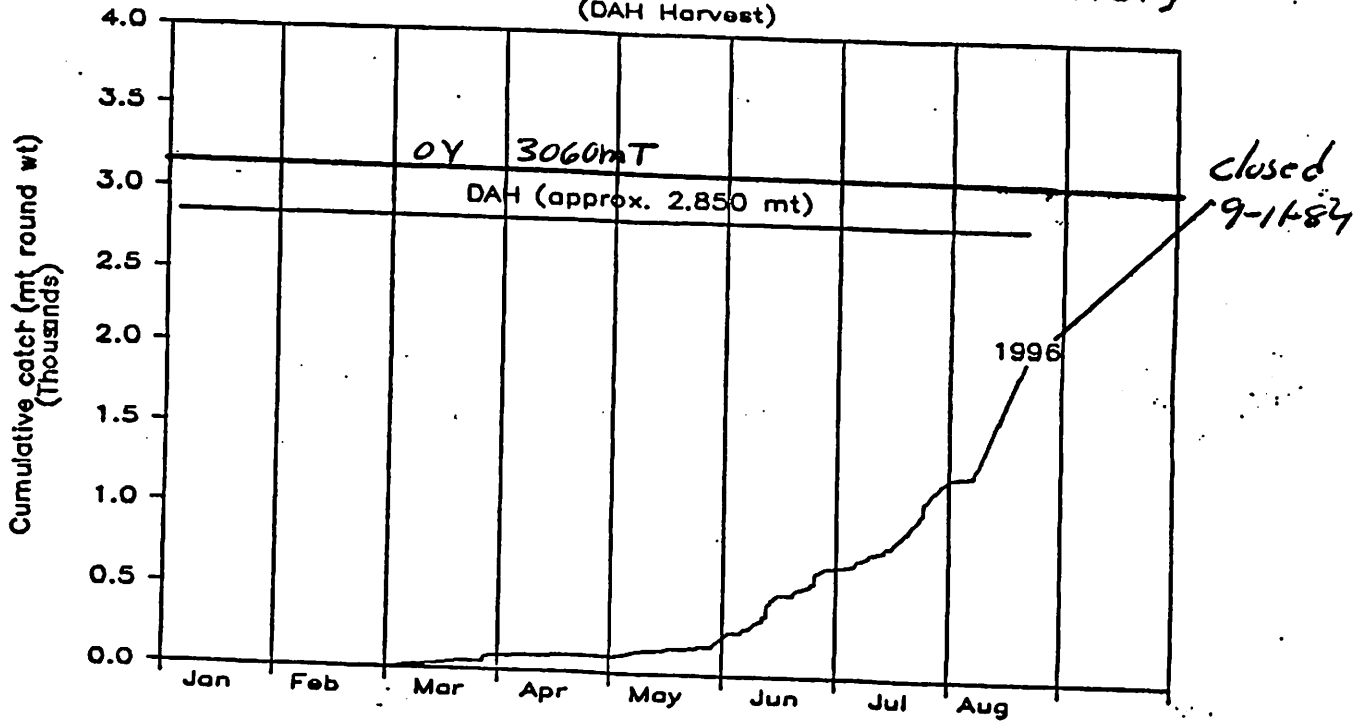
FOOTNOTES

- 1/ Most of the reserves will be apportioned to DAP. Some reserves may be needed for bycatch in joint venture and foreign fisheries for other species.
- 2/ DAP is set equal to the greater of the NMFS survey results or the projected NMFS 1984 catch, but less than or equal to 80% of the OY.
- 3/ JVP is set equal to the greater of the NMFS survey results of the projected NMFS 1984 catches, but less than or equal to the remainder of 80% of OY minus DAP.

1984 Western Yakutat Sablefish Fishery (DAP Harvest)



1984 Central Gulf Sablefish Fishery (DAH Harvest)



Landings in the Central Gulf FMP area are estimated at 1,996 metric tons round weight as of August 22. Assuming that DAH will be 2,850 metric tons, the fishery will reach this harvest level between Sept. 8 and Sept. 15 if the current rates of harvest continue.

Additional to 1985 NMFS Domestic Fishery Utilization Survey.

ALASKAN FISHERIES COMPANY

Eastern Areas

	Jan. - Jun.	Jul. - Dec.
Pacific Cod	300	300
Flounders	200	200
Pacific Ocean Perch	500	500
Rockfish	200	200
Sablefish	200	200

Aleutian Islands

Pacific Cod	600	600
Flounders	400	400
POP	1000	1000
Rockfish	400	400
Sablefish	400	400

As you will recall recent legislation (an amendment to the MFCMA) signed by the President gives U.S. fisheries managers the flexibility of "banking" fish. The language change of "shall allocate" to "may allocate" gives the U.S. a vehicle to do so.

- C. Sablefish/BS; Sablefish/AI: The harvesting capacity of the U.S. Joint Venture and Longline fleets for sablefish has increased significantly. The Council should exercise its ability to recommend to the Secretary that when in question of allocating TALFF or not, the U.S. fleet will get the benefit and zero TALFF will be recommended.
- D. Pacific Cod: The debate between the biologists and the industry in regards to the total cod biomass in the Bering Sea has continued for over a year now. The catcher/processor fleet continues to observe decreasing catch patterns and at times are forced to fish pollock because of the low abundance of cod. We suggest that the anticipated JVP catch is too low, all indications are that it will be 25% larger for calendar year 1985. The TALFF should be zero to benefit the U.S. industry and TAC should be lowered to echo the trends that the fleet has observed during the 1984 seasons.
- E. Yellowfin Sole: The potential social and economic concerns of the U.S. industry while utilizing this resource outweigh any benefit for the U.S. by "giving this resource away to the foreigners". Reduce TALFF, increase JVP (57,000 is too low) and give the U.S. industry the benefit of the doubt.
- F. Turbot; Flatfish: NPFVOA recommends that the Council separate these two categories into the following:
 - 1). Arrowtooth Flounder
 - 2). Greenland Turbot
 - 3). Rocksole
 - 4). Other flatfish

These are relatively valuable species in the market place. We predict that within the very near future U.S. vessels will actively seek Greenland Turbot and Rocksole. Anticipating greater U.S. involvement we suggest that the Council separate the four categories for management ease in the future.

G. Atka Mackerel: Not much is known about this species, we stress the need for detailed research and evaluation. We as fishermen and you as managers need a "handle" on resource population and distribution information for this species.

1985 BERING SEA/ALEUTIAN ISLANDS GROUND FISH

<u>Species</u>	<u>TAC</u>	<u>DAP</u>	<u>JVP</u>	<u>DAH</u>	<u>Reserve</u>	<u>TALFF</u>	<u>NPFVOA comments paragraph</u>
POLLOCK/BS	1,100,000	6,826	274,500	281,326		653,674 ^{1/}	A
POLLOCK/AI	100,000	300	10,000	10,300		74,700	
POP/BS	680	578	0 ^{7/}	578		0	B
POP/AI	3,800	100	2,310 ^{7/}	2,410		-820 ^{2/}	B
ROCKFISH/BS	1,120	600	20 ^{7/}	620		-332 ^{2/}	B
ROCKFISH/AI	5,500	5	535 ^{7/}	540		-471 ^{35/}	B
SABLEFISH/BS	2,600	1,979	100	2,079		-131 ^{2/}	C
SABLEFISH/AI	3,360	100	417 ^{7/}	517		-2,339 ^{2/}	C
P.COD	210,000	62,940	40,000 ^{7/}	102,940		-75,560 ^{3/}	D
YELLOWFIN SOLE	288,700	3,076	57,000	60,076		185,319 ^{4/}	E
TURBOTS	50,000	0	2,000	2,000		40,500 ^{5/}	F
FLATFISH	139,840	907	22,000	22,907		95,957 ^{6/}	F
ATKA MACKEREL	37,700	0	32,045	32,045		0	G
SQUID	10,000	0	30	30		8,470	
OTHER SPECIES	46,700	1,000	2,800	3,800		35,895	
TOTAL:	2,000,000	78,411	443,757	522,168	300,000 ^{8/}	1,117,832 ^{9/}	

- 1/. Depends on out-come of U.S./Japan Industry-to-Industry Meetings.
- 2/. Zero TALFF.
- 3/. Suggested decrease in TALFF.
- 4-5/. Separate into: Arrowhead Flounder, Greenland Turbot, Rocksole, and Other species.
- 6/. Need for extensive research.
- 7/. JVP's are to conservative.
- 8/. Could change depending on outcome of other NPFVOA recommendations.
- 9/. Anticipated decreases due to changes in individual stocks.

II. 1985 Gulf of Alaska Groundfish:

- A. Pollock: We anticipate the JVP for this species to be greater than indicated, possibly 30,000 mt larger. In the process of evaluating TALFF the law outlines our priority: 1). Conservation of the resource; 2). Domestic allocation; 3). JVP allocation and 4). TALFF allocation. We suggest that prior to recommending any TALFF we maximize the benefit to the U.S. industry by fulfilling all Domestic and Joint Venture needs.
- B. Pacific Cod: We suggest that the Council evaluate these DAH figures to verify their levels. Our concern is that if there is any non-used DAH we would want the Joint Venture operations to have the flexibility to harvest this allocated proportion.
- C. Flounders: As in our comments for the BS/Aleutians we suggest for the same reasons that flounders be separated: i.e.
- 1). Arrowtooth Flounder
 - 2). Greenland Turbot
 - 3). Rocksole
 - 4). Other Flatfish.
- D. P. Ocean Perch: Recommend the E. Gulf of Alaska allocation be zero. Sablefish/POP incidental by-catch levels must be established for Joint Ventures so as to utilize the resource without wastage. These levels must be realistic and depict actual fishing practices. The classic example is that of black cod where the by-catch level is lower than what is needed to eliminate wastage. These vessels are not targeting on this species, but need the flexibility to retain their by-catch.
- E. Atka Mackerel: JVP data for the Western and Central Gulf is too low. For all three areas the TALFF should be adjusted downward and reserves should be increased, anticipating greater U.S. participation. As in the Bering Sea we strongly encourage more research on this species.
- F. Rockfish: With increased U.S. interest in rockfish we suggest that the Council recommend to the Secretary zero TALFF. Domestic and JV operations should have the opportunity to benefit from this valuable resource.

1985 GULF OF ALASKA GROUND FISH

<u>Species</u>	<u>Area</u>	<u>OY</u>	<u>Reserve</u>	<u>DAP</u>	<u>JVP</u>	<u>DAH</u>	<u>TALFF</u>	<u>NPFVOA Commer</u>
POLLOCK	W/C	400,000	80,000	2,023	-190,000 ^{1/}	192,023	127,977	
	E	16,600	3,320	5	0	5	13,275	
TOTAL:		416,600	83,320	2,028	-190,000 ^{1/}	192,028	141,252	A
PACIFIC COD	W	16,560	3,312	600	5,965	6,565	6,683	
	C	33,540	6,708	8,691	8,200	16,891	9,941	
	E	9,900	1,980	120	0	120	7,800	
TOTAL:		60,000	12,000	9,411	14,165	23,576 ^{2/}	24,424	B
FLOUNDERS ³	W	10,400	2,080	400	800	1,200	7,120	
	C	14,700	2,940	1,486	3,000	4,486	7,274	
	E	8,400	1,680	300	0	300	6,420	
TOTAL:		33,500	6,700	2,186	3,800	5,986	20,814	C
P.OCEAN PERCH	W	2,700	540	2,160	0 ^{5/}	2,160	0	
	C	7,900	1,580	6,320	0 ^{5/}	6,320	0 ^{4/}	
	E	875	175	136	0 ^{5/}	136	0 ^{4/}	
TOTAL:		11,475	2,295	8,616	0 ^{5/}	8,616	0	D
SABLEFISH	W	1,670	334	1,336	0 ^{5/}	1,336	0	
	C	3,060	612	2,448	0 ^{5/}	2,448	0	
	W.YAK	1,680	336	1,344	0 ^{5/}	1,344	0	
	E.YAK	1,135	0	1,135	0 ^{5/}	1,135	0	
	S.E.OUT	1,435	0	1,435	0 ^{5/}	1,435	0	
TOTAL:		8,980	1,282	7,698	0 ^{5/}	7,698	0	D
ATKA MACKEREL	W	4,678	936	0	3,400 ^{6/}	3,400	342	
	C	20,836	4,167	0	500 ^{6/}	500	16,169	
	E	3,186	637	0	0	0	2,549	
TOTAL:		28,700	5,740	0	3,900 ^{6/}	3,900	19,060	E
ROCKFISH	GW	7,600	1,520	2,947	1,765	4,712	1,368 ^{7/}	F
THORNYHEAD	GW	3,750	750	40	10	50	2,950	

1985 GULF OF ALASKA GROUND FISH CONTINUED

<u>Species</u>	<u>Area</u>	<u>OY</u>	<u>Reserve</u>	<u>DAP</u>	<u>JVP</u>	<u>DAH</u>	<u>TALFF</u>	<u>NPFVC</u> <u>Comme</u>
SQUID	GW	5,000	1,000	100	10	110	3,890	
OTHER SPECIES	GW	28,780	5,756	150	1,400	1,550	21,474	
TOTAL		604,385	120,363	33,176	215,050	248,226	235,796	

- 1). Anticipated increase.
- 2). Check with processing industry to verify anticipated level.
- 3). Separate species.
- 4). Recommend zero TALFF.
- 5). Reasonable by-catch levels must be established.
- 6). JVP's too low.
- 7). Recommend zero TALFF.

We can not stress to you enough that when the Council is in question of an allocation, the resource should come first and secondly the benefit of any opportunities should be given to the expanding U.S. Industry. Thank you for this opportunity to voice our concerns. We will be available for comments at the December Council Meeting.

Happy Thanksgiving!

Sincerely,


Barry D. Collier

Executive Director
NPFVOA

BDC:djp

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FISHERIES AGENCY
MINISTRY OF AGRICULTURE, FORESTRY AND FISHERIES
GOVERNMENT OF JAPAN

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November 21, 1984

Mr. Jim H. Branson
Executive Director
North Pacific Fisheries Management Council
P.O. Box 103136
Anchorage, AK 99510
U.S.A.

Dear Mr. Branson:

I would hereby submit the enclosed comments of the Fisheries Agency of the Government of Japan (GOJ) on the TACs, DAPs, JVPs and TALFFs in the Bering Sea and Aleutian Islands Area and the OYs, DAPs, JVPs and TALFFs in the Gulf of Alaska for 1985.

The GOJ strongly requests that the North Pacific Fisheries Management Council take full account of its comments as well as those submitted by Japanese fishing industry.

Yours sincerely,

Keiichi Nakajima

Keiichi Nakajima
Director
Oceanic Fisheries Department
Fisheries Agency

COMMENTS BY THE GOVERNMENT OF
JAPAN ON THE TACs, DAPs, JVPs,
AND TALFFs IN THE BERING SEA AND
ALEUTIAN ISLANDS AREA AND THE
OYS, DAPs, JVPs, AND TALFFs IN
THE GULF OF ALASKA FOR 1985

The Government of Japan is pleased to submit herewith its Comments with respect to the TACs, DAPs, JVPs, and TALFFs in the Bering Sea and Aleutian Islands area and the OYS, DAPs, JVPs, and TALFFs in the Gulf of Alaska for 1985. We request that the U.S. give these Comments its full consideration in light of the research data that Japan has accumulated over the years on these areas as well as its extensive experience in developing and utilizing these fishing grounds.

There is perhaps no need to point out that both these areas are traditional fishing grounds for Japan where our vessels have conducted fishing operations for many years, and their importance remains undiminished to this day.

In the interest of assuring the most effective resource utilization in the subject areas, the Government of Japan hopes that TACs and OYS will be established that are optimum for both the U.S. and Japan, based on the findings of the joint research projects carried out each year by our two countries as well as the deliberations by scien-

tists from both countries at the U.S.-Japan
Scientific Meetings and INPFC Meetings.

1. The Bering Sea and Aleutian Islands Area:

1) General Problems:

- (1) Any sharp decline in TALFF has a major impact on the formulation of Fishing Plans by and the operational patterns of Japan's fisheries in the subject area.

In setting TALFF levels, we ask that the U.S. duly value the cooperation Japan has extended the U.S. to date in the form of over-the-side purchases and other activities. Also, in expanding the DAH, we request that the U.S. avoid any adverse impact on TALFF that might impede the operations of our fisheries by raising TACs to EY levels.

- (2) With respect to "zero TALFFS" for Pacific Ocean Perch (POP) in the Bering Sea and Atka mackerel in the Bering Sea/Aleutian Islands area as well as minute TALFFs for sablefish in the Bering Sea area, we strongly request that these species be handled as prohibited species, establishing minimum unavoidable incidental catch limits for Japan's main fisheries so as not to handicap their target operations for Alaska pollock, Pacific cod, and flatfish, which comprise the bulk of their fishing activities in the U.S. FC2.

(3) In connection with the estimates of DAP and JVP, any expansion of these activities beyond the original estimates could easily be absorbed by the 15% reserve that has been established. Accordingly, we ask that DAP and JVP be set at realistic values, reflecting the catch performances of last year.

2) Problems by Individual Species:

(1) The TAC for Alaska pollock in the Bering Sea area should be set at 1.2 million tons.

In the Resource Assessment Document (RAD), the EY has been estimated at 1.2 million tons, but a TAC 50,000 tons below EY has been recommended in this document on the basis of allegedly weak recruitment for the 1979-1981 classes. In addition, the RC has recommended a TAC of 1.1 million tons, 50,000 tons still lower than the RAD figure..

However, based on the results of the recent (1983) study on Alaska pollock in the Bering Sea area,

conducted by Japanese scientists, the recruitment conditions are acknowledged to be at average levels, while the EY is reported at 1,844,000 tons. Based on these findings (INPFC Document No. 2805), we see no need to set this year's TAC lower than last year.

Accordingly, even taking into consideration the U.S. concerns regarding the setting of this year's TAC, we feel that a TAC of at least 1.2 million tons, comparable to last year's, would be appropriate.

- (2) The TAC for turbot in the Bering Sea/Aleutian Islands Area should be set at 69,000 tons.

With respect to the turbot resource, it is maintained by the U.S. that, while the arrowtooth flounder resource is in good shape, since the 1979-1981 classes of Greenland turbot are weak, this resource is, on the whole, declining. On this basis, this year's EY has been set at 57,500 tons, a full 10,000 tons below last year's level (cf. INPFC Document No. 2830), while the RC has set the proposed TAC at 50,000 tons, 7,500 tons below EY and 9,610 tons below last year's TAC.

Nevertheless, CPUE, which forms the basis for the U.S. assessment of conditions in the Greenland turbot resource, understates, in our view, the size of this

resource. Based on an erroneous assumption that the trawler vessels are able to catch all the enmeshed fish, the catch efficiency is set at 1 (or 100%). Another factor artificially depressing the CPUE level is the fact that commercial fishing vessels have been restricting their fishing grounds and fishing seasons in order to avoid the incidental catch of prohibited species and species with minute allocations. Thus, as Japan pointed out during the debate at the INPFC Annual Meeting, we feel that it would be appropriate to set the EY for Greenland turbot at 47,200 tons.

Accordingly, based on an EY of 47,200 for Greenland turbot plus one of 21,800 tons for arrowtooth flounder, it would be appropriate to set the TAC for turbot at 69,000 tons.

- (3) The TAC for POP in the Aleutian area should be set at 5,700 tons.

Based on an EY of 11,400 tons, as called for by the U.S. in this year's RAD and at the INPFC Annual Meeting, in order to give the Alaska POP resource a chance to rebuild, we request that a 5,700 ton TAC be used for this species, based on a 50% catch ratio, rather than the 33% ratio adopted by the RC.

- (4) The TAC for rockfish in the Aleutian Islands area should be set at 7,800 tons.

The BY for this species, based on U.S. assertions in the RAD and at the Annual Meeting of INPFC, has been set at 7,800 tons. Since the resource conditions for these species, in contrast to those for POP, are quite good, we feel it would be appropriate to set the TAC at the BY level.

- (5) An increase in the TAC for the above species should logically be implemented by raising the individual TACs of all species concerned. However, in order to prevent the total TAC from exceeding the stipulated 2 million tons for all species combined, individual TACs should, we feel, be proportionately lowered for such species as yellowfin sole, flatfish, and "other species", for which large TACs have been established outstripping both catch capabilities and past catch performance.

-8-

1985 Levels of TAC, DAP, JVP, and TALFF
 In the Bering Sea and Aleutian Islands Area
for 1985, as Proposed by the Government of Japan

<u>Species</u>	<u>TAC</u>	<u>DAP</u>	<u>JVP</u>	<u>Reserve</u>	<u>TALFF</u>
Pollock					
Bering Sea (BS)	1,200,000	6,826	274,500		738,674
Aleutian Islands (AI)	100,000	300	10,000		74,700
Pacific Ocean Perch					
BS	680	578	0		0
AI	5,700	100	2,310		2,435
Rockfish					
BS	1,120	600	20		332
AI	7,800	5	535		6,090
Sablefish					
BS	2,446	1,979	100		0
AI	3,360	100	417		2,339
Pacific cod	210,000	62,942	40,000		75,560
Yellowfin sole	213,889	3,076	57,000		121,730
Turbots	69,000	0	2,000		56,650
Flatfish	103,664	907	22,000		65,207
Atka mackerel	37,700	0	32,045		0
Squid	10,000	0	30		8,470
Other Species	34,641	1,000	2,800		25,645
TOTAL	2,000,000	78,411	443,757		1,177,832

2. Gulf of Alaska:

1) General Problems:

With regard to POP and sablefish in the Gulf of Alaska, we ask that TALFFs be established to allow for the inevitable by-catches of these species in order to avoid handicapping the FCZ operations of Japanese fishing vessels, the bulk of which target Alaska pollock and Pacific cod.

For our part, if minute TALFFs are allocated that fall below the levels of unavoidable minimum by-catches by our principal fisheries, the latter would have no alternative but to suspend operations in the middle of the season, thereby leaving the bulk of the TALFF unutilized.

Accordingly, we strongly request that, rather than allocating minute TALFFs for these species, the respective TALFFs be set at zero.

With respect to such prohibited species, Japanese fishing vessels reaffirm their intention of continuing, as in past years, their utmost efforts to hold incidental catches to an irreducible minimum.

- 2) With regard to the DAP and JVP estimates, even if the expansion of these activities were to exceed the original estimates, inasmuch as a 20% reserve has been established, any such overruns could easily be absorbed. Accordingly, we ask that these values be set at realistic levels reflecting the catch performance of last year.

GARVEY, SCHUBERT, ADAMS & BARER
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November 22, 1984

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PLEASE REPLY TO SEATTLE OFFICE

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

Re: 1985 Gulf of Alaska Groundfish OYs

Dear Mr. Branson:

On behalf of the Japan Deep Sea Trawlers Association, we submit the following comment concerning the optimum yields (OYs) for the Gulf of Alaska groundfish fishery for 1985. Our comment is based upon the information available to us as of the date of this letter, and we reserve the right to make additional comments at the Council meeting in December. This letter supersedes our prior comment dated November 21, 1984. Please disregard that comment and replace it with the present one.

We believe that it is necessary to comment only on the Gulf of Alaska pollock OY at this time. The plan team has most recently recommended that the harvest level for 1985 for the combined Western and Central regions be set so that the 1985 harvest does not exceed the 1984 harvest. However, setting OY at the 1984 catch level is not appropriate for 1985. An OY at that level would result in a much lower catch, due to the large reserves and the cumbersome process for the release of those reserves to TALFF and for the allocation of TALFF throughout the year. Moreover, an OY at the 1984 catch level would result in a severe reduction in TALFF due to the significant increase in the estimated JVP catch amount for 1985. Such a severe reduction is not justified biologically and will magnify the problems that already exist in the fishery/


We believe that in order to maintain the 1984 catch level, the OY should be set at approximately 360,000 metric tons, thereby providing for a DAH plus TALFF in the range of approximately 285-290,000 metric tons. The mandatory 20% deduction from OY for reserves will provide a substantial buffer between OY and catch. Recent experience has shown that allocations from these reserves, if made at all, are not likely to be timely enough to be exploited by the foreign fleets. Therefore, for most practical purposes the 72,000 metric tons placed into reserves constitute a mere bookkeeping entry. The likely

catch level which will result from a 360,000 metric ton OY will adequately protect the resource while reducing somewhat the dislocation in the foreign directed pollock fishery.

We will be pleased to discuss this comment with you or your staff at any time before or during the December Council meeting. Thank you for your consideration.

Very truly yours,

GARVEY, SCHUBERT, ADAMS & BARER

by 
Donald P. Swisher

1985 DAP, JVP WORKSHEET

<u>Species</u>	<u>Area</u>	<u>OY</u>	<u>DAP</u>	<u>JVP</u>	<u>Reserves</u>	<u>TALFF</u>
Pollock	W/C E					
Pacific cod	W C E					
Flounders	W C E					
POP	W C E					
Sablefish	W C W. Yakutat E. Yakutat S.E. Outside					
Atka mackerel	W C E					
Rockfish	Gulfwide					
Thornyhead	Gulfwide					
Squid	Gulfwide					
Other species	Gulfwide					

Gulf of Alaska Groundfish
Pacific ocean perch, Sablefish and Atka mackerel
Deficits Projected for 1985

<u>Species</u>		<u>OY</u> ^{1/}	<u>R</u>	<u>.8 OY</u>	<u>DAP</u> ^{2/}	<u>DAP</u> <u>Deficit</u>	<u>JVP</u> ^{3/}	<u>JVP</u> <u>Deficit</u>
POP	W	1,400	280	1,120	3,045	-1,925	6,951	-6,951
	C	3,300	660	2,640	7,278	-4,638	500	-500
	E	875	175	700	1,136	-436	0	0
Sablefish	W	1,430	286	1,144	1,862	-718	114	-114
	C	4,490	898	3,592	15,040	-11,448	290	-290
	E	3,450	N/A	N/A	3,628	-178	0	---
Atka mackerel	W	1,000	200	800	0	0	3,400	-2,600
	C	100	20	80	0	0	500	-420
	E	3,186	637	2,549	0	0	0	0

1/ Suggested biological quotas by Plan Team

2/ DAP from NMFS, J. Smoker, Nov. 27, 1984

3/ JVP from SSC minutes, September 1984

GULF OF ALASKA GROUND FISH PLAN TEAM MEETING REPORT

November 14-16, 1984

Northwest and Alaska Fisheries Center
Seattle, Washington

The Gulf of Alaska Groundfish Plan Team (PT) met in Seattle on November 14-16, 1984. The principal topics were the review of results from the NMFS Gulf of Alaska Triennial survey, a revision to the PT's status of stocks report, and an analysis of the management problem with bycatch of fully utilized species. Other topics included discussion of PT management proposals for the upcoming amendment cycle and a discussion of criteria that the Council may wish to use in establishing an objective for the domestic sablefish fishery.

In attendance were Plan Team members Gary Stauffer, Joe Terry and Jeff Fujioka, NWAFC; Ron Berg, NMFS; Fritz Funk, Barry Bracken and Pete Jackson, ADF&G; Bob Fagen, UA; Steve Hoag, IPHC; and Steve Davis, NPFMC. Advisors to the Plan Team were Pat Travers, NOAA-GC; Miles Alton, Dick Major, Eric Brown, Craig Rose and Marty Nelson, NWAFC. Members of the public in attendance were Paul MacGregor and Tadashi Nemoto, North Pacific Longline Gillnet Assn.; and Don Swisher and Steve Dickerson, Japan Deep Sea Trawlers Assn., Hokuten Trawlers Assn.

With the expansion of the Plan Team and the establishment of the Interim Action Committee, the Team thought it appropriate to elect a chairman and vice-chairman. Dr. Gary Stauffer was elected as chairman and Ron Berg, vice-chairman.

I. REVIEW OF NMFS GULF OF ALASKA TRIENNIAL SURVEY RESULTS/UPDATE STATUS OF STOCKS REPORT

Preliminary results from the 1984 NMFS Gulf of Alaska Triennial survey were provided to the Team by NWAFC scientists. These results included biomass estimates for the rockfish species and the POP complex, sablefish, Pacific

cod, Atka mackerel and the flatfish species. For some of these species, updated values of equilibrium yield and allowable biological catch were calculated. Possible optimum yield values were also determined for other analyses. Details on these and other estimates can be found in the Plan Team's Status of Stocks Report, dated November 14-16, 1984. Table 1 summarizes the Plan Team's findings.

II. ANALYSIS OF ISSUES STATEMENTS 84-1, 84-2, 84-4, 84-5

Pacific ocean perch, sablefish and Atka mackerel have or will shortly, become fully utilized by American fishermen. The Council must decide in December how to manage POP, sablefish and Atka mackerel to accommodate full domestic utilization of them. The listed issues statements were prepared by the Council staff to describe the situation in the Gulf of Alaska groundfish fishery. At the September 1984 meeting the Council proposed that TALFF should equal zero for Pacific ocean perch (POP) and sablefish in the Gulf of Alaska. It is also very likely that TALFF will equal zero for Atka mackerel as a result of the Plan Team's new estimate of ABC. The Council proposed that JVP for POP and sablefish in the Gulf also be set at zero. Again, it is possible that Atka mackerel may also fall into this category following the December Council meeting.

In reference to TALFF and a fully utilized species; Issues Statement 84-1 presented three options: (1) continue to permit a minimal TALFF for fully utilized species; (2) reduce TALFF to zero; or (3) make fully utilized species a prohibited species in foreign fisheries.

Pat Travers advised the Team of the legal problems or questions with some of the options. It has been determined that option 1 to permit a minimum TALFF for bycatch purposes is not legal given that the Gulf of Alaska Groundfish FMP currently states that DAP ". . . shall equal the amount of those species harvested by domestic fishermen during the previous year plus any additional amounts the Regional Director finds will be harvested by the growing domestic fishery. A FMP amendment would be required to change this definition in the

plan to allow for a foreign bycatch as TALFF, but then this course of action may be illegal under the MFCMA.

Option 2 (FMP status quo) appears to be free from legal problems. Under this option, all foreign fisheries which would catch any amount of fully utilized species would cease. Foreign fisheries targeting on a species (for example pollock using mid-water trawls) would only be permitted as long as their operation caught no fully utilized species. The Plan Team discussed briefly the costs and benefits of this option, identifying the costs as a loss in potential revenues, and the potential loss of foreign interest in joint ventures, the sharing of technology, and cooperative research. A possible benefit with a 0-TALFF option might be an increased interest in developing joint ventures as foreign nations look elsewhere for sources of fish. However, if 0-JVP is required for fully utilized species, the potential benefit disappears.

Option 3, where fully utilized species are treated as prohibited species by foreign fisheries is another alternative which depending on how it is implemented could create legal problems. Currently, the foreign fishing regulations for groundfish in the Gulf of Alaska specify that those species with 0-TALFF will become "prohibited species." This means that as with salmon, halibut and crab, any catches of fully utilized species must be returned to the sea. While this regulation exists for foreign operations it does not apply to domestic fisheries. The FMP is silent in regards to this foreign regulation.

An in-depth legal analysis on the above options is being done by NOAA General Counsel. The results of this analysis should be available at the December Council meeting.

In context of the prohibited species option, the Plan Team then discussed the issue of bycatch, and if considered necessary by the Council, how we might control it. Everyone generally agreed that a "ceiling" on the amount of fully utilized species to be taken as a bycatch by foreign fisheries is necessary. As with halibut, a prohibited species catch (PSC) is determined as a ceiling or limit on bycatch in the domestic groundfish fisheries. The Team

believes a PSC for foreign or joint venture bycatch would be consistent with the Council's past policy of minimizing bycatch. If foreign or joint venture fisheries reach the PSC, fishing would end for that year.

The question of how the Council could establish PSC's for fully utilized species was explored. The Plan Team could see only three methods: (1) redefine OY that would allow a bycatch; (2) develop a Gulf of Alaska groundfish complex approach where there would be a single OY for the entire Gulf (similar to the methodology being used in the Bering Sea); and (3) redefine EY to include bycatch amounts of fully utilized species.

1. Redefinition of OY: Currently the definition of OY in the GOA Groundfish FMP has $OY = DAP + JVP + TALFF$, with DAP and JVP given first and second priorities respectively. The Team developed a relationship where

$$OY_{sp} = DAP_{sp} + PSC_{sp}; PSC_{sp} = JVP_{sp} [+ TALFF_{sp}].$$

Bycatch limits, or PSC_{sp} of fully utilized species would be included in the Council's OY determination. PSC_{sp} would equal the necessary bycatch of fully utilized species needed by joint-ventures, plus any amounts needed for foreign fisheries if a foreign bycatch amount were to be allocated.

Pat Travers informed the Team that he thought that this method was not approvable and may not be legal under the MFCMA, given current interpretations of optimum yield by the federal government.

2. Develop a Gulf of Alaska Groundfish Complex Approach to Management:

In the Bering Sea/Aleutian Islands Groundfish FMP, a groundfish complex approach is used in management of those fisheries. Under this plan, a single OY is set for the Bering Sea and Aleutians with individual Total Allowable Catch (TAC) levels set for each species. The establishment of a PSC of fully utilized species for joint venture and/or foreign fisheries may be more feasible under current OY interpretations with the species-complex approach. The species-complex OY option could provide

flexibility in establishing annual harvest and incidental bycatch levels and would be at best a long-term solution and not feasible for 1985. The basis for this option would not be supported by any ecosystem model given that none presently exist.

3. Redefinition of EY: The definition of equilibrium yield (EY) in the Gulf groundfish FMP says that EY is equal to the largest catch that would maintain the stock at approximately the same level. OYs can be set either below or above the EY to either allow the rebuilding of a stock or to take advantage of a particularly strong year class. Current EY values for Gulf of Alaska groundfish species have been calculated for POP and sablefish and are higher than current OYs. Assuming that EY is higher than OY, the Plan Team developed a relationship where:

$$EY \geq OY + \text{bycatch} [+ \text{any rebuilding factor if appropriate}].$$

The variable, bycatch, was defined as: $\text{bycatch} = PSC_{jv} [+ PSC_F]$.

If the Council should choose to set aside a bycatch amount, that amount could be divided and most likely prioritized between joint ventures and foreign fisheries.

This method would allow the establishment of a bycatch amount outside of OY, but when added to OY would not exceed the EY of the fully utilized species.

Apparently, this method also raises legal questions which were not answered at the meeting. Pat Travers plans to research this option and report to the Council at the December meeting.

III. DETERMINATION OF POTENTIAL PSC LEVELS FOR POP, SABLEFISH AND ATKA MACKEREL

If the Council were to decide that some amount of fully utilized species should be allocated towards incidental bycatches in joint venture and foreign

fisheries, how much fish should be set aside? The Plan Team devoted a considerable amount of time to this question. Bycatch data obtained from the NMFS Foreign Observer Program were used in determining necessary bycatch amounts of POP, sablefish and Atka mackerel by foreign vessel category. Data was not available to the Team for determining bycatch amounts by time and area or for joint ventures. A workgroup headed by Joe Terry is to obtain these time/area data and to present their findings to the Council, are also examining joint venture bycatch to determine amounts of fully utilized species necessary for joint venture operations.

Observer data taken from Gulf of Alaska groundfish fisheries in 1983 and 1984 were presented to the Team by Joe Terry (Attachments 1 and 2). The data was presented by species and by vessel category (i.e., Japanese small trawler, Japanese surimi trawler, Korean large freezer trawler, etc.) It was evident that foreign fisheries in the Gulf target primarily on two species: pollock and Pacific cod. Pollock is the primary target species by many trawl vessels and Pacific cod is the target species by foreign longline vessels. Assuming that all other groundfish species are a bycatch to the primary target species, the Team was able to identify the lowest and highest bycatch rates by fishing vessel categories. Tables 2 and 3 show observed bycatch rates of fully utilized species by vessel category for 1983 and 1984 respectively. Team members noted that these rates may include some small amounts of targeting on POP, sablefish and Atka mackerel but the resolution in the data did not separate this targeting effort from true incidental bycatch. Review of the observed bycatch rates clearly show that Japanese small and large freezer trawlers and Korean small and large freezer trawlers have the highest bycatch rates for fully utilized species. For purposes of the Team's analysis, these four vessel types were lumped into one category when calculating bycatch amounts.

From Table 2, the Plan Team noted the following:

1. For Sablefish: - lowest observed bycatch rate is about 1% for all trawl categories except surimi where the rate was about 0.14%
 - foreign longline effort on cod provided a rate of less than 1.2%

2. For POP: - lowest observed bycatch rate is about 1.2%
 - surimi trawl and longline bycatch rate was lowest of all categories at 0.2%

3. For Atka mackerel: - All trawl categories except surimi averaged about 23% Atka mackerel due to directed fishing; therefore 1983 data is not helpful.
 - surimi trawlers caught 0.76% Atka mackerel
 - longliners caught only a trace

Assuming that the 1985 pollock OY will equal the 1984 catch of 250,000 mt, there would be a TALFF of 58,000 mt. Using the described bycatch rates above for fully utilized species the following scenarios produced a range of potential PSC amounts:

For Sablefish:

Target Sp

Pollock	(1)	if 50% surimi at 0.15%	43 mt sablefish
		50% other trawl at 1%	<u>290 mt</u>
			333 mt sablefish

Pollock (2) if 100% surimi trawl at 0.15% 86 mt sablefish

Cod If the 1985 Pacific cod TALFF were 30,000 mt, then at 1.2%, 360 mt of sablefish would be needed as bycatch by foreign

longline fisheries. Adding the longline bycatch to the three trawl scenarios produces a bycatch range of

446-693 mt sablefish

For Pacific ocean perch:

Target Sp

Pollock	(1)	if 50% fishery at 0.2%,	58 mt POP
		50% fishery at 1.2%,	<u>348 mt</u>
			406 mt POP

Pollock (2) if 100% fishery at 0.2%, 116 mt POP

Cod Using a longline bycatch rate of 0.2%, then 60 mt POP.
Thus providing a total foreign bycatch range for POP of

176-466 mt POP

This procedure was then applied to observer data collected in 1984. Table 3 summarizes the bycatch rates noted by NMFS observers. From this database the Plan Team made the following observations:

1. For Sablefish:
 - Lowest observed bycatch rate for all trawl categories except surimi was 0.32% sablefish, lower than in 1983.
 - Japanese surimi trawlers had the lowest rate of 0.06%, lower than 1983.
 - Japanese longliners had a high of 4.0% but this number includes some targeting.
2. For POP:
 - Lowest observed rate for all trawl categories except surimi was 0.5%, lower than 1983.
 - Surimi trawl rate was 0.001%, lower than 1983.
3. For Atka mackerel: - Lowest rate for all trawl categories except surimi was 0.82%.

- Surimi bycatch rate was 0.003%, lower than 1983.
- Japanese longline bycatch rate was 1.8%, lower than 1983.

Using the same scenarios as applied to 1983 data, potential PSC amounts were calculated for 1984:

For Sablefish:

Target Sp

Pollock	(1)	if 50% fishery at 0.06%,	17 mt sablefish
		50% fishery at 0.32%,	<u>93 mt</u>
			110 mt sablefish

Pollock	(2)	if 100% fishery at 0.06%,	35 mt sablefish
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Cod Using a longline bycatch rate of 1.2%, then 360 mt sablefish.
Thus providing a total foreign bycatch range for sablefish of

395-470 mt sablefish

For Pacific ocean perch:

Target Sp

Pollock	(1)	if 50% fishery at 0.05%,	14.5 POP
		50% fishery at 0.5%,	<u>145 mt</u>
			160 mt POP

Pollock	(2)	if 100% fishery at 0.05%,	29 mt POP
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Cod Using a longline bycatch rate of 0.001%, then 0.3 mt POP.
Thus providing a total foreign bycatch range for POP of

29.3-160.3 mt POP

For Atka mackerel:

Target Sp

Pollock	(1)	if 50% fishery at 0.003%,	0.9 mt A. mackerel
		50% fishery at 0.82%,	<u>238 mt</u>
			238.9 mt A. mackerel

Pollock	(2)	if 100% fishery at 0.003%,	1.8 mt A. mackerel
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Cod Using a longline bycatch rate of 1.8%, then 540 mt Atka mackerel.

Thus providing a total foreign bycatch range for Atka mackerel of

541.8-778.9 mt Atka mackerel

As mentioned previously, data were not available for the Team to calculate observed bycatch rates for joint ventures that separate out the mid-water trawl joint venture in Shelikof Straits from the bottom trawl joint venture fisheries. These data, and foreign bycatch data broken out by time and regulatory areas are to be analyzed using the Team's approach by a Plan Team workgroup. Results of the workgroup's analysis will be provided to the Council at the December meeting. Therefore, the bycatch rates and potential PSC's calculated by the Team are to be viewed as tentative and reflect the Team's desired approach to any calculation of PSC values.

IV. OTHER ITEMS DISCUSSED BY PLAN TEAM

Southeast Alaska Shelf Rockfish Management

The Plan Team received a report from Barry Bracken and Fritz Funk on potential management problems with shelf rockfish. Currently these species are aggregated into the "other rockfish" category for purposes of management. With domestic interest building for individual species within this category, new species definitions, management areas, and separate OYs may be needed. A written report that will be submitted to the Board of Fisheries was provided

to the Team (Attachment 3). An oral report will be given to both the Board and Council at its joint meeting in February. The Plan Team basically agreed with the ADF&G recommendation and will address possible solutions more formally during the upcoming amendment cycle.

Sablefish Management Areas

A discussion paper on sablefish management areas was presented at the meeting by Barry Bracken and Ron Berg. The current problem with managing the sablefish fishery is that most of the catch comes from just a few areas. Basically the Team favored managing sablefish by INPFC areas instead of the larger areas currently defined by the FMP. This would prevent localized depletion of stocks which is very probable with the current concentrations of effort. Ron Berg indicated that there was a possibility that a redefinition of management areas for sablefish could be implemented this year by emergency rule. Given the potential increase in harvest levels in the Central area (Kodiak-Chirikof), this could be a problem in 1985. Ron Berg volunteered to prepare a management proposal that addresses this problem for the groundfish amendment cycle.

Southeast Sablefish Pot Ban - Amendment 12 Status

Steve Davis reviewed the action taken by the Council at its September meeting. Amendment 12 was formally withdrawn and the Council asked the Plan Team to evaluate the advantages and disadvantages of all gear types for fishing sablefish in the Gulf of Alaska. The motion adopted by the Council also required that the Council provide an objective for sablefish management to the Team so that a gear analysis can be conducted. No objective was provided. The Plan Team requests that the Council develop management goals and objectives for the sablefish fishery. Recognizing that management proposals are being submitted to eliminate all gear types except longline for sablefish, the Team and eventually the Council will need these objectives when evaluating proposals and preparing supporting documents. The Team asked Barry Bracken and Steve Davis to develop possible criteria that the Council may wish to use when evaluating gear types. This subgroup will report back to the Team at its next meeting.

PacFIN

The Plan Team discussed more appropriate catch reports from the PacFIN system with PacFIN manager Will Daspit. It was decided not to develop final report specifications at this time, since regulatory areas for sablefish and rockfish are currently subject to revision. A subcommittee consisting of Ron Berg, Fritz Funk and Joe Terry was appointed to develop report specifications and draft a memo from the Team to the Pacific Coast Data Committee for review by the Plan Team at their next meeting.

V. THE FOLLOWING IS A LIST OF PROPOSALS THAT THE PLAN TEAM IS PREPARING FOR THE UPCOMING AMENDMENT CYCLE.

1. Revision to harvestable biomass, equilibrium yield, allowable biological catch and optimum yield values for 1985 Gulf of Alaska groundfish.
2. Implementation of Council policy in regards to management of fully-utilized species.
3. Develop a framework procedure for the setting of optimum yield.
4. Expand the Regional Director's field order authority to include crab bycatch as a basis for time/area closures.
5. Revision of regulatory areas for purposes of managing the sablefish fishery.
6. Develop a management strategy for continental shelf rockfish species.
7. Expand on vessel checkin/checkout procedures for purposes of data reporting.
8. Implement Council's PSC levels for halibut.
9. Update historical chapters of the FMP.

10. Delete references to Southeast Alaska cul-de-sacs and bring FMP into conformity with the law.

VI. NEXT PLAN TEAM MEETING

The Gulf of Alaska Groundfish Plan Team has scheduled a meeting on December 13-14, 1984 in the NMFS Conference Room, Juneau, Alaska. The primary purpose for the meeting is to review and prioritize management proposals being considered under the 1985 amendment cycle and to begin work on proposal analyses.

DABS

Gulf 1983 %

Percent Dilution

Percent Profit

from former dates

	PPOL	PCOD	PSAB	PAM	PPOP	PFL
1	66.1003	3.30439	0.749578	2.84215	9.00743	14.3482
2	97.5630	0.603827	0.139345	0.740076	0.179600	0.634793
3	31.2074	6.88025	1.00485	12.4660	20.3807	22.1717
4	1.10864	83.4330	12.5176	626351E-02	0.184773	1.98553
5	79.6307	1.31605	0.549990	15.8711	0.216058	1.70890
6	70.1765	2.67391	0.353516	18.6367	0.934801	6.05485
7	0.	9.44444	84.0741	0.	0.370370	0.555556
8	94.0683	1.70139	0.192862	0.554040	1.38510	1.88724
	1	2	3	4	5	6

POR PTH

1	1.43669	2.21126
2	990896E-01	402552E-01
3	4.99468	0.892540
4	0.259935	0.504212
5	0.687488	194429E-01
6	1.15308	166081E-01
7	0.	5.55556
8	0.202680	841580E-02
	7	8

JPLL and Keams did fight on satellite in 1983

metric ton

	MTPOL	MTCOD	MTSAB	MTAM	MTPOP	MTFL
1	10582.0	529.000	120.000	455.000	1442.00	2297.00
2	31507.0	195.000	45.0000	239.000	58.0000	205.000
3	5280.00	1164.00	170.000	2109.00	3448.00	3751.00
4	354.000	26641.0	3997.00	2.00000	59.00000	634.000
5	4054.00	67.0000	28.0000	808.000	11.0000	87.0000
6	29578.0	1127.00	149.000	7855.00	394.000	2552.00
7	0.	51.0000	454.000	0.	2.00000	3.00000
8	134131.	2426.00	275.000	790.000	1975.00	2691.00
	1	2	3	4	5	6

Most of this came from Tomson and Keams JV's together on A. Michael.

1 J small + 5. K small +
 2 J sur. + 6 K large f +
 3 J large f.t 7. K large
 4 J long 1 8. J-V

Japanese Small and by Tomson are the interest subseries

everything = growthish
harvest

SAMPLE #	PGFPOL	PGFCOD	PGFSAB	PGFAM	PGFPOP	PGFFL
1	82.6095	1.30086	0.244095	0.671832	8.51917	5.23379
2	98.5957	0.506653	614137E-01	307069E-02	491310E-01	0.752318
3	23.2380	4.80027	0.630489	4.61608	39.3074	22.0221
4	0.396356	94.6179	3.78972	655222E-02	973507E-01	0.959599
5	88.6254	1.75670	0.439174	439174E-01	0.263505	8.78349
6	94.5392	1.54394	0.667650	0.909573	0.216986	1.99162
7	0.	0.	0.	0.	0.	0.
8	99.6503	0.286078	0.	0.	317864E-01	317864E-01
9	99.6220	0.297285	658805E-02	0.	271757E-01	469399E-01
10	94.2431	0.607182	0.376548	0.930255	2.63166	0.771154
11	99.2009	0.240685	192548E-01	0.	385097E-01	0.490998
12	79.0710	10.6284	1.20219	273224E-01	0.382514	8.66120
13	16.4151	33.3962	5.28302	0.180679	0.377359	43.9623
14	33.5744	39.1858	1.78117	133933E-01	0.214276	24.8159
15	95.8065	2.58065	0.322521	0.	0.516129	0.709677
15	95.0545	2.04821	0.215526	0.277096	0.812079	1.43494
		2	3	4	5	6

Shelby N-9 Copar
Stab. - 10 Stab

PGFDR	PGFTH
0.616197	0.762473
276362E-01	307069E-02
6.30489	1.08084
695362E-01	625826E-01
439174E-01	439174E-01
0.116839	139094E-01
0.	0.
0.	0.
0.	0.
0.410741	292227E-01
962742E-02	0.
273224E-01	0.
0.377358	0.
0.415160	0.
322581E-01	322581E-01
0.138789	864425E-02

	PPDL	PPCOD	PPSAB	PPAM	PPPOP	PPFL
1	100.000	1.57471	0.319678	0.816955	10.3126	6.33436
2	100.000	0.513875	.622878E-01	.311439E-02	.498303E-01	0.763026
3	100.000	29.2636	2.71318	19.0843	151.938	94.7674
4	100.000	23871.9	956.140	1.75439	24.5614	242.105
5	100.000	1.98216	0.495540	.495540E-01	0.297324	9.91080
6	100.000	1.63312	0.706215	0.962218	0.229520	2.10687
7	0.	0.	0.	0.	0.	0.
8	100.000	0.287081	0.	0.	.318979E-01	.318979E-01
9	100.000	0.298414	.661305E-02	0.	.272788E-01	.471180E-01
10	100.000	0.644272	0.399655	0.987080	2.79242	0.818260
11	100.000	0.242624	.194099E-01	0.	.388199E-01	0.494953
12	100.000	13.4416	1.92039	.348643E-01	0.483760	10.9537
13	100.000	203.448	<u>32.1839</u>	1.14943	2.29885	267.816
14	100.000	116.713	5.30515	.390883E-01	0.638213	73.9130
15	100.000	2.69360	0.336700	0.	0.538721	0.740741
16	100.000	2.15454	0.226820	0.291462	0.854239	1.50944
	1	2	3	4	5	6

	PPDR	PPTH
1	0.745915	0.947194
2	.250295E-01	.311439E-02
3	27.1318	4.65116
4	17.5439	15.7895
5	.495540E-01	.495540E-01
6	0.123588	.147128E-01
7	0.	0.
8	0.	0.
9	0.	0.
10	0.435831	.310078E-01
11	.970497E-02	0.
12	.345343E-01	0.
13	2.29885	0.
14	1.23654	0.
15	.336700E-01	.336700E-01
16	0.145994	.909302E-02
	7	8

SAMPLE = 1 8 16 18

! total pataak banast

- 1) Japan small Trawl
- 2) " swimi trawl
- 3) " lg. fr. trawl
- 4) " longline
- 5) Korea small trawl
- 6) " lg. fr. trawl
- 7) " longline
- 8) J V US - Ger
- 9) " US - Japan
- 10) " US - Korea
- 11) " US - Poland
- 12) " US - Soviet
- 13) " US - Spain
- 14) " US Taiwan
- 15) Poland Lg fr. trawl
- 16) J V all

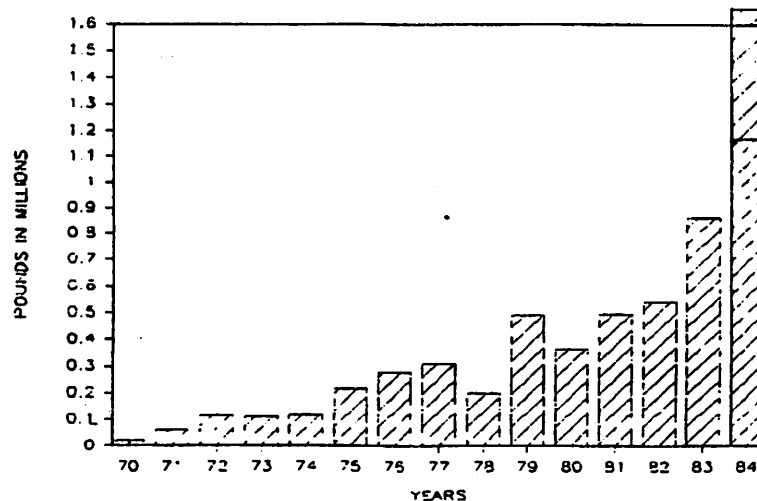
SOUTHEASTERN ALASKA CONTINENTAL SHELF DEMERSAL ROCKFISH FISHERY

By: ADF&G Staff - November 7, 1984

A major new domestic fishery for rockfish in the rocky nearshore areas of the continental shelf off Southeastern Alaska has developed in recent years. This fishery is second in importance only to the sablefish fishery in Southeastern Alaska. The species assemblage harvested by this new longline fishery is not addressed in the Gulf of Alaska Fishery Management Plan. There are currently no state or federal management regulations which directly apply to this fishery. Since the annual harvest is escalating at an exponential rate, it is urgent that management guidelines be developed.

The Gulf of Alaska Fishery Management plan currently contains an "other" rockfish category. The MSY, EY, and OY for this category are based on foreign trawl fishery harvests from 1973 through 1975. However these trawl fisheries occurred on the continental slope and harvested a different species assemblage from that harvested in the new Southeastern Alaska rockfish longline fishery on the continental shelf. The shelf demersal rockfish species occur in an entirely different habitat from the slope assemblage described in the FMP and cannot be harvested by the same gear types. Separate management regulations should be used to regulate the harvest of these two species assemblages.

Annual harvests are escalating rapidly in the Southeastern Alaska nearshore rockfish fishery:



Most (80% in 1984) of this harvest is concentrated in the nearshore areas of the outer coasts of Baranof and Chichagof Islands, over an 80 mile latitudinal range. ADF&G staff have received numerous requests for information from additional fishermen and processors interested in entering this fishery in 1985, indicating that the fishing effort will continue to expand.

Appropriate sustained yield harvest levels for the shelf demersal rockfish assemblage cannot be determined with conventional techniques. These species occur very close to the bottom in rocky habitats strewn with boulders and pinnacles where trawls cannot be used, so that biomass cannot be estimated from conventional trawl survey area-swept expansions. Reliable acoustic estimates of densities are also doubtful. The fishery has developed so rapidly that there are far too few data points for a stock-production model determination of MSY. There are no time series of catch-at-age data to allow cohort analysis estimates of initial biomass. Furthermore, the fishery harvests a multi-species assemblage so that conventional single species population models are probably not applicable. Since ecological interactions among the component species are poorly defined, the production response of the entire assemblage is unknown.

Given that guideline harvest levels cannot be determined from biomass or production estimates in the near future, fishery management must be based on relative trends in abundance determined from survey or fishery catch-per-unit-effort (CPUE). A few limited surveys have been performed on the shelf demersal rockfish assemblage, using fishing gear suitable for the habitat. However, there are too few surveys to determine whether stock abundance is increasing or decreasing. Fishery CPUE determined from skipper interviews has not yet shown any substantial decline. However, trends in fishery CPUE may be confounded by other factors in the fishery. Target species in the fishery fluctuate because of changes in market conditions. Fishing efficiency increased markedly in 1984 as virtually the entire fleet switched to circle hooks. CPUE determined from skipper interviews also has a high inherent variance since a vessel may fish several fishing grounds and depth zones over the course of a single trip. CPUE determined from skipper interviews represents the average of all the grounds fished during a single trip so that declines on a single fishing ground may go undetected.

There are some other indications that localized depletion is beginning to occur, particularly in the heavily fished areas closest to Sitka, the major port of landing. The Kruzof Island and Cape Edgecumbe/Sitka Sound subareas were the major fishing grounds in 1982 (Figure 1). By 1984, much of the effort had transferred out of these areas to the more southerly Whale Bay and Redfish Bay subareas. Fishermen have indicated to ADF&G staff that declines in fishing success are responsible for the changes in fishing grounds.

The history of rockfish management on the Pacific coast is not encouraging. Rockfish are extremely long lived (some species have been aged in excess of 140 years) and slow growing. Hence the sustainable yield that can be taken from a given biomass is much lower than for a comparable biomass of faster growing species such as gadids. Rockfish populations are very easily and quickly overfished. Nearly every rockfish population on the Pacific coast is in poor condition due to overfishing. Rebuilding overharvested rockfish populations (e.g. Pacific Ocean Perch) to near-MSY levels may take 50 to 100 years, even with little or no fishing. Faced with lack of information about appropriate harvest levels for rockfish species, the risk of overharvesting the resource is great.

Management of the Southeastern Alaska rockfish fishery requires joint state-federal action. The current fishery occurs in nearshore, relatively shallow

(< 100 fathom) waters, but approximately 50% of the potential fishing grounds are in the Fishery Conservation Zone (FCZ). Obviously state and federal actions will have to be closely coordinated.

In view of the above we recommend that the Council work closely with the Board of Fisheries to define this new rockfish fishery and establish preliminary harvest limits to prevent overfishing. This issue is already on the Board's agenda during their February 1985 meeting in Sitka. We see the following options for Council action:

1. Accept the risk of overharvesting and allow the fishery to continue unrestricted, pending the results of further studies.

2. Allow the Board of Fisheries to restrict the harvest in State waters only, with no restrictions in the FCZ.

3. Together with the Board of Fisheries, temporarily restrict harvests to current levels in all waters of Southeastern Alaska, pending results of further studies. This option would involve a plan amendment which defines the species composition of the shelf demersal rockfish assemblage and establishes an OY temporarily set at the current harvest level. State and Federal emergency regulations may have to be implemented as interim measures, prior to adoption of the amendment.

4. Together with the Board of Fisheries, temporarily restrict harvests to current levels in the area of the current intensive fishery off the coasts of Baranof and Chichagof Islands only, pending results of further studies. This option would involve a plan amendment as in #3 above, but 2 or more management areas would be defined within Southeastern Alaska. Only harvest in the Baranof Island area would be restricted at the present time.

We recommend option 4. Because of the above mentioned concerns with this new fishery, we believe that some management guidelines must be implemented as soon as possible. We feel there is insufficient time to wait for further studies (option 1) before taking action. Option 2 would not effectively restrict the harvest since 50% of the fishing grounds are in federal waters. In addition option 2 would create severe enforcement and regulatory problems. Option 3 would restrict harvests, but would permit overfishing in the vicinity of Baranof and Chichagof Islands. Option 4 would protect these grounds, while not restricting fishermen from developing new fishing grounds. Fishermen and processors have already expressed an interest and are currently developing other grounds and major ports of landing in southern Southeastern Alaska.

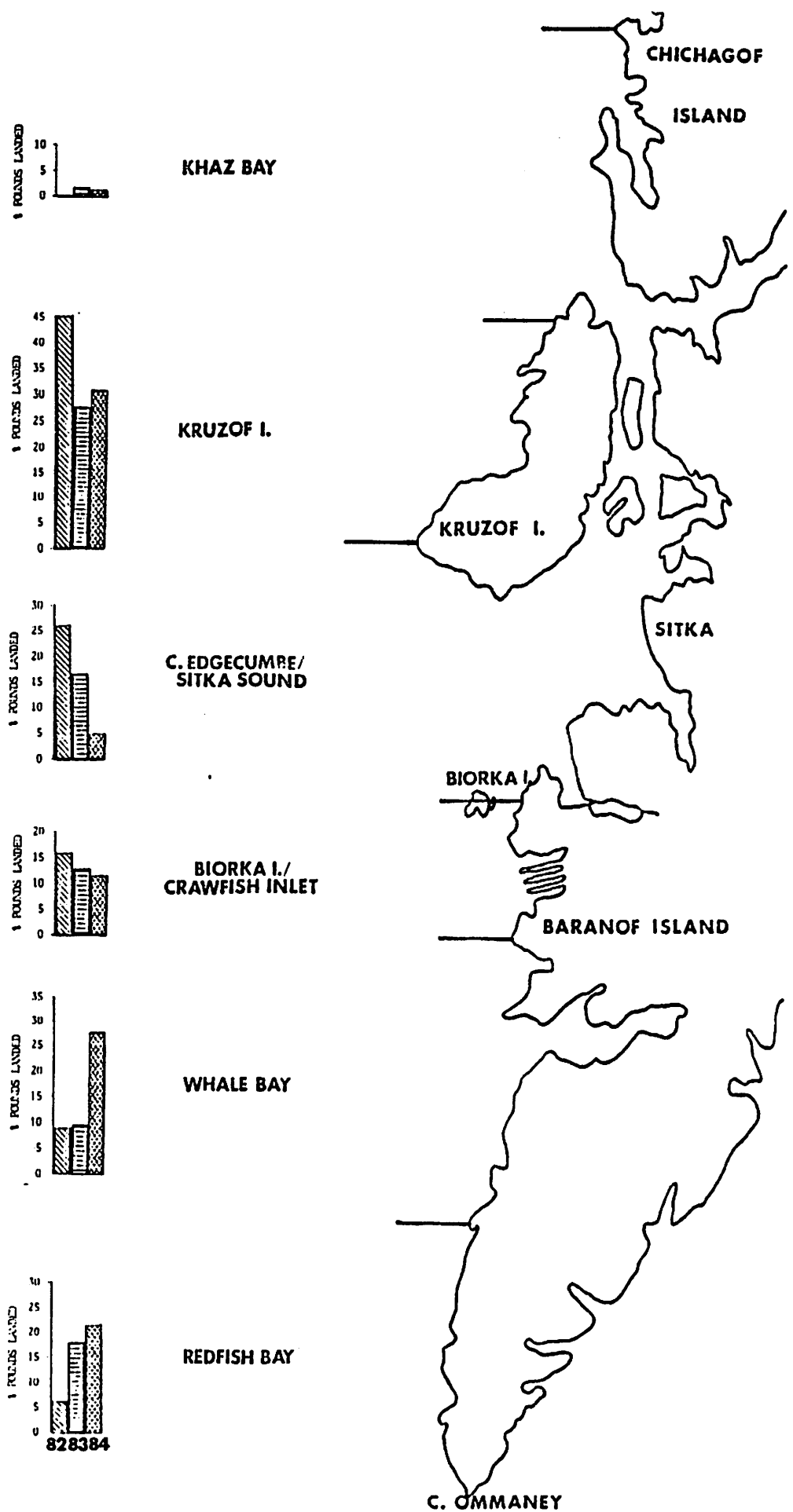


Figure 1. Percent of rockfish landings by area in the Southeastern Rockfish fishery, 1982-84.

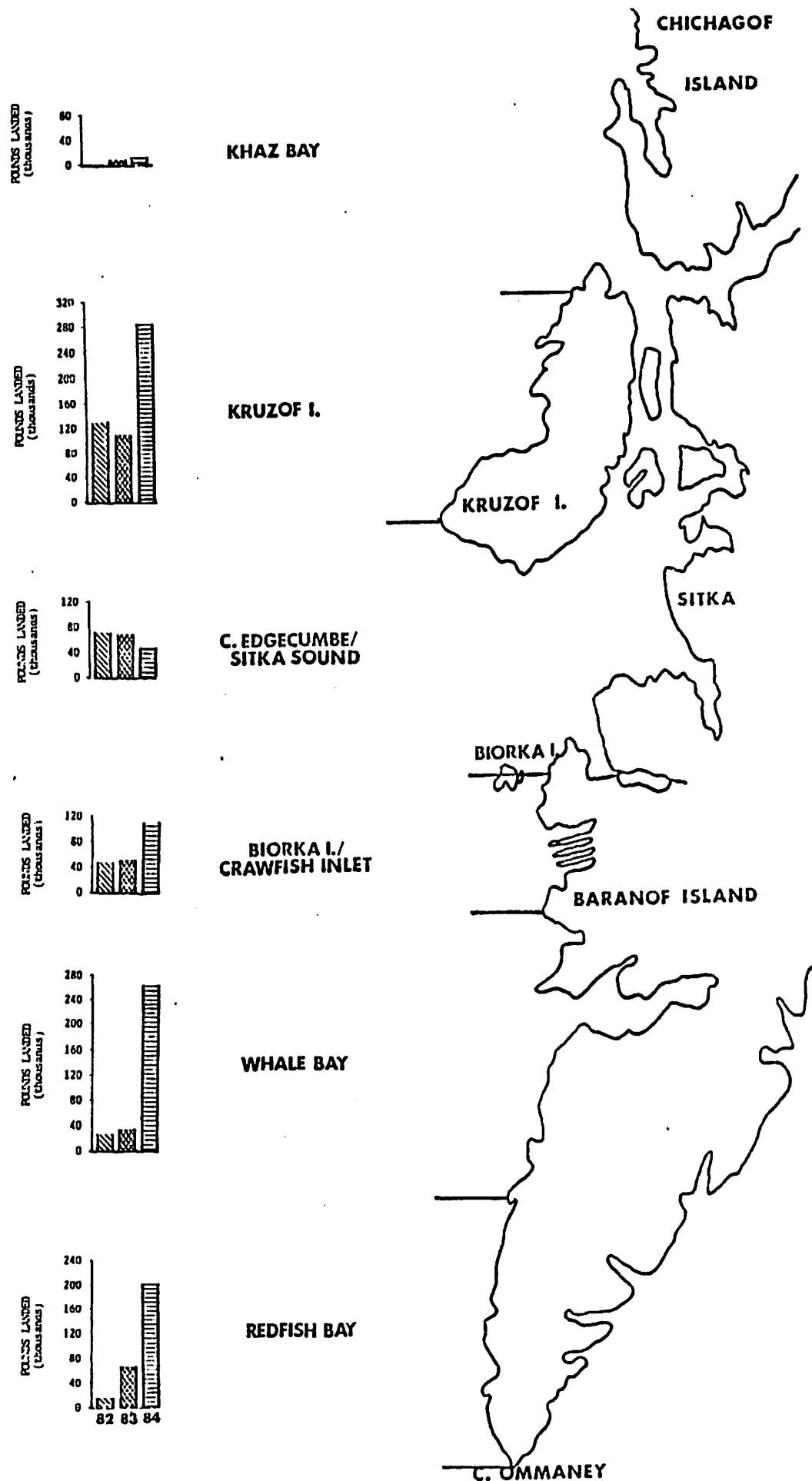


Figure 2. Pounds of rockfish landed by area in the Baranof - Chichagof rockfish fishery, 1982-1984.