MEMORANDUM

TO: Council, SSC and AP Members

FROM: Clarence G. Pautzke
Executive Director

DATE: December 1, 1994

SUBJECT: Staff Tasking

ESTIMATED TIME
1 HOUR

ACTION REQUIRED

Review amendment proposals and determine which to process further.

BACKGROUND

For reference, Item D-4 (a) is a status report on Council projects, including major plan and regulatory amendments in progress. Item D-4(b) contains 26 proposals for new projects submitted during this year's amendment cycle. The Groundfish Plan Teams conducted a preliminary review of these proposals which included initial estimates of workload requirements for each. The Council's Plan Amendment Advisory Group (PAAG) met earlier this week and a copy of their recommendations has been distributed.

STATUS OF COUNCIL TASKING

December 4, 1994

	ACTION	STATUS	TASKING
REPORTS:			
1	Pacific Pelagics Management	Report in January 1995	Region/Council
2	Halibut Charter Cap	Report in January 1995	Council
3	Opilio Bycatch	Report in December	Region
4	Full Utilization/Harvest Priority	Report in December	Region/Council/Center
REGULATORY AMENDMENTS:			
1	Insh/Offsh/CDQ Bycatch	Passed by Council Dec 1992. Never implemented.	Council/Region
2	1995 Reporting/Recording Requirements	Being developed by NMFS	Region
3	Observer Requirements 1994/1995	Final Rule in Effect	Region/Council
4	Standard PRRs/Pollock roe-stripping adjustments	Final Rule Effective November 4, 1994	Region
5	Directed Fishing Standards	Proposed Rule in DC	Region/Council
6	Pollock 'A' Season Start Dates	Final Rule in DC	Council/Region
7	Area 4B Halibut Am.	Final Rule Published Effective June 6, 1994	Council
8	Salmon Bycatch cap in CVOA	Emergency Interim Rule Effective August 15, 1994	Region
9	Seamount Restrictions	Review in January	Region
10	Halibut Grid Sorting	Review in January	Council/IPHC
11	Relax Halibut Fixed Gear PSC	Proposed Rule in DC	Region

	ACTION	STATUS	TASKING
PLAN AMENDMENTS:			
1	Moratorium	Disapproved August 5, 1994 Resubmitted Nov. 7, 1994	Council/Region
2	Sablefish/Halibut IFQs	Final Rule on Nov. 9, 1993. Discuss in December 1994	Council/Region
3	NPFR Plan	Final Rule Published Sept. 6, 1994	Council/Region/Center
4	Pribilof Closures	Comment period on Proposed Rule closed November 28	ADFG/Region
5	Salmon Retention/Delivery	Proposed Rule in preparation	Region
6	Salmon Bycatch Program (Foundation)	Review in January 1995	Region
7	Salmon Hotspot Authority/Bycatch	Review in January 1995	ADFG
8	Comp. Rationalization Plan (a) License Prgm (b) IFQ Program	Review in December 1994 Initial review in 1995	 Council Council
9	Total Weight Measurement for CDQ Fisheries	Effective Aug. 15, 1994	Region
10	Scallop FMP/Moratorium	Proposed Rule in Preparation Discuss in December	Region/Council
11	Release PSC rates by vessel name	In effect - May 25, 1994	Region
12	Norton Sound Crab Superexclusive Zone	Final Rule filed Effective July 1, 1994	State/Region/Council
13	Mesh Size Amendment	Action in Sept. 1994 Proposed Rule in preparation	Council/Region
14	Total Weight Measurement General Fisheries	Final Review in Sept. 1994	Region
15	IFQ Block Amendment	Approved on Sept. 14, 1994	Region
16	Inshore/offshore rollover	Analysis in April 1995	Council

	ACTION	STATUS	TASKING
17	Pollock CDQ rollover	Analysis in April 1995	Council

OTHER ACTIONS:

1	April 24, 1994 Scallop Control Date	Published on June 15, 1994	Region
2	Halibut Charter Control Date		Region
3	Bristol Bay Crab Bycatch Control Measures	Emergency Rule in Nov. Discuss in December	Region

Report of the Plan Amendment Advisory Group
North Pacific Fishery Management Council
December 6, 1994

The Council's Plan Amendment Advisory Group (PAAG) met Thursday, December 6 from 8:00 - 9:30 p.m. to review 28 groundfish amendment proposals. Chairman Mace reviewed the procedure whereby the PAAG was requested by the Council to review the amendment proposals. The Council did not solicit a call for proposals this past summer due to the press of current projects. However, the Council received about 20 groundfish proposals by the September Council meeting. The Council requested that the Gulf of Alaska and Bering Sea Plan Teams rank the proposals and provide recommendations to the Council's Plan Amendment Advisory Group. The Council requested that the PAAG also review and rank the proposals for the Council's consideration at the December Council meeting.

A total of 25 proposals were reviewed and ranked by the Plan Teams. The Teams blocked the 25 proposals into 12 blocks of similar management action. They identified the area affected, whether it would require a plan or regulatory amendment, the relative amount of staff time to prepare the amendment, and its priority relative to current management actions being considered by the Council. The results are listed in the first attached table.

The committee deliberated over the approach in which to evaluate the proposals (including three additional proposals not received by the Plan Teams). The committee identified that most proposals addressed symptoms of current management regimes, and not the problem of over-capitalization. Most proposals were allocative and would likely be addressed under Comprehensive Rationalization Program currently under consideration by the Council (proposal #4 is already being considered under CRP) The committee acknowledged the importance of each proposal to its requestor, and chose to defer ranking of those proposals to the full Council.

The committee, however, did group the blocks identified by the Plan Teams further to simplify the decision-making process. The proposals were divided into allocative and non-allocative issues. The committee ranked the non-allocative proposals on a relative scale:

BLOCK	RANK
6	M
10, broaden to include all fisheries	H
12	L

The allocative issues were further grouped into six categories, but were not ranked:

CATEGORY	BLOCK
<u>Gulf of Alaska</u>	
1. Pacific cod gear allocations	1, 3
2. season extensions	2, 5, 7, 8
<u>Bering Sea/Aleutian Islands</u>	
3. groundfish OY	9
4. pollock & rock sole A/B season apportionments	11
5. Pacific cod gear allocations	4
6. sablefish IFQs	13

The PAAG discussed the Council's heavy management schedule and the current level of staff tasking. The committee recommends that the Council consider the short-term benefits of the proposals to industry against the long-term benefits of CRP and other comprehensive management alternatives before the Council.

jdc/paagrpt

27
BLOCK 2

Jay E. Stinson
PO Box 3845
Kodiak, Alaska 99615
(907) 486-6933

Richard B. Lauber, Chairman
Clarence Pautzke, Executive Director
North Pacific Fishery Management Council
PO Box 103136
Anchorage, Alaska 99501

Re: Regulatory Amendment for Quarterly Apportionment of the Pollock TAC in the Eastern Gulf of Alaska.

Dear Mr. Lauber and Mr. Pautzke,

Because of the reduced pollock quota in the eastern gulf of Alaska, controlled management of the fishery will become increasingly difficult without certain measures being taken to safe guard the stock from over exploitation.

Consequent to ocean currents in the gulf, this spawning stock is extremely critical to the continued health and viability of down-current fishing stocks in this area of 630, 620 and eventually 610. By putting the eastern gulf pollock into quarterly apportionment, the risk of over exploitation of the spawning stock is reduced.

Additionally, by spreading fishing effort out over more of the year, there is less potential impact on the marine mammal stocks in the area. Although the sea lion stocks in this area seem to be doing better than in other portions of the state, it is extremely critical to protect and husband any and all of these animals.

In conclusion, quarterly fishing allotments would reduce the potential for over harvesting of this stock, and would reduce the potential for adverse impact on marine mammal stocks in this area.

Sincerely,

Jay E. Stinson
Owner F/V Alaskan

28
block 2

Paul Finzer
PO Box 4363
Kodiak, Alaska 99615
(907) 486-6234

Richard B. Lauber, Chairman
Clarence Pautzke, Executive Director
North Pacific Management Council
PO Box 103136
Anchorage, Alaska 99501

Re: Trip limits for Pollock in Eastern Gulf of Alaska

Dear Mr. Lauber and Mr. Pautzke,

In order to protect the pollock spawning stocks in the eastern gulf of Alaska, and to better control the rate of harvest to lessen likelihood of over-harvesting, trip limits should be considered as a management tool in this area. Because of the reduced biomass in the gulf, spawning stocks need to be managed with minimal biological impact and maximum control. Maximum economic utilization of the resource needs to occur, particularly for some of the communities of the central and north gulf coast. One hundred ton trip limits would address these concerns.

Sincerely,

Paul Finzer

GROUNDFISH FISHERY MANAGEMENT PLAN AMENDMENT PROPOSAL
North Pacific Fishery Management Council

Name of Proposer: Scientific and Statistical Committee **Date:** 12/7/94
Address:
Telephone:

Fishery Management Plan: GOA/BSAI Groundfish

Brief Statement of Proposal:

Reconsider overfishing definition to provide buffer between ABC and OFL and to respond to "Scientific Review of Definitions of Overfishing" prepared for NMFS.

Objectives of Proposal: (What is the problem?)

Problems have occurred in the groundfish specification process when ABC and OFL turn out to be the same. Conceptually, ABC should be a "target" and OFL should be a "threshold" level to be avoided, so that there should be a buffer between them.

Need and Justification for Council Action: (Why can't the problem be resolved through other channels?)

The OFL process is specified in the plans. The Teams sometimes adjust the ABC downward to provide a buffer. The SSC does not agree with this approach and the desirability of the downward adjustment has not been evaluated. The "Scientific Review" claims that the NPFMC overfishing definition is somewhat ambiguous and may not be conservative in some cases. It recommends an evaluation mechanism based on recruitment falling to 1/2 the pristine level that may not be appropriate. The Council should be proactive in addressing overfishing.

Foreseeable Impacts of Proposal: (Who wins, who loses?)

Evaluation of the OFL process is needed to provide credibility for the desired conservatism of the NPFMC TAC's, ABC's, and OFL's. Overfishing is one of the most important issues in fisheries management at the current time, and the Council needs the assurance that its management avoids overfishing.

Are There Alternative Solutions? If so, what are they and why do you consider your proposal the best way of solving the problem?

NO

Supportive Data & Other Information: What data are available and where can they be found?

"Scientific Review of Definitions of Overfishing in U.S. Fishery Management Plans" by A. Rosenberg, et al. (1994).

Signature:

Terrance J. Quinn II, Chair, SSC

North Pacific Fishery Management Council

Richard B. Lauber, Chairman
Clarence G. Pautzke, Executive Director

605 West 4th Avenue
Anchorage, Alaska 99501

Mailing Address: P.O. Box 103136
Anchorage, Alaska 99510

Telephone: (907) 271-2809
FAX (907) 271-2817

MEMORANDUM

TO: Plan Amendment Advisory Group

FROM: Jane DiCosimo, Fishery Biologist

DATE: November 23, 1994

SUBJECT: Review of groundfish amendment proposals

The Council did not solicit a call for proposals this past summer as we normally do, due to the press of current projects. Nonetheless, we received about 20 proposals for plan or regulatory amendments to the groundfish FMPs by the time of the September Council meeting. Rather than review the proposals at the September meeting, the Council decided to postpone consideration until the December meeting, allowing for their review by the Plan Teams and the Plan Amendment Advisory Group. Additional proposals have been received since the September meeting.

I have enclosed a package of 26 proposals, numbered in order of date of receipt. They have since been blocked into similar management actions for review, as suggested by the Plan Teams. I have enclosed a worksheet ranking the proposals completed at the Joint Meeting of the Bering Sea/Aleutian Islands and Gulf of Alaska Plan Teams in November. I will also have a summary of specific Plan Team member comments pertaining to individual proposals and blocks of proposals prior to our meeting.

In order to take advantage of group members' Council schedule, I have scheduled our meeting for Tuesday, December 6 at 8 p.m. Please let me know, if we need to reschedule.

Enc.
Committee: Bob Mace, Chairman
Wally Pereyra
Ron Hegge
Rich Marasco
Doug Eggers
Loh-lee Low
Sandra Lowe
John Roos
Al Burch

Groundfish amendment proposal rankings by Plan Teams				
		Rankings		
		Action	Staff	
No.	Proposal	Area	Required	Time	Priority	Comments
Block 1	*Allocate GOA Pacific cod*	GOA	Plan	H	L	allocations require underlying rationale and data analysis;
1	to fixed gear		Amendment			would increase efficiency
7	among gear based on recent historical gear shares					vote: 5L, 3M, 2H
12	to jig gear					
13	to jig gear, 33 %					
14	to jig gear, 33 %					
20	to trawl (55%), fixed gear (45%), jig (5%)					
Block 2	*seasonal apportionment*		Regulatory	M	M	pursue spreading catch over the year
8	seasonal apportionment		Amendment			vote: 4L, 5M, 1H
19	seasonal apportionment					
Block 3	*GOA Pacific cod*	GOA	Regulatory	M	M	require interacting with state government - evaluation of
2	open state waters from Sept to end of year	(State)	Amendment			crab survey data already ongoing
11	8,000 mt for western GOA state waters to gig and pot fisheries	(State)				vote 3L, 4M
Block 4	*Bering Sea Pacific cod*		Regulatory	L	L	cod model complete; can evaluate allocation alternatives
15	Allocate between fixed gear (75%) and trawls (25%)	BSAI	Amendment			vote: 6L, 1M
Block 5	*license limitation*		Regulatory			
22	license limitation for southeast Alaska DSR	GOA	Amendment	H	L/M	license limitation requires substantial effort; already being
4	set second class of permits for CRP	BOTH		H		addressed by Council under CRP
						vote: 3L, 3M
Block 6	*forage fish*		Regulatory			
5	prohibit commercial fishing for capelin	BOTH	Amendment	L	H	limited biol. info., but is already summarized; economic
6	prohibit commercial fishing for capelin, sand lance, and other fish	BOTH				analysis tied to uncertain biol. info.; if collapse of fishery
						is casually related, there are increased economic implications
Block 7	*area registration*		Regulatory			vote: 2L, 6H
9	area registration for pollock and Pacific cod	GOA	Amendment	H	L/M	need to look at many years of data for fishing pattern analysis
	(or catcher boat trip limits)					vote: 4L, 4M, 1H
10	area registration for pollock and Pacific cod	BOTH				
Block 8	*trip limits*		Regulatory			
17	trip limits for central GOA for Alaska pollock	GOA	Amendment	M	L	data available/needs analysis; less intensive analysis than area
						registration
Block 9	*species TACs*		Regulatory			vote: 6L, 4M
16	BSAI jig fishery species TACs	BSAI	Amendment	H	H	complex analysis to include ecosystem concerns; possibly
21	BSAI species TACs for pollock and other species	BSAI				requires evaluation of 2 m lb OY
						vote 1L, 5M, 7H
Block 10	*other*		Regulatory			
3	set base amount of halibut PSC on historical performance	BOTH	Amendment	M	L	requires modelling of alternatives for economic analysis
Block 11	*pollock B season*		Reg./Plan			
18	move back pollock B season start	BSAI	Amendment	M	M	data analysis need to be done for rock sole; done for other
24	move back pollock B season start					species in August 94
23	split rock sole into A and B season					
Block 12	*FMP update*	BOTH	Plan	L	L	administrtaive update of FMPs (tables, figures, revise foreign
25	Fishery Management Plan update		Amendment			fishing and JVP discussion)
						vote: 7L, 3M, 1H
Block 13	*sablefish IFQ*	BSAI	Regulatory	Unrated	Unrated	received after Plan Team meeting
26	no closure for sablefish in the BSAI during the winter		Amendment			

Groundfish amendment proposal rankings by Plan Amendment Advisory Group												
								Rankings				
								Action	Staff			
No.	Proposal						Area	Required	Time		Priority	Comments
Block 1	*Allocate GOA Pacific cod*						GOA	Plan				
1	to fixed gear							Amendment				
7	among gear based on recent historical gear shares											
12	to jig gear											
13	to jig gear, 33 %											
14	to jig gear, 33 %											
20	to trawl (55%), fixed gear (45%), jig (5%)											
Block 2	*seasonal apportionment*							Regulatory				
8	seasonal apportionment							Amendment				
19	seasonal apportionment											
Block 3	*GOA Pacific cod*						GOA	Regulatory				
2	open state waters from Sept to end of year						(State)	Amendment				
11	8,000 mt for western GOA state waters to gig and pot fisheries						(State)					
Block 4	*Bering Sea Pacific cod*							Regulatory				
15	Allocate between fixed gear (75%) and trawls (25%)						BSAI	Amendment				
Block 5	*license limitation*							Regulatory				
22	license limitation for southeast Alaska DSR						GOA	Amendment				
4	set second class of permits for CRP						BOTH					
Block 6	*forage fish*							Regulatory				
5	prohibit commercial fishing for capelin						BOTH	Amendment				
6	prohibit commercial fishing for capelin, sand lance, and other fish						BOTH					
Block 7	*area registration*							Regulatory				
9	area registration for pollock and Pacific cod						GOA	Amendment				
	(or catcher boat trip limits)											
10	area registration for pollock and Pacific cod						BOTH					
Block 8	*trip limits*							Regulatory				
17	trip limits for central GOA for Alaska pollock						GOA	Amendment				
Block 9	*species TACs*							Regulatory				
16	BSAI jig fishery species TACs						BSAI	Amendment				
21	BSAI species TACs for pollock and other species						BSAI					
Block 10	*other*							Regulatory				
3	set base amount of halibut PSC on historical performance						BOTH	Amendment				
Block 11	*pollock B season*							Reg./Plan				
18	move back pollock B season start						BSAI	Amendment				
24	move back pollock B season start											
23	split rock sole into A and B season											
Block 12	*FMP update*						BOTH	Plan				
25	Fishery Management Plan update							Amendment				
Block 13	*sablefish IFQ*						BSAI	Regulatory				
26	no closure for sablefish in the BSAI during the winter							Amendment				

BLOCK 1

(1)

GROUNDFISH FISHERY MANAGEMENT PLAN AMENDMENT PROPOSAL
North Pacific Fishery Management Council

AGENDA D-6(b)
September 1994

Name of Proposer:

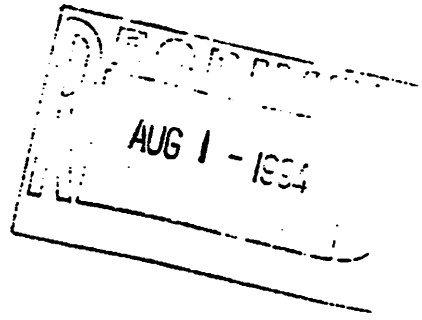
Bill Alwert

Date:

August 1, 1994

Address:

P.O. Box 1711 Kodiak Alaska 99615



Telephone:

486-5511

Fishery Management Plan:

Gulf of Alaska Groundfish

Brief Statement of Proposal:

Allocate a percentage of the P. Cod TAC to fixed gear

Objectives of Proposal: (What is the problem?)

NPFMC should promote harvesting of P.Cod that shows least waste, least bycatch, least marine mammal impact and least salmon interception

Need and Justification for Council Action: (Why can't the problem be resolved through other channels?)

Only the Council and the Secretary can allocate TAC's and set-up incentives that make people fish cleaner and more responsibly in the 200-mile zone

Foreseeable Impacts of Proposal: (Who wins, who loses?)

If the Council, the Secetary and the fleet reduce waste and bycatch and help the sea lions recover, doesn't the whole industry win?

Are There Alternative Solutions? If so, what are they and why do you consider your proposal the best way of solving the problem?

Only the Council and the Secretary have the legal authority to do this.

Supportive Data & Other Information: What data are available and where can they be found?

NMFS and ADFG have the relevent data on bycatch, waste and sea lions

Signature:

Bill Alwert

ATTCHB :1A

GP/REPMAN

cc: JDC
DMJ

SEP 20

Petition to the North Pacific Fishery Management Council

Bill Alwert, FV Buccaneer Phone (907) 486-5511

The annual Total Allowable Catch (TAC) of Pacific Cod in the Gulf of Alaska (GOA) can be harvested without the use of trawls. Fixed gear fishermen using longlines, pots and jigs can harvest P. Cod year-round and thereby reduce the waste and discards that occur in the trawl fishery, especially during the spawning season. Using fixed gear to harvest GOA P. Cod will generate more jobs on American fishing boats and in coastal community processing plants and help reduce the trawlers' annual halibut bycatch of 1200 metric tons.

We the under-signed urge the members of the North Pacific Fishery Management Council to allocate the 1995 GOA Pacific Cod TAC to fixed gear harvesters and to allocate that TAC on a quarterly basis to promote conservation, reduce waste and enhance the value of Cod fish to the fleet, the industry, coastal communities and the nation.

Name and Vessel	Address	Phone
Alaska Trojan	3859 Yaquina Bay Rd Newport OR 97365	503-265-5422
Kiska Sea	Same As Above	
Siberian Sea	Same As Above	
Ted Painter	Managing Partner in above boats	

Upon signature please fax to Bill Alwert (907) 486-8356
and the North Pacific Council (907) 271-2817

7

GROUNDFISH FISHERY MANAGEAMENT PLAN AMENDMENT PROPOSAL
North Pacific Fishery Management Council

SEP - 9

Name of Proposer: Alaska Draggers Association

Address: P.O. Box 991, Kodiak, Alaska 99615

Fishery Management Plan: Gulf of Alaska

Brief Statement of Proposal: Allocate Central Gulf Pacific cod between or among gear types (trawl and fixed gear or trawl/line gear/pot) based on the recent historical gear shares as was recently done in the Bering Sea, including the roll-over provisions from one gear to another should a gear type not take or be unable to take its annual allocation.

Objectives of Proposal (What is the problem?):
1. The implementation of the longline ITQ program will remove the halibut cap restraints which limited the longline gear share of the Central Gulf Pacific cod quota.
2. Different gear types may wish to fish different times of year. An allocation between or among gears will allow each gear type to fish its preferred time of year.
3. There is increasing agitation on the part of each gear type in the Central Gulf for an allocation. Alaska Draggers Association feels it is better to address this issue now rather than allow a "gear war" to develop.
4. It appears that any ITQ program is many years away and can not offer a timely solution.

Need and Justification for Council Action: (Why can't the problem be resoved through other channels?) Pacific cod in the Central Gulf are a federally managed fishery.

Forseeable Impacts of Proposal: (Who wins, who loses?) Since the gear shares appear to have been fairly stable in recent years, we do not see any winners or losers under an allocation based on recent historic gear shares. By allocating among gears so that each gear can set the season which best suits its needs, all participants win.

Are There Alternative Solutions? If so what ae they and why do you consider your proposal the best way of solving the problem? There are no civilized alternatives.

Supportive Data & Other Information: What data are availabale and where can they be found? National Marine Fisheries Service Juneau has the historic catch by gear data and can provide the recent historic gear share information.

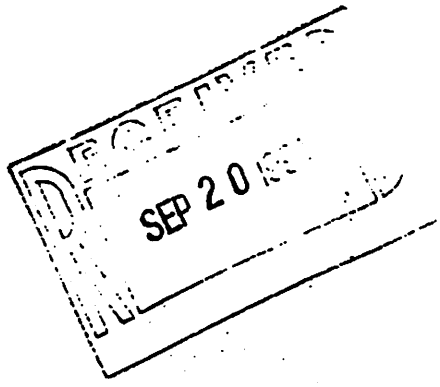
Signature: Richard L Nelson Alvin R Burch

RICHARD L NELSON
BOX 2228
KODIAK, AK
99615

Box 991
Kodiak ak
99615

Cc: Dw ✓

(12)



Facsimile Message
Original Message
Mailed

September 19, 1994

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

Dear Council Member:

I would like to request a separate T.A.C. for Pacific Cod, for a jig fishery for the Gulf of Alaska.

We have a great concern on the by-catch issue. And, the jig fishery has proven to be very selective, with very little by-catch and the by-catch can be returned to the sea alive.

The small boat fleet in King Cove needs an alternative fishery. We have had low prices in salmon, and the King crab fishery did not open in Bristol Bay. In which, some of our boats and people participate. This causes a hardship on the community, where very few jobs are available. Fishing has been our livelihood and hopefully will continue to be.

Any help or relief you can provide to the small boat fleet will be greatly appreciated.

Sincerely,

Mother + Grandmother
Clara Newman

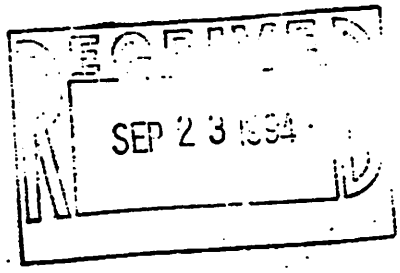
King Cove, Alaska

(13)

September 20. 1994

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

Robert Newman
P.O. Box 154
King Cove, AK
99612



facsimile message
Original Mailed.
fax#

Dear Council Members:

I would like to request a separate T.A.C. for Pacific Cod, for a Jig fishery for the Western Gulf of Alaska. Please consider at least a third share for the Jig quota.

We have a great concern on the by-catch issue. And, the jig fishery has proven to be very selective, with very little by-catch and the by-catch can be returned to the sea alive.

The small boat fleet in King Cove needs an alternative fishery. We have had low prices in salmon, and the King Crab fishery in Bristol Bay did not open, In which, some of our boats and people participate. This causes a hardship on the community, where very few jobs are available.

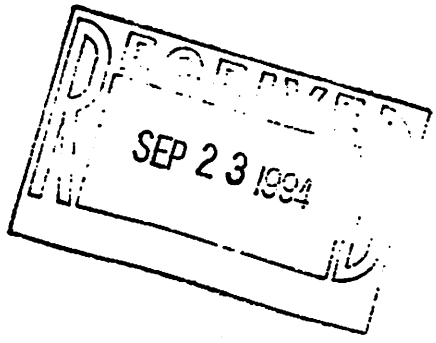
Fishing has been our livelihood as it is in our neighboring towns and villages, As a life long fisherman and city council member I am very concerned, Any help or relief you can provide to the small boat fleet will be greatly appreciated.

Sincerely,

Robert E. Newman.

Robert E. Newman

AGENDA D-6
SEPTEMBER 1994
SUPPLEMENTAL



Clara Newman
P.O. Box 2541
King Cove AK
99612

September 19, 1994

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

Dear Council Member:

I would like to request a separate T.A.C. for Pacific Cod, for a jig fishery for the Gulf of Alaska.

We have a great concern on the by-catch issue. And, the jig fishery has proven to be very selective, with very little by-catch and the by-catch can be returned to the sea alive.

The small boat fleet in King Cove needs an alternative fishery. We have had low prices in salmon, and the King crab fishery did not open in Bristol Bay. In which, some of our boats and people participate. This causes a hardship on the community, where very few jobs are available. Fishing has been our livelihood and hopefully will continue to be.

Any help or relief you can provide to the small boat fleet will be greatly appreciated.

Sincerely,
Mother & Grandmother
Clara Newman

King Cove, Alaska

cc DNR

(14)

SEP 20 19

City of King Cove
Arthur Newman, Mayor
P.O. BOX 37
KING COVE, ALASKA 99612
(907) 497 2297) phone (907)497 2589 fax

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

September 20, 1994

facsimile message
Original Mailed.
271-2817

Dear Council Members:

We are desperately seeking ways to help the small boat fleet in our region stay active, as being in the middle of the Area M salmon controversy, low salmon prices and no Bristol Bay King Crab season makes us, in my opinion, an economically depressed area.

For that reason, I would like to request you consider a Jig fishery quota, of possibly a third of the Western Gulf of Alaska Pacific Cod T.A.C. - We would need that much of the quota to make it a year round fishery for the small boats.

Small boat Jig fishing is a clean fishery in that any by-catch is returned to the sea alive and it would help the economy of several villages in our area.

Thank you for your consideration.

Sincerely,

Arthur L Newman

Arthur L. Newman

(20)

North Pacific Fishery Management Council
P.O. Box 103136
Anchorage, AK 99510

Box 1855
Cordova, AK 99574
November 4, 1994.

Dear Sir:

I am writing in support of several Pacific Cod related proposals for the Gulf of Alaska which were compiled in the memorandum of September 20, 1994 from Mr. C. Pautzke re.: staff tasking. I am also submitting the accompanying proposal which hopefully will present additional insights into the dilemma of many small boat fishermen.

I support the intent of proposals #2 (City of Chignik), #11 (Mr. Raymond Nutt), and #'s 12, 13, and 14. These proposals would attempt to establish a cod fishery of longer duration producing far less by-catch waste than either trawl or longline gear and would be of much benefit to inshore, small boat fishermen.

Additionally, I support proposal #7, at least in concept. I believe ultimately it is most advantageous to all gear types if their allocation percentages are defined and I agree with the Alaska Draggers Association's rationale for allocation. However, actual allocation percentages need to be determined with adequate public input. I am aware this will probably be a contentious issue but believe steps should be taken now to resolve the P. cod allocation problem.

Voices of dissatisfaction can be heard all the way from King Cove and with my proposal, to Cordova. Although these proposals were deemed to be low priority items for the Council, I can assure you the issues presented are of real importance to many small boat operators throughout Alaska's coast. I therefore ask your serious consideration and action to aid this component of the fishing community.

Yours truly,

Kenneth Adams

North Pacific Fishery Management Council
Management Proposal for Pacific Cod in the Gulf of Alaska

Statement of Proposal

Allocate Pacific Cod harvest in the Gulf of Alaska similar to Pacific Cod allocation for the Bering Sea-Aleutian Islands region.

Allow 55% for trawl, 45% for fixed gear (pot, longline, jig) with 5% of fixed gear quota dedicated to jig. Provide for transfer to other fixed gear types if jig allocation is not completely used within a year.

Objectives of Proposal

Small boat, onshore fishermen are preempted by larger trawl vessels which harvested approximately 68% of the P. Cod TAC in both '93 and '94 in western and central regions. The trawl effort causes an early season shut down of the P. Cod fishery at a time when weather is improving and small boats can better participate in the fishery.

Another problem small boat operators face today concerns the impending implementation of halibut and black cod IFQs. Fishing opportunities for many will be reduced. This increases dependence upon the harvest of other species such as salmon and herring which can lead to financial hardship as the abundance of these species and market conditions can vary greatly.

Onshore fishermen need to diversify their efforts in order to survive.

Justification for Council Action

The Council has already allocated the P. Cod resource among user groups in the BSAI Area. The precedent has already been set with 2% and 45% of that area's TAC allocated betwen jig and fixed gear respectively.

Foreseeable Impacts of Proposal

Clearly, fixed gear fishermen will benefit by having a longer harvest season. Prospects for better market conditions will improve particularly for fresh market product. Options for entering a low-cost fishery (Jig) will be provided for small boat operators who seek to diversify their fishing efforts. On the negative side, trawlers will lose some of the allocative percentage of the Cod TAC.

Possible Alternative Solution

The Alaska Department of Fish and Game could take over the management of Pacific Cod in waters within 3 miles of shore and develop an allocative scheme. This direction needs to be simultaneously pursued until the problem is resolved.

Supportive Data

Jig gear and pot gear are clean with respect to halibut by-catch. They are nonintrusive and nondestructive of bottom habitat. Also, in view of public awareness of wasteful by-catch and discard practices of other gear types, this is commendable.

Throughout the Gulf of Alaska, there is a groundswell of opinion that small boat operators residing in coastal Alaskan communities should have the option to harvest Cod later into the year, diversify their fishing efforts and establish better markets for well-cared-for fish. There must be additional fishing opportunities for the many small boat operators who wil be denied access to halibut and black cod by IFQ implementation.

BLOCK 2

8

Groundfish Data Bank

GROUNDFISH FISHERY MANAGEAMENT PLAN AMENDMENT PROPOSAL
North Pacific Fishery Management Council

SEP 13

Name of Proposer: Alaska Groundfish Data Bank

Address: P.O. 2298, Kodiak, Alaska 99615

Fishery Management Plan: Gulf of Alaska

Brief Statement of Proposal: Apportion a percentage of the Central Gulf Pacific cod quota for release in the fall. Suggested fall apportionment is in the neighborhood of 35% of the quota. Suggested opening date is somewhere in the time period between September 1 and October 1.

The AGDB membership has no objection to an allocation of Pacific cod among gear types, but feels that any allocation should be negotiated among the gear groups. Should there be an allocation of Pacific cod among gear types, this proposed seasonal apportionment would apply only to the trawl share. The other gear groups would then be free to propose their own seasons.

Objectives of Proposal (What is the problem?):

1. Reduce the catch during the roe season. Currently the bulk of the quota is taken during the roe season. While there is no scientific documentation that a roe season fishery is bad for the stocks, there is certainly a public perception that taking the entire quota during the roe season is poor policy.
2. Allow for a portion of the quota to be taken when the fillet quality is best.
3. Assure work in the fall for the processing plants and their employees. The expected reductions in the pollock quota for Central Gulf mean a fall Pacific cod fishery may be the only way of assuring fall employment.
4. If there is no allocation of Pacific cod among gear groups, the seasonal apportionment offers additional opportunities for all gear groups.
5. Reduce the potential for Pacific cod catch to exceed the quota early in the year as happened in 1994 and therefore reduce discards in all fleets.

Need and Justification for Council Action: (Why can't the problem be resoved through other channels?) Pacific cod is a federally managed fishery.

Forseeable Impacts of Proposal: (Who wins, who loses?) The stock wins, plant workers hoping for work in the fall win. Trawlers' share of the quota may be reduced a few percentage points by fishing the quota outside the period of maximum aggregation, but other gear types should gain a small percentage in share. On the other hand, a fall Pacific cod fishery allows trawlers an opportunity to choose between flatfish or Pacific cod, whichever has the lower halibut bycatch and also offers a fall back fishery should thornyheads or POP reach the overfishing definition.

Are There Alternative Solutions? If so what are they and why do you consider your proposal the best way of solving the problem?
We see no alternativae solutions.

Chris Blackburn • Director • P.O. Box 2298 • Kodiak, Alaska 99615 • (907) 486-3033 • FAX (907) 486-3461

Supportive Data & Other Information: What data are available and where can they be found? NMFS Juneau has all the historic data on catch by gear type and halibut bycatch rates by season.

Signature:

Director, AGDB

(19)

United Fishermen's Marketing Association, Inc.

P.O. Box 1035 Kodiak, Alaska 99615

Telephone 486-3453

October 14, 1994

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

Dear Clarence,

Attached please find a Proposal for a Plan/Regulatory Amendment to the Fishery Management Plan for Groundfish in the Gulf of Alaska. For your reference, I am also attaching a very similar Proposal that we submitted to the Council on August 23, 1991, in response to a 1991 Call For Proposals.

We submitted our 8/23/91 Proposal to the SSC for their consideration at the September, 1994, Council meeting in Seattle. We also intended to submit this Proposal to the AP and to the Council, but, as you know, the AP did not address the issue of Plan/Regulatory Amendment Proposals, and the Council defered consideration of Plan/Regulatory Amendment Proposals until the December, 1994, Council meeting. We understand that prior to the December Council meeting, any Proposals for Plan/Regulatory Amendments will be forwarded to the respective Plan Development Teams and Plan Amendment Advisory Groups (PAAGS).

Please include our attached Proposal for consideration by the Council at the December Council meeting, and by the GOA Plan Team and the PAAG at the time of their respective meetings.

Thank you.

Sincerely,

Jeffrey R. Stephan

United Fishermen's Marketing Association, Inc.

P.O. Box 1035 Kodiak, Alaska 99615

Telephone 486-3453

FISHERY MANAGEMENT PLAN AMENDMENT PROPOSAL

North Pacific Fishery Management Council

Name of Proposer: United Fishermen's Marketing Association, Inc. Date: 10/14/94
Address: Box 1035, Kodiak, Alaska 99615
Telephone: 907-486-3453 Fax: 907-486-8362
Fishery Management Plan: Groundfish for the Gulf Of Alaska

Brief Statement of Proposal: Institute a periodic apportionment of the pacific cod (p. cod) TAC in the Gulf of Alaska. Quarterly, tri-annual (three periods per year), semi-annual (two periods per year) or some other periodic apportionment of the p. cod TAC should all be considered. Whatever period may be chosen for the periodic apportionment, equal divisions between periods would not necessarily be required (e.g., if a tri-annual apportionment of p. cod is adopted, we do not recommend that 33% of the TAC should necessarily be apportioned to each trimester). For discussion purposes, we recommend that 60% of the p. cod TAC be apportioned during January through April, 5% of the TAC be apportioned during May through September 14, and 35% of the TAC be apportioned during September 15 through December 31.

Objectives of the Proposal: (What is the problem?) This proposed Plan/Regulatory Amendment would assist in achieving, (1) a supply of p. cod throughout the year to harvesters and processors, (2) a minimization of pulse fishing and localized impact on discreet aggregations of p. cod, (3) a minimized impact on spawning aggregations of p. cod, (4) the possible minimization of bycatch of non-target species, (6) a method of addressing potential problems of resource depletion, (7) a supply of p. cod to the fall/winter market (generally a good market), (8) fall employment opportunities for the labor force, and (9) maximization of product quality (generally, product quality in the fall is considered very good).

Needs and Justification for Council Action: (Why can't the problem be resolved through other channels?) Periodic apportionment of TAC is only possible by Plan/Regulatory Amendment.

Foreseeable Impacts of Proposal: (Who wins, who loses?) The probability of greater reproductive potential of the resource is increased. P. cod would be available to harvesters and processors throughout the year. There is the probability of a lesser impact on younger age classes. The negative effects of pulse fishing, and the localized impact on discreet aggregations and spawning aggregations of p. cod would be minimized. Bycatch of non-target species may be minimized by spreading out the harvesting effort on p. cod throughout the year. P. cod would be available on the fall/winter market, which has generally paid higher prices. Improved employment opportunities would exist for the seafood processing work force. The fall/winter market would receive excellent p. cod product quality, since the quality of p. cod in the fall/winter is outstanding. Harvesters, processors, the labor force, consumers, and the long-term productivity of the resource benefit from the implementation of this Plan/Regulatory Amendment. No losses are expected to result from this proposed Plan/Regulatory Amendment.

Are there Alternative Solutions? If so, what are they, and why do you consider your proposal the best way of solving the problem? No alternative solution would achieve the objectives of this proposed Plan/Regulatory Amendment. We believe that the above-proposed Plan/Regulatory Amendment will add to the future long-term rational management of the GOA groundfish fishery.

Supportive Data and Other Information: What data are available and where can they be found? The management/research agencies have the data/information that is necessary for analysis.

United Fishermen's Marketing Association, Inc.

P.O. Box 1035 Kodiak, Alaska 99615

Telephone 486-3453

FISHERY MANAGEMENT PLAN AMENDMENT PROPOSAL
North Pacific Fishery Management Council

Name of Proposer: United Fishermen's Marketing Association, Inc. Date: 8/23/91
Address: Box 1035, Kodiak, Aleska 99615
Telephone: 907-486-3453 Fax: 907-486-8362
Fishery Management Plan: Groundfish for the Gulf Of Aleska

Brief Statement of Proposal: Institute a periodic allocation of pacific cod (p. cod) in the Gulf of Alaska. Quarterly, tri-annnual (three periods per year), semi-annual (two periods per year) or some other periodic allocation of the p. cod TAC should all be considered. Whatever period may be chosen for the periodic allocation, our recommendation is that equal divisions between periods would not necessarily be required (for example, if a tri-annual allocation of p. cod is adopted, we do not necessarily recommend that 33% of the p. cod TAC should be allocated to each trimester).

Objectives of the Proposal: (What is the problem?) This proposed Plan Amendment would assist in achieving, (1) a supply of p. cod throughout the year to harvesters and processors, (2) a minimization of pulse fishing and localized impact on discreet aggregations of p. cod, (3) a minimized impact on spawning aggregations of p. cod, (4) the possible minimization of bycatch of non-target species, and (6) a method of addressing potential problems of resource depletion.

Needs and Justification for Council Action: (Why can't the problem be resolved through other channels?) It is our understanding that a periodic allocation of p. cod is only possible through a Plan Amendment.

Forseeable Impacts of Proposal: (Who wins, who loses?) The probability of greater reproductive potential of the resource is increased. P. cod would be available to harvesters and processors throughout the year. There exists the probability of a lesser impact on younger age classes. The negative effects of pulse fishing, and the localized impact on discreet aggregations and spawning aggregations of p. cod would be minimized. Bycatch of non-target species may be minimized by spreading out the harvesting effort on p. cod throughout the year. The entire fishing industry, as well as the long-term productivity of the resource, should benefit from the implementation of this Plan Amendment. No forseeable losses are expected as a result of this proposed Plan Amendment.

Are there Alternative Solutions? If so, what are they, and why do you consider your proposal the best way of solving the problem? There are no alternative solutions that would achieve the objectives of this proposed Plan Amendment. We believe that the above-proposed Plan Amendment will add to the future long-term rational management of the GOA groundfish fishery.

Supportive Data and Other Information: What data are available and where can they be found?

Signature: Jeff R. Stephan

BLOCK 3

CITY OF CHIGNIK

P.O. Box 110 • Chignik, Alaska 99564 • (907) 749-2280

(2)

July 28, 1994

Regulators
National Marine Fisheries
709 W. 9th St., Room 461
Juneau, AK 99801

RE: Amendment to cod fishery regulations

Dear Regulatory Staff:

Enclosed is a proposed amendment to the existing cod fishery regulations. It is designed to address both the biological and economic problems that have developed in this area. If your agency or any other agency has taken a census of the cod and other bottomfish population, please advise.

Very truly yours,

Donald J. Braun
City Administrator

cc: Ron Morris
C. Pautzky ✓

GROUNDFISH FISHERY MANAGEMENT PLAN AMENDMENT PROPOSAL
North Pacific Fishery Management Council

Name of Proposer: City of Chignik **Date:** July 26, 1994

Address: P. O. Box 110
Chignik, AK 99564

Telephone: (907) 749-2280/2281 (907) 749-2300 (fax)

Fishery Management Plan: Central Gulf of Alaska Plan

Brief Statement of Proposal: The City of Chignik proposes that the cod fishery be opened. The fishery would be within the three mile limit. The district would be the existing Chignik Salmon Seine Fishery District. Gear would be limited pots or jigging machines. Boats not larger than fifty-eight feet would be allowed to participate in this fishery. The season would be opened as soon after the September NMFS meeting and extend to December 31, or until the area quota is caught.

Objectives of Proposal: (What is the problem?) The problem is in two parts, biological and economic. The biological problem is that there is an oversupply of cod. Ideally the present management regime should produce a cod population that has reached an equilibrium. However the local population is so dense that salmon smolt, young crab, and shrimp, the natural food of cod, populations have been (particularly in the case of crab and shrimp) and will be decimated.

The economic problem is in two parts. First there is the classical problem of full employment of all of the factors of production, particularly capital. Were the proposed fishery open, the local fleet would operate (capital would be employed for eight months instead of four months. More locals would be employed to fish, transport, process and ship the cod, so the labor market would double. The cod are so thick, the city submits that entrepreneurial ability and capacity would not be taxed.

The second economic problem is declining salmon prices. Over the last few years catches have been normal. However prices have fallen an average of 99%. The salmon industry has driven the local economy. This industry competes in a world market that is undergoing a structural change due to an increased supply and a the decreased ability to purchase the supply.

The Japanese consumer comprises the bulk of the market for Alaska salmon. GDP in Japan has declined 2%, the rate of productivity increase is one-quarter of that of the US. The yen has increased 20% over the value of a dollar. The present prospect and five-year outlook for stable or slightly increased demand. However the production curve has shifted. A greater supply coupled with decreased demand does not bode well for the salmon fishery of Chignik. Its capital and labor must be shifted to other markets. The goal of this proposal is to mitigate current and long-term effects of declining salmon prices.

Need and Justification for Council Action (Why can't the problem be resolved through other channels?) There is no other channel. The NPFMC controls the cod fishery in the North Pacific and Alaska. The cod fishery is considered and regulated on a mass basis. The problem is a local problem. Chignik fishermen have consistently shown the willingness to take responsibilities for the resources they harvest. They assess themselves a 2% tax on salmon. The present problem is beyond their control; however the continuing solution is within the grasp of the local fishermen.

Foreseeable impacts of proposal: (Who wins, who loses?) Winners are those who derive direct money from the fishery, the fishermen, boat owners, processors, transporters, brokers, etc. Indirect winners are governments and the environment. Depending on the regime, there may be no losers. Cod here are an under-utilized (under-used) resource. If the catch is taken out of the total allocated cod harvest, some of the boats in the "big" cod fishery would suffer an estimated loss of not more than 5%, which is not much considering the benefit to the local people and the state coffers.

Are there alternative solutions? If so, what are they and why do you consider your proposal the best way of solving the problem?
There are no alternative solutions.

Supportive data and other information: What data are available and where can they be found?
1. Affidavit of Aloys Kopun, 2. Resolution 94-15
No known local census of cod

Signature:

Donald J. Braun, Administrator

STATE OF ALASKA)
) ss.
THIRD JUDICIAL DISTRICT)

AFFIDAVIT OF ALOYS KOPUN, MAYOR

Aloys Kopun, being first duly sworn upon oath deposes and says:

1. That he is the Mayor of the City of Chignik, Alaska.

2. That he has commercially fished salmon in the Chignik area for thirty years. He holds Commercial Fisheries Entry Commission Permit SO1L 57863 I.

3. That he has commercially fished crab in the Chignik area since 1972 but due to the closure of the Chignik crab fishery, he has not fished crab in Chignik since 1989.

4. That he has commercially fished shrimp in the Chignik area since 1972 but due to the closure of the Chignik shrimp fishery, he has not fished shrimp in Chignik since 1979.

5. That he and other fishermen have seen a dramatic increase in the cod population.

6. That when landed, cod frequently disgorge the contents of their digestive systems and this ejecta is primarily small crab, shrimp, and salmon smolt.

7. That on July 25, 1994, at 1:00 p.m., in Chignik Bay, the cod and pollack biomasses were so numerous and dense that his depthfinder, a Furuno model 561C, could not record the depth or profile of the bottom of the area over which he was sailing.

FURTHER AFFIANT SAYETH NAUGHT.

CHIGNIK AK JUL 28 1994 USPS

Aloys Kopun, Mayor

SUBSCRIBED and sworn to before me this 28th day of July, 1994.

CHIGNIK AK JUL 28 1994 USPS

Notary for Alaska
My commission expires

CITY OF CHIGNIK
P. O. Box 110
Chignik, Alaska 99564
(907) 749-2280

RESOLUTION 94-15

A RESOLUTION REQUESTING THAT THE FEDERAL GOVERNMENT AND THE NORTH PACIFIC FISHERY MANAGEMENT COUNCIL PRESERVE LOCAL FISH POPULATIONS AND RECOGNIZE DIFFICULT TIMES FOR THE CHIGNIK ECONOMY

WHEREAS, residents of the City of Chignik are boat owners and fishermen, and

WHEREAS, most residents of Chignik derive their incomes from fishery-related jobs and businesses, and

WHEREAS, the cod biomass in the waters of the Chignik Salmon Seine District has substantially increased and has affected commercial and subsistence catches of crab and shrimp, and

WHEREAS, the cod biomass in the waters of the Chignik Salmon Seine District will soon decrease the numbers of salmon smolt, and

WHEREAS, the fishermen and residents of the villages of the Chignik Economic Zone (Ivanof Bay, Perryville, Chignik Lake, Chignik Lagoon, and the City of Chignik) have suffered because of the reduced price for salmon, and

WHEREAS, the local fleet and workforce is underemployed before and after the salmon fishing season,

NOW THEREFORE BE IT RESOLVED that the City of Chignik request that the North Pacific Fishery Management Council and the National Marine Fisheries Service open a cod fishery in the waters contiguous to the Chignik Economic Zone, and that this fishery be a pot and jigging machine fishery and that it be restricted to boats with a maximum length of fifty-eight feet, and

BE IT FURTHER RESOLVED that either Aloys Kopun and/or Donald J. Braun is authorized to execute agreements which effect the above-stated purposes.

PASSED AND APPROVED by a quorum of the city council this 27th day of July, 1994.

Aloys Kopun, Mayor

ATTEST:

Richard J. Shappe, City Clerk

(11)

North Pacific Fishery Management Council

C 13

Raymond Nutt
P.O. Box 122
Sand Point, Alaska 99661

907-383-3822

Proposal: P. Cod Quota for the Western Gulf in side 3 miles. This Quota to be 8,000 metric ton. Season starting September 1 and ending when quota is caught. Gear type restriction: Gig and Pot fishery only.

Objectives: There needs to be a quota and fishery established for the smaller vessels of the area. There are approximately 80 vessels that can not participate in the trawl fishery in the Western Gulf due to the size of the vessel. The only fishery the smaller (48 foot and under) vessel has left to participate in is Salmon. Prior to the trawl fishery these vessels all gigged and long lined for cod. The seasons are now such that the quotas are caught by the trawl fleet in January through mid March leaving non for the smaller vessels to fish as the weather improves.

Justification: A bait fishery has been here for years prior to the trawl fishery, providing bait for the Crab boats. From information gathered from processors the fall Cod are considered better fish marketable for their flesh rather than just their roe and milt, as winter cod are.

Foreseeable Impacts: The trawl fishery looses a portion of their quota. These trawl boats (local fleets) would also participate in this fishery under the gear type specified. The families of the smaller vessel fleet gain back fishing time and ability to support their families through the winter months.

Alternative Solution: None

Supportive Data: Sand Point was founded as a cod fish station in the 1800's. Our grandfathers fished in dories, cod fish has been part of our fishery since that time. Unfortunately not all of us are able to afford or want larger vessels. We have fished all our lives and have watched our fisheries decline and become geared only towards the

larger vessels. We need to be able to fish to support our families and continue our way of life. Catch history and records show the effort by the small vessel fleet. This can be obtained through the processors of the area and through the history of the Aleut villages.

Signature:

BLOCK 4

(15)

SEP 20

Olov Vedoy
F/V Bluefin
1805 Village Green Drive
Mill Creek, WA 98012

September 20, 1994

Honorable Ron Brown
Secretary of Commerce
U.S. Department of Commerce
Room 5516
Hoover Commerce Building
Fourteenth and Constitution Avenue
Washington, D.C. 20230

RE: The Future of Our Fisheries - Selective Gear

Dear Secretary Brown:

We have got to do something for the future fisheries of the United States - and for our kids and our grandchildren.

Fishing technology today is so powerful that quotas, restrictions and laws must be strict. Those gear types which cannot show an improvement in selectivity - avoidance of bycatch of non-target species - must tolerate a reduction in their portion of the quotas.

Bottom dragging for fish such as cod, sole and pollock is very destructive. I know, because I have done it. Bycatch and associated mortality in these fisheries is very high, not only for halibut, crab and shellfish, but also for "scrap" fish which serve a purpose in the marine ecosystem as food for other fish, mammals and birds.

Bottom dragging also destroys bottom-dwelling organisms such as coral, sea anemones, and shellfish. Blue shell patches are a favorite habitat for cod, and it does not take much imagination to figure out what kind of damage is done by a net with bobbins, several fathoms of heavy cable, and steel doors which are dragged along the bottom. The NMFS Observer Program will verify this.

As our resources have dwindled over the years, selective fishing gear has been developed - gear which increases the take of target species. Some fishermen have realized the value of jigging, longlining and pot fishing for cod, longlining for halibut, and pot fishing for crab. This is selective fishing! A long time ago dragging was done for crab, but the method was outlawed because it destroyed the crab stocks. Today it is still legal to bottom trawl for groundfish on the same fishing grounds. Does this make any sense?

Today we have pot fishing for cod, which is the most selective method. We don't catch small fish - they are allowed to swim out of the pot, grow up, and reproduce. Draggers bring them up on deck where they die, and are then shoveled overboard. Our bycatch of scrap fish is so small that it is barely noticeable.

Pot fishing for cod is increasing every year. People concerned about the future of United States fisheries for their kids and grandkids should back up this selective fishery. Pot fishing for cod has been monitored by the NMFS Observer Program so the data is available, as it is on all fisheries.

Today the cod quota in the Bering Sea/Aleitian Islands Area is split between the draggers (54%) and fixed gear (longliners and pot fishermen - 44%). With the growing concern in the fishing industry about dwindling fish stocks in Alaska and everywhere else in the world, we have an opportunity to do something. The selectivity of fixed gear should be recognized by the North Pacific Fishery Management Council. Fixed gear should be given 75% of the BSAI cod quota, and the destructive outmoded bottom draggers 25%. Dragging has been a means of fishing worldwide, but with its ever-increasing capacity to kill it has outgrown its usefulness - it fails in the selective gear competition. It is an outmoded way of fishing. Also, the quality of drag-caught product is not comparable with that of fixed gear product.

I hope that the Council will recognize the facts, and adopt my proposal for a 75/25 split between fixed gear and trawlers. Data which has been recorded by the Observer Program the last few years clearly demonstrates the value of selective fishing.

Sincerely,

Olov Vedoy
F/V Bluefin

cc: North Pacific Fishery Management Council
Mr. Rolland Schmitten

BLOCK 5

(22)

GROUNDFISH FISHERY MANAGEMENT PLAN AMENDMENT PROPOSAL
North Pacific Fishery Management Council

Name of Proposer: Sitka Rockfish Work Group **Date:** 11/11/94

Address: Box 2826
Sitka, AK 99835

Telephone: (907) 747-6024

Fishery Management Plan: GOA Groundfish

Brief Statement of Proposal: License limitation program for Southeast Alaska Demersal Shelf Rockfish Fishery

Objectives of Proposal (What is the problem?): The Southeast Demersal Shelf Rockfish (DSR) fishery has been carefully managed by the State of Alaska with trip limits, and trimester quota apportionments. These measures were implemented at the request of DSR fishermen to maintain the socioeconomic framework of the fishery and to enhance market opportunities. These measures served to control effort, enabling ADF&G to achieve management goals. However, indications are that implementation of the sablefish/halibut QS program will cause a dramatic increase in effort. Given that the quota available to the directed fishery is extremely limited, this additional effort will compromise management goals and displace historic users. For these reasons, Sitka rockfish fishermen have developed a license limited entry proposal for the DSR fishery (see attachment 1). Before developing the proposal, the rockfish work group identified the following future management goals:

1. Maintain the health of the DSR resource
2. Preserve the directed DSR fishery
3. Protect traditional participants and maintain the small boat nature of fleet
4. Prevent the DSR fishery from becoming a derby
5. Enhance safety
6. Enhance market opportunities

Need and Justification for Council Action: (Why can't the problem be resolved through other channels?) DSR fishermen have exhausted the State's traditional management tools in an effort to protect the resource and to maintain the integrity of the directed fishery. Limiting entry is the obvious next step. Current State limited entry laws do not allow an effective limited entry program to be created for this fishery. Since the Council has both the authority to limit entry in this fishery and the flexibility to design an effective program, work group members are requesting Council action.

Foreseeable impacts of Proposal: (Who wins, who loses?) The proposed license program will preclude prospective entry into the DSR fishery, preventing a wasteful rockfish "derby" from developing. Limiting the number of participants will ensure that harvest guidelines continue to be met, but not exceeded. Precluding prospective entry will also ensure that the historic DSR fishermen will not be displaced. For these reasons, both the resource and the traditional fishermen will benefit. A short-term loss will be imposed on new entrants, since the license program will increase the cost of entry to the fishery. This increased cost will be off-set to some degree by the enhanced stability afforded by the limited entry program.

Are there alternative solutions? If so what are they, and why do you consider your proposal the best way of solving the problem? As stated above, DSR fishermen have made full use of available traditional management tools to protect the resource and to preserve the socioeconomic characteristics of the directed fishery. Current State limited entry laws do not allow an effective limited entry program to be created for this fishery (under State law, the number of licenses issued can be no less than the number of fishermen participating in the fishery during the year of greatest effort; for the DSR fishery this would license over 300 fishermen, five times more than currently participate) IFQs were deemed unworkable at this time for a number of reasons, including the importance of evaluating the sablefish/halibut QS program before expanding it, the difficulties associated with fishing IFQs for a high mortality species, and the still undetermined bycatch needs of the halibut QS fishery.

Supportive Data and Other Information: what data are available and where can they be found? Both CFEC and ADF&G have data on this fishery. Data provided by ADF&G aided work group members in developing the qualifying criteria for the proposed license program (see attachment 2). This data base could be used in preparing the EA for the DSR license limited entry plan.

Signature: Jay Skordahl, rockfish work group

Jay Skordahl

DSR LICENSE PROGRAM

November 10, 1994

Demersal shelf rockfish (DSR) fishermen met in Sitka last Fall to develop a management plan for their fishery. Goals identified at the meeting by this "rockfish work group" were to:

1) Maintain the health of the DSR resource
2) Preserve the directed DSR fishery without constraining the halibut IFQ fishery
3) Prevent the DSR fishery from becoming a derby
4) Prevent traditional participants and small boats from being displaced
5) Enhance market opportunities
6) Enhance safety

With these goals in mind the work group developed several management proposals to present to the Board of Fisheries (Board) and the North Pacific Fishery Management Council (Council). Among the changes recommended by the work group and ultimately adopted by the Board were: 1) changes in the seasonal apportionment of the DSR quota; 2) changes in the DSR bycatch regulations to prevent the halibut IFQ fishery from eliminating the directed DSR fishery; 3) implementation of trip limits in the East Yakutat area; and 4) reduction in the size of the Southeast outside trip limit.

After numerous meetings throughout the Winter and Spring, work group members concluded that a limited entry program would be necessary to achieve the goals outlined above. At the last Spring work group meeting, members reviewed various limited entry options. After learning that the State could not legally restrict a limited entry program for the DSR fishery to less than 300+ licenses, work group members focused on the federal system--i.e., the Council. The Council has regulatory authority over DSR and has the flexibility to design a license program tailored to each fishery. The Council is also in the process of designing a license limited entry system for groundfish fisheries in the North Pacific and Bering Sea. The work group determined that the Council offered the most likely avenue for timely implementation of an effective license program for DSR. Before moving ahead with a license program, however, the work group elected to solicit comments from rockfish fishermen throughout Southeast. At the work group's request, ALFA prepared a summary of the limited entry options considered by the Sitka fishermen and mailed it to all rockfish permit card holders for comment.

On November 9, the rockfish work group met again to identify specific elements of a license limited entry plan for the DSR fishery. The work group strove to define the traditional character of the DSR fishery and to develop elements that would preserve this character. The specific elements selected by the work group and the supporting rationale are as follows:

Attachment 1

ELEMENTS AND OPTIONS OF THE PROPOSED DSR LICENSE LIMITED ENTRY PLAN

Nature of licenses:

* **A single license shall be issued for the combined Southern, Central, Northern and East Yakutat Outside management districts.** The work group recommends combining the outside districts under a single license since most DSR fishermen traditionally fish more than one area. The inside areas are omitted because the Council does not have jurisdiction over State waters.

* **Licenses shall be issued to the the person who owned the vessel when qualifying landings were made except where a qualified lease existed.** This provision is consistent with the sablefish and halibut QS plan. Licenses would be issued to the individual who has demonstrated a commitment to the fishery by investing in a vessel or assuming the responsibility of leasing one.

* **Licenses shall be issued to individuals and may be purchased only by individuals. Leasing of licenses is prohibited. License holders must be on-board during harvesting and landing operations.** The work group believes that the current owner-operated nature of the fleet is a fundamental characteristic of the DSR fishery. Therefore, in order to maintain the character of the fleet and to prevent speculative investment in licenses by corporations or absentee owners, leasing of licenses should be prohibited.

Vessel size classes:

* **Licenses shall be specific to three vessel size classes. These size classes shall be vessels less than 35'; vessels 35' to 55'; and vessels 55' and greater. Licenses shall not be transferable across these size classes.** Work group members recognize that the DSR fishery has historically been prosecuted with small to mid-size vessels (32' to 48'). Size classes are necessary to preserve the character of the fleet, to prevent migration of licenses, and to prevent overcapitalization. The work group choose to deviate from the halibut vessel size classes in order to separate the high capacity "limit seiners" from the smaller boat fleet. Work group members consider this seperation critical to retaining the socioeconomic profile of the DSR fishery.

Qualifying criteria: Before deciding on the qualifying criteria for a license, work group members reviewed preliminary information provided by ADF&G on effort trends. This information indicated that approximately 40 to 80 vessels participate in the DSR fishery in any given year and that the turn-over rate is high, with a relatively small number (12 to 30 vessels) remaining in the fishery for more than three years. In order to capture this characteristic, the work group developed a program with both transferable and non-transferable licenses. The transferable licenses would go to fishermen with both historic dependance and recent participation in the DSR fishery. Non-transferable licenses would be issued to active fishermen with a demonstrated historic interest in the fishery and/or current participants with a multi-year commitment to the DSR fishery. The specific qualifying years selected by the work group are:

Transferable Licenses:

* Transferable licenses shall be issued to vessel owners or qualified lease holders who have legal DSR landings on a "Y" or "M" card in at least three (3) of the five (5) years between January 1, 1990 and December 31, 1994.

Options to include:

A) No minimum poundage per landing
B) A 1,000 lbs per year minimum

Non-Transferable Licenses:

*Non-transferable licenses shall be issued to vessel owners or qualified lease holders who have a legal landing of DSR on a "Y" or "M" card in:

1) At least two (2) years between 1990 and 1994

A) No Minimum
B) 1,000 lbs/year minimum

OR

2) At least five (5) years between January 1, 1984 and December 31, 1994 with at least one (1) landing between Jan. 1, 1992 and Dec. 31, 1994.

A) No minimum
B) 1,000 lbs/year minimum

Number of permits that would qualify by number of years participated and total pounds of DSR landed for years specified Southeast Outside District excuding East Yakutat Subdistrict.

Total pounds for qualifying years	1992-1994		1991-1993		1991-1994	
	1 or more years	2 or more years	1 or more years	2 or more years	2 or more years	3 or more years
>00	154	46	175	56	66	27
>2000	92	[illegible]	98	[illegible]	61	[illegible]
>5000	57	39	63	43	53	26
>10000	38	31	38	31	39	21
>15000	24	24	25	24	30	18
>20000	19	19	21	21	24	15
>30000	10	10	14	14	14	12

Ac : CJ –
LH –

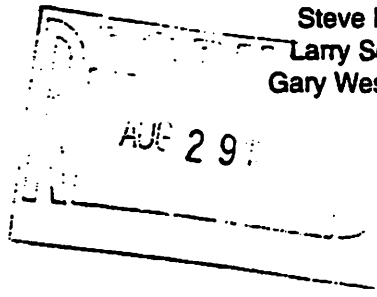
(4)

Midwater Trawlers Cooperative

1626 N. Coast Highway • Newport, Oregon 97365

Capt. R. Barry Fisher
President
Yankee Fisheries
1626 North Coast Highway
Newport, Oregon 97365
Telephone: (503) 265-9317
Telefax: (503) 265-4557

August 25, 1994



MEMBER VESSELS

AMBITION
ARGOSY
BAY ISLANDER
BLUE FOX
CAPE FALCON
CAPE KIWANDA
CARAVELLE
COHO
EXCALIBUR
EXCALIBUR II
HAZEL LORRAINE
LESLIE LEE
LISA MELINDA
MARATHON
MISS BERDIE
MISS LEONA
MISS SUE
NEW LIFE
OCEAN SPRAY
PACIFIC
PACIFIC CHALLENGER
PACIFIC FUTURE
PACIFIC RAM
PEGASUS
PERSEVERANCE
PERSISTENCE
PIONEER
RAVEN
ROSELLA
ROYAL AMERICAN
SEADAWN
SEEKER
VANGUARD
WESTERN DAWN

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

RE: CRP Analysis

Dear Chairman Lauber:

Enclosed is a proposal which we are now submitting so as to hopefully be included in the Council's Comprehensive Rationalization Plan (CRP) analysis. We would request that this proposal be included in the Council briefing books for the September/October meeting so that it can be appropriately considered by the SSC, the AP and the Council.

The enclosed proposal is intended only at this time as a framework to provide the opportunity for the Council to have more than one class of permits in its license limitation program. We feel based upon our experience in developing a license limitation program with the Pacific Council, that having a second class of permits will give the Council options that it does not now have including an ability to deal with extenuating circumstances and hardship cases, many of which may become contentious during the process.

Thank you for your consideration.

Sincerely,

MIDWATER TRAWLERS COOPERATIVE

R. Barry Fisher
President

Fred A. Yeck
Vice President

enclosure

PROPOSAL FOR AMENDMENT TO THE INTEGRATED FISHERIES RATIONALIZATION PROGRAM

The following would be added to the Groundfish and Crab License Limitation System:

1. Specify a Class A permit which would be fully transferable and a Class B permit which would be non-transferable.

2. The Class A permits would be issued to those vessel owners who meet the "criteria for eligibility" ultimately adopted by the Council for permits that would be permanent and transferable.

3. Class B permits. A second category of permits would be created for issuance to those vessel owners in both the trawl and crab fishery who do not meet the criteria for eligibility for Class A permits but who do have a historical and/or current participation in the fishery that justifies a limited right of continuation. Eligibility criteria for Class B permits should be considered for:

   a. Historical participants that were involved in the fishery between 1980 and the cutoff date established for A permits.

   b. Recent participants in a fishery that do not qualify for an A permit because of entry after the cutoff date for A permits and/or because of insufficient participation in a fishery during the "window" period for qualifying for A permits.

   c. Other hardship cases.

4. The characteristics of the Class B permit would include the following:

   a. The permit would be non-transferable except to a replacement vessel owned by the same vessel owner of record that originally received the Class B permit. Restrict

replacement vessel as to length (LOA) to prevent significant increases in capacity.

b. The Class B permit would terminate upon the death of the owner of the permit. In the case of multiple owners or vessels owned by corporations the permit would expire with the death of the last owner or shareholder who are owners of the vessel or corporate owner at the time of the original issuance of the Class B permit.

c. In addition, a performance requirement should be considered which would provide for the expiration of the permit in the event it was not utilized. For example, if the permit was not utilized in any two consecutive years the Class B permit would be terminated.

d. In addition, after issuance of the permit, if there is a change of ownership by sale, foreclosure or otherwise, the Class B permit would terminate (however, transfers between original owners would not cause the permit to terminate).

e. Class B permits would not be combinable into permits for larger vessels.

The merits of this particular proposal include the following:

1. First and foremost, it allows for equity. There are many vessel owners who would qualify under the moratorium to participate in the fisheries based upon historical landings between 1980 and whatever time is selected for the cutoff for eligibility for the currently proposed limited entry license. Most of these vessel owners have long since given up any concept of participating in the fishery but there are a few long term industry participants who have left the fishery for the sole reason they were pushed out by the overcapitalization occurring in 1988 and 1989, even though some of these participants have five or more years in the fishery prior to this time. For the reason that these vessel owners were the original pioneers in the Americanization

and for the further reason that they had the legal right to return to the fishery pursuant to the moratorium, they should be extended that right to at least earn a living personally under any license limitation program. Most of these vessels involved are small and would have little impact on overall capacity.

2. There will be vessel owners who will have significant participation in the fishery, both historic and current, that will be excluded from various fisheries when the final eligibility criteria is established. These vessel owners legally made their investments prior to the establishment of this criteria and should not be excluded from participating in the fisheries after the fact by the adoption of a retroactive license limitation program. The concept of the Class B permits can be used to address all of these issues as well as a number of hardship cases, many of which may be contentious.

3. Similarly, under the proposed crab license system, vessels that legally crossed over to the crab fishery after the 1992 moratorium cutoff date would not receive permits. Again, vessels that legally made investments in reliance upon the Council adopted moratorium should not be eliminated from fisheries with regulations adopted after the fact. A Class B permit issued to these vessels recognizing their legitimate investments would be an equitable approach.

4. The Class B permit system would continue to allow for a significant reduction of effort as compared to that permitted under the moratorium but without the draconian effects of only a single class of permits. The number of permits would be reduced by time and without cost to the industry or to the government as the result of time and the death of the vessel owners and/or as a result of non-use of their permit if that option should be selected.

5. By being virtually non-transferable the permits would not acquire an

economic value nor provide the base for increases in capacity by the development of more modern vessels.

6. In many cases, by having the option of granting Class B permits to certain classes of fishermen, it will permit the Council to be more restrictive in its consideration of criteria for Class A permits.

BLOCK 6

(5)

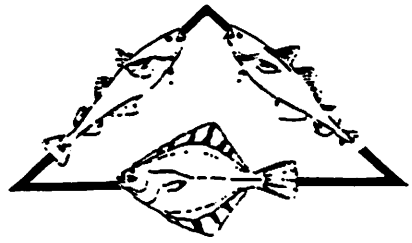
Groundfish Data Bank

Alask

TO: GULF PLAN TEAM

RE: PROPOSAL FOR REGULATORY CHANGE

DATE: AUGUST 31, 1994



The following proposal is being prepared for submission to the North Pacific Fishery Management Council. It will most probably be sent in by someone other than myself, but in the interest of receiving Plan Team comments I am presenting it to the Plan Team at the August meeting.

Chris Blackburn

PROPOSAL TO PROHIBIT COMMERCIAL FISHING ON CAPELIN EXCEPT UNDER A SPECIAL PERMIT WHEN DATA NEEDS ARE MET

This proposal calls for the NPFMC to prohibit any commercial fishery on capelin. However, the proposal does provide for a limited fishery to occur under a special permit if

1. The biomass of capelin in the area where the fishery is to occur is known and
2. The regional director, in consultation with the Council, finds the proposed fishery does not jeopardize marine mammals or marine birds or fish which feed on capelin and
3. The fishery is carefully monitored and scientific data collected.

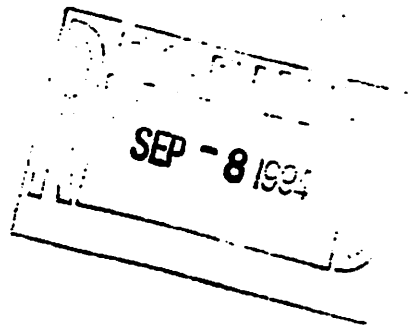
Currently capelin is a species under the "other species" category and a large scale roe fishery could occur, as it does in the North Atlantic, without any notification to the Council or NMFS.

Considering the apparent importance of capelin in the diet of marine birds, mammals and commercial fish species and the growing efforts to consider the ecosystem in management decisions, we feel it is important to prevent a capelin fishery from starting. The provisions for a special permit were added to allow flexibility in the future should the status of capelin, the marine environment and/or scientific knowledge change.

Chris Blackburn • Director • P.O. Box 2298 • Kodiak, Alaska 99615 • (907) 486-3033

(6)

LONG JOHN SILVER'S



September 7, 1994

Richard Lauber
Chairman, NPFMC
605 West 4th Avenue
Anchorage, AK 99501

Dear Mr. Lauber,

I am writing to ask for Council consideration of a proposal to ban fishing for capelin, sand lance and other forage fish in the waters off Alaska.

Unlike the North Atlantic, the Northeast Pacific does not have large-scale fish meal production from fishing on capelin and other small forage fish. This may be a contributing factor to why groundfish stocks in the North Pacific have been sustained at higher levels than in the North Atlantic.

I have heard reports of interest expressed in capelin meal fishing or fishing for roe-bearing capelin. There are numerous reasons why this type of fishing should not be allowed including the following:

1) There is currently no directed fishing for small forage fish (capelin, sand lance, etc.) in the waters under the jurisdiction of the North Pacific Fishery Management Council.

2) Directed fishing for small forage fish could remove important food sources for groundfish, salmon, marine birds, and marine mammals.

3) Directed fishing for small forage fish could create significant bycatch problems for prohibited species, especially salmon.

4) There is no tool available to the Council at present to prevent the initiation of directed fishing for small forage fish.

5) There is reported recent interest in initiating directed fishing for small forage fish; and

6) There are no biological data regarding biomass, age structure or other parameters important for management.

Long John Silver's
Restaurants, Inc.
101 Jerrico Drive
P.O. Box 11988
Lexington, KY 40579

Direct Line:
606.263.6000
Fax Line:
606.263.6145

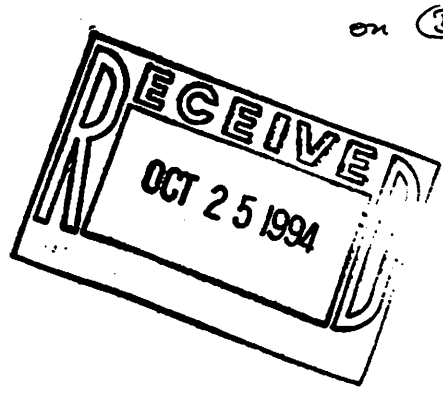
I appreciate the Council's consideration of this proposal.

Sincerely yours,

Ronald Rogness
Director, Seafood Sourcing

CC: Clarence Pautzke
Steve Pennoyer

COMMENT LETTER
ON (5)+(6)



October 24, 1994

North Pacfic Fisheries Management Council
605 West 4th Ave
Anchorage, AK 99501

Dear Council Members:

I wish to comment on items 5 and 6 which have been assigned to Staff Tasking. Both seek to ban directed fishing for capelin in Alaska waters.

Large concentrations of capelin have spawned on the beaches of Bristol Bay, especially in the Port Mollar and Togiak districts. Abundance varies greatly from year to year. Small scale fisheries for roe capelin have been conducted at various times since 1979. I have personally been involved in those fisheries, most recently in 1993 and 1994 at Togiak with T-NP, a joint venture partnership. Biomass in those years was not as great as we have seen in the past and production was negligible due to fish size and male/female ratio requirements. However, we were prepared to handle 5 -600 tons of roe capelin had the proper fish been available. For 1995 T-NP expects to be capable of handling at least that amount for roe, bait and zoo food markets.

During the years of strong capelin showing, the biomass has been estimated as high as 500,000 tons at Togiak alone. The literature suggests that virtually all capelin die after spawning. Our small fishery takes place just prior to spawning. These fish are already essentially removed from the forage fish biomass in the Bering Sea and will not be returning.

Our domestic inshore capelin fishery poses little threat to the Bering Sea forage fish biomass and provides an opportunity for small boat fishermen to pursue their livelihoods.

Sincerely,

Emil "Beaver" Nelson
Box 130, Homer, AK 99603
907-235-8778

BLOCK 7

(9)

Groundfish Data Bank

GROUNDFISH FISHERY MANAGEAMENT PLAN AMENDMENT PROPOSAL
North Pacific Fishery Management Council

SEP 13

Name of Proposer: Alaska Groundfish Data Bank

Address: P.O. Box 2298, Kodiak, Alaska 99615

Fishery Management Plan: Gulf of Alaska

Brief Statement of Proposal: This proposal contains two options for resolving the problems caused by influxes of effort into the Gulf of Alaska from the Bering Sea:

Preferred Alternative: Super Exclusive Registration
- Suboption a: All species Gulfwide
- Suboption b: Pollock and Pacific cod Gulfwide
- Suboption c: All Species Central Gulf
- Suboption d: Pollock and Pacific cod Central Gulf

Alternative Option: Catcher boat trip limits for pollock & Pacific cod. Catcher boat pollock trip limit to be set at 130 MT/trip. Catcher boat Pacific cod trip limit to be set at 100 MT/trip.
- Suboption a: Trip limits Gulfwide
- Suboption b: Trip limits Central Gulf

Setting trip limits for catcher boats is in no way intended to change the existing regulation limiting under 125-foot catcher processors to 18 MT/day of Pacific cod or pollock, nor change any of the other provisions in the Inshore/Offshore regulations.

The overage provisions used to regulate trip limits in the open access halibut fishery would apply to trip limits for pollock and Pacific cod in the Gulf of Alaska.

Objectives of Proposal (What is the problem?):

Pollock: The change of the Bering Sea A and B season dates, coupled with the shorter Bering Sea pollock seasons and the requirement that the Gulf of Alaska remain on a schedule of quarterly pollock openings, has created an opportunity for large capacity catcher vessels designed for the Bering Sea fishery to fish Gulf pollock quarters 2, 3 and 4 with the following results:

1. Reduction in the share of the quota delivered to local communities and available to local vessels.
2. Increasing problems accurately projecting when the quarterly quota will be reached since effort is unpredictable.
3. Concern that if no steps are taken to maintain a status quo, the effort on Gulf pollock the last three quarters of year will increase to the point the fishery is unmanageable. This happened the fall of 1991, prior to inshore/offshore, and resulted in 7,000 MT of pollock being left on the grounds because the fishery was declared unmanageable.

Chris Blackburn • Director • P.O. Box 2298 • Kodiak, Alaska 99615 • (907) 486-3033 • FAX (907) 486-3461

4. Local response to the influx of Bering Sea effort will be to increase vessel capacities and fleet size to remain competitive -- setting off another spiral of over-capitalization.
5. Gulf pollock is declining and, if effort is not stabilized, the expected small quotas will be unmanageable.

Pacific cod: An unexpected influx in effort near the end of the 1994 season resulted in the Central Gulf Pacific cod catch exceeding the quota. Reported catch for the last week of the season was 4,200 MT. The previous four weeks had weekly catches of less than 1,000 MT.

Exceeding the quota meant that for the remaining nine months of the year all gear types in the Central Gul had to discard Pacific cod taken as bycatch. To avoid a similar occurrence in the future, the opportunity for influxes of effort must be stopped or curtailed.

Need and Justification for Council Action: (Why can't the problem be resoved through other channels?) Pacific cod and pollock in the Gulf of Alaska are under federal management.

Forseeable Impacts of Proposal: (Who wins, who loses?) In terms of managing the fishery and reducing discards, everyone wins. An argument could be made that precluding the opportunity to move into the Gulf at near the end of a fishery and take enough fish to push the catch over quota is a loss to the vessels that might use that opportunity.

Are There Alternative Solutions? If so what are they and why do you consider your proposal the best way of solving the problem?
Exclusive registration is the best alternative as it eliminates influxes of effort. Trip limits mitigate the problem by reducing the distance vessels can profitably run to deliver fish and capping the average catch per trip. ITQ's could also mitigate the problem, but implementation of ITQ's appears to some years away.

Supportive Data & Other Information: What data are available and where can they be found? All data is available from NMFS Juneau.

Signature:

Director, AGDB

(10)

North Pacific Fishery Management Council

SEP 13

Peninsula Marketing Association
P.O. Box 248
Sand Point, Alaska 99661

PH: 907-383-3600
Fax: 907-383-5618

September 9, 1994

Proposal: Vessel Registration of Gulf P. Cod and Pollock Fishery. Vessel Registration to be between Gulf and Bering Sea. Allowing vessels to fish only the Bering Sea P. Cod and Pollock quota or only the Gulf of Alaska P. Cod and Pollock quota.

Objective: Large trawlers that fish both the Gulf and Bering Sea P. Cod/Pollock quotas, quickly take the smaller quota of the Gulf fishery. Vessels that fish the Gulf are generally smaller vessels and from the communities on the Gulf side. These vessels support the families and communities in the Gulf.

The local fleet is composed of generally a 58 foot size seine boat constrained by weather and unable to travel to the Bering Sea. The Gulf communities, particularly the Eastern Aleut Villages need this winter fishery as the area's fisheries have been tremendously altered. There no longer is a King/Tanner Crab fishery, IFQ's has irrevocably altered Halibut, Shrimp fishing is gone and the Salmon fishery has been very unstable, economically, politically and biologically. Sand Point was founded as a cod station in the 1800's and has fished Cod and Pollock since that time. With the larger vessels fishing both quotas the local fleets suffer economically by reduced fishing time and amount of fish to be harvested.

Foreseeable Impacts: Vessels who fish both Bering Sea and Gulf

Alternative Solution: Non that can be identified

Supportive Data : Catch History

Barbara Wilson
President

BLOCK 8

(17)

GROUNDFISH FISHERY MANAGEMENT PLAN AMENDMENT PROPOSAL
NORTH PACIFIC FISHERY MANAGEMENT COUNCIL

NAME OF PROPOSER: RICHARD L NELSON **DATE:** 9/9/94

ADDRESS: BOX 2228
KODIAK AK
99615

TELEPHONE: 486-3479

FISHERY MANAGEMENT PLAN: GULF FMP

BRIEF STATEMENT OF PROPOSAL:

Implement trip limits for Central Gulf of Alaska pollock. Suggested trip limit is 100-125 metric tons per trip. Trip limit to remain effective until replaced with a Comprehensive Rationalization Program.

OBJECTIVES OF PROPOSAL:

Avoid localized depletion. Reduce quarterly quota overages. Maintain the spirit of the Sea Lion Protective Measures which include spreading pollock catch out over time and area.

FORESEEABLE IMPACTS OF THE PROPOSAL:

(Who wins, who loses?) Winners include pollock, sea lions (if the theory that there is a relationship between the pollock fishery and the sea lion decline is correct) and vessels capable of carrying 200,000 pounds or less of pollock. Potential losers may be vessels capable of packing more than 100-125 metric tons of pollock. However, the extended season will make up a substantial portion of this loss.

ARE THERE ALTERNATIVE SOLUTIONS?

There are two alternative solutions:
1. Set the Gulf pollock openings to coincide with periods when the Bering Sea pollock fishery is open. 2. Designate the Gulf an exclusive registration area for all species.

Both these alternative methods have been proposed in the past. However, neither was acceptable to either the council and/or NMFS.

SUPPORTIVE DATA & OTHER INFORMATION:
SEA LIONS AND LOCALIZED DEPLETION:

When the quarterly apportionment of the pollock quota was implemented, the Gulf and Bering Sea were fishing pollock at the same time. In 1990 the Gulfwide catch ran around 3,000 to 5,000 MT/week. In 1994 Central Gulf catch through third quarter was 8,000 to almost 11,000 MT/week (weather and/or scattered fish resulted in weekly catches as low as 3,000 MT in June 1994, but this is not reflective of most weeks.

The 11,000 MT/week was achieved by a combination of Kodiak based vessels and a few larger capacity non-Kodiak vessels running product to plants outside Kodiak.

Regardless of which vessels took the fish and of where the

fish were delivered, the trend toward increasing weekly catch rates is clearly established. If the concern that the possibility of localized depletion of pollock may negatively impact sea lions is great enough to preclude matching the Gulf pollock openings to the Bering Sea openings, then the increasing weekly catch is of equal concern for the same reasons.

HOLDING THE CATCH WITHIN THE QUOTA:

Quarterly quota overruns have been a constant problem in the Gulf pollock fishery, both because of the small quotas and the increasing vessel capacity. Anything that reduces the amount of pulsed effort will allow management to be more effective.

ALLOCATIVE EFFECTS:

This proposal will limit a few Kodiak based vessels and the few large capacity non-Kodiak vessels which make trips into the Central Gulf when the Bering Sea is closed. It does not preclude any vessel from participating and running Central Gulf fish to other areas.

PRECEDENTS:

Under inshore/offshore the under 125-foot catcher processors fishing under the shorebased quotas operate under a daily limit.

SIGNATURE:

Richard L Nelson

M/V DUSK

RICHARD L NELSON
BOX 2229
KODIAK, ALASKA
99615

BLOCK 9

16

UNALASKA NATIVE FISHERMAN ASSOCIATION
P.O. BOX 591
UNALASKA, ALASKA 99685
(907)581-2920
Fax: 581-3644

September 16, 1994

North Pacific Fisheries Management Council
P.O. Box 103136
Anchorage, Alaska 99510

RE: Jig Fishery

In Unalaska the jig fishery is finally getting off to a good start. In May of 1994, we had eight boats fishing, others were interested, but did not want to make an investment in jig machines due to the unanswered questions on fixed gear PSC shutting down the jig fishery. Your action on exempting the jig fishery from the hook and line Halibut PSC cap has definately made a change in the jig fishery. We now have 15 small boats in the fishery and a few more coming. Thank you for making that change.

It would help if the jig fishery had a separate TAC on rockfish (red and duskey), pacific ocean perch and Atka mackerel. Jig fishing is fairly selective and separate quotas for these species would enhance the small boat fishery locally.

Sincerely,

Emil W. Berikoff
President

GROUNDFISH FISHERY MANAGEMENT PLAN AMENDMENT PROPOSAL
North Pacific Fishery Management Council

Name of Proposer: EMIL W. BERIKOFF **Date:** 9-16-94

Address: P.O. Box 81
UNALASKA, AK 99685

Telephone: (907) 581-2920

Fishery Management Plan:
BERING SEA / ALEUTIAN ISLANDS

Brief Statement of Proposal:
A SEPERATE TAC FOR THE JIG FISHERY FOR ROCKFISH (RED & DUSKEY) PACIFIC OCEAN PERCH AND ATKA MACKEREL

Objectives of Proposal: (What is the problem?)

Need and Justification for Council Action: (Why can't the problem be resolved through other channels?)

Foreseeable Impacts of Proposal: (Who wins, who loses?)
CONSUMER HAS HIGHEST QUALITY PRODUCT
JIG FISHERMAN HAS ALTERNATIVE MARKET

Are There Alternative Solutions? If so, what are they and why do you consider your proposal the best way of solving the problem? NONE

Supportive Data & Other Information: What data are available and where can they be found?

Signature: Emil W. Berikoff

21

GROUNDFISH FISHERY MANAGEMENT PLAN AMENDMENT PROPOSAL
North Pacific Fishery Management Council

Name of Proposer: Rudy A. Petersen

Address: North Pacific Fishing, Inc.
4039 21st Avenue West, Suite 201
Seattle, WA 98199

Fishery Management Plan: Bering Sea/Aleutian Islands

Brief Statement of Proposal: Establish separate harvest caps for pollock and other groundfish species. Manage non-pollock groundfish species separately from pollock.

Objectives of Proposal/Problem Statement:

The current management of pollock and non-pollock groundfish species under the same harvest cap is irrational in both economic and biological terms. Over the past four years the portion of the Bering Sea/Aleutian Islands (BSAI) annual harvest of non-pollock groundfish species has increased by approximately 13%, while the pollock harvest has remained nearly constant. Currently the non-pollock groundfish species, in particular the flatfish and Atka mackerel stocks of the Bering Sea, have continued to increase with respect to pollock and other stocks. This imbalance may threaten the Bering Sea stocks.

Need and Justification for Council Action:

Current management practices include pollock and other groundfish under the same overall harvest cap. The pollock fleet's high harvest capacity and its history of attaining full utilization during the Americanization of the BSAI fisheries have created an economic necessity to apportion large amounts of Total Allowable Catch (TAC) to the pollock fisheries. Currently the pollock TAC accounts for two-thirds of the total allowable 2M mt harvest cap. This has led to a disproportionate harvest of pollock compared to other stocks. By encouraging the harvest of flatfish at a rate closer to Maximum Sustainable Yields (MSY), a better harvest balance can be achieved.

Currently the TACs for pollock, cod, and sablefish are 98% of the Acceptable Biological Catches (ABCs) for these species or approximately 16.4% of the biomass. Similarly, the BSAI rockfish species are assigned TACs equal to 100% of their ABCs. In comparison the TACs for all flatfish species combined (with the exception of halibut) are at 54% of the ABCs for these species which equates to approximately 8.4% of the biomass. The BSAI Atka mackerel TAC is set at 56% of the ABC or 8.3% of the biomass.

In the past, many species have not been utilized due to the lack of technology or markets; however, this situation is changing. The 1994 Atka mackerel fishery was closed due to having reached its TAC which was only a fraction of the ABC available for harvest. This is a waste of a

fishery for which there is no need to limit the TAC so dramatically other than to maintain the overall groundfish cap. Additionally, the market for yellowfin sole is increasing along with markets for other flatfish. Improved incentives to reduce bycatch (e.g., individual reporting of bycatch rates), and the low halibut bycatch rates seen in 1994 show an ability to efficiently utilize Prohibited Species Catch (PSC) allowances. It is therefore appropriate for the council to provide further incentives to optimize the utilization of the resource by encouraging the harvest of formerly underutilized resources.

Under the current joint management plan, pollock receives disproportionately more harvest quota per metric ton of Acceptable Biological Catch than other more valuable species. This causes an under-harvest of the more valuable species compared to pollock. Comparing the economic value of Atka mackerel and flatfish to pollock using NMFS/NPFMC determined ex-vessel values shows that unprocessed Atka mackerel is worth 145% of the same weight of unprocessed pollock. Similarly the value of unprocessed non-roe flatfish is worth approximately 191% of the same weight of unprocessed non-roe pollock. Finally roe-bearing flatfish is worth 400% of roe-bearing pollock. Quota is currently assigned to Atka mackerel and flatfish species at the rate of its ABC that is half that of the rate at which pollock TAC is assigned. This decision comes at an economic loss considering that Atka mackerel and flatfish species are worth significantly more than an equal weight of pollock.

Foreseeable Impacts of Proposal:

1) Improved balance between fisheries by removing artificial barriers from obtaining optimum yield from the Bering Sea stocks.
2) Improved economic return from the nation's fisheries resource.
3) More efficient use of fisheries resources.

Alternative Solutions:

There are alternative solutions, however they are not economically or socially acceptable. Requiring that the ratio of TACs to ABCs be equalized would pose an significant impact on fishermen and processors that utilize the pollock resource. Additionally, the alternative solution would fail to achieve Optimum Yield (OY) as required by the Magnuson Act.

Supportive Data & Other Information:

Annual National Marine Fisheries Service, Alaska Fisheries Science Center Status of Stocks Reports (SAFE documents); Alaska Fisheries Science Center, chart of biomass trends, 1979-1993; 1988 - 1995 Bering Sea/Aleutian Islands TAC specifications; and NMFS Domestic Annual Processing (DAP) reports; NPFMC Newsletter, October 21, 1994. This data is summarized below.

Table 1: Species for which quotas are set below Acceptable Biological Catches (ABCs):

Species	1995 Preliminary SAFE Report Biomass Estimates	1995 Preliminary SAFE Report Acceptable Biological Catch	1995 Total Allowable Catch Council Initial Specifications.	1994 Harvest to Date (10/29/94)
Arrowtooth Flounder	519,000 mt	93,400 mt	10,000 mt	14,030 mt
Atka mackerel	816,000 mt	245,000 mt	68,000 mt	69,519 mt
"Other" Flatfish	1,240,000 mt	225,000 mt	26,382 mt	28,343 mt
Greenland Turbot	165,000 mt	7,000 mt	7,000 mt	10,186 mt
Rocksole	1,790,000 mt	313,000 mt	75,000 mt	59,359 mt
Yellowfin Sole	1,880,000 mt	230,000 mt	150,325 mt	132,006 mt

Table 2: Comparison of NMFS Round Weight Equivalent (RWE) Ex-Vessel Values:

Species	Average $/lb. RWE	$/MT RWE	Comparison to Pollock
Atka Mackerel	.090	198.72	145%
Flatfish (roe)	.300	662.40	400%
Flatfish (non-Roe)	.118	261.43	191%
Pollock (roe)	.075	165.60	n/a
Pollock (non-roe)	.062	136.90	n/a

Submitted:

Rudy A Petersen

Rudy A. Petersen
North Pacific Fishing, Inc.

ering Sea and Aleutian Islands ABC and TAC Comparisons

ased on BSAI SAFE Report for 1995

	Biomass	Acceptable Catch (ABC)***:	Quota TAC 1994:	1994 Harvest:	Harvest % of Biomass:	Harvest % of ABC:
ellowfin Sole:	1,880,000 mt	230,000 mt	150,325 mt	132,006 mt	7.02%	57.39%
reenland Turbot:	165,000 mt	7,000 mt	7,000 mt	10,186 mt	6.17%	145.51%
rrowtooth Flounder:	519,000 mt	93,400 mt	10,000 mt	14,030 mt	2.70%	15.02%
ock Sole:	1,790,000 mt	313,000 mt	75,000 mt	59,359 mt	3.32%	18.96%
ther Flatfish*:	1,240,000 mt	225,000 mt	225,000 mt	28,343 mt	2.29%	12.60%
otal Flatfish:	5,594,000 mt	868,400 mt	467,325 mt	243,924 mt	4.36%	28.09%
tka Mackerel:	816,000 mt	122,500 mt	68,000 mt	69,519 mt	8.52%	56.75%

otal flatfish TAC as % of ABCs: 54%

tka mackerel TAC as a % of ABC: 56%

ollock, Cod, and Sablefish TACs as % of ABCs: 98%

	Biomass	Acceptable Catch (ABC):	Quota TAC:	1994 Harvest:	% of Biomass:	% of ABC:
alibut**:	136,081 mt	- mt	- mt	5,926 mt	4.35%	n/a

Other Flatfish includes both flathead sole (610,000 mt) and AK plaice (515,000 mt)
nd misc. other flatfish species (87,200 mt).

* Halibut data is for 1993 commercial catch and bycatch.

** 1994 ABCs shown are the same as the preliminary 1995 SAFE except as follows:
the Greenland turbot 1995 TAC is 17,200 mt, and the 1995 Atka mackerel TAC is 240,000 mt.

ote: 1994 harvests shown are based on NMFS DAP reports through 10/29/94

Historical Harvests:

Based on 1991 - 1994 NMFS DAP Harvest Reports:

Category:	1991	1992	1993	1994 (10/29)	1994 (est.)
Pollock	1,257,375	1,347,507	1,252,864	1,269,472	1,273,472
Other Groundfish	508,167	465,728	501,520	554,583	572,283
Total Harvest	1,765,542	1,813,235	1,754,384	1,824,055	1,885,968
DAP as % of 1991	100%	103%	99%	103%	107%
DAP Plk % of 1991	100%	107%	100%	101%	101%
DAP nonplk % of 1991	100%	92%	99%	109%	113%

Note: In 1992 the Pollock BSAI TAC was exceeded by 106,505 mt or 8.6% of the TAC.

Value Comparison

Based on NMFS/NPFMC Approved Ex-vessel Values:

Species:	$/lb. RWE:	$/MT RWE:
Atka Mackerel	0.090	$198.72
Flathead Sole	0.122	$269.38
Greenland Turbot	0.300	$662.40
Other Flatfish	0.060	$132.48
Rock Sole (roe)	0.300	$662.40
Rock Sole (w/o roe)	0.060	$132.48
Yellowfin Sole	0.050	$110.40
Pollock (roe)	0.075	$165.60
Pollock (w/o roe)	0.062	$136.90

Average Prices:			Value Compared to:
Atka Mackerel	0.090	$198.72	145.2% non-roe pollock
Flatfish (roe)	0.300	$662.40	400.0% roe pollock
Flatfish (w/o roe)	0.118	$261.43	191.0% non-roe pollock
Pollock (roe)	0.075	$165.60	
Pollock (w/o roe)	0.062	$136.90	

BLOCK 10

(3)

GROUNDFISH FISHERY MANAGEMENT PLAN AMENDMENT PROPOSAL
North Pacific Fisheries Management Council

08/29/94

Name of Proposer: Arctic Alaska Fisheries Corp.
Dave Benson

Address: P. O. Box 79021
Seattle, WA 98119

Telephone: (206) 298-4009

Statement of Proposal:
Set base amount of halibut PSC limits for each management plan derived from historical performance and adjust base amount annually using change in abundance of halibut biomass and of groundfish species.

Objectives of Proposal:
The objective is to maximize the amount of groundfish harvested, while keeping the PSC limits as low as practical. The base amount sets a reasonable performance-based standard that can be adjusted as abundance changes.

Need and Justification for Council Action:
The Council has jurisdiction over bycatch.

Foreseeable Impacts of Proposal:
Vessels will be able to optimize the harvest of groundfish if changes in biomass of halibut are reflected in the amount of PSC available for each management plan. The percentage of the halibut biomass available to the halibut fishermen will not decrease, because the percentage of the halibut biomass available for groundfish PSC will not increase.

Alternative Solutions:
Alternatives would involve setting base amounts from criteria other than historical performance but would need to encourage the fleet capabilities for reducing bycatch.

Supportive Data:
IPHC and NMFS surveys show the abundance of halibut biomass and impacts of bycatch on groundfish fisheries.

BLOCK 11

(18)
D-6

PROPOSAL

FROM: UNITED SEINERS ASSOCIATION
RAY WADSWORTH, CHAIRMAN

TO: NORTH PACIFIC FISHERY MANAGEMENT COUNCIL

SUBJECT: 'B' SEASON

PROPOSAL: MOVE START DATE OF 'B' SEASON BACK TO SEPTEMBER 7.

JUSTIFICATION: 1. FACTORY TRAWLERS HAVE THE CAPABILITY OF PROCESSING PINK SALMON FOR THE BLOCK FROZEN BONELESS SKINLESS MARKET. THE AUGUST 15 DATE AS NOW SET IS THE PEAK OF THE PINK SALMON SEASON WHEN A HARVESTABLE SURPLUS USUALLY EXISTS. U.S.A. IS A MARKETING COOPERATIVE OF SALMON PRODUCERS, INTERESTED IN PRODUCING HIGH QUALITY PRODUCTS OF A MORE CONSUMER READY TYPE. FACTORY TRAWLER MACHINERY, TOGETHER WITH ON LOCATION MOBILE CAPABILITY, COULD PLAY A MAJOR ROLE IN RESTORING MARKET VALUE BACK TO A FAILED PINK SALMON INDUSTRY.

2. BYCATCH OF TRAWL CAUGHT SALMON SHOULD BE LESS, AS MOST SALMON STOCKS MOVE OFF TO WINTER FEEDING GROUNDS.

RAY WADSWORTH
40 WADSWORTH DR
SEQUIM, WA
98382

206-683-4030

(23)

GROUNDFISH FISHERY MANAGEMENT PLAN AMENDMENT PROPOSAL

North Pacific Fishery Management Council

Name of Proposer: **Date: November 16, 1994**

Cold Sea International, Inc.
2909 Arctic Boulevard, Suite 100
Anchorage, Alaska 99503
Phone: 907-562-2653
Fax: 907-561-3468

Fishery Management Plan: 1995 BSAI Rock Sole.

Brief Statement of Proposal:

a. 1995 BSAI Rock Sole be split into A and B seasons. A season should start in January, and B season should start in August.
b. 50% of the TAC should be allocated to each of the seasons.
c. Bycatch should also be split 50-50 between the A and B seasons.
d. Retention:
   (1) 60% of whatever is in the trawl/codend should be retained in the A season, and 75% should be retained in the B season.
   (2) Exceptions: Arrowtooth, sculpin and skate should not be counted for the purposes of the 60% and 75% retention standards.
e. Only those boats/fishermen who meet the above retention standards in the A season should be allowed to fish the B season. Only those who meet the standards for the A and B seasons should be rewarded by being allowed to take part in further allocations and/or reserve commitments.
f. This value of the Rock Sole fishery increases from more than **$27 million** under past policies and practices to more than **$45 million** under this proposal.

Objectives of Proposal: (What is the Problem?)

a. The first objective is to effect a dramatic reduction in the economic discards of the Rock Sole fishery during the 1995 allocation period. In general, it can

be stated that the current discard rate of about 66% will be reduced to about 33% during the first year of the implementation of this proposal. If as successfully as expected, then this proposal can be continued under its present or even expanded standards.

b. A second objective is to reduce the practice of pulse fishing, which has negative consequences on fishery management and conservation.

c. A third objective is to increase opportunities to expand and diversify markets for the Rock Sole products. Rock Sole with Roe is now dominated by the Japanese market. Adding other product lines will encourage development of other markets, which decreases risks.

d. A fourth objective is to require retention and use of economically viable fish which are now being consciously discarded. This includes non-Rock Sole species such as Pollock, Cod, Yellowfin Sole and others, all of which will have values in a range of, say $0.20 - $0.60 per pound round frozen or H&G frozen. Since there is no incentive or requirement to retain these species during the Rock Sole fishery, they are very naturally being discarded to leave precious freezer room for the higher value Rock Sole with Roe. This proposal provides for correction of such practices and incentives to do so.

e. It will be shown herein that the overall value of the Rock Sole fishery will be greatly increased by adopting this proposal, despite the allocation of 50% of the Rock Sole into a non-roe B season.

f. This proposal is a reasonable first step toward the resolution of the large economic discard record of the Rock Sole fishery.

g. It is possible that there will also be positive effects in bycatch, since it likely that the pace of fishing will be slower, allowing for the possibility of greater escapement of halibut. In addition, it would appear that King Crab bycatch could be reduced, since fishing seasons would be spread out into periods when the King Crab may not be present in the Rock Sole fishing grounds in as great a concentration as in the January - March period. The record of the first year's experience under this proposed regime will indicate the degree of positive effects this proposal will have on bycatch.

Need and Justification for Council Action: (Why can't the problem be resolved through other channels?)

a. The Council is the responsible authority for the sound economic harvest of the resource, combined with effective conservation practices. This proposal is properly submitted to the Council for consideration and implementation. No other authority exists for such action.

b. Increased political, environmental and media attention is being focused on the waste in the Rock Sole fishery. This attention emanates from national,

regional and local sectors as more and more information on the extent of the waste is promulgated.

c. Unless positive steps are taken, the entire Rock Sole fishery could be shut down. Policy makers at all levels are demonstrating a recognition that the record of waste demands strong corrective action.

d. Recent Council meetings signal a strong will on the part of the Council to take action in response to the problems in the Rock Sole fishery. Council's November 14 teleconference was an example of the Council's earnest attempt to respond to the problem, in this instance regarding the King Crab bycatch issue.

e. The mechanism of splitting into A and B seasons is already established in the Pollock fishery. This mechanism was designed to control a Pollock fishery which was, at the time, a frenzied pulse-style fishery in danger of becoming dedicated soley for the harvest of the Pollock roe. To a very large extent, this is exactly the case with the existing Rock Sole fishery. Thus the mechanism should have very healthy effect. It provides a management process which is known and tested by the Council and NMFS.

Foreseeable Impacts of Proposal: (Who wins, who loses?)

a. Those who desire an increase in retention, with a concomitant strong reduction of economic waste, in the Rock Sole fishery are winners.

b. Industry and market elements who can respond to the increased standards of retention are winners. Those who cannot respond are losers until they adapt, unless they simply move to another fishery.

c. Public and private sectors interested in value-added industry for economic development will be winners, since it is certain that the value of retained resource in the A and B seasons will outstrip any loss of the roe in the A season. (See supporting data below.)

d. Those who share tax revenues, to include the State of Alaska, its political subdivisions, and others, will be winners, since the base taxable value of the fishery will increase.

Are There Alternative Solutions? If so, what are they and why do you consider your proposal the best way of solving the problem?

a. The Harvest Priority/Full Retention/Full Utilization concepts contain measures which present alternative solutions.

b. Representatives of the Rock Sole fleet have presented the Council with steps which present alternative solutions. These include increased mesh size and voluntary reporting of bycatch hot-spots.

c. This proposal has the following merits:

(1) It can be implemented immediately, since its management is familiar to existing authority. It would follow the patterns of the Pollock fishery.

(2) It responds quickly and effectively to the growing pressure from political, environmental and media sectors to do something to lessen or totally curtail the waste which is on record in the Rock Sole fishery.

(3) The proposal works with, as opposed to against, concepts which are contained in the Harvest Priority family of objectives.

(4) It delivers a large, quantifiable savings in the area of economic waste. Instead of a discard rate of 66% (for a total of 39,321 mt) as has occurred through November 5, 1994, the following figures could emerge in 1995:

75,000 mt	1995 TAC
63,750 mt	1995 ITAC
31,875 mt	A season ITAC (at 15% reserve)
19,125 mt	A season retention at 60%
31,875 mt	B season ITAC (at 15% reserve)
23,906 mt	B season retention at 75%

Note that 1994 rates shows a 34% retention rate, but 1995 would show under this proposal a 67.5% retention of Rock Sole ITAC in A and B seasons combined.
(19,125 + 23,906 = 43,031 + 63,750 = 67.5%)

Supportive Data & Other Information: What data are available and where can they be found?

a. NMFS records catch and discard data for the Rock Sole fishery. From even a brief look at that data, it appears that this proposal should show savings not only in the Rock Sole fishery but also in others. This occurs because of the requirement to save a high percentage (60% and 75% in the A and B seasons, respectively) of economically viable fish which are in the codend. This means that usable species such as other flatfish,

Yellowfin Sole, Pollock, Cod and Plaice will have to be retained instead of being discarded as is now happening in the one-season Rock Sole with Roe fishery.

b. Various ADF&G reports identify the extent and kinds of waste. Most recently, their November 7, 1994, report discusses the issue of King Crab bycatch.

c. Attached are two scenarios which outline the values of the Rock Sole with Roe fishery at typical discard rates and the Rock Sole fishery as proposed herein. These two outlines provide a means of comparing the values of the Rock Sole fishery we have come to expect with the Rock Sole fishery under this proposal.

Respectfully,
Cold Sea International, Inc.

William C. Noll
Vice President

Scenario I

Rock Sole with Roe Fishery
Typical, Based on Past Allocations and Practices

75,000 mt	TAC
63,750 mt	ITAC
42,075 mt	Discards (at 66%)
21,675 mt	Retained Rock Sole
13,005 mt	Rock Sole product, applying a 0.6 recovery factor.

Discussion.

a. Estimate two-thirds of the Rock Sole are retained during the roe season, and the remaining one-third is taken as allowable bycatch during the remainder of the year. This split would be typical of the fishery experience for the purposes of this discussion.

b. The two-thirds taken during roe season will be counted as female with roe at a value of $1.20 per pound, and the remaining one-third will be counted as H&G frozen with a value of $0.50 per pound.

c. Two-thirds of the Rock Sole product equals a total of 8,670 mt. Its value at $1.20 per pound is about $22,937,000. (Use 2204.6 pounds per metric ton.)

d. One-third of the Rock Sole product equals a total of 4,335 mt. Its value at $0.50 per pound is $4,778,000.

Conclusion.

$22,937,000	Value of Rock Sole with Roe.
4,778,000	Value of other Rock Sole.
$27,715,000	Total value of typical Rock Sole fishery under past allocations and practices.

Scenario II

Proposed Rock Sole Fishery
Featuring A and B Seasons and Mandatory Retention

75,000 mt	TAC
63,750 mt	ITAC
31,875 mt	A and B season ITAC (each)

1. Discussion, A Season.

a. During A season boats will retain all female with roe. This should represent about one-third of the A season ITAC catch.

b. The balance of the 60% retained during A season will be comprised of males and females with immature roe.

c. Based on these assumptions, out of the 31,875 mt A season ITAC, about 10,625 mt (one-third) will be female with roe. All of them will be retained. Applying a 0.6 recovery factor, there will be about 6,375 mt of the female with roe product. At a value of $1.20 per pound, the value of this portion of the A season will be about $16,865,000.

d. Since there is only a 60% retention of the ITAC required during A season, then the total required to be retained is 19,125 mt. Since 10,625 mt has been shown to be female with roe, we can assume that the remaining 8,500 mt will be male or females with immature roe.

e. Applying a recovery factor of 0.25 to the 8,500 mt yields 2,125 mt of product. At a value of $1.00 per pound, the value of this portion of A season is about $4,685,000.

2. Discussion, B Season and Remainder of Year.

a. During B season there will be a requirement to retain 75% of everything in the codend (see above). However, it is assumed that, out of the 31,875 Rock Sole ITAC a much higher percentage will be retained. This will be true during B season, as well as allowable bycatch during the remainder of the year. For the purposes of this discussion, let us assume that 90% Rock Sole will be retained during B season and the remainder of the year as allowable bycatch, the remaining 10% being discarded for reason of being bruised, broken, crushed or otherwise economically unusable.

b. Under these assumptions about 28,687 mt of Rock Sole will be retained in B season and the remainder of the year. Applying a 0.25 recovery factor for processing yields about 7172 mt. At $1.00 per pound, this gives a value to this portion of the Rock Sole fishery of $15,811,000.

3. Combined Value of A Season, B Season and Remainder of Year.

$16,685,000	A season females with roe.
4,685,000	A season, fillets.
15,811,000	B season and remainder of year, fillets.
$37,181,000	Total value of Rock Sole products in proposed Rock Sole fishery.

4. Discussion, other values.

a. With the mandatory retention standards imposed during the A and B seasons, it is assumed that a large quantity of otherwise-discarded fish will be retained, processed to at least a minimum degree, and marketed. As mentioned earlier above, these species will include other flatfish, Yellowfin Sole, Pollock, Cod and Plaice.

b. For the purposes of this discussion, the proposal assumes that 10,000 - 20,000 metric tons of these fish will be retained instead of being discarded.

c. Using an average of 15,000 mt, further assume one-half of that volume is round frozen at an average value of $0.20 per pound. Further assume that the other half is H&G frozen with a 0.6 recovery factor and at an average value of $0.50 per pound.

d. These assumptions yield values of:

$ 3,306,900	7,500 mt of round frozen at $0.20 per pound.
$ 4,960,350	7,500 mt at 0.6 recovery factor at $0.50 per pound.
$ 8,267,250	Other values of retained species in proposed Rock Sole fishery.

5. Conclusion.

The estimated total value of the Rock Sole fishery as proposed is:

$37,811,000	Rock Sole products.
8,267,250	Products from other retained species.
$45,448,250	Grand total.

6. **Final Comparison.**

$27,715,000	**Value of typical Rock Sole fishery under past allocations and practices.**
$45,448,250	**Value of Rock Sole fishery, including other species retained, under this proposal.**

(24)

Grounders Fishery Management Plan Amendment Proposal
North Pacific Fishery Management Council

Name of Proposer: United Seiners Association (USA). We represent pink salmon fishermen interested in producing new high quality pink salmon products that will be more competitive in the US domestic seafood market.

Address: 40 Wadsworth dr.
Sequim, Wa. 98382

Telephone: 206 683 4030

Fishery Management Plan: The "B" season pollock harvest in the Bering Sea.

Brief Statement of Proposal: Move the "B" season back from August 15 to September 7

Objectives of Proposal: The harvest timing for the "B" pollock season has been changed several times to accommodate different objectives of the council. Moving the season opening date back from the 15th of August to the 7th of September would allow the factory trawlers and floating motherships the latitude to participate in the processing of pink salmon during the summer months before the "B" season.

The Pollock factory fleet is capable of processing pink salmon products into forms that are more conducive to new markets without major retrofits of their existing processing lines.

This would allow the Pollock processing sector to fill some of the gaps in their processing year created by the shorter seasons of the past few years.

Need and Justification for Council Action: *(Why can't the problem be resolved through other channels?)*
Under the present opening timing the Pollock processing fleet must start their season on August 15th. The Pink Salmon season peaks about the same time. If the Pollock season opened on the 7th of September the Pollock processors could participate in the entire pink salmon season. Salmon fishermen can't commit product to a processor that will not be available for their entire salmon season.

Using present methods of processing and marketing Pink Salmon, the grounds price has fallen drastically in the past five years. In order for us to survive and to feed our families we need to develop new product forms that can return a better profit to the fishermen. The Pollock factory fleet is already geared up to process Pink Salmon into product forms that we can market more easily in the US domestic market.

Salmon by-catch is also a problem that continues to plague the Pollock fishery. Moving the opening date to Sept. 7 may allow more salmon to transit the Pollock grounds without being caught in the Pollock trawls.

Foreseeable Impacts of Proposal: ***(Who wins, who loses?)***

Winners

Pollack Processors

- The pollock allocation can be taken at any time of the year. Moving the season back will not affect how much fish will be taken by the pollock fleet.

- The short seasons that are the wave of the future create substantial down time for the pollock fleet. Moving the season back will allow the Pollock processors to work their equipment during the salmon season until about the 1st of September and then go directly into their pollock season. This will increase the potential working processing days by as much as 70 days depending on how much salmon they can buy.

Pink Salmon fishermen

- Pink Salmon fishermen will have access to more processor capacity. This will allow them to expand their product base and market share in the US domestic seafood market.

Losers

- Salmon processors that cannot economically upgrade their equipment to meet the demands of the US domestic market product forms.

Are there alternative Solutions? If so, what are they and why do you consider your proposal the best way of solving the problem?

No, from our perspective the only other solutions are uneconomic. Most of thecurrent Pink Salmon processors are geared up to can Pink Salmon. Retrofitting their existing processing lines to create Pink Salmon fillets in shatter packs, blocks, mince, or vacuum packs is prohibitively expensive. We have approached several processors about this project and by far the most receptive has been the factory trawler fleet. The biggest obstacle is the timing of the "B" season.

BLOCK 12

(25)

GROUNDFISH FISHERY MANAGEMENT PLAN AMENDMENT PROPOSAL
North Pacific Fishery Management Council

Name of Proposer: North Pacific Fishery Management Council Staff **Date:** November 18, 1994

Address: P.O. Box 103136
Anchorage, AK 99510

Telephone: 907-271-2809

Fishery Management Plan: Gulf of Alaska and Bering Sea/Aleutian Islands Groundfish FMP

Brief Statement of Proposal:

Revise the Fishery Management Plan for the Gulf of Alaska and Bering Sea/Aleutian Islands Groundfish Fisheries to reflect current status of the fisheries, including landings, stock assessments of species and species groups, management actions and description of marine mammal and other ecosystem concerns, as well as delete obsolete descriptive sections.

Objectives of Proposal: (What is the problem?)

The current fishery management plans do not reflect the current status of the fishery or the stocks.

Need and Justification for Council Action: (Why can't the problem be resolved through other channels?)

Revising a fishery management plan requires public review, Council action, and NMFS approval.

Foreseeable Impacts of Proposal: (Who wins, who loses?)

The Council, National Marine Fisheries Service, Alaska Department of Fish and Game, other agencies, the fishing industry, environmental groups, and the general public would benefit from a document that describes the current status of the stocks of Alaska's groundfish resources. There are no identifiable losers to revising the FMPs.

Are There Alternative Solutions? If so, what are they and why do you consider your proposal the best way of solving the problem?

Currently, the fishery management plans are updated periodically to reflect specific language changes to the plans from individual amendments. However, no full scale revision and update of the documents has occurred to reflect current status of the stocks and fisheries; tables and figures are current only through 1987 for the Gulf of Alaska and 1977 for the Bering Sea/Aleutian Islands.

Supportive Data & Other Information: What data are available and where can they be found?

Much of the data to update tables and figures and language to revise descriptions of fisheries, status of stocks, and marine mammal and other ecosystem concerns are available in the 1995 SAFE documents.

Signature: Chris Oliver

BLOCK 13

(26)

Groundfish Fishery Management Plan Amendment Proposal
North Pacific Fishery Management Council

Date: Nov. 18, 1994

Name of Proposer: Mary Standaert / Pat McBride / F/V Judi B
Address: Box 319 Homer, Ak. 99603
Telephone: (206) 774-8624 Fax (206) 774-8928

Fishery Management Plan: IFQ Management Plan for Sablefish

Brief Statement of Proposal: To allow the sablefish fishery in the BSAI to remain open during the winter months (Nov, Dec, Jan, Feb) under the IFQ Management Plan. This issue was brought before the Council at it's June 1994 meeting and they voted to "initiate an amendment to have an earlier opening date for Aleutian Island sablefish fishery than for other IFQ areas, which are scheduled to open March 1." (quoted from June newsletter) The amendment never materialized. At the council's September meeting, Steve Pennoyer informed us that NMFS had not followed up with the paper work due to an over loaded staff and at that point it was impossible to get the amendment in place for Jan, 1995. We felt let down, to say the least. The council did discuss getting an amendment in place by 1996.

I would propose that - 1) The BSAI remain open during the winter months for sablefish only (no directed fishing for halibut). 2) The council ask NMFS to give this amendment some priority so it can be in place by Nov. 1, 1995. 3) In the event that the IFQ plan is delayed beyond the scheduled March 1, 1995 implementation date, the council will include in the emergency rule to postpone the program an exemption for the BSAI.

Objectives of Proposal:(What is the problem?) The BSAI sablefish fishery was, with the exception of one year, open for 12 months a year during the qualifying years of the IFQ plan. Our vessel generally fished 10-11 months a year during that time. Now we are expected to catch a proportionate amount of fish in 8 months. It is particularly detrimental to this fishery to loose the winter months. Our catch records show that we have consistantly better fishing during those months. Also, the market is at it's strongest during the winter and that makes a huge difference in a fishery that can be marginally profitable.

We realize that the IPHC asked for this winter closure to protect the spawning halibut. This makes perfect sense in the Gulf of Alaska where halibut and sablefish is a mixed bag fishery. After all, the beauty of the IFQ plan is to minimize bycatch waste. However, this is not the situation in the BSAI. During the winter months, this fishery utilizes around 10 mt of halibut PSC. We are not asking to have a directed halibut fishery during these months and I don't believe this small amount of halibut PSC would be impactful to the spawning stocks

Need and Justification for Council Action: (Why can't the problem be resolved through other channels?)

To have the BSAI remain open during the winter months once the IFQ plan is in place takes a regulatory amendment. I would emphasize, as well, that if the council would like to see this change in place by Nov. 1, 1995, they need to communicate this to NMFS so they will follow through with the paperwork this time.

Forseeable Impacts of Proposal: (Who wins, who loses?)

The BSAI sablefish operations will obviously benefit but there is no negative impact on another fishery.

Are There Alternative Solution?

If NMFS cannot effectively issue the BSAI sablefish quota share to the small number of fishermen by January 1 each year, a fiscal year ending March 1 could resolve that problem.

Signature:

Mary Shirdart

11-27-94
NPFMC
271-2817
pg

AGENDA D-4
DECEMBER 1994
SUPPLEMENTAL

KERNES

CITY OF HOMER
HOMER, ALASKA

RESOLUTION 94-119

A RESOLUTION OF THE CITY COUNCIL OF HOMER, ALASKA SUPPORTING THE DIVISION OF THE PACIFIC COD QUOTA FOR THE GULF OF ALASKA INTO MULTIPLE SEASONS.

WHEREAS, the total allowable catch of Pacific Cod in the Gulf of Alaska is likely to double in 1995; and

WHEREAS, the Pacific Cod fishery in the Gulf of Alaska has ended early in the spring for the last four years; and

WHEREAS, an extended Pacific Cod fishery through the year would provide year round jobs and income for many Homer families and businesses; and

WHEREAS, the quality of Pacific Cod flesh improves during the second half of the year; and

WHEREAS, the markets for Pacific Cod improve later in the year; and

WHEREAS, continuity of supply through the year is necessary for effective marketing.

NOW, THEREFORE, BE IT RESOLVED that the City Council of Homer, Alaska supports the Division of Pacific Cod Quota for the Gulf of Alaska into multiple seasons; and

BE IT FURTHER RESOLVED, that the City Council of Homer, Alaska respectfully requests the North Pacific Fisheries Management Council to allocate the Total Allowable Catch for the Pacific Cod season in the Gulf of Alaska on a quarterly or trimester basis, whichever best accomplishes the goal of extending this fishery through the year.

PASSED AND ADOPTED by the City Council of Homer, Alaska this 28th day of November, 1994.

CITY OF HOMER

HARRY E. GREGOIRE, MAYOR

ATTEST:

MARY L. CALHOUN, CITY CLERK

AGENDA D-4
DECEMBER 1994
SUPPLEMENTAL

PENINSULA MARKETING ASSOCIATION

P.O. BOX 248
SAND POINT, ALASKA 99661
PH(907)383-3600 FAX(907)383-5618

The Peninsula Marketing Association, representing fishermen of the Alaska Peninsula and Shumigan Islands, support the proposal that State waters should be managed by the State as addressed in agenda item D-6, proposals submitted at the last Council meeting. We support that separate P. Cod stocks do exist and should be determined.

The assessments of these stocks are not encompassed in the triennial trawl surveys done by NMFS and we feel these stocks should be assessed.

We submit by testimony the presence of cod and pollock that have shown up in abundance during our Salmon fisheries. This concerns us a great deal; as, we have watched the increase of cod in our King and Tanner Crab grounds, and now these crab species no longer exist.

We have submitted by testimony at the last Council meetings regarding the increase abundance of cod and pollock during our Salmon fisheries and supported the testimony with findings of smolt in the mouths of cod which have been determined by the Alaska Dept. of Fish and Game Kodiak, to infact be pink salmon.

Barbara Wilson
President

North
Pacific
Longline
Association

AGENDA D-4
DECEMBER 1994
SUPPLEMENTAL

December 1, 1994

Mr. Richard B. Lauber, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue
Anchorage, AK

RE: Judi B Proposal on Winter Sablefish Fishery

Dear Rick:

The North Pacific Longline Association has reviewed the proposal of Mary Standaert and Pat McBride, to keep the BSAI sablefish fishery open during the winter months under the IFQ management plan. We wish to offer our full support for this measure.

Sincerely,

Thorn

Thorn Smith

4209 21st Avenue West, Suite 300, Seattle, Washington 98199
TEL: 206-282-4639; FAX: 206-282-4684

The Native Village of Eyak Tribal Council
P.O. Box 1388
Cordova, Alaska 99574-1388
(907) 424-7738 • Fax (907) 424-7739

RESOLUTION 12-03-94-01

WHEREAS: The Native Village of Eyak, is a Federally Recognized Tribe, with an economy based largely on Commercial Fisheries;

WHEREAS: The Spring Herring Fisheries have failed in Prince William Sound and will likely remain in poor condition for several years;

WHEREAS: Implementation of IFQ"s for Halibut and Sablefish by the Federal Government will reduce the ability of Cordova's and other Alaskan Communities Fishermen to participate in these fisheries;

WHEREAS: Trawlers fishing in the winter quarter of the calendar year currently harvest approximately 68% of the total allowable catch of Pacific Cod in the Gulf of Alaska and cause an early closure of the fishery;

WHEREAS: Many small boat fishermen are more dependent upon weather conditions which are more likely to be favorable in the spring and beyond;

WHEREAS: Pacific Cod appear to be more abundant in local waters in the Spring and beyond;

WHEREAS: An extension of fishing time for Pacific Cod, the desired goal of accompanying proposal, would be of benefit to local fishermen and processors alike;

THEREFORE: Be it resolved that the Native Village of Eyak support the proposal of Ken Adams, to the North Pacific Fisheries Management Council (NPFMC), to initiate gear type allocations for Pacific Cod in the Gulf of Alaska to create additional fishing opportunities for local fishermen to diversify their efforts.

At a meeting of the Tribal Council, of The Native Village of Eyak, held on December 3, 1994, with a quorum of four members present, this resolution was passed by a vote of 4 to 0.

Bob Henrichs
Bob Henrichs, President

Cheryl M. Lettich
Cheryl Lettich, Vice-President

Marlena Fonzi
Marlena Fonzi, Secretary

Julia DeMott
Julia DeMott, Elder Council Advisor

Cordova District Fishermen United

P.O. Box 939
Cordova, Alaska 99574
(907) 424-3447 FAX (907) 424-3430

December 9, 1994

North Pacific Fisheries Management Council
P.O. Box 103136
Anchorage, AK 99510

Dear Council Members:

On behalf of the nearly 300 commercial fishers who comprise Cordova District Fishermen United (CDFU), I am pleased to offer support for regulations and management initiatives which allocate at least 45% of the total groundfish harvest in the Gulf of Alaska to fixed gear fisheries. In the Bering Sea, 45% of the total harvest is allocated to fixed gear and CDFU believes that a similar proposal would be appropriate for the Gulf of Alaska.

If you have any questions or require additional information, please do not hesitate to contact us at the number above. Thank you for your consideration.

Sincerely,
CORDOVA DISTRICT FISHERMEN UNITED

Board of Directors

CITY OF CORDOVA, ALASKA

RESOLUTION 12-94-69

WHEREAS, Cordova is a community with an economy based largely on fisheries; and

WHEREAS, the spring herring fisheries have failed in Prince William Sound and will likely remain in poor condition for several years; and

WHEREAS, implementation of IFQ's for halibut and sablefish by the Federal Government will reduce the ability of Cordova's and other Alaska coastal communities' fishermen to participate in these fisheries; and

WHEREAS, trawlers fishing in the winter quarter of the calendar year currently harvest approximately 68% of the total allowable catch of Pacific Cod in the Gulf of Alaska and cause an early closure of the fishery; and

WHEREAS, many small boat fishermen are more dependent upon weather conditions which are more likely to be favorable in the spring and beyond; and

WHEREAS, Pacific Cod appear to be more abundant in local waters in the spring and beyond;

WHEREAS, an extension of fishing time for Pacific Cod, the desired goal of the accompanying proposal, would be of benefit to local fishermen and processors alike;

NOW, THEREFORE, BE IT RESOLVED that the City of Cordova, Alaska, supports the proposal of Kenneth Adams to the North Pacific Fisheries Management Council (N.P.F.M.C.) to initiate gear type allocations for Pacific Code in the Gulf of alaska to create additional fishing opportunities for local fishermen to diversify their efforts.

PASSED AND APPROVED THIS 7TH DAY OF DECEMBER, 1994.

Mayor Margy K. Johnson

Lynda Plant, City Clerk