North Pacific Fishery Management Council

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June 1, 1977

The Honorable Juanita Kreps Secretary of Commerce United States Department of Commerce Commerce Building Washington, D.C. 20230

Dear Madam Secretary:

At its meeting May 26th and 27th in Anchorage, the North Pacific Council unanimously adopted the following motion.

"It is now a certainty that the U.S. harvest of herring in the Bering Sea will far exceed the 1,000 metric tons estimated in the preliminary management plan. Should the foreign allocation be harvested, it will exceed the total allowable catch (TAC). At the present time 9,000 tons of this foreign allocation remain to be taken, but no further catch effort is expected before November. Therefore, the Council feels it essential that all or part of the unfilled foreign allocation be cancelled. Specific recommendations relative to such action will be developed at the regular June Council meeting based on the performance of the U.S. fishery as of that time."

At the time the preliminary management plan was developed by your department governing the herring fishery in the eastern Bering Sea, there was no evidence to indicate there would be a substantial U.S. fishery on that stock of fish. Of the 21,000 metric ton TAC set by the management plan, 1,000 metric tons was expected to be used by U.S. fishermen, primarily in the subsistence fisheries of the villages along the Bering Sea coast. Of the remaining 20,000 tons, 19,400 were assigned to foreign nations and 600 tons were left unassigned.

Since that plan was approved, a large U.S. fishing effort has developed on these stocks of fish that will continue through late June. It is apparent at this time that they will take well over the 1,000 tons originally expected to be taken by U.S. subsistence fishermen. Most of the foreign catch from these stocks occurs from November through February.

The best information available at this time is that they have taken approximately 9,500 metric tons since the first of the year of the 19,400 allotted. That winter trawl fishery will not begin again until November.

The Council believes that the total allowable catch should not be exceeded under any circumstances. By the time of the next Council meeting on June 23rd and 24th, catch figures for the American fishery should be complete. At that time they will propose a specific figure for reduction of the foreign allocation in 1977. Since there is approximately 9,000 tons left to be caught of the foreign allocation this year and the fishery will not start before November, a reduction of their allocation should not upset their planned fishing operations, since they will have plenty of time to readjust their effort prior to the time the fish again become available.

To recapitulate briefly, the TAC for herring in the eastern Bering Sea was calculated at 21,000 metric tons in the preliminary management plan, 20,000 tons of this was considered surplus and available for foreign allocation. It was felt the 1,000 metric tons not available for allocation would be used by the eskimo villages along the Bering Sea coast for subsistence purposes.

Of the 20,000 tons available for foreign allocation, 19,400 tons were assigned, 5,800 tons to Japan and 13,600 tons to the Soviet Union. Current catch figures (1 January to March 1977) are 1,277 MT by Japan and 8,257 MT by the Soviet Union.

An ongoing U.S. commercial fishery has taken at least 2,500 MT to date and will continue to mid-June. The 1,000 MT subsistence fishery is being conducted at this time also.

In order to stay within the TAC it will be necessary to reduce the foreign allocation of herring before that fishery resumes in November.

The North Pacific Council will forward its' recommendations to you by early July for the exact amount the foreign allocation should be reduced.

Since the concept of mid-year reduction of foreign catch allocation has not previously been explored the Council is taking this opportunity to alert you to the impending request. They feel very strongly that the TAC set by the PMP should not be exceeded, and are anxious to work closely with you to solve this problem.

Sincerely,

Jim H. Branson Executive Director

CC: Secretary of State
Robert W. Schoning, NMFS,
Harry Rietze, NMFS, Scattle
Lee Alverson, NMFS, Scattle
Enforcement, D.C., Attn: Perry Allen

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GENERAL COMMENTS BY GEORGE ROGERS ON TANNER CRAB AND GULF GROUND FISH FIHSERY MANAGEMENT PLANS

My comments are limited to the areas of my professional interest (socio-economic) and the general format and organization of the two plans. There is considerable overlap between the plans and my presentation will cover both. Very little of this will be of direct use in the revisions of the present drafts because of time limits, but they may be useful in preparation for future efforts and in the identification of needed research.

Use of the Outline Guide

Both reports follow meaning manufacture manufacture and solution developed by the S and S Committee which was, I believe, our intent. This has assured that all points have been considered, but immediately reveals the shortcomings of this approach. In the future, the outline should be used only as a check list by the management teams in assembling their data and organizing their analysis. The matrix type table of contents used in the tanner cray plan me might be considered as an index to the report, rather than a table of contents. In the places where data is not available or the listed element was not appropriate to the specific species under consideration, mandament symbols might be put in these cells indicating this.

The actual report might follow the general outline (to the two digit level), but the mammum presentation of background, descriptors and analysis tailored to the subject. The key elements will vary from plan to plan and there should be more flexibility in giving greater weight or putting appropriate emphasis upon these, rather than following the same system in all cases. In the tanner crab, for example, there should be one place in which the subject of minimum shell width is fully developed (it does not even appear in the table of contents because of the all-purpose outline used) rather than being fing fragmented and scattered throughout the report in accordance with the section headings. The heart of the decision by the Board is burish on page 65 where as the size "which would pummuming protect 100% of all immature and newly mature male crab." This decision, in turn, appears to be based upon data in Table 4 of Somerton and Low of the mammum 1976 mammumbam survey sample distribution by size and classification as immature, newly mature and previously matured.etc. etc.

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Definition of Community for Socio-economic Analysis

The tanner crab plan uses the major management areas (statistical areas) as the geographic basis of their definition of "community" and presents, relevant characteristics in terms of total population, minimal manipular manipular and indicates the intention to also present total employment and workforce data by areas in the future (statewide tables are included). There is a need (recognized by the authors of the report) to develop more adequate fishing employment than that reported by the Department of Labor and a start has been made on estimating this in the section on domestic commercial fleet (sect. maxim 3.5.2.4) on the basis of area biologists' estimates. Until comprehensive research on fisheries employment in all fisheries has been accomplished, however, it is not possible to go beyond this bare beginning. Employment must then be related to more fully developed manimum manimum manimum demographic information.

The ground fish plan starts with a different definition or concept of "community". This refers to "profiles for over 100 Alaska coastal communities" and in appendix II presents an example of such a profile for Unalaska. The concept of "community" used here is simply that of a "place" (village, town, fishing station, etc.) and the inventory of characteristics to be considered for each includes a very humanum wide range of elements. (specifics of location, climate, local government, community facilities, etc.). There are many definitions of "community" (including those used in the two plans), but one which related to socio-economic analysis starts with an occupational or economic system concept. The area of the "community" must embrace the principal economic activity which is the subject of the main analysis and provide a basis for describing and studying a hierarchy of economic and social functions upon which this central activity is based. The community area included the humanum fleet and gear shore-bases, processing and transporting places, villages in which resident labor force is located, etc.

Not only should the area of the "community" be broader than that proposed in the ground fish plan, the relevant characteristics should be more selective and limited to only the strategic elements in the analysis. For further discussion on both these points, refer to my drafts on OY and my article on the <u>Polar</u>

<u>Record</u> on the approach to analysis of offshore oil and gas-fishing interactions.

Employment Data

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The tanner crab plan presents Alaska Department of Labor mamminim statistics on fishing and processing employment and estimates the total number of persons employed on fish harvesting in each area on the basis of crew factors applied to vessels participating in the harvest. The ground fish plan refers to total commercial fishing employment as reported by ADFG in harvesting and ADL in processing. The authors of both plans are fully aware of the inadequacies of these data, but some discussion should be made of what type of data will provide a basis for the desired analysis. This should first be made consistent or mamphimbm compatable with exisiting labor series which have been putkished by the U.S. and Alaska departments of labor and other agencies. These are usually presented in the form of monthly workforce and employment figures and/or annual figures which are twelve month averages. The monthly data, in turn, are generally assumed to represent ave age labor force or employment for each month, but are actually estimates based upon information for a bench mark week in each month (usually the second week of the month). Because of the highly seasonal nature of fishing activity the use of a bench-mark week would not be an appropria te proxy for a monthly average and employment estimates would have to be made for each week and then averaged. Employment must be classified not only by the fishing emmmmm area in which it took place, but by place of residence (in this case the dual minimum minimum classification of resident and non-resident would suffice). The total labor series must also be examined to determine the basis on which their estimates have been made.

Schedule of Activities

Fishing effort and management regimen reflect the basic biological seasonality of the fish resource. Members of the S and S Committee have already suggested that the relationship between the dates of molting, spanning, etc. be presented in tables relating this to the proposed closed seasons. This seasonal pattern for each area and species should also be related to the scheduling of the actual fishing effort in order to add the appropria te time dimensions to the employment and capacity analysis. For example, the calcuation of employment as number of vessels multiplied by crew factor (as presented in the tanner crab plan) does not give us enough mmm to relate fishing to the total employment picture and to the employment by month. This is merely an indication of total employment if all participating vessels and units of gear are in use.