North Pacific Fishery Management Council

Clement V. Tillion, Chairman
Jim H. Branson, Executive Director

Suite 32, 333 West 4th Avenue
Post Office Mall Building

Mailing Address: P.O. Box 3136DT
Anchorage, Alaska 99510

Telephone: (907) 274-4563
FTS 265-5435

AGENDA ITEM #12
January 25-26, 1979

GULF OF ALASKA GROUNDFISH
ACTION PAPER

The Gulf of Alaska Groundfish FMP was implemented "as is" on December 1 to extend through October 31, 1979. The Council has approved the following amendments to the plan but has not sent them to the SOC:

Amendment #1 Remove the one-hour tow duration restriction and requirement for the use of off-bottom trawls from December 1 - May 31 (domestic);

Amendment #2 Allow fishing from 169 to 170 degrees West longitude from 3-12 miles (foreign);

Amendment #3 Remove the restriction allowing not more than 25% of FAC to be taken from December 1 - May 31 (foreign);

Amendment #4 Restrict to 0.5% the incidental catch of sablefish in joint-venture catches and allocations of the total pollock catch;

Amendment #5 Allow foreign longlining seaward of 400 meters from May 1 - September 30 and seaward of 500 meters October 1 - April 30 in the area 157 W to 140 W;

Amendment #6 Increase the squid OY to 5,000 mt (from 2,000 mt);

Amendment #7 Exempt the foreign longline fishery from the provisions of Sec. 8.3.2.3 of the foreign regulations which provides that all of a nation's fishery in a statistical area be closed once the allocation for any one species has been taken.

The effect of the exemption is to allow the longliners to continue fishing after the allocation of any one species has been taken by trawlers in the same statistical area, providing the species is not a target species for the longliners.

Those seven amendments will go forward to be incorporated into the FMP after the January Council meeting.

In addition, three amendments have been approved after the FMP was published on April 21, 1978, and they became effective with the publishing of the plan on December 1, 1978. They are:

Amendment #1 Extends the plan to October 31, 1979;

Amendment #2 Increases the reserve for pollock to 133,800 mt with appropriate increases in the reserve for other species.

Amendment #3 Assigns the entire Chirikof reserve and FAC to TALFF west of 157 degrees West longitude for Pacific cod.

During the meeting of November 30 - December 1, 1978, several proposed amendments were deferred until the January meeting and those amendments must be taken up at this meeting. They are:

Deferred Amendment #1 Change the sablefish OY. (a) reduce the OY commensurate with the latest (1977) CPUE data; (b) increase the OY in the FMP from 13,000 mt to 15,000 mt, which was the OY in the PMP in 1978;

Action Needed: Change the OY to either increase or reduce it. THE COUNCIL UNANIMOUSLY DEFERRED THIS AMENDMENT WITH THE STIPULATION THAT NO RESERVE ALLOCATION OF SABLEFISH BE RELEASED ON JANUARY 2. Additional data is expected from the SSC at this meeting to establish ABC-OY.

Deferred Amendment #2 Open Davidson Bank to longlining. (More information is expected at this meeting.)

Action Needed: Retain status as a prohibited foreign fishing area or open for foreign longlining.

Deferred Amendment #3 Restrict the incidental catch of sablefish in joint-venture catches and allocations to 0.5% of the total pollock catch.

This is the same proposal as (4) on page one EXCEPT that the Council, when considering this at the November 30 - December 1 meeting and placing an 0.5% incidental catch limit on sablefish, expressed concern over a directed trawl fishery for sablefish. The SSC was requested to report further to the Council at this meeting. Oral Burch, of the AP, was also asked to report to the Council on the same subject.

Action Needed: None. Reports to be given.

Deferred Amendment #4 Eliminate the special joint-venture reserve amount for Pacific cod (3,000 mt).

COUNCIL APPROVED THE ADVISORY PANEL RECOMMENDATION TO APPROVE THIS PROPOSAL, BUT TABLED THE MOTION FOR RECONSIDERATION AT THIS MEETING.

Action Needed: Reconsideration

Deferred Amendment #5 Reduce the number of statistical (regulatory) areas in the Gulf of Alaska.

THE COUNCIL DISCUSSED THE SSC RECOMMENDATION TO REDUCE FROM FIVE TO THREE THE NUMBER OF STATISTICAL AREAS BECAUSE OF OPERATIONAL DIFFICULTIES THIS IS CAUSING THE FOREIGN EFFORT. THE SUBJECT HAS BEEN ADVERTISED FOR DISCUSSION AND ACTION AT THIS MEETING AND WILL BE REVIEWED BY THE SSC FOR ADVICE TO THE COUNCIL.

Action Needed: Re-consideration of the number of regulatory areas in the Gulf of Alaska.

Deferred Amendment #6 Allow a directed foreign longline fishery for Pacific cod east of 157 degrees West longitude to 140 degrees West longitude landward of the 500 meter isobath during the off-season for U.S. halibut fishermen.

THIS WAS PROPOSED ORIGINALLY IN NOVEMBER, WITHDRAWN BY SPONSOR (Japanese Longline and Gillnet Association) FOR SUBMISSION OF NEW DATA TO SUPPORT THEIR ARGUMENT AT THIS MEETING.

Action needed: Consideration

Agenda #12
January 1979

FISHING VESSEL OWNERS' ASSOCIATION
INCORPORATED
ROOM 232, C-3 BUILDING
FISHERMEN'S TERMINAL
SEATTLE, WASHINGTON 98119

(206) 284-4720

January 18th, 1979

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

Dear Mr. Chairman Tillion:

At the November/December meeting of the council in Anchorage the NPFMC took action to ammend he Gulf of Alaska Groundfish Plan and eliminate the regulation, which limited the allowable catch of a nation's vessels to no more than 25% of the total national allocation during the period between December 1st and June 1st.

The Fishing Vessel Owners Association was shocked at the ease with which the Japanese trawlers obtained their ammendment. A copy of their request is attached. It provides no statistical support of economic hardship on themselves, no harvesting trends only a promise which is as follows/

> "The plan notes that if pelagic trawls are used properly the incidence of halibut is quite low. Therefore, with assurance from Japanese fishermen that pelagic trawls will be used in the best manner possible to protect the halibut resource..."

The restriction as stated in the plan would have saved 1130 MT annually of halibut. This fact I am sure was taken into consideration when the NPFMC recommended OY levels. It appears to the F.V.O.A. that the council acted without looking at the purpose of the restriction stated in he Plan, without consideration that the incidence of halibut is six time as great during the winter (.5% vs 3.0%), nor did the council bother to look at the past pattern of foreign fishing which I have provided.(attached)

If the council is going to start making ammendments to management plans based on promises, then the credibility of the council has been lost. The council did not seek assurance from the Soviets nor the Koreans that they would handle pelagic trawls correctly. The Japanese harvest only about 50% of the FAC in the Gulf. The council ammended the regulation based on a 50% assurance. The action the council took removed the only new substantial regulation on foreign tralwers since the FCMA in the Gulf of Alaska.

The Japanese must recognize that they must change their fishing pattern to some degree in order to accommodate some of the problems of the resource and U.S. fisherman. The F.V.O.A. therefore recommends the following, we ask the council to do the following and reconsider there action.

1. A review of the fishing patterns of foreign trawlers in the Gulf of Alaska by NMFS.

2. Consult the IPHC on there original projected savings of halibut.

3. Ask the Japanese trawl industry what they can live with, in terms of changing the fishing pattern to a summer fishery.

Very truly yours

FISHING VESSEL OWNERS ASS'N

Robert D. Alverson

Robert D. Alverson, Manager

2. RELAX THE REGULATION WHICH LIMITS THE ALLOWABLE CATCH OF A NATION'S VESSELS TO NO MORE THAN 25% OF THE TOTAL NATIONAL ALLOCATION DURING THE PERIOD BETWEEN DECEMBER 1 AND JUNE 1. [Sec. 611.92 (b)(2)(ii)(E)].

The FMP refers to data from the observer program which indicates a 3% incidence of halibut during the winter and spring in the trawl fishery, [Sec. 8.3.2.1(B)]. With a restriction limiting the catch during the winter and spring to no more than 25% of the total FAC, the plan estimates an annual halibut savings of 1,130 mt as compared to a fishery operated uniformly throughout the year. However, in addition to the regulation requiring the use of pelagic gear only during the same period, the 25% catch restriction seems redundant and unnecessary. The plan notes that if pelagic trawls are used properly, the incidence of halibut is quite low, [Sec. 3.6.2]. Therefore, with assurance from Japanese fishermen that pelagic trawls will be used in the best manner possible to protect the halibut resource, an additional regulation restricting the catch during the winter and spring will only add to the operational difficulties of the foreign fleet. We would request the Council to amend the implementing regulations by removing this restriction.

Country	Jan-May 1975 &Dec.	Total 1975	% of Winter Catch	Jan-May 1976 &Dec	Total 1976	% of Winter Catch	Jan-May 1977 &Dec	Total 1977	% of Winter Catch	Jan-May *1978 only	Total Jan-Nov.	% of Winter Catch
Japan	49,622	91,142	54%	44,250	89,938	49.2	48,479	100,687	48%	15,213	65,401	23%
U.S.S.R.	56,559	95,082	59%	33,514	79,873	41.9	20,817	64,697	32%	51,463	62,501	82.2%
Korea	unknown	13,988	-	3152	37,414	.084	7,981	38,140	187%	1,440	29,611	.048%
Poland	2,132	2,132	100%	-0-	-0-	-	275	1,465	-0-	-0- &	684	-0-
	108,313	202,344	53.4%	80,916	207,225	39%	77,552	204,989	37.8%	68,116	158,297	43%

Catch statistics provided by NMFS Juneau and Seattle, they are in M.T.

JAPAN DEEP SEA TRAWLERS ASSOCIATION

PROPOSED AMENDMENT TO INCREASE THE OY FOR POLLOCK IN THE BERING SEA/ALEUTIAN GROUNDFISH PMP AND ADDITIONAL DATA IN SUPPORT OF THE PROPOSED AMENDMENT TO REDUCE THE NUMBER OF REGULATORY AREAS IN THE GULF OF ALASKA GROUNDFISH FMP

Submitted by the Japan Deep Sea Trawlers Association
Anchorage - January 25, 1979

Mr. Chairman and the members of the Council:

I am Toru Fukui, representative of the Japan Deep Sea Trawlers Association. Our fishery mission represents all the fishing enterprises affiliated with the Japan Deep Sea Trawlers Association that have been operating in the Bering, Aleutian and the Gulf of Alaskan waters.

Today we are presenting a proposed amendment to the Bering Sea/ Aleutian PMP and additional data in support of our previous proposal to reduce the number of regulatory areas in the Gulf of Alaska. We ask your full attention and consideration to the changes we are recommending.

I would like to thank the Council on behalf of our mission.

TORU FUKUI

JAPAN DEEP SEA TRAWLERS ASSOCIATION

I. REQUEST TO INCREASE THE OY FOR POLLOCK IN THE PMP FOR THE 1979 GROUNDFISH FISHERY IN THE BERING SEA/ALEUTIAN AREA

During the October meeting of the INPFC, Japanese scientists, based upon the best information available and after adequate consultation with the U.S. scientists, concluded that the OY for continental shelf portion of the pollock stock in the eastern Bering Sea be set at 1,200,000 mt. U.S. scientists concluded that the OY should be established at 1,000,000 mt in the traditional fishing areas and designated a separate OY of 100,000 mt for the deep water component of the stock located beyond the continental shelf in statistical area IV. The draft FMP has adopted the estimate of the U.S. scientists, recommending an OY of 1,000,000 mt.

It is our understanding that the Council during the January meeting will be reviewing all the data and testimony submitted during the public review period and making its final decisions for approval of the FMP to be sent to the Secretary of Commerce. However, until the FMP is finally approved and implemented by the Secretary, the PMP, which has maintained the OY for pollock in the traditional fishing area at 950,000 mt, will continue to provide the management regime for the eastern Bering Sea pollock fishery. Since implementation of the FMP by the Secretary could be delayed beyond the scheduled date, it is possible that the recommended increase in the OY for pollock during 1979 could not be fully utilized by the foreign fishery. For this reason, we are requesting the Council for approval of an amendment to the PMP increasing the OY for pollock to the same level which will be recommended by the Council for the FMP.

Should the Council approve an amendment to the PMP which conforms to the recommended FMP, we would seek the Council's support in requesting the Secretary of State to allocate the surplus as soon as possible giving priority to those nations whose vessels have traditionally engaged in the fishery.

II. COMMENT IN SUPPORT OF THE PROPOSED AMENDMENT TO REDUCE THE NUMBER OF REGULATORY AREAS FROM FIVE TO THREE IN THE FMP FOR THE GULF OF ALASKA GROUNDFISH FISHERY

The five regulatory areas established under the Gulf of Alaska groundfish FMP have created a severe problem for Japanese fishermen in starting their fishery operations since implementation of the FMP. To date, not a single Japanese trawl vessel has attempted to begin fishing operations in the Gulf; a situation which has never been experienced by our fishermen in the history of Japanese fisheries in this area. In order to alleviate this serious problem, the Japan Deep Sea Trawlers Association has proposed an amendment to the FMP reducing the 5 regulatory areas to 3 by combining Shumagin with Chirikof and Kodiak with Yakutat.

During the last meeting of the Council, we agreed to provide further information and data demonstrating the operational difficulties resulting from the 5 regulatory areas as opposed to the proposed 3 regulatory areas. The major factor discouraging us from beginning our fishery under the FMP is the likelihood of early closures of certain areas due to the further uneven division of already comparatively low Gulf-wide Japanese allocations into the 5 regulatory areas. This can easily be demonstrated by Table 1 F which shows the total allowable fishing days during which one vessel of average fishing capability and capacity may operate within each of the 5 regulatory areas under the current allocations. The shaded areas represent those species for which the allocations would be prematurely taken resulting in a a premature closure of the regulatory area.

As compared with 5 regulatory areas, Table 1 F estimates the number of operable fishing days for the same fishing vessel in the proposed 3 regulatory areas. By reducing the number of areas to 3, Table 1 F demonstrates our operating difficulties will be substantially improved by reducing the number of species for which low allocations would result in premature area closures. With the exception of

pollock in all areas, the combinations of Shumagin with Chirikof and Kodiak with Yakutat will provide significant relief from premature closures which are inevitable under the existing five areas. However, since experience has demonstrated that pollock and Pacific cod will constitute the majority of the catch between December 1st and June 1st under the pelagic gear restriction, commencement of our fishing operations will still depend upon the release of the pollock reserves.

While the Japanese trawlers recognize the objective of the management team to maintain the regulatory concept, our proposed reduction to 3 regulatory areas will not result in any adverse effects upon the resources. According to past catch records upon which the existing area OYs are based, it can be reasonably concluded that the Japanese fleet will not redistribute its fishing effort in such a manner as to overfish in any one localized area. With 3 regulatory areas the basic goals and objectives of the FMP will be better served by offering us the relief necessary to more fully utilize our share of the foreign allocation.

Based upon the foregoing, we would like to urge the Council to amend the FMP by reducing the number of regulatory areas in the Gulf of Alaska from 5 to 3 as proposed.

Recognizing that the Council is not responsible for the allocations among foreign nations, we would still like to point out that our current operational problems would not have been nearly as severe had the 1979 allocations been based upon the extent to which the vessels of Japan have traditionally engaged in the fishery. The unexplained formula upon which the allocations were established and apportioned among the 5 regulatory areas, as shown in Table II, have simply disrupted our fishing strategy which could result in underutilization of the fishery resources.

TABLE I ESTIMATED ALLOWABLE VESSEL DAYS by FMP REGULATORY AREAS

BASED UPON 1978 JAPANESE TRAWL CATCH and EFFORT DATA

A: 1978 Japanese Trawl Effort

	SH	CK	KD	YA	SE	TOTAL
a: Vessel days	419	282	929	729	175	2534 (days)
b: Towing time	3788	3110	11021	8810	1914	28644 (hours)
c: b/a (hours)	9.04	11.03	11.86	12.09	10.94	11.30 (hours)

B: 1978 Japanese Trawl Catch (metric tons)

Pollock	3505	6073	12659	3289	996	26522 (mt)
Pacific Cod	286	487	889	214	67	1943
Flounders	2213	2346	4989	3360	2604	15512
POP	438	395	1001	1047	1075	3956
Other Rockfishes	63	71	198	168	150	651
Atka Mackerel	264	252	482	152	164	1314
Others	524	349	1094	595	239	2801
Total	7294	9974	21312	8825	5294	52699

C (=B/a): 1978 Japanese Trawl Average Daily Catch(metric tons)

Pollock	8.36	21.54	13.63	4.51	5.69	10.47(mt)
Pacific Cod	0.68	1.73	0.96	0.29	0.38	0.77
Flounders	5.28	8.32	5.37	4.61	14.88	6.12
POP	1.05	1.40	1.08	1.44	6.14	1.56
Other Rockfishes	0.15	0.25	0.21	0.23	0.86	0.26
Atka Mackerel	0.63	0.89	0.52	0.21	0.94	0.52
Others	1.25	1.24	1.18	0.82	1.37	1.11
Total	17.41	35.37	22.94	12.11	30.25	20.80

(Table I -2)

D: 1979 Japanese Allocations (metric tons)

Pollock	80	20	75	27	30	232(mt)
Pacific Cod	2370	480	150	100	100	3200
Flounders	5090	70	5800	3060	878	14898
POP	700	50	900	250	2130	4030
Other Rockfishes	20	10	10	20	469	529
Atka Mackerel	1458	10	50	10	0	1528
Others	910	110	1664	50	88	2822
Total	10628	750	8649	3517	3695	27239

(Table I -3)

E (=D/C): Allowable Fishing Days During Which One Fishing Vessel Equipped with Average Fishing Capacity & Capability May Operate Under the Japanese Quota Divided Among the Five Regulatory Areas

	SH	CK	KD	YA	SE
Pollock	10	1	6	6	5 (days)
Pacific Cod	3485	277	156	345	263
Flounders	964	8	1080	664	59
POP	666	36	833	174	347
Other Rockfishes	133	40	48	87	545
Atka Mackerel	2314	11	96	48	-
Others	728	89	1410	61	64

F : Allowable Fishing Days During Which One Fishing Vessel Equipped with Average Fishing Capacity & Capability May Operate Under the Japanese Quota Divided Among the Proposed Three Regulatory Areas

	SH-CK	KD-YA	SE
Pollock	11	12	5 (days)
Pacific Cod	3762	501	263
Flounders	972	1744	59
POP	702	1007	347
Other Rockfishes	173	135	545
Atka Mackerel	2325	144	-
Others	817	1471	64

TABLE II - 1 COMPARISON OF THE JAPANESE ALLOCATION WITH THE OY, DAH, RESERVE, AND TALFF AS APPORTIONED AMONG THE STATISTICAL AREAS

	SH	CH	KO	YA	SE	TOTAL
(Pollock)						
OY	57.100	54.450	40.850	12.500	4.150	168.800
DAH	11.850	11.300	8.450	2.600	900	35.100
RESERVE	45.250	43.150	32.450	9.950	3.200	133.850
TALFF	7.600	6.700	5.000	1.500	600	20.800
JAPAN	80	20	75	27	30	232
OTHER NATIONS	6.920	6.680	4.925	1.473	570	20.568
(Pacific Cod)						
OY	9.600	4.150	15.350	4.350	1.500	34.850
DAH	6.870	2.950	10.880	3.030	1.070	24.800
RESERVE	2.730	1.150	4.420	1.270	430	10.000
TALFF	2.570	1.150	4.080	1.130	390	9.320
JAPAN	2.370	480	150	100	100	3.200
OTHER NATIONS	200	670	3.930	1.030	270	6.120
(Flounders)						
OY	10.450	2.750	12.000	6.450	2.050	33.500
DAH	7.450	1.900	8.500	4.600	1.450	23.800
RESERVE	3.000	850	3.500	1.850	650	9.750
TALFF	5.250	1.300	5.150	3.200	1.000	16.100
JAPAN	5.030	90	5.000	3.060	878	14.898
OTHER NATIONS	110	1.230	150	140	122	1.702
(POP)						
OY	2.950	2.760	5.200	7.950	6.500	25.350
DAH	1.850	1.850	3.450	4.450	4.500	17.150
RESERVE	950	950	1.650	2.500	2.000	7.950
TALFF	1.750	1.750	3.450	5.000	4.200	16.150
JAPAN	700	50	950	250	2.130	4.030
OTHER NATIONS	1.050	1.650	2.500	4.750	2.070	11.970
(Other rockfishes)						
OY	300	200	650	3.450	3.150	7.650
DAH	200	100	350	1.800	1.700	4.150
RESERVE	100	100	300	1.650	1.450	3.500
TALFF	100	100	150	900	900	2.150
JAPAN	20	10	10	20	469	529
OTHER NATIONS	80	90	90	880	431	1.571
(Sablefish)						
OY	2.150	1.450	2.450	3.450	3.750	13.250
DAH	1.450	800	1.650	2.250	3.000	8.750
RESERVE	700	650	950	1.250	750	4.150
TALFF	1.300	800	1.400	1.450	0	4.950
JAPAN	1.230	760	1.360	895	0	4.185
OTHER NATIONS	70	150	40	505	0	765

TABLE II -2

	SH	CH	KD	YA	SE	TOTAL
(Atka Mackerel)						
OY	4.450	3.600	15.800	1.600	0	24.800
DAH	3.480	2.800	12.300	800	0	19.380
RESERVE	1.150	800	3.500	200	0	5.500
TALFF	3.480	2.800	12.300	800	0	19.380
JAPAN	1.488	10	50	10	0	1.528
OTHER NATIONS	1.942	2.790	12.250	790	0	17.772
(Squid)						
OY	400	400	400	400	400	2.000
DAH	200	200	200	200	200	1.000
RESERVE	200	200	200	200	200	1.000
TALFF	200	200	200	200	200	1.000
JAPAN	10	10	10	10	10	50
OTHER NATIONS	190	190	190	190	190	950
(Other species)						
OY	4.450	3.600	5.000	2.100	1.100	16.200
DAH	3.100	2.600	3.500	1.500	800	11.500
RESERVE	1.300	1.000	1.500	600	300	4.700
TALFF	3.600	2.500	3.380	1.450	800	11.850
JAPAN	900	100	1.654	40	78	2.772
OTHER NATIONS	2.100	2.400	1.646	1.360	722	8.228
(Total)						
OY	91.350	93.100	99.500	41.410	22.450	326.760
DAH	36.170	24.460	49.180	22.130	13.470	145.480
RESERVE	55.130	48.660	48.320	19.270	8.830	180.200
TALFF	24.470	17.260	35.180	15.530	8.070	101.550
JAPAN	11.858	1.450	10.009	4.412	3.695	31.424
OTHER NATIONS	12.612	15.800	26.671	11.118	4.375	67.576

Agenda #12
January 1979

FISHING VESSEL OWNERS' ASSOCIATION
INCORPORATED
ROOM 232, C-3 BUILDING
FISHERMEN'S TERMINAL
SEATTLE, WASHINGTON 98119

(206) 284-4720

January 18th, 1979

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

Dear Mr. Chairman Tillion:

At the November/December meeting of the council in Anchorage the NPFMC took action to ammend he Gulf of Alaska Groundfish Plan and eliminate the regulation, which limited the allowable catch of a nation's vessels to no more than 25% of the total national allocation during the period between December 1st and June 1st.

The Fishing Vessel Owners Association was shocked at the ease with which the Japanese trawlers obtained their ammendment. A copy of their request is attached. It provides no statistical support of economic hardship on themselves, no harvesting trends only a promise which is as follows/

> "The plan notes that if pelagic trawls are used properly the incidence of halibut is quite low. Therefore, with assurance from Japanese fishermen that pelagic trawls will be used in the best manner possible to protect the halibut resource..."

The restriction as stated in the plan would have saved 1130 MT annually of halibut. This fact I am sure was taken into consideration when the NPFMC recommended OY levels. It appears to the F.V.O.A. that the council acted without looking at the purpose of the restriction stated in he Plan, without consideration that the incidence of halibut is six time as great during the winter (.5% vs 3.0%), nor did the council bother to look at the past pattern of foreign fishing which I have provided. (attached)

If the council is going to start making ammendments to management plans based on promises then the credibility of the council has been lost. The council did not seek assurance from the Soviets nor the Koreans that they would handle pelagic trawls correctly. The Japanese harvest only about 50% of the FAC in the Gulf. The council ammended the regulation based on a 50% assurance. The action the council took removed the only new substantial regulation on foreign tralwers since the FCMA in the Gulf of Alaska.

The Japanese must recognize that they must change their fishing pattern to some degree in order to accommodate some of the problems of the resource and U.S. fisherman. The F.V.O.A. therefore recommends the following, we ask the council to do the following and reconsider there action.

1. A review of the fishing patterns of foreign trawlers in the Gulf of Alaska by NMFS.

2. Consult the IPHC on there original projected savings of halibut.

3. Ask the Japanese trawl industry what they can live with, in terms of changing the fishing pattern to a summer fishery.

Very truly yours

FISHING VESSEL OWNERS ASS'N

Robert D. Alverson

Robert D. Alverson, Manager

2. RELAX THE REGULATION WHICH LIMITS THE ALLOWABLE CATCH OF A NATION'S VESSELS TO NO MORE THAN 25% OF THE TOTAL NATIONAL ALLOCATION DURING THE PERIOD BETWEEN DECEMBER 1 AND JUNE 1. [Sec. 611.92 (b)(2)(ii)(E)].

The FMP refers to data from the observer program which indicates a 3% incidence of halibut during the winter and spring in the trawl fishery, [Sec. 8.3.2.1(B)]. With a restriction limiting the catch during the winter and spring to no more than 25% of the total FAC, the plan estimates an annual halibut savings of 1,130 mt as compared to a fishery operated uniformly throughout the year. However, in addition to the regulation requiring the use of pelagic gear only during the same period, the 25% catch restriction seems redundant and unnecessary. The plan notes that if pelagic trawls are used properly, the incidence of halibut is quite low, [Sec. 3.6.2]. Therefore, with assurance from Japanese fishermen that pelagic trawls will be used in the best manner possible to protect the halibut resource, an additional regulation restricting the catch during the winter and spring will only add to the operational difficulties of the foreign fleet. We would request the Council to amend the implementing regulations by removing this restriction.

Country	Jan-May 1975 &Dec.	Total 1975	% of Winter Catch	Jan-May 1976 &Dec	Total 1976	% of Winter Catch	Jan-May 1977 &Dec	Total 1977	% of Winter Catch	Jan-May *1978 only	Total Jan-Nov.	% of Winter Catch
Japan	49,622	91,142	54%	44,250	89,938	49.2	48,479	100,687	48%	15,213	65,401	23%
U.S.S.R.	56,559	95,082	59%	33,514	79,873	41.9	20,817	64,697	32%	51,463	62,501	82.2%
Korea	unknown	13,988	-	3152	37,414	.084	7,981	38,140	187%	1,440	29,611	.048%
Poland	2,132	2,132	100%	-0-	-0-	-	275	1,465	-0-	-0- &	684	-0-
	108,313	202,344	53.4%	80,916	207,225	39%	77,552	204,989	37.8%	68,116	158,297	43%

Catch statistics provided by NMFS Juneau and Seattle, they are in M.T.

distributed at the meeting.

Atka mackerel -- Gulf of Alaska

Atka mackerel OY for the Gulf of Alaska of 24,800 mt is based on Sowit reports for the Shumagin - Kodiak Areas. Japanese experience during 1978 indicates that Atka mackerel abundance in Yakutat - Southeast Areas is 32% that of Shumagin - Kodiak [(12+12)÷(20+19+37)], or 7,900 mt. Therefore, Gulf-wide OY should be 24,800 + 7,700 = 32,700[1] mt. Accordingly, Atka mackerel OY / Reserve / FAC subdivisions should be:

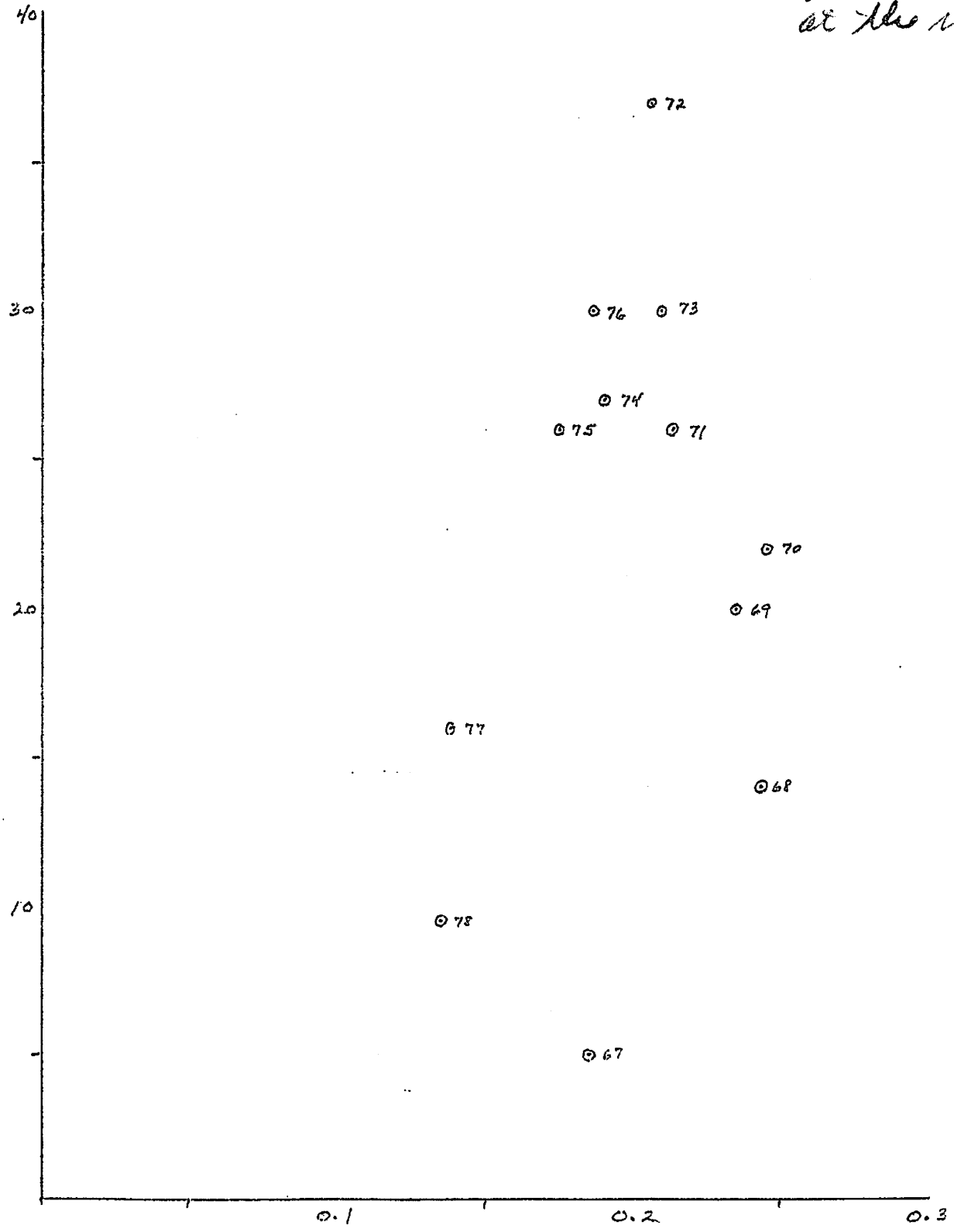
	SH	CK	KO	YA	SO	TOT
% of TOT OY	14.3	11.5	50.3	11.6	12.5	99.9
OY	4,585[2]	3,751[2]	16,464[2]	3,800	4,100	32,700
Reserve	917	750	3,293	760	820	6,540
DAH	0	0	0	0	0	0
FAC	3,668	3,001	13,171	3,040	3,280	26,160

[1] This is slightly less than original MSY of 33,000 mt

[2] includes proportional amount of 1,000 mt originally allocated to Yakutat.

GULF OF ALASKA SABLEFISH

all these materials distributed at the meeting.



Total Sablefish (metric tons)

Longline CPUE (mt/ra hachi)

SABLEFISH

I. MSY for NE Pacific

General Production Model (GENPROD)	50,300 mt

II. MSY for Gulf of Alaska

A. GENPROD for Gulf only	26,500 mt
B. 62% of GENPROD for Gulf + B.S. + Al (40,800 mt)	25,300 mt
C. 47% OF GENPROD for entire NE Pacific	23,600 mt
D. Average of A-C, above	25,100 mt

III. EY for Gulf of Alaska (when MSY = 25,100)

A. If GENPROD applies to Gulf only (parabola)	20,200 mt
B. If GENPROD does not apply to Gulf and yield per exploitable biomass used (linear)	14,000 mt

IV. OY for Gulf of Alaska

A. No higher than lower estimate of EY (14,000 mt) because:

(1) 1977 CPUE was sharply downward and 1978 CPUE remained low.

(2) If GENPROD does apply, parabola probably skewed to right reducing yield at biomass.

(3) Fishery is on left limb of yield/biomass curve.

B. No lower than 13,000 mt because:

(1) Some of CPUE decreases may not have been due to reduced abundance (see Mundt Ltr 1/15/79).

(2) Abundance of juveniles appears higher than in recent past.

(3) 1977 and 1978 catches were well below lower estimate of EY.

SABLEFISH

I. MSY for NE Pacific

General Production Model (GENPROD)	50,300 mt

II. MSY for Gulf of Alaska

A. GENPROD for Gulf only	26,500 mt
B. 62% of GENPROD for Gulf + B.S. + Al (40,800 mt)	25,300 mt
C. 47% OF GENPROD for entire NE Pacific	23,600 mt
D. Average of A-C, above	25,100 mt

III. EY for Gulf of Alaska (when MSY = 25,100)

A. If GENPROD applies to Gulf only (parabola)	20,200 mt
B. If GENPROD does not apply to Gulf and yield per exploitable biomass used (linear)	14,000 mt

IV. OY for Gulf of Alaska

A. No higher than lower estimate of EY (14,000 mt) because:

(1) 1977 CPUE was sharply downward and 1978 CPUE remained low.

(2) If GENPROD does apply, parabola probably skewed to right reducing yield at biomass.

(3) Fishery is on left limb of yield/biomass curve.

B. No lower than 13,000 mt because:

(1) Some of CPUE decreases may not have been due to reduced abundance (see Mundt Ltr 1/15/79).

(2) Abundance of juveniles appears higher than in recent past.

(3) 1977 and 1978 catches were well below lower estimate of EY.

SABLEFISH

I. MSY for NE Pacific

General Production Model (GENPROD)	50,300 mt

II. MSY for Gulf of Alaska

A. GENPROD for Gulf only	26,500 mt
B. 62% of GENPROD for Gulf + B.S. + Al (40,800 mt)	25,300 mt
C. 47% OF GENPROD for entire NE Pacific	23,600 mt
D. Average of A-C, above	25,100 mt

III. EY for Gulf of Alaska (when MSY = 25,100)

A. If GENPROD applies to Gulf only (parabola)	20,200 mt
B. If GENPROD does not apply to Gulf and yield per exploitable biomass used (linear)	14,000 mt

IV. OY for Gulf of Alaska

A. No higher than lower estimate of EY (14,000 mt) because:

(1) 1977 CPUE was sharply downward and 1978 CPUE remained low.

(2) If GENPROD does apply, parabola probably skewed to right reducing yield at biomass.

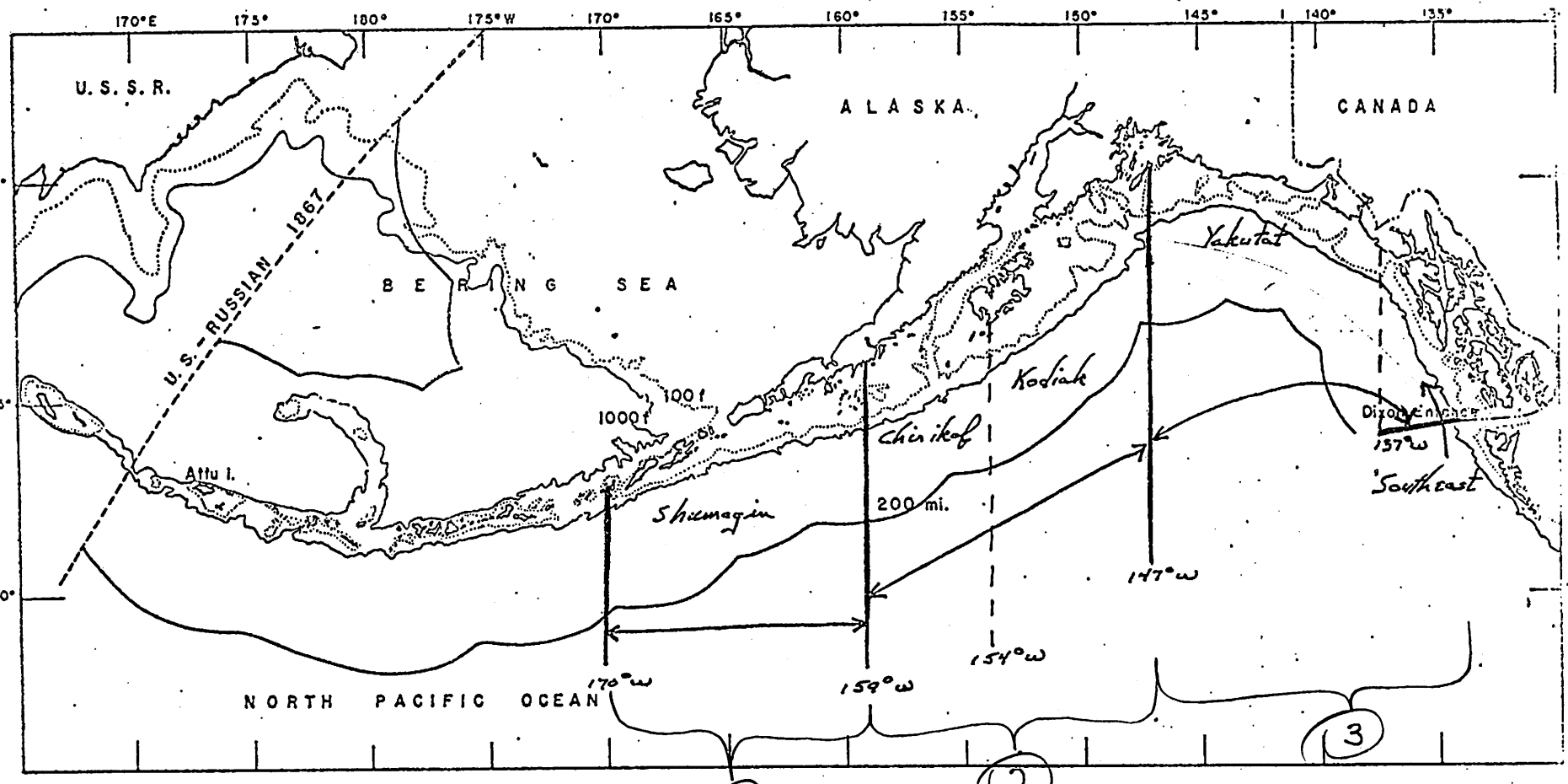
(3) Fishery is on left limb of yield/biomass curve.

B. No lower than 13,000 mt because:

(1) Some of CPUE decreases may not have been due to reduced abundance (see Mundt Ltr 1/15/79).

(2) Abundance of juveniles appears higher than in recent past.

(3) 1977 and 1978 catches were well below lower estimate of EY.



Statistical Areas

Shumagin
Chirikof
Kodiak
Yakutat
Southeast

Management Areas

Shumagin
Chirikof + Kodiak
Yakutat + Southeast

C1

JAPANESE SABLEFISH FISHERY -- GULF OF ALASKA

Year	Trawl Sablefish Catch	LL Sablefish Catch	Total Sablefish Catch	% Trawl	Area & Amount of Best Trawl Catch
1969	4,434	15,154	19,588	23	Yak - 1,727
1970	3,917	17,480	21,397	18	Yak - 1,394
1971	4,095	21,545	25,640	16	Kod - 1,372
1972	8,293	25,966	34,259	24	Yak - 2,882
1973	7,042	22,207	29,249	24	Kod - 2,291
1974	3,073	20,226	23,299	13	Yak - 999
1975	3,380	18,181	21,561	16	Yak - 1,194
1969-75 Ave.	4,891	20,108	24,999	20	--

1969-75 AVERAGE JAPANESE TRAWL CATCH OF SABLEFISH, BY AREA (MT)

Shumagin	375
Chirikof	498
Kodiak	1,410
Yakutat	1,646
Southeast	961

Gulf of Alaska DAH — Clutwood

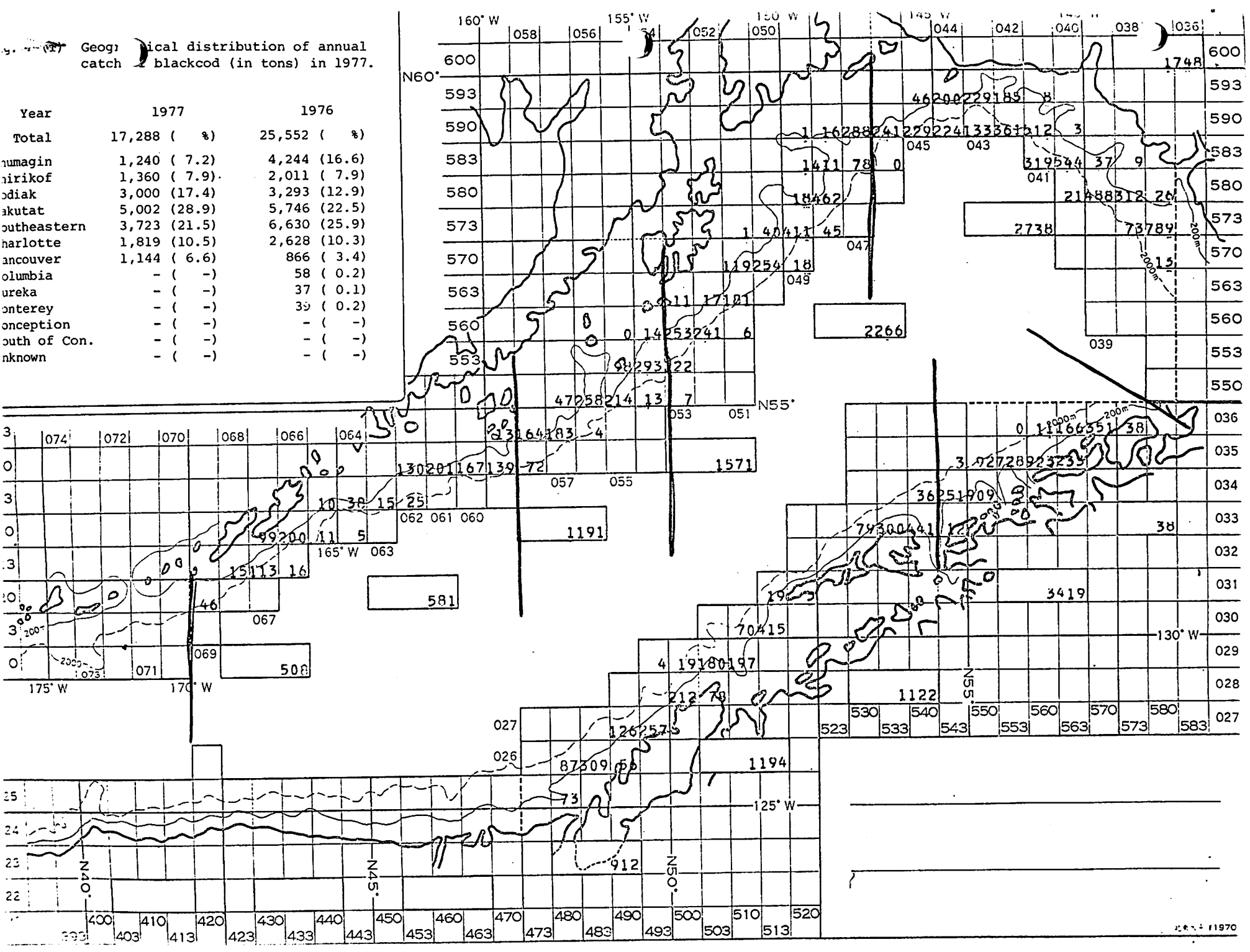
Phys. poss. in place? Fishermen? What kinds of gear?

Worth more as bait than as food. All picked up dragging shrimp boats.

Re DAH — Ck c̄ Stokes, Retting etc.

Bering Sea

Comments to Bart re value emph. in eval. alternatives. Note also need to eval. add'l cost (if any) to for fleets if they get TALFF outside closed areas.

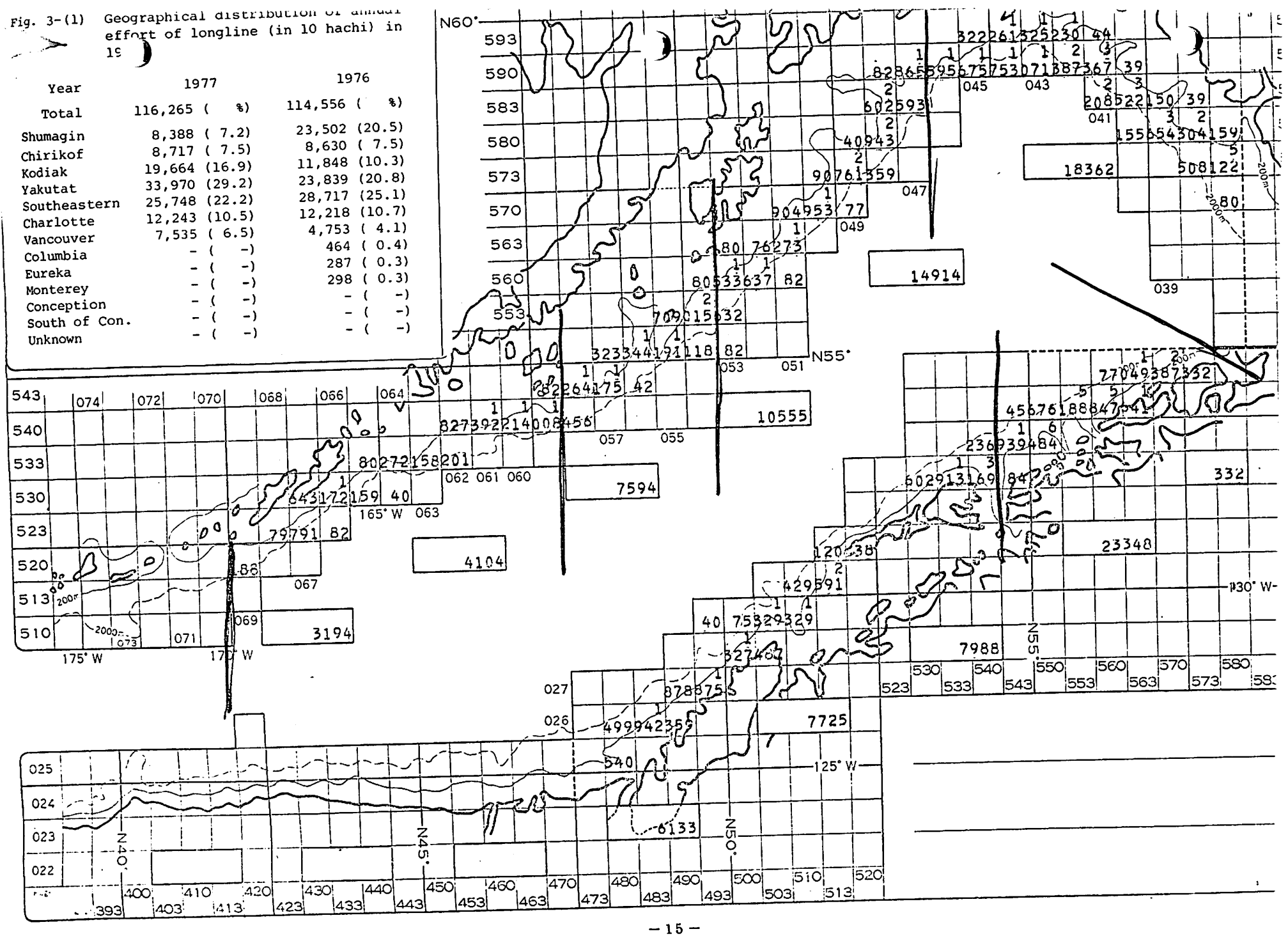


Geographical distribution of annual catch of blackcod (in tons) in 1977.

Year	1977	1976
Total	17,288 (%)	25,552 (%)
Shumagin	1,240 (7.2)	4,244 (16.6)
Chirikof	1,360 (7.9)	2,011 (7.9)
Kodiak	3,000 (17.4)	3,293 (12.9)
Yakutat	5,002 (28.9)	5,746 (22.5)
Southeastern	3,723 (21.5)	6,630 (25.9)
Charlotte	1,819 (10.5)	2,628 (10.3)
Vancouver	1,144 (6.6)	866 (3.4)
Columbia	- (-)	58 (0.2)
Eureka	- (-)	37 (0.1)
Monterey	- (-)	39 (0.2)
Conception	- (-)	- (-)
South of Con.	- (-)	- (-)
Unknown	- (-)	- (-)

Fig. 3-(1) Geographical distribution of annual effort of longline (in 10 hachi) in 19

Year	1977	1976
Total	116,265 (%)	114,556 (%)
Shumagin	8,388 (7.2)	23,502 (20.5)
Chirikof	8,717 (7.5)	8,630 (7.5)
Kodiak	19,664 (16.9)	11,848 (10.3)
Yakutat	33,970 (29.2)	23,839 (20.8)
Southeastern	25,748 (22.2)	28,717 (25.1)
Charlotte	12,243 (10.5)	12,218 (10.7)
Vancouver	7,535 (6.5)	4,753 (4.1)
Columbia	- (-)	464 (0.4)
Eureka	- (-)	287 (0.3)
Monterey	- (-)	298 (0.3)
Conception	- (-)	- (-)
South of Con.	- (-)	- (-)
Unknown	- (-)	- (-)



g. 1 —(1) D ribution of effort by
ock in 1973.
(1 Longline (10 Hachi)

ear	1973		1972
otal	117, 885		141, 553
humagin	16, 935	14.4	10.7
hirikof	10, 870	9.2	8.1
odiak	20, 383	17.3	16.6
akatat	25, 594	21.7	23.8
outheastern	31, 697	26.9	29.8
Charlotte	8, 846	7.5	8.3
Vancouver	3, 561	3.0	2.7
Columbia	—	—	—
Eureka	—	—	—
Monterey	—	—	—
Conception	—	—	—
Unknown	—	—	—

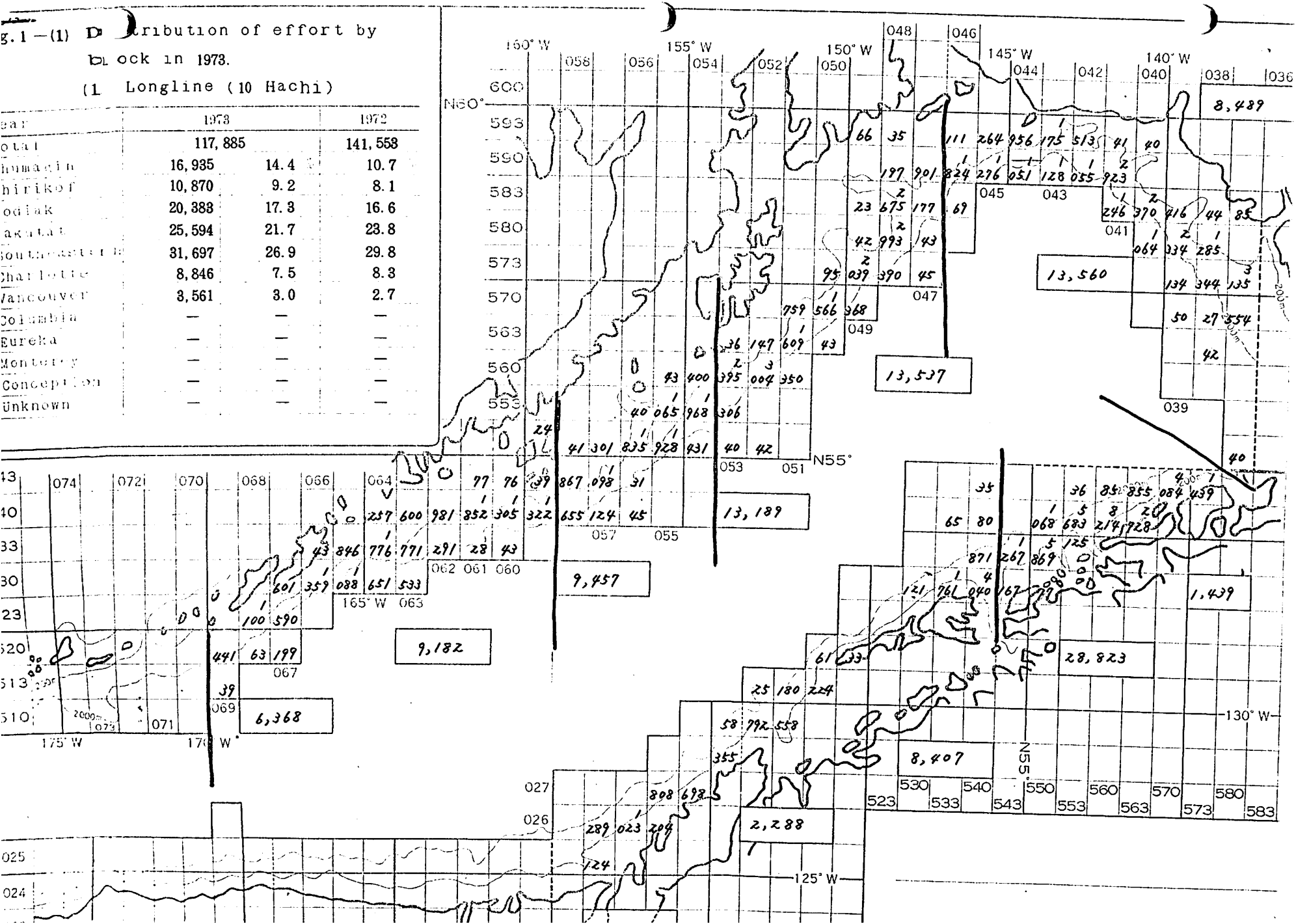


Fig. 2 — (1) Distribution of catch by block in 1973.

(1) Blackcod (ton)

Year	1973		1972
Total	32,521		38,714
Shumagin	4,036	12.4	9.9 %
Chirikof	3,546	10.9	7.4
Kodiak	6,658	20.5	19.0
Yakutat	7,582	23.3	25.3
Southeastern	7,425	22.8	27.0
Charlotte	2,239	6.9	6.6
Vancouver	909	2.8	3.2
Columbia	21	0.1	1.5
Eureka	104	0.3	0.2
Monterey	—	—	—
Conception	—	—	—
Unknown	—	—	—