


M E M O R A N D U M

TO: Council, SSC and AP Members

FROM: Clarence G. Pautzke 
Executive Director

DATE: November 30, 1988

SUBJECT: Bering Sea/Aleutian Islands Groundfish Fishery Management Plan

ACTION REQUIRED

Set groundfish TACs, apportionments to DAP, JVP, TALFF, and PSCs for fully-utilized species.

BACKGROUND

Based upon the ABCs and socioeconomic factors, the Council needs to set total allowable catches (TACs), and apportionments to domestic, joint venture, and foreign fisheries for each species of groundfish in the Bering Sea/Aleutian Islands. Item C-5 has the DAP results from the NMFS survey; item C-6 has joint venture requests, and item C-7 has foreign fisheries requests. Item D-2(b)(1) is a worksheet for your use in concert with the computer spreadsheet to be displayed during your deliberations. The sum of individual TACs must fall within the OY range of 1.4 to 2.0 million metric tons.

In addition, PSC limits for fully-utilized groundfish species may be set for joint ventures (and foreign operations if necessary). According to Amendment 12a, these PSCs are outside the TAC and OY and normally the sum of the TAC and PSC should not exceed ABC. The sum may exceed ABC so long as the species is not in danger of being overfished.

The RAD described the calculations used to anticipate the amount of Greenland turbot, sablefish, Pacific ocean perch, and other rockfish that would be required as bycatch by joint ventures without constraining those fisheries. Based upon the groundfish TACs and apportionments approved at the September meeting, the PSCs would be as follows:

Greenland turbot		54 mt
Sablefish	BS	212 mt
	AI	59 mt
POP	BS	78 mt
	AI	644 mt
Other rockfish	BS	63 mt
	AI	310 mt

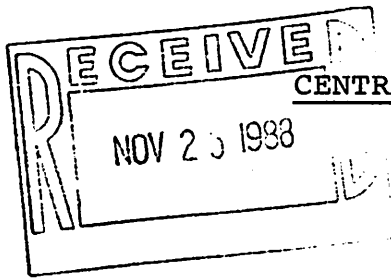
If the groundfish TACs and apportionments are revised, the PSCs can be recalculated and brought back for review and approval.

Item D-2(b)(2) is a comment received on Bering Sea/Aleutian Islands groundfish apportionments for 1989.

Table D-2(b)(1). Preliminary 1989 recommendations for ABC, TAC, DAP, and JVP for Bering Sea/Aleutian Islands Groundfish (metric tons).

Species	Area	1988		1989 ABC Recommendations		Advisory Panel Recommendations		
		TAC	Catch 1/	PT	SSC	TAC	DAP	JVP
Pollock	EBS	1,300,000	1,194,479	1,340,000				
	AI	45,000	43,594	117,900				
	Area 515		(Not recognized)	250,000	> 117,900 No Div.			
Pacific cod		200,000	183,089	370,600				
Yellowfin sole		254,000	212,161	241,000				
Greenland turbot		11,200	6,789	20,300				
Arrowtooth flounder		5,531	4,600	163,700				
Rock sole		(Previously in other flatfish)		171,000				
Other flatfish		131,369	137,762	155,900				
Sablefish	EBS	3,400	3,190	2,800				
	AI	5,000	3,374	3,400				
Pacific ocean perch	EBS	5,000	1,482	6,000				
	AI	6,000	2,214	16,600				
Other rockfish	EBS	400	359	400				
	AI	1,100	723	1,100				
Atka mackerel		21,000	21,690	21,000				
Squid		1,000	446	10,000				
Other species		10,000	12,519	59,000				
BS/AI TOTAL		2,000,000	1,828,471	2,950,700	0	0	0	0

Notes: 1. JVP catch data through November 19, 1988
 2. DAP catch data through November 19, 1988



CENTRAL BERING SEA FISHERMEN'S ASSOCIATION

PO BOX 88

ST. PAUL ISLAND, ALASKA 99660

November 23, 1988

Clarence Pautzke, Executive Director
North Pacific Fisheries Management Council
411 W. Fourth Avenue
Anchorage, Alaska 99501

Dear Mr. Pautzke,

RE 1989 Groundfish Allocations, Bering Sea/
Aleutian Islands FMP

Central Bering Sea Fishermen's Association, representing the fishermen of St. Paul Island has the following comments in response to the Council's call for input on management decisions in groundfish allocations for 1989.

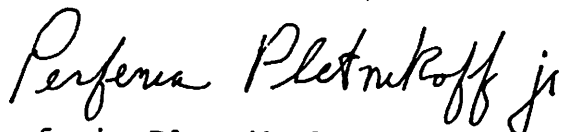
1. TAC should not exceed the 2.0 million metric ton upper limit level for groundfish harvest in the BS/AI areas. CBSFA applauds the conservative management posture of the Council in recent years despite the pressure from many sources to increase the OY range, or raise the cap. Until such time as we can employ a unified scientific approach between user fishing nations of the Bering Sea in estimating biomass and ABC levels for the Bering Sea (including the "Donut Hole"), we believe that the Council, for the long term well being of the fishery, should err on the conservative side of the estimates.
2. We do not believe that the issue of bycatch levels in the trawl fishery has been handled adequately by the Council. If the Joint Venture fleets (notably the Russian fleet) can maintain a clean fishery, we believe that no less should be expected of the domestic fleet of American vessels.
3. Our own concern is growing that the Bering Sea area surrounding the Pribilof Islands, upon which we must rely as a resource for a developing local fishery and a local economy, may suffer irreparable damage to shellfish and longline species stocks from bottomdragging. It is these same species upon which we are basing our development efforts. We noted with some curiosity in last month's bycatch debate that the zones established by the Council do not clearly identify a Pribilof area treated as a zone. In fact the zones split the Pribilofs. Given the importance of the shellfish resources around our islands, as well as the abundance of other longline species, we believe the area to be worthy of special conservation

measures in the interests of the productive crab and longline fisheries in the area. Protection of productive crab grounds by not allowing bottomdragging has preserved the King Crab resources in Soviet waters, a stark contrast to our own domestic management mistakes that devastated Pribilof Red King Crab stocks. We believe that some good arguments can be made for similiar protective measures in Pribilof waters (roughly the 4C halibut area), and our fishermen will be discussing these ideas with other fishermen who fish Pribilof waters in the coming months.

4. A decline in biomass of Atlantic and other fishing stocks worldwide dramatically underscores the importance of Bering Sea groundfish stocks and all other BS/AI species in the future of fishing and feeding of human beings from the sea. Management should be careful and conservative, but more importantly, as we have argued in the case of the fur seals, the perspective of management should be across the entire Bering Sea ecosystem, and not myopically focused on politically construed boundaries. We are encouraged that there appears to be strong scientific sentiment for such an approach to at least one species, as evidenced in the recent International Pollock Symposium sponsored by the Alaska Sea Grant College in Anchorage.

Central Bering Sea Fishermen's Association is aware that the NPFMC has a difficult and complex responsibility in managing the fisheries of our region. We remain interested and concerned with the actions of the Council, because our future and the future of our Pribilof Aleut communities are at stake also in the management of the Central Bering Sea. Thank you for this opportunity to provide input.

Sincerely,



Perfenia Pletnikoff, Jr., President
Central Bering Sea Fishermen's Association

cc. St. George International
Governor Steve Cowper
Senator Ted Stevens
Senator Frank Murkowski
Congressman Don Young