

MEMORANDUM

TO: Council, AP, and SSC Members

FROM: Chris Oliver *Chris*
Executive Director

DATE: May 28, 2004

SUBJECT: Alaska Groundfish Fisheries Programmatic SEIS

ESTIMATED TIME
6 HOURS

ACTION REQUIRED

- (a) Develop workplan for addressing management policy actions
- (b) Initial/Final Review of Groundfish FMP Revisions (Amendments 83/75)

BACKGROUND

- (a) Develop workplan for addressing management policy actions

At this meeting, the Council will consider the groundfish programmatic management policy adopted in April 2003. The Council will assess its ongoing groundfish management in light of the new policy, and develop a workplan to in the short term, bring groundfish management in line with the policy (as necessary), and to advance the precautionary, forward-thinking precepts of the policy in management for the long-term. The workplan will be posted on the Council website. The Council has affirmed in its management policy that the policy objectives will be reviewed annually, and the workplan developed at this meeting will need to be revisited at least on the same schedule.

In order to assist the Council in crafting a workplan, staff has prepared two documents. The first, Item C-2(a)1, presents the Council's adopted groundfish management policy. Each of the 45 objectives is matched with its related bookend range. In order to assist the Council in assessing whether current groundfish management is in line with the programmatic policy, the status of each bookend action has been identified. A "✓" indicates that the bookend action is currently in the FMP or in regulations. "P" indicates those actions which are currently the practice of the Council, but which would need an amendment analysis to formalize in the FMP or in regulations. "O" indicates that an amendment analysis has been initiated, that the action is ongoing. "A" indicates that the action would require an amendment analysis to be initiated. "R" indicates that initiating action would require the Council to make a recommendation to NOAA Fisheries.

The second attachment, Item C-2(a)2, depicts ongoing groundfish actions that the Council has already initiated, along with the estimated duration of the analysis (note, this timeline does not include estimates of the time required for NMFS rulemaking).

In order to develop the workplan, the Council should consider all of the objectives in the groundfish management policy to determine whether there are areas in which the current management program does not accord with the policy. The Council may then wish to develop a priority list of policy objectives, indicating, perhaps by tiers, which objectives or their resulting amendment actions are the most pressing. Once a priority list has been determined, the Council should identify those actions which are to be undertaken (or continued) immediately. For those analyses which are to be addressed in a subsequent tier of amendments, the Council may wish to indicate, where possible, an estimate of when an amendment package may be initiated.

(b) Initial/Final Review of Groundfish FMP Revisions (Amendments 83/75)

The FMP amendment will implement housekeeping changes to the FMPs to revise outdated information and improve readability. The revised FMPs were distributed to the Council family at the end of April. A description of the changes between the existing and revised versions of the FMPs is attached as Item C-2(b)1.

The FMP review process has highlighted several sections of the existing FMPs that are brought to the Council's attention in Item C-2(b)2 for the BSAI and Item C-2(b)3 for the GOA. Changes to these sections have not been included by staff in the revised FMPs. However, the Council may wish to include some or all of these changes as part of Amendments 83/75. Where possible, staff has drafted potential amendment language that the Council could incorporate into the revised FMPs as part of these amendments.

Some minor edits have been suggested for Section 2.2, the Council's groundfish management policy, in Item C-2(b)4, which will be folded into the amendments unless the Council directs otherwise. A new Section 6.2.1, Expected costs of groundfish management, is attached as Item C-2(b)5, and will be inserted into the BSAI and GOA revised FMPs. Additionally, there may be other minor changes between the version of the amendment that the Council approves and the version that is submitted to the Secretary of Commerce, which correct typographical errors and incorporate approved amendment language from amendments that are currently being reviewed by NMFS and the Secretary.

Relative to changes outlined in this action memo, the Council may determine that additional review time, and further public input, is warranted prior to final approval of the revised FMPs. In this case, staff would take whatever guidance the Council can provide at this meeting and compile another draft for final review in October.

KEY:	✓	currently in FMP/regs	A	to act on measure, Council would initiate analysis
	P	not in FMP/regs, but standard practice	R	to act on measure, Council would make a priority recommendation to NMFS
	O	analysis initiated, ongoing		

PROGRAMMATIC MANAGEMENT POLICY FOR GROUND FISH FISHERIES

Prevent Overfishing:

1. Adopt conservative harvest levels for multi-species and single species fisheries and specify optimum yield.

PA.1		PA.2	
- Set ABC < OFL	✓	- Set ABC < OFL	✓
- Sum of TACs has to be within OY range	✓	- Set TAC =< ABC for all targets and "other spp." category	P/A
- B ₂₀ rule for prey species (pollock, P.cod, Atka mackerel)	✓	- No change from PA.1	✓
- Specify MSSTs for Tiers 1-3	P	- Initiate analysis of MSSTs for priority stocks based on the timeframe determined by additional availability of required resources taking into account SSC comments and concerns	R
- Continue to use and improve current harvest control rules to maintain a spawning stock biomass with the potential to produce sustained yields on a continuing basis	O	- Improve collection of biological information necessary to determine spawning stock biomass estimates, particularly for species in Tier 4-5	R
		- Develop appropriate harvest strategies for rockfish	A
- Target species closures when harvest limit is reached	✓	- No change from PA.1	✓
- Species TAC distributed spatially for some BSAI and GOA species	✓	- No change from PA.1	✓

2. Continue to use existing optimum yield cap for BSAI (as stated in current law) and GOA groundfish fisheries.

PA.1		PA.2	
- Sum of TACs has to be within OY range	✓		
- OY specified as range for BSAI: 1.4- 2.0 mill MT and OY specified as range for GOA: 116,000 - 800,000 MT; BSAI OY cap: if the sum of TAC > 2 mill mt then TAC will be adjusted down	✓	- Revisit the calculation of the OY caps to determine their relevancy to current environmental conditions and our knowledge of current stock levels	A

3. Provide for adaptive management by continuing to specify optimum yield as a range.

PA.1		PA.2	
- OY specified as range for BSAI: 1.4- 2.0 mill MT and OY specified as range for GOA: 116,000 - 800,000 MT; BSAI OY cap: if the sum of TAC > 2 mill mt then TAC will be adjusted down	✓	- Revisit the calculation of the OY caps to determine their relevancy to current environmental conditions and our knowledge of current stock levels	A

4. Initiate a scientific review of the adequacy of F₄₀ and adopt improvements as appropriate.

PA.1		PA.2	
- Conduct F ₄₀ review and adopt appropriate measures as necessary	✓/O	- Develop, implement and update as necessary, procedures to account for uncertainty in estimating ABC, species-specific production patterns, and ecosystem considerations	O/R
		- Revisit the calculation of the OY caps to determine their relevancy to current environmental conditions and our knowledge of current stock levels	A

KEY:	✓	currently in FMP/regs	A	to act on measure, Council would initiate analysis
	P	not in FMP/regs, but standard practice	R	to act on measure, Council would make a priority recommendation to NMFS
	O	analysis initiated, ongoing		

5. Continue to improve the management of species through species categories.

PA.1		PA.2	
- Set group TAC for "other species".	✓	- Develop criteria for 'splitting and lumping' of species in order to have a consistent approach over as wide a range as possible ('other species', rockfish, non-specified, etc.)	O
- Maintain species categories (target, "other species", PSC and non-specified species)	✓	- Consider breaking sharks and skates and additional groups out of "other species" group for TAC setting	A
		- Develop criteria to bring a non-specified species into a managed category	A

Promote Sustainable Fisheries and Communities:

6. Promote conservation while providing for optimum yield in terms of providing the greatest overall benefit to the nation with particular reference to food production, and sustainable opportunities for recreational, subsistence and commercial fishing participants and fishing communities
7. Promote management measures that, while meeting conservation objectives, are also designed to avoid significant disruption of existing social and economic structures.
8. Promote fair and equitable allocation of identified available resources in a manner such that no particular sector, group or entity acquires an excessive share of the privileges.

PA.1		PA.2	
- Retain existing gear restrictions and allocations. No pot fishing in GOA for sablefish. Sablefish and P. cod allocated by gear in BSAI. Sablefish allocated by gear in GOA.	✓	- Evaluate pot fishing in GOA for sablefish	A
- Continue development of rights-based mgmt, on a fishery by fishery basis as needed including: (a) IFQs (b) Coops (i) community-based (ii) sector-based (c) CDQs (d) Other community-based programs (e.g., halibut community share program as applied to other species)	O	- Rationalize all fisheries (all GOA, BSAI non-pollock/sablefish) - Ensure CDQ program maximizes benefits in rural communities	O/A

9. Promote increased safety at sea.

Preserve Food Web:

10. Develop indices of ecosystem health as targets for management.

PA.1		PA.2	
- Develop ecosystem indicators for future use in TAC-setting	O	- Develop and implement, as appropriate, criteria for using key ecosystem indicators in the TAC-setting process	R

KEY:	✓	currently in FMP/regs	A	to act on measure, Council would initiate analysis
	P	not in FMP/regs, but standard practice	R	to act on measure, Council would make a priority recommendation to NMFS
	O	analysis initiated, ongoing		

11. Improve the procedure to adjust ABCs as necessary to account for uncertainty and ecosystem factors.

PA.1		PA.2	
- Develop ecosystem indicators for future use in TAC-setting	O	- Develop and implement, as appropriate, criteria for using key ecosystem indicators in the TAC-setting process	R
- Continue to use and improve current harvest control rules to maintain a spawning stock biomass with the potential to produce sustained yields on a continuing basis	O		
		- Develop, implement and update as necessary, procedures to account for uncertainty in estimating ABC, species-specific production patterns, and ecosystem considerations	O/R

12. Continue to protect the integrity of the food web through limits on harvest of forage species.

PA.1		PA.2	
- B ₂₀ rule for prey species (pollock, P.cod, Atka mackerel)	✓	- No change from PA.1	✓
- No directed fishery for forage fish (forage fish ban, Amendment 36/39)	✓	- No change from PA.1	✓

13. Incorporate ecosystem-based considerations into fishery management decisions as appropriate.

PA.1		PA.2	
- Develop ecosystem indicators for future use in TAC-setting	O	- Develop and implement, as appropriate, criteria for using key ecosystem indicators in the TAC-setting process	R
- Species TAC distributed spatially for some BSAI and GOA species	✓	- No change from PA.1	✓

KEY:	✓	currently in FMP/regs	A	to act on measure, Council would initiate analysis
	P	not in FMP/regs, but standard practice	R	to act on measure, Council would make a priority recommendation to NMFS
	O	analysis initiated, ongoing		

Manage Incidental Catch and Reduce Bycatch and Waste:

14. Continue and improve current incidental catch and bycatch management program.

PA.1		PA.2	
- Set group TAC for "other species".	✓	- Develop criteria for 'splitting and lumping' of species in order to have a consistent approach over as wide a range as possible ('other species', rockfish, non-specified, etc.)	O
- Maintain species categories (target, "other species", PSC and non-specified species)	✓	- Consider breaking sharks and skates and additional groups out of "other species" group for TAC setting	A
		- Develop criteria to bring a non-specified species into a managed category	A
- Maintain current closed/ restricted areas such as Walrus Island closures, RKC Savings Area, Bogoslof, Pribilof Island closures, nearshore Bristol Bay closures, Kodiak Type I-III areas, EGOA trawl closures, closures for herring and salmon, Sitka Pinnacles, etc.	✓		
- Maintain existing inseason bycatch closures	✓	- Evaluate effectiveness of existing closures.	A
- Maintain PSC limits for herring, crab, halibut, and salmon in BSAI; maintain PSC limit for halibut in GOA	✓		
- Review effectiveness of coop managed PSC reduction	A		
- For those PSC species where annual population estimates exist, explore a mortality rate based approach to setting limits	A	- BSAI/GOA: For those PSC species where annual population estimates exist, explore a mortality rate-based and abundance based approach to setting limits	A
- Maintain current bycatch and incidental catch restrictions. Full retention of DSR in SEO	✓		
- Maintain coop managed 'hot spot' closures to control	✓		
- Maintain VIP program	✓	- Repeal VIP program	O
- Maintain MRAs	✓	- Repeal or modify MRAs and establish a system of caps and quotas	A

15. Develop incentive programs for bycatch reduction including the development of mechanisms to facilitate the formation of bycatch pools, VBAs, or other bycatch incentive systems.

PA.1		PA.2	
		- Incentive program for incidental catch and bycatch reduction, e.g.: (a) Individual Bycatch Quota (b) Harvest Priority (10% of TAC reserved to reward clean fishing) (c) bycatch reduction standards established (d) Coop managed Harvest Priority (0-10% TAC or PSC reserved to reward clean fishing)	A
- Maintain VIP program	✓	- Repeal VIP program	O
		- Repeal or modify MRAs and establish a system of caps and quotas	A

16. Encourage research programs to evaluate current population estimates for non-target species with a view to setting appropriate bycatch limits as information becomes available.

R

KEY:	✓	currently in FMP/regs	A	to act on measure, Council would initiate analysis
	P	not in FMP/regs, but standard practice	R	to act on measure, Council would make a priority recommendation to NMFS
	O	analysis initiated, ongoing		

17. Continue program to reduce discards by developing management measures that encourage the use of gear and fishing techniques that reduce bycatch which includes economic discards.

PA.1		PA.2	
- Review effectiveness of coop managed PSC reduction	A		
- BSAI: Consider reducing PSC limits for herring, crab, halibut, and salmon to the extent practicable (0-10%) (for purposes of analysis will use 10%)	A	- BSAI: Reduce PSC limits for herring, crab, halibut and salmon to the extent practicable (0-20% for analytical purposes)	A
- GOA: Establish PSC limits on salmon (for example, NTE a 25,000 fish cap for Chinook and a 20,500 fish cap for 'other salmon'); establish PSC limits on crab and herring based on biomass or other fishery data	O O/A	- GOA: Establish PSC limits on salmon (for example, NTE a 25,000 fish cap for Chinook and a 20,500 fish cap for 'other salmon'); establish PSC limits on crab and herring based on biomass or other fishery data - GOA: consider reducing all PSC by 0-10%	O O/A A
- IR/IU for Pollock and P. cod, yellowfin and rocksole (BSAI only), shallow water flatfish (GOA only)	✓/O	- Extend to other species as appropriate	A

18. Continue to manage incidental catch and bycatch through seasonal distribution of TAC and geographical gear restrictions.

PA.1		PA.2	
- Species TAC distributed spatially for some BSAI and GOA species	✓	- No change from PA.1	✓
- Maintain current closed/ restricted areas such as Walrus Island closures, RKC Savings Area, Bogoslof, Pribilof Island closures, nearshore Bristol Bay closures, Kodiak Type I-III areas, EGOA trawl closures, closures for herring and salmon, Sitka Pinnacles, etc.	✓		
- Maintain existing inseason bycatch closures	✓	- Evaluate effectiveness of existing closures.	A
- GOA: Identify salmon savings areas and establish PSC limits to manage	O	- Develop appropriate inseason closure areas in GOA to address bycatch of halibut, salmon, and/or crab when PSC cap is reached for that species	O/A
- Retain existing no trawl zones and fixed gear restrictions. Bottom trawl ban in BSAI for pollock	✓	- BSAI and GOA prohibition on pollock bottom trawl	✓/ A

19. Continue to account for bycatch mortality in TAC accounting and improve the accuracy of mortality assessments for target, PSC bycatch, and non-commercial species.

R

KEY:	✓	currently in FMP/regs	A	to act on measure, Council would initiate analysis
	P	not in FMP/regs, but standard practice	R	to act on measure, Council would make a priority recommendation to NMFS
	O	analysis initiated, ongoing		

20. Control the bycatch of prohibited species through PSC limits or other appropriate measures.

PA.1		PA.2	
- Maintain existing inseason bycatch closures	✓	- Evaluate effectiveness of existing closures. - Develop appropriate inseason closure areas in GOA to address bycatch of halibut, salmon, and/or crab when PSC cap is reached for that species	A A
- Maintain PSC limits for herring, crab, halibut, and salmon in BSAI; maintain PSC limit for halibut in GOA	✓		
- BSAI: Consider reducing PSC limits for herring, crab, halibut, and salmon to the extent practicable (0-10%) (for purposes of analysis will use 10%)	A	- BSAI: Reduce PSC limits for herring, crab, halibut and salmon to the extent practicable (0-20% for analytical purposes)	A
- GOA: Identify salmon savings areas and establish PSC limits to manage - GOA: Establish PSC limits or other appropriate measures on salmon (for example, NTE a 25,000 fish cap for Chinook and a 20,500 fish cap for 'other salmon'); establish PSC limits or other appropriate measures on crab and herring based on biomass or other fishery data	A O O/A	- GOA: Establish PSC limits on salmon (for example, NTE a 25,000 fish cap for Chinook and a 20,500 fish cap for 'other salmon'); establish PSC limits on crab and herring based on biomass or other fishery data - GOA: consider reducing PSC by 0-10%	O O/A A
- For those PSC species where annual population estimates exist, explore a mortality rate based approach to setting limits	A	- BSAI/GOA: For those PSC species where annual population estimates exist, explore a mortality rate-based and abundance based approach to setting limits	A

21. Reduce waste to biologically and socially acceptable levels.

PA.1		PA.2	
- BSAI: Consider reducing PSC limits for herring, crab, halibut, and salmon to the extent practicable (0-10%) (for purposes of analysis will use 10%)	A	- BSAI: Reduce PSC limits for herring, crab, halibut and salmon to the extent practicable (0-20% for analytical purposes)	A
- GOA: Establish PSC limits or other appropriate measures on salmon (for example, NTE a 25,000 fish cap for Chinook and a 20,500 fish cap for 'other salmon'); establish PSC limits or other appropriate measures on crab and herring based on biomass or other fishery data	O O/A	- GOA: Establish PSC limits on salmon (for example, NTE a 25,000 fish cap for Chinook and a 20,500 fish cap for 'other salmon'); establish PSC limits on crab and herring based on biomass or other fishery data - GOA: consider reducing PSC by 0-10%	O O/A A
- IR/IU for Pollock and P. cod, yellowfin and rocksole (BSAI only), shallow water flatfish (GOA only)	✓/O	- Extend to other species as appropriate	A

Avoid Impacts to Seabirds and Marine Mammals:

22. Continue to cooperate with USFWS to protect ESA-listed species, and if appropriate and practicable, other seabird species.

PA.1		PA.2	
- No directed fishery for forage fish (forage fish ban, Amendment 36/39)	✓	- No change from PA.1	✓
- Take of more than 4 short-tailed albatross within 2 years triggers consultation in groundfish longline fisheries	✓	- No change from PA.1	✓
- Longline: Maintain current seabird avoidance measures as approved in 2001	✓	- Longline: Cooperate with USFWS to develop scientifically-based fishing methods that reduce incidental take for all seabird species	A
- Trawl: Cooperate with USFWS to develop scientifically-based fishing methods that reduce incidental take of ESA-listed seabird species	O	- Trawl: Cooperate with USFWS to evaluate and implement scientifically-based fishing methods that reduce incidental take of ESA-listed, and if	R/A

KEY:	✓	currently in FMP/regs	A	to act on measure, Council would initiate analysis
	P	not in FMP/regs, but standard practice	R	to act on measure, Council would make a priority recommendation to NMFS
	O	analysis initiated, ongoing		

23. Maintain or adjust current protection measures as appropriate to avoid jeopardy to ESA-listed Steller sea lions.

PA.1		PA.2	
- B ₂₀ rule for prey species (pollock, P.cod, Atka mackerel)	✓	- No change from PA.1	✓
- No directed fishery for forage fish (forage fish ban, Amendment 36/39)	✓	- No change from PA.1	✓
- Species TAC distributed spatially for some BSAI and GOA species	✓	- No change from PA.1	✓
- Maintain current closed/ restricted areas such as Walrus Island closures, RKC Savings Area, Bogoslof, Pribilof Island closures, nearshore Bristol Bay closures, Kodiak Type I-III areas, EGOA trawl closures, closures for herring and salmon, Sitka Pinnacles, etc.	✓		
- 2002 SSL closures: no fishing in Seguam Pass; 3nm no transit zones around rookeries; trawl and fixed gear closures in nearshore and critical habitat areas	✓	- Modify 2002 SSL closures and designation of Critical Habitat as appropriate scientific information becomes available	O/A
- Review cumulative impacts of opening AI pollock fishery	O	- Modify AI SSL closures and designation of Critical Habitat as appropriate scientific information becomes available	A

24. Encourage programs to review status of endangered or threatened marine mammal stocks and fishing interactions and develop fishery management measures as appropriate.

R

25. Continue to cooperate with NMFS and USFWS to protect ESA-listed marine mammal species, and if appropriate and practicable, other marine mammal species.

PA.1		PA.2	
- B ₂₀ rule for prey species (pollock, P.cod, Atka mackerel)	✓	- No change from PA.1	✓
- No directed fishery for forage fish (forage fish ban, Amendment 36/39)	✓	- No change from PA.1	✓
- Species TAC distributed spatially for some BSAI and GOA species	✓	- No change from PA.1	✓
- Maintain current closed/ restricted areas such as Walrus Island closures, RKC Savings Area, Bogoslof, Pribilof Island closures, nearshore Bristol Bay closures, Kodiak Type I-III areas, EGOA trawl closures, closures for herring and salmon, Sitka Pinnacles, etc.	✓		
- 2002 SSL closures: no fishing in Seguam Pass; 3nm no transit zones around rookeries; trawl and fixed gear closures in nearshore and critical habitat areas	✓	- Modify 2002 SSL closures and designation of Critical Habitat as appropriate scientific information becomes available	O/A
- Review cumulative impacts of opening AI pollock fishery	O	- Modify AI SSL closures and designation of Critical Habitat as appropriate scientific information becomes available	A

KEY:	✓	currently in FMP/regs	A	to act on measure, Council would initiate analysis
	P	not in FMP/regs, but standard practice	R	to act on measure, Council would make a priority recommendation to NMFS
	O	analysis initiated, ongoing		

Reduce and Avoid Impacts to Habitat:

26. Review and evaluate efficacy of existing habitat protection measures for managed species.

PA.1		PA.2	
		- Review all existing closures to see if these areas qualify for MPAs under established criteria. MPAs could include no-take reserves or have restrictions of specific gear types or specific fisheries or specific time periods	A
		- Evaluate effectiveness of existing closures.	A
		- Develop appropriate inseason closure areas in GOA to address bycatch of halibut, salmon, and/or crab when PSC cap is reached for that species	A
		- Determine extent of adverse effects from fishing, if any. Implement mitigation measures, if necessary.	O

27. Identify and designate EFH and HAPC, pursuant to Magnuson-Stevens Act rules, and mitigate fishery impacts as necessary and practicable to continue the sustainability of managed species.

PA.1		PA.2	
- Identify and designate EFH and HAPC	✓/O	- Identify and designate EFH and HAPC	✓/O
		- Determine extent of adverse effects from fishing, if any. Implement mitigation measures, if necessary.	O
		- Establish Aleutian Island management area to protect coral/live bottom habitats	A

28. Develop a Marine Protected Area policy in coordination with national and state policies.

PA.1		PA.2	
- Executive Order 13158: Initiative establishes MPA Advisory Committee, MPA Center, MPA website, agency tasks and list of existing US MPAs	✓		
- Development and adoption of definitions of MPAs, marine reserves, marine fishery reserves, protected marine habitats etc.	O		
- Develop MPA efficacy methodology including program goals, objectives, and criteria, for establishing MPAs	A		

29. Encourage development of a research program to identify regional baseline habitat information and mapping, subject to funding and staff availability. R

30. Develop goals, objectives and criteria to evaluate the efficacy and suitable design of marine protected areas and no-take marine reserves as tools to maintain abundance, diversity, and productivity. Implement marine protected areas if and where appropriate.

PA.1		PA.2	
- Develop MPA efficacy methodology including program goals, objectives, and criteria, for establishing MPAs	A	- Consider adopting 0-20% of BS, AI, GOA as MPAs and no-take marine reserves (e.g., 5% = no take, 15% = MPA) across a range of habitat types	A
		- Establish Aleutian Island management area to protect coral/live bottom habitats	A

KEY:	✓	currently in FMP/regs	A	to act on measure, Council would initiate analysis
	P	not in FMP/regs, but standard practice	R	to act on measure, Council would make a priority recommendation to NMFS
	O	analysis initiated, ongoing		

Promote Equitable and Efficient Use of Fishery Resources:

31. Provide economic and community stability to harvesting and processing sectors through fair allocation of fishery resources.

PA.1		PA.2	
- Retain existing gear restrictions and allocations. No pot fishing in GOA for sablefish. Sablefish and P. cod allocated by gear in BSAI. Sablefish allocated by gear in GOA.	✓	- Evaluate pot fishing in GOA for sablefish	A
- Continue development of rights-based mgmt, on a fishery by fishery basis as needed including: (a) IFQs (b) Coops (i) community-based (ii) sector-based (c) CDQs (d) Other community-based programs (e.g., halibut community share program as applied to other species)	O	- Rationalize all fisheries (all GOA, BSAI non-pollock/sablefish) - Ensure CDQ program maximizes benefits in rural communities	O/A

32. Maintain LLP program and modify as necessary and further decrease excess fishing capacity and overcapitalization by eliminating latent licences and extending programs such as community or rights-based management to some or all groundfish fisheries.

PA.1		PA.2	
- Maintain existing restricted access programs (LLP and moratorium, AFA, IFQ sablefish, etc.)	✓		
- Continue development of rights-based mgmt, on a fishery by fishery basis as needed including: (a) IFQs (b) Coops (i) community-based (ii) sector-based (c) CDQs (d) Other community-based programs (e.g., halibut community share program as applied to other species)	O	- Rationalize all fisheries (all GOA, BSAI non-pollock/sablefish) - Ensure CDQ program maximizes benefits in rural communities	O/A

33. Provide for adaptive management by periodically evaluating the effectiveness of rationalization programs and the allocation of access rights based on performance.

34. Develop management measures that, when practicable, increase the efficient use of fishery resources taking into account the interest of harvesters, processors, and communities.

PA.1		PA.2	
- Continue development of rights-based mgmt, on a fishery by fishery basis as needed including: (a) IFQs (b) Coops (i) community-based (ii) sector-based (c) CDQs (d) Other community-based programs (e.g., halibut community share program as applied to other species)	O	- Rationalize all fisheries (all GOA, BSAI non-pollock/sablefish) - Ensure CDQ program maximizes benefits in rural communities	O/A

KEY:	✓	currently in FMP/regs	A	to act on measure, Council would initiate analysis
	P	not in FMP/regs, but standard practice	R	to act on measure, Council would make a priority recommendation to NMFS
	O	analysis initiated, ongoing		

Increase Alaska Native Consultation:

35. Continue to incorporate local and traditional knowledge in fishery management.

PA.1		PA.2	
- Develop and implement procedures to incorporate local and traditional knowledge into fisheries management	O	- Incorporate additional local and traditional knowledge from research	R

36. Consider ways to enhance collection of local and traditional knowledge from communities, and incorporate such knowledge in fishery management where appropriate.

PA.1		PA.2	
- Develop and implement procedures to incorporate local and traditional knowledge into fisheries management	O	- Incorporate additional local and traditional knowledge from research	R

37. Increase Alaska Native participation and consultation in fishery management.

PA.1		PA.2	
- Increase consultation with Alaska Native and encourage increased participation	R	- Increase consultation with and representation of Alaska Natives in fishery management	R

Improve Data Quality, Monitoring and Enforcement:

38. Increase the utility of groundfish fishery observer data for the conservation and management of living marine resources.

PA.1		PA.2	
		- Improve collection of biological information necessary to determine spawning stock biomass estimates, particularly for species in Tier 4-5	R
		- Improve species identification for non-target species	R
		- Develop uncertainty estimates for target species data	R

39. Improve groundfish Observer Program, and consider ways to address the disproportionate costs associated with the current funding mechanism.

PA.1		PA.2	
- Continue existing Observer coverage or modify based on data and compliance needs	✓/O	- Expand/modify observer coverage based on scientific data and compliance needs (applies to all vessels: <60' and ≥ 60')	A
- Modification should be scientifically-based (e.g., random placement, flexibility, variable rate)	O		
- Industry pays for observer deployment related costs	✓	- Develop and implement alternate funding mechanisms (a) Federal funding (b) Research Plan (e.g., fee-based)	O

KEY:	✓	currently in FMP/regs	A	to act on measure, Council would initiate analysis
	P	not in FMP/regs, but standard practice	R	to act on measure, Council would make a priority recommendation to NMFS
	O	analysis initiated, ongoing		

40. Improve community and regional economic impact costs and benefits through increased data reporting requirements.

PA.1		PA.2	
- Maintain current reporting requirements (a) AFA requirement that all CPs and motherships to weigh all pollock catch on NMFS approved scales (b) CDQ requirement that all CDQ groundfish catch is to be weighed on NMFS-approved scales	✓	- Develop programs for mandatory economic data collection while protecting confidential information	A
		- Explore programs that collect, verify, then aggregate economic data through independent third party (accounting firm/other) while protecting confidential information on an individual/firm basis	A
		- Collect and verify aggregate economic data through independent third party (e.g. accounting firm)	A

41. Increase the quality of monitoring and enforcement data through improved technological means.

PA.1	PA.2
- Maintain mandatory VMS requirement for Atka mackerel, p.cod, and pollock fleets	✓ - Modify VMS to incorporate new technology and system providers

42. Encourage a coordinated, long-term ecosystem monitoring program to collect baseline information and compile existing information from a variety of ongoing research initiatives, subject to funding and staff availability. R

43. Cooperate with research institutions such as the North Pacific Research Board (NPRB) in identifying research needs to address pressing fishery issues. R

44. Promote enhanced enforceability.

45. Continue to cooperate and coordinate management and enforcement programs with the Alaska Board of Fish, Department of Fish and Game, and Alaska Fish and Wildlife Protections, the U.S. Coast Guard, NMFS Enforcement, IPHC, Federal Agencies, and other organizations to meet conservation requirements, promote economically healthy and sustainable fisheries and fishing communities, and maximize efficiencies in management and enforcement programs through continued consultation, coordination, and cooperation.

COUNCIL ACTIONS TO IMPLEMENT GROUNDFISH MANAGEMENT POLICY

POLICY GOAL	MANAGEMENT ACTION	2004				2005				2006				2007				2008				2009			
		Apr	Jun	Oct	Dec	Feb	Apr	Jun	Oct	Dec	Feb	Apr	Jun	Oct	Dec	Feb	Apr	Jun	Oct	Dec	Feb	Apr	Jun	Oct	Dec
Prevent Overfishing*	TAC specifications																								
	non-target species management																								
Promote Sustainable Fisheries and Communities*																									
Preserve Food Web*	ecosystem chapter in SAFE																								
Manage, Reduce, and Avoid Bycatch and Incidental Catch*	PSC limit specifications																								
	repeal of VIP																								
	GOA salmon and crab PSC limits																								
Avoid Impacts to Seabirds and Marine Mammals*	SSL closure area modifications																								
	AI pollock fishery review																								
	evaluation of trawl 3rd wire/STA interactions																								
Reduce and Avoid Impacts to Habitat*	redefinition of EFH																								
	identification/mitigation of adverse effects from fishing																								
	designation of HAPC																								
Promote Equitable and Efficient Use of Resources*	GOA rationalization																								
	Aleut corporation AI pollock allocation																								
	sector allocations for BSAI species																								
Increase Alaska Native Consultation*	reexamination of AP terms of reference																								
Improve Data Quality, Monitoring and Enforcement*	new Observer Program funding system																								

* NOTE: Some management actions fit under more than one policy goal, however for the purposes of this timeline, each management action will only appear in one place in order to minimize scheduling confusion.

5/28/2004 8:59 AM

Changes to the FMPs

Changes that apply to both BSAI and GOA FMPs:

- BSAI and GOA FMPs have been reorganized into a similar format, with supporting material moved to appendices:

Chapter 1	Introduction
Chapter 2	Management Policy and Objectives
Chapter 3	Conservation and Management Measures
Chapter 4	Description of Stocks and Fishery
Chapter 5	Relationship to Applicable Law and Other Fisheries
Chapter 6	References
- A new executive summary contains a brief overview of the management measures in place for the BSAI groundfish fisheries.
- Foreign fishery management measures, including those governing the allocation of harvest quota to foreign fisheries, have been deleted.
- Chapter 3, Conservation and Management Measures, has been streamlined to focus entirely on the management measures; descriptive text is moved to chapter 4.
- A new section (3.10.2) has been added to reflect the Council's intent annually to review the newly adopted management policy.
- Chapter 4, Description of stocks and fishery, has been updated with current status of stocks and fishery information; the description of the foreign fisheries has been considerably reduced.
- Much of the EFH supporting material has been moved to Appendices D, E, and F.
- A section has been included in Appendix H, Research Needs, to reflect the research management objectives in the newly adopted groundfish management policy.

Changes that apply to the BSAI FMP only:

- The description of fishing areas (Section 3.1.1) has been updated to define the Bering Sea and Aleutian Islands subareas and where appropriate, their districts, as defined in regulation for the BSAI (the existing area description referred to Areas I-IV, which are no longer used).
- All management measures or procedures that relate to the assessment and allocation of TAC, with the exception of the sablefish, pollock, or CDQ share-based programs, have been gathered in Section 3.2, Determining harvest levels.
- The treatment of closed areas and PSC limits has been regularized in the revised FMP. Those areas that are annually closed to a gear type or directed fishery for part or all of the year are listed in Section 3.5.2. Those areas that are closed in response to a prohibited species cap trigger are listed in Section 3.6.2.2. Individual species limits for prohibited species are all listed in one place, in Section 3.6.2.1.
- The old FMP contains a lengthy policy statement about the treatment of prohibited species in the BSAI FMP. Policy goals and objectives about the treatment of prohibited species are addressed in the Council's revised management policy, therefore this section has been deleted from the FMP.
- Changes to the FMP are accomplished through specific amendment text. In a couple of cases, the approved text did not amend all the requisite sections of the FMP, even though the intent of the amendment and the implementing regulations were comprehensive. These omissions

have been corrected. (For example, the BSAI FMP now correctly allocates 10% of the pollock TAC to the CDQ program.)

Changes that apply to the GOA FMP only:

- All management measures or procedures that relate to the assessment and allocation of TAC, with the exception of the sablefish IFQ program, have been gathered in Section 3.2, Determining harvest levels.
- The definition of TAC has been amended as follows (change indicated in strikeout):

Total allowable catch (TAC) is the harvest quota for a species or species group; ~~the retainable catch~~. TAC will be apportioned by area.
- Changes to the FMP are accomplished through specific amendment text. In a couple of cases, the suggested text did not amend all the requisite sections of the FMP, even though the intent of the amendment and the implementing regulations were comprehensive. These omissions have been corrected. (For example, the Shelikof District was rescinded in GOA 25.)
- Management and enforcement requirements have been updated.
- The existing version of the FMP has a number of sections that discuss the halibut fishery (paragraph in introduction about importance of halibut even though not managed under this FMP, preface to PSC limits and measures themselves, status of halibut stock, history of halibut fishery, impacts on halibut of other fisheries, consistency of FMP with IPHC) which indicate a level of importance. The revised, streamlined, FMP does not necessarily reflect this same importance at a Table of Contents level (although the introduction, and management measure sections are unchanged, there is less of the description focused on halibut.)

Existing Sections of the BSAI FMP for Council Consideration

For items 1-6, potential amendment language has been suggested on pages 2-3 of this attachment, which would address the issues raised.

1. definition of MSY (Section 3.2.1.1): definition differs from National Standard 1 guidelines; the Council may wish to consider substituting the existing definition for the definition in the guidelines.
2. definition of OY (Section 3.2.1.1): there are two issues with the definition, a housekeeping one and a substantive one. The first is that the definition is confusing; the paragraph reads as though OY is set for the same management units as ABC, whereas in reality we typically set about 20 ABCs annually while OY is a single fixed range. Grant Thompson has suggested a rewrite of this paragraph which includes the statutory definition and also clarified the text.

The potentially more substantive issue with the definition is that OY can be set higher than ABC. This is contrary to the language in the newly adopted groundfish management policy; the Council may wish to take this opportunity to amend the definition.

3. definition of TAC: the GOA FMP includes a definition of TAC in this section. It could be appropriate to include such a definition in the BSAI FMP also.
4. description of MSY (Section 3.2.1.2): the description of MSY, written in 1982, is dated. Grant Thompson has suggested a rewrite of this section that would be non-substantive, but would bring the description of MSY up to date, in keeping with the intention of this amendment.
5. description of OY (Section 3.2.1.3): as with MSY, the description of OY is dated. Grant Thompson has suggested a rewrite of this section that would be non-substantive, but would bring the justification of OY up to date, in keeping with the intention of this amendment.
6. vessel safety section: unlike the GOA FMP, the BSAI FMP was not amended to accommodate the suggested language from the MSA regarding temporary management adjustments to accommodate vessel safety. Staff recommends that the Council incorporate this language into the FMP at this time.
7. Schedule and Procedures for Evaluation (Section 3.10.1): the Council may wish to review the FMP's commitments in this section.
8. Review of EFH components (Section 3.10.2): the Council may wish to review the FMP's commitment to review EFH components in the annual SAFE process.
9. PSC limits and areas review (Section 3.10.3): the Council may wish to review the FMP's commitment to PSC limit and area review.
10. Important Habitat Information for non-FMP species (Appendix I): the existing FMP contains habitat assessments for halibut and herring. The Council may wish to consider adding a summary of EFH information for crab and salmon to this appendix.
11. Information on marine mammal populations (Appendix J): the existing FMP contains information on marine mammals that interact with the fishery. The Council may wish to expand this appendix to also include a summary of seabirds populations that interact with the fishery. Information for this section would be summarized from the PSEIS.

Potential Amendment Language

1. definition of MSY, Section 3.2.1.1 - replace existing text with the following:

Maximum sustainable yield (MSY) is the largest long-term average catch or yield that can be taken from a stock or stock complex under prevailing ecological and environmental conditions.

2. definition of OY, Section 3.2.1.1 - two options:

Option A: non-substantive changes - replace existing text with the following:

Optimum Yield is the amount of fish which—

(A) will provide the greatest overall benefit to the Nation, particularly with respect to food production and recreational opportunities, and taking into account the protection of marine ecosystems;

(B) is prescribed as such on the basis of the MSY from the fishery, as reduced by any relevant economic, social, or ecological factor; and

(C) in the case of an overfished fishery, provides for rebuilding to a level consistent with producing the MSY in such fishery.

In the case of the BSAI groundfish fishery, OY is specified as an annual catch of 1.4 to 2.0 million mt to the extent that this can be harvested consistently with the management measures specified in this FMP. In addition to definitional differences, OY differs from ABC in two practical respects. First, ABC is specified for each stock or stock complex within the “target species” and “other species” categories whereas OY is specified for the groundfish fishery as a whole. Second, ABCs are specified annually whereas the OY range is constant. The sum of the stock-specific ABCs may fall within or outside of the OY range.

Option B: substantive change in keeping with management policy - delete the last sentence from the revised definition above, or delete existing sentence from FMP: “OY may be set higher than ABC in order to produce higher yields from other more desirable species in a multispecies fishery.”

3. definition of TAC, Section 3.2.1.1 - add the following text:

Total allowable catch (TAC) is the harvest quota for a species or species group.

4. description of MSY, Section 3.2.1.2 - replace existing text with the following:

The groundfish complex and its fishery are a distinct management unit of the Bering Sea. This complex forms a large subsystem of the Bering Sea ecosystem with intricate interrelationships between predators and prey, between competitors, and between those species and their environment. Ideally, concepts such as productivity and MSY should be viewed in terms of the groundfish complex as a unit rather than for individual species or species groups. Due to the difficulty of estimating the parameters that govern interactions between species, however, estimates of MSY for the groundfish complex have sometimes been computed by summing MSY estimates for the individual species and species groups.

Early studies estimated MSY for the groundfish complex in the range of 1.7 to 2.4 million mt. This range was obtained by summing the MSY ranges for each target species and the “other species” category, as defined in Section 3.2.2 of this plan. By way of comparison, this range included both the average annual catch (1.8 million mt) and the maximum annual catch (2.4 million mt) taken during the period 1968-1977 (see Section 4.3.1, History of Exploitation).

Another early study was based on an ecosystem model of the Bering Sea (Laevastu and Larkins, 1981). This study simulated the principal components of the ecosystem (mammals, birds, demersal fish, semi-demersal fish, pelagic fish, squid, crabs, and benthos) and considered fluctuations in their abundance caused by predation, other sources of natural mortality, environmental anomalies, and fishing. It estimated the mean exploitable biomass of the species covered by this FMP at a value of 9.3 million mt, suggesting that the MSY for the groundfish complex is probably much higher than the 1.7 to 2.4 million mt range estimated conservatively by the single species approach.

An ecosystem perspective also suggests that the MSY of the groundfish complex may change if an environmental regime shift occurs or if the present mix of species is altered substantially. Also, as new data are acquired and as statistical methodology evolves over time, it is to be expected that estimates of MSY will change, even if the ecosystem has remained relatively stationary. Therefore, estimates of MSY contained in this section should be viewed in context, as historical estimates that guided development of the FMP but not necessarily as reflective of the best scientific information available currently.

5. description of OY, Section 3.2.1.3 - replace existing text with the following:

The optimum yield of the groundfish complex is specified as 85% of the historical estimate of the MSY range for the target species and the "other species" categories (1.4 to 2.0 million mt), to the extent this can be harvested consistently with the management measures specified in this FMP, plus the actual amount of the nonspecified species category that is taken incidentally to the harvest of target species and the "other species" category. This deviation from the historical estimate of MSY reflects the combined influence of biological and socioeconomic ecological, social, and economic factors. The important ecological factors may be summarized as follows:

1. The OY range encompasses the summed ABCs of individual species for 1978-1981 (Low, et al. 1978; and Bakkala, et al. 1979, 1980, and 1981). This sum was used as an indicator of the biological productivity of the complex, although such use is not completely satisfactory because multi-species/ecosystem interactions are not taken into account explicitly. The 15% reduction from MSY reduces the risk associated with incomplete data and questionable assumptions in assessment models used to determine the condition of stocks.
2. When multi-species/ecosystem interactions *are* taken into account explicitly, the OY range still appears to represent a safe range of long-term average harvests for the groundfish complex. The mean exploitable biomass of 9.3 million mt estimated for the groundfish complex by Laevastu and Larkins (1981) suggests that harvest levels level can be considerably higher than the OY range can be sustained.

The important social and economic factors may be summarized as follows:

1. The OY range is not likely to have any significant detrimental impact on the industry. On the contrary, specification of OY as a constant range helps to create a stable management environment in which the industry can plan its activities consistently, with an expectation that each year's total groundfish catch will be at least 1.4 million metric tons.
2. The OY range encompasses the annual catch levels taken in the period immediately prior to its implementation, during which the fishery operated profitably.

OY may need to be respecified in the future if major changes occur in the estimate of MSY for the groundfish complex. Likewise, OY may need to be respecified if major changes occur in the ecological, social, or economic factors governing the relationship between OY and MSY.

6. vessel safety, new Section 3.8.3 - add the following text:

The Council will consider, and may provide for, temporary adjustments regarding access to the fishery for vessels otherwise prevented from harvesting because of weather or other ocean conditions affecting the safety of the vessels, after consultation with the Coast Guard and persons utilizing the fishery.

Existing Sections of the GOA FMP for Council Consideration

For items 1, 3, and 4, potential amendment language has been suggested on page 2 of this attachment, which would address the issues raised.

1. definition of MSY (Section 3.2.1.1): definition differs from National Standard 1 guidelines; the Council may wish to consider replacing it with the definition in the guidelines.
2. description of MSY (Section 3.2.1.2): MSY is only described in the FMP as the origin for the upper range of OY. The Council may wish to consider describing MSY in the FMP.
3. Framework for setting TAC (Section 3.2.3.1): the second paragraph describes the Council's policy/action to rebuild POP stocks due to low biomass. As the POP stock is now rebuilt, the Council may wish to consider whether this paragraph is still required in the FMP. Also, the procedure in this section includes specific considerations for POP in step 2, which may also no longer be necessary.
4. Framework for setting TAC (Section 3.2.3.1): in step 2 of the framework, TAC may be set higher than ABC in some instances. This is contrary to the language in the newly adopted groundfish management policy; the Council may wish to take this opportunity to amend the definition.
5. Ongoing actions (Section 3.10.1): the Council may wish to review the FMP's commitments in this section.
6. Review of EFH components (Section 3.10.2): the Council may wish to review the FMP's commitment to review EFH components in the annual SAFE process.
7. Important Habitat Information for non-FMP species (Appendix I): the existing FMP contains habitat assessments for halibut and GOA crab. The Council may wish to consider adding a summary of EFH information for other prohibited species to this appendix.
8. Information on marine mammal and/or populations (would be a new Appendix J): the BSAI FMP contains information on marine mammals that interact with the fishery. The Council may wish to add this section to the GOA FMP, and also expand it to include a summary of seabirds populations that interact with the fishery. Information for this section would be summarized from the PSEIS.

Potential Amendment Language

- 1. definition of MSY, Section 3.2.1.1** - replace existing text with the following:

Maximum sustainable yield (MSY) is the largest long-term average catch or yield that can be taken from a stock or stock complex under prevailing ecological and environmental conditions.

- 3. description of POP rebuilding policy, Section 3.2.3.1** - delete second paragraph in Section 3.2.3.1.

The Council may also wish to remove the procedure for setting TAC for POP during rebuilding. In that case, the Council would delete the content of step 2 of Section 3.2.3.1, starting with the second paragraph "The Council has examined biological and socioeconomic information..."

- 4. TAC setting, Section 3.2.3.1** - delete 3rd sentence in first paragraph of step 2, namely "Conversely, the TAC may be higher than ABC if the Council believes that socioeconomic considerations warrant a harvest in excess of ABC."

2.2 Management Approach for the BSAI Groundfish Fisheries

The productivity of the North Pacific ecosystem is acknowledged to be among the highest in the world. For the past 25 years, the Council management approach has incorporated forward looking conservation measures that address differing levels of uncertainty. ~~This management approach has, in recent years, been labeled the precautionary approach.~~ **This management approach has in recent years been labeled the precautionary approach.** The Council's precautionary approach is about applying judicious and responsible fisheries management practices, based on sound scientific research and analysis, proactively rather than reactively, to ensure the sustainability of fishery resources and associated ecosystems for the benefit of future, as well as current generations. Recognizing that potential changes in productivity may be caused by fluctuations in natural oceanographic conditions, fisheries, and other, non-fishing activities, the Council intends to continue to take appropriate measures to insure the continued sustainability of the managed species. It will carry out this objective by considering reasonable, adaptive management measures, as described in the Magnuson-Stevens Act and in conformance with the National Standards, the Endangered Species Act (ESA), the National Environmental Policy Act, and other applicable law. This management approach takes into account the National Academy of Science's recommendations on Sustainable Fisheries Policy.

As part of its policy, the Council intends to consider and adopt, as appropriate, measures that accelerate the Council's precautionary, adaptive management approach through community-based or rights-based management, ecosystem-based management principles that protect managed species from overfishing, and where appropriate and practicable, increase habitat protection and bycatch constraints. All management measures will be based on the best scientific information available. Given this intent, the fishery management goal is to provide sound conservation of the living marine resources; provide socially and economically viable fisheries **and for the well-being of** fishing communities; minimize human-caused threats to protected species; maintain a healthy marine resource habitat; and incorporate ecosystem-based considerations into management decisions.

This management approach recognizes the need to balance many competing uses of marine resources and different social and economic goals for sustainable fishery management, including protection of the long-term health of the resource and the optimization of yield. This policy will ~~use~~ **utilize** and improve upon the Council's existing open and transparent process ~~to of public involvement the public~~ in decision-making.

2.2.1 Management Objectives

Adaptive management requires regular and periodic review. Objectives identified in this policy statement will be reviewed annually by the Council. The Council will also review, modify, eliminate, or consider new issues, as appropriate, to best carry out the goals and objectives of this management policy.

To meet the goals of this overall management approach, the Council and NMFS will use the Alaska Groundfish Fisheries Programmatic Supplemental Environmental Impact Statement (PSEIS) (NMFS 2004) as a planning document. To help focus consideration of potential management measures, the Council and NMFS will use the following objectives as guideposts, to be re-evaluated, as amendments to the FMP are considered over the life of the PSEIS.

Prevent Overfishing:

1. Adopt conservative harvest levels for multi-species and single species fisheries and specify optimum yield.
2. Continue to use the **existing 2 million mt** optimum yield cap for the BSAI (~~as stated in current law~~) groundfish fisheries. (*NOTE: BSAI only; GOA objective unchanged.*)
3. Provide for adaptive management by continuing to specify optimum yield as a range.
4. ~~Initiate a scientific review~~ **Provide for periodic reviews** of the adequacy of F_{40} and adopt improvements, as appropriate.
5. Continue to improve the management of species through species categories.

Promote Sustainable Fisheries and Communities:

6. Promote conservation while providing for optimum yield in terms of **providing** the greatest overall benefit to the nation with particular reference to food production, and sustainable opportunities for recreational, subsistence, and commercial fishing participants and fishing communities.
7. Promote management measures that, while meeting conservation objectives, are also designed to avoid significant disruption of existing social and economic structures.
8. Promote fair and equitable allocation of identified available resources in a manner such that no particular sector, group or entity acquires an excessive share of the privileges.
9. Promote increased safety at sea.

*******NO COMMENTS ON INTERVENING SECTIONS*******

Promote Equitable and Efficient Use of Fishery Resources:

31. Provide economic and community stability to harvesting and processing sectors through fair allocation of fishery resources.
32. Maintain the license limitation program, **and modified** as necessary, and further decrease excess fishing capacity and overcapitalization by eliminating latent licences and extending programs, such as community or rights-based management, to some or all groundfish fisheries.
33. Provide for adaptive management by periodically evaluating the effectiveness of rationalization programs and the allocation of access rights based on performance.
34. Develop management measures that, when practicable, consider the efficient use of fishery resources taking into account the interest of harvesters, processors, and communities.

*******NO COMMENTS ON INTERVENING SECTIONS*******

Improve Data Quality, Monitoring and Enforcement:

38. Increase the utility of groundfish fishery observer data for the conservation and management of living marine resources.
39. **~~Improve the North Pacific Groundfish Observer Program, and consider ways to address the disproportionate costs associated with the current funding mechanism. Develop funding mechanisms that achieve equitable costs to the industry for implementation of the North Pacific Groundfish Observer Program.~~**
40. Improve community and regional economic impact costs and benefits through increased data reporting requirements.
41. Increase the quality of monitoring and enforcement data through improved **technological means**.
42. Encourage a coordinated, long-term ecosystem monitoring program to collect baseline information and compile existing information from a variety of ongoing research initiatives, subject to funding and staff availability.
43. Cooperate with research institutions such as the North Pacific Research Board in identifying research needs to address pressing fishery issues.
44. Promote enhanced enforceability.
45. Continue to cooperate and coordinate management and enforcement programs with the Alaska Board of Fish, Alaska Department of Fish and Game, and Alaska Fish and Wildlife Protection, the U.S. Coast Guard, NMFS Enforcement, International Pacific Halibut Commission, Federal agencies, and other organizations to meet conservation requirements; promote economically healthy and sustainable fisheries and fishing communities; and maximize efficiencies in management and enforcement programs through continued consultation, coordination, and cooperation.

6.2.1 Expected costs of groundfish management

Estimates of the costs of BSAI and GOA groundfish management are summarized in Table 6-1 below. For reasons discussed in the table, it has not been possible to make accurate estimates of exact expenditures on groundfish management, nor, in some cases, to distinguish between the two groundfish fisheries. An examination of the Table 6-1 suggests that the GOA and BSAI groundfish fisheries appear to cost the U.S. in excess of \$60 million, annually, in management and related research efforts. A larger share of this appears to be spent in the BSAI than the GOA.

A comparison of the costs reported in this section with estimates of revenues generated by the groundfish fisheries does not constitute a cost-benefit analysis of this management effort. There are a number of reasons for this:

- The gross revenues from fishing are not a measure of the value of the commercial groundfish fisheries. On one hand, they ignore the private costs (the opportunity costs of labor and capital) used to catch and process the fish resources. On the other hand, they ignore the appropriate measure of benefits to consumers - the "consumers' surplus" or the value that consumers would be willing to pay for consuming the fish, over and above what they actually have to pay.
- Management costs are only imperfectly identified. Many costs are incurred for multiple purposes, and it is difficult to determine what costs were incurred for which function. Research into ecosystem dynamics may support groundfish management, as well as many other goals. Agency staff often had difficulty determining what portion of an agency budget was spent on groundfish management; staff were often unable to make the even more detailed cost assignment to GOA or BSAI management. This is a problem inherent in the nature of the joint or fixed costs that are often involved. There often simply is no logical way to make these allocations. Even when cost estimates are provided, they are generally very rough approximations.
- The comparison would imply that the management activity was related to the revenues in a specific way. However, specific causal relationships have not been analyzed here. Moreover, even if a causal relationship were implied, it would only be an evaluation of whether or not management at the given level had higher benefits than costs. It would not involve an evaluation of alternative approaches or levels of management. It would thus be of very limited use for policy decisions.
- The BSAI and GOA groundfish fisheries produce a range of social and ecological services beyond the commercial production and consumption of groundfish products. Groundfish support sport and subsistence fisheries and are an integral part of the North Pacific ecosystem. For example, groundfish provide forage for other fish species, seabirds, and marine mammals. The commercial values above only represent one "use" of the groundfish resources.

Table 6-1 presents the estimated cost of groundfish fishery management in a "typical" year in the period 2002-2006. Often the cost estimates are based on operations in the 2003 Federal year, the most recently completed fiscal year at the time the estimates were completed (May 2004). In some instances they incorporate projections; for example, the estimates for the NMFS Alaska Region's Restricted Access Management Program are estimates of anticipated costs following implementation of the new Crab Rationalization Program. Almost all of the agencies listed here have multiple functions. Often an activity - such as a Coast Guard patrol - will carry out a wide range of tasks in addition to supporting groundfish management. It has therefore often been impossible for agency staff to separate groundfish management costs

from overall expenditures, or to separate out GOA and BSAI groundfish management expenditures from groundfish expenditures. Where agency staff did not feel they had a basis on which to make an estimate, no estimate has been provided. In general, estimates are provided to the hundred thousand dollar level. This convention may reasonably approximate costs in some instances where budgets are relatively small and well defined criteria exist for making estimates. In other instances, the reader should be aware that they may provide an undue sense of precision. In general, these estimates are very rough.

The general procedure has been to get budget information from the various departments and to allocate that to groundfish, GOA groundfish, and BSAI groundfish drawing on agency expertise. There are a number of problems inherent with this process. Many activities produce multiple outcomes and it is difficult or impossible to assign their costs to one of those outcomes. Often there is no clear bright line between fishery management activities and other activities. In many cases, the appropriate criteria for allocating costs to one activity or another were not well defined. Much of this analysis depends on the judgement of agency analysts, and the use of different analysts for each agency means that differing judgements might have been used by different agencies. For all of these reasons, the reader should be aware that these estimates can only be treated as rough approximations.

Table 6-1 Estimated cost of fishery management by government agencies. Estimates are expressed in millions of dollars. Note: These estimates are rough approximations.

Agency	Function	Overall Alaska region expenditures	Groundfish fisheries	GOA	BSAI
North Pacific Fishery Management Council (Council)	The Council is one of eight regional councils established by the Magnuson Fishery Conservation and Management Act in 1976 (which has been renamed the Magnuson-Stevens Fishery Conservation and Management Act) to oversee management of the nation's fisheries. With jurisdiction over the 900,000 square mile Exclusive Economic Zone (EEZ) off Alaska, the Council has primary responsibility for groundfish management in the Gulf of Alaska (GOA) and Bering Sea and Aleutian Islands (BSAI), including cod, pollock, flatfish, mackerel, sablefish, and rockfish species harvested mainly by trawlers, hook and line longliners and pot fishermen. The Council also makes allocative and limited entry decisions for halibut, though the U.S. - Canada International Pacific Halibut Commission (IPHC) is responsible for conservation of halibut. Other large Alaska fisheries such as salmon, crab and herring are managed primarily by the State of Alaska. The Council budget is about \$3 million, annually. Staff reports that groundfish takes about 80% of their effort, with a 1 to 2 ratio of GOA to BSAI concerns.	\$3.0	\$2.4	\$0.8	\$1.6

Agency	Function	Overall Alaska region expenditures	Groundfish fisheries	GOA	BSAI
National Marine Fisheries Service (Alaska Region)		Estimates below by division			
Sustainable Fisheries Division (SFD)	The SFD implements the intent of the Council and NOAA Fisheries approved management programs consistent with the Magnuson-Stevens Act and other applicable law. SFD coordinates with the State of Alaska on the development of management programs, including halibut subsistence, and the International Pacific Halibut Commission on the development of regulations governing the Pacific halibut fishery off Alaska. SFD collects and manages catch data from North Pacific groundfish fisheries, develops and maintains information systems for integrating catch and observer data for estimating species specific total catch and uses those data to manage fisheries in an orderly and safe manner while maintaining harvest amounts within specified total allowable catch and prohibited species catch limits. SFD staff provides current and historic fishery statistics to other government agencies and the public, maintaining the confidentiality of protected statistics; and providing guidance to the Council and other management agencies on implementation and monitoring considerations of proposed management measures. The SFD administers and manages the Western Alaska Community Development Program so that allocations of groundfish, crab, and halibut quotas to the CDQ groups are accomplished consistent with applicable law and are harvested within established administrative and fishery management regulations to provide the maximum economic benefits to western Alaska communities.	\$3.6	\$2.9	\$0.9	\$2.0
Protected Resources Division (PRD)	The PRD is responsible under the Endangered Species Act (ESA) for consultations on Federal actions that may affect listed marine mammal species for which NMFS has trust responsibility. NMFS is also responsible for recovering listed protected species to the point that they are no longer in danger of extinction and may be removed from listing under the ESA.	\$2.2	\$0.8	No estimate provided	
Habitat Conservation Division (HCD)	The HCD carries out NOAA Fisheries' statutory responsibilities for habitat conservation in Alaska under the Magnuson-Stevens Fishery Conservation and Management Act, Fish and Wildlife Coordination Act, National Environmental Policy Act, Federal Power Act, and other laws. HCD has two principal programs: identification and conservation of Essential Fish Habitat (EFH) through fishery management, and environmental review of non-fishing activities that may adversely affect EFH or other habitats for living marine resources. HCD also supports habitat restoration projects in conjunction with the NOAA Fisheries Restoration Center. HCD has staff located in the Alaska Regional Office in Juneau and a field office in Anchorage.	\$1.6	\$0.4	\$0.2	\$0.2
Restricted Access Management (RAM)	RAM implements the Alaska Region's licensing and permitting programs. Specific duties within that broad mandate include calculation and issuance of Individual Fishing Quota (IFQ) permits in the halibut and sablefish IFQ program, together with annual issuance of related permits and licenses, cost recovery activities mandated by the Magnuson-Stevens Act, and determinations on applications for transfers, hired skippers, and other program elements. Additionally, RAM oversees implementation of several other licensing programs, including the North Pacific groundfish and crab License Limitation program (LLP), the Federal Fisheries and Processing Permit program, and vessel, processor, and cooperative permitting under the American Fisheries Act. During FY03, RAM assumed responsibilities for implementation of the subsistence halibut program.	\$1.9	\$0.4	\$0.3	\$0.1

Agency		Function	Overall Alaska region expenditures	Groundfish fisheries	GOA	BSAI
Other NMFS-AKR organizational units: Regional Directorate, Operations, Management & Information		Fulfills a variety of Regional leadership & coordination roles. Includes: workload competence, quality, and management. IT support, grants administration, administrative appeals. Finance & logistical support. NEPA coordination & compliance, preparation of NEPA, E.O. 12866, and Reg Flex analyses for other divisions.	\$6.2	\$3.5	\$1.0	\$2.5
Grants administered by the Alaska Region		The Alaska Region dispenses millions of dollars in grants for fishery management administration and research. Grants to the State of Alaska to assist with groundfish related activity are discussed below, under the line for the State of Alaska. In general, there are few other funds distributed for groundfish related projects. Considerable funding is used for marine mammal related projects, and in recent years large sums have been dispensed for Steller sea lion (SSL) research. In FY 2003, total marine mammal related grants were about \$13 million, of which about \$11 million were for SSL research. While much of this marine mammal work will have implications for groundfish management, it serves many other purposes as well, and cannot be considered primarily a groundfish management cost item. It is therefore not listed in the summary columns.	Grants to the state are described below. No additional significant grants specifically for groundfish.			
Alaska Fisheries Science Center (AFSC)			Estimates below by division			
Resource Assessment and Conservation Engineering Division (RACE)		The RACE Division conducts fishery surveys to measure the distribution and abundance of approximately 40 commercially important fish and crab stocks in the eastern Bering Sea, Gulf of Alaska, and marine waters off California, Oregon, and Washington. Data derived from these surveys are analyzed by Center scientists and supplied to fishery management agencies and to the commercial fishing industry.	\$17.7	\$13.6	\$5.8	\$7.8
Resource Ecology and Fisheries Management (REFM)		The REFM Division conducts research and data collection to support management of Northeast Pacific and eastern Bering Sea fish and crab resources. Groundfish and crab stock assessments are developed annually and used by the Pacific and North Pacific Fishery Management Councils to set catch quotas (based on assessments). Division scientists also evaluate how fish stocks and user groups might be affected by fishery management actions.	\$11.2	\$10.7	\$3.2	\$7.5
Auke Bay Lab (ABL)		ABL has housed federal fisheries research in Alaska since 1960. The laboratory is located 12 miles north of Juneau and consists of six research programs.	\$12.0	\$3.9	\$2.9	\$1.0
NOAA Office of General Counsel - Alaska Region		The NOAA General Counsel serves as the chief legal officer for the National Oceanic and Atmospheric Administration (NOAA) of the U.S. Department of Commerce. The position of the NOAA General Counsel was established in section 2(e)(1) of Reorganization Plan No. 4 of 1970 that created NOAA. The General Counsel is appointed by the Secretary of Commerce, with the approval of the President. The Office of the General Counsel provides legal service and guidance for all matters that may arise in the conduct of NOAA's missions. The Office of the Alaska Regional Counsel (GCAK) is co-located with the Alaska Region of the NOAA National Marine Fisheries Service (NMFS) in Juneau, Alaska. GCAK provides legal advice and assistance on issues related to the administration of NOAA programs in Alaska.	\$2.0	No estimates provided		

Agency	Function	Overall Alaska region expenditures	Groundfish fisheries	GOA	BSAI
<p>NOAA Office of Law Enforcement - Alaska Region</p>	<p>NOAA Fisheries Office for Law Enforcement is dedicated to the enforcement of laws that protect and conserve our nation's living marine resources and their natural habitat. NOAA Fisheries special agents and enforcement officers have specified authority to enforce over 100 legislative acts under 32 statutes, as well as numerous treaties related to the conservation and protection of marine resources and other matters of concern to NOAA. These are projected FY2004 costs. They do not include costs of sablefish IFQ enforcement. IFQ halibut and IFQ sablefish enforcement were so interlinked, staff was unable to break out the costs. Total IFQ enforcement expenditures were projected to be \$1.73 million.</p>	<p>\$5.0</p>	<p>\$2.4</p>	<p>\$1.8</p>	<p>\$0.6</p>
<p>United States Coast Guard - 17th District (USCG)</p>	<p>The Coast Guard supports the groundfish fisheries by providing at-sea enforcement of all domestic fishery regulations. The numbers provided cannot capture the accurate cost of domestic fishery enforcement. Because all Coast Guard ships and aircraft are multi-mission platforms, counting all fishery resources hours expended will overestimate the cost. The Coast Guard does not conduct patrols that strictly examine fishery regulations nor does any boarding conducted by the Coast Guard look only for compliance with fishery regulations. All federal laws and regulations are enforced on every boarding. Because of that, the true cost of at-sea enforcement is something less than the number provided but a more accurate number is intangible. Many of the resource hours used to build these numbers would have been conducted in the absence of FMP requirements for enforcement. Such patrols would enforce safety regulations and/or drug laws, and interdict alien migration. Currently all of these are being enforced concurrently with fishery regulations. The numbers provided include resources from the Coast Guard budget in Alaska and the Pacific Area headquarters budget. This is necessary because some Coast Guard ships patrolling in Alaska come from the lower 48 or Hawaii, and are not funded from the Alaskan Coast Guard budget. The numbers are therefore not conducive to comparing amount spent on enforcement in Alaska to overall the Coast Guard budget in Alaska.</p>		<p>< \$40.2</p>	<p>< \$13.9</p>	<p>< \$26.3</p>
<p>Alaska Department of Fish and Game (ADF&G)</p>	<p>The groundfish fisheries in the EEZ are a source of jobs and income for many residents of Alaska; groundfish stocks and fishing operations move across the line dividing state from federal jurisdiction; a large proportion of groundfish harvests from the EEZ are delivered to state ports and are recorded on state fish landings records. For all these reasons, the State of Alaska has a significant role in the management of groundfish stocks and fisheries in the EEZ. The state spends money to support the Council process. State managers are particularly important in the management of the demersal shelf rockfish fishery in the eastern GOA. The state spends money on port sampling of groundfish landings, collecting landings records, and data processing and analysis of landings records. The Alaska Board of Fisheries interacts with the Council and considers management proposals to better coordinate federal and state regulations. State ADF&G offices provide local sources of information on EEZ management rules for the public. A significant part of the state's contribution is supported with federal funding. The figure for groundfish represents the value of federal grants awarded to the state. This understates ADF&G expenditures.</p>		<p>>\$2.5</p>	<p>No estimates provided</p>	

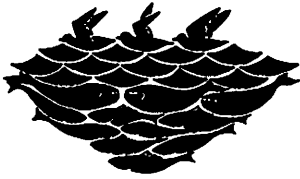
Agency	Function	Overall Alaska region expenditures	Groundfish fisheries	GOA	BSAI
Other agencies of the State of Alaska	The Alaska Commercial Fisheries Entry Commission processes landings records and Commercial Operators' Annual Reports reports and is an important source for price information for shoreside landings; the Alaska Department of Commerce monitors CDQ group activity and is involved in the process of allocating CDQ among the groups; the Alaska Division of Measurement Standards checks scales for shoreside plants.	No estimate provided			
Fish and Wildlife Service (USFWS)	A representative of the USFWS serves on the Council and on the Ecosystem and Steller Sea Lion Mitigation committees. The USFWS is also represented on the Groundfish Planning Team. USFWS seabird and marine mammal expertise help provide a broader ecological perspective on fisheries management. In addition to long-term seabird and marine mammal population monitoring programs in the GOA and BSAI, USFWS staff are actively engaged with industry and NMFS to develop strategies and technologies to reduce the incidental take of seabirds in groundfish fisheries.	No estimate provided			
Alaska Fisheries Information Network (AKFIN)	AKFIN is a cooperative data program of the Pacific States Marine Fishery Commission, Alaska Department of Fish and Game, Commercial Fisheries Entry Commission, North Pacific Fisheries Management Council, and NOAA. AKFIN transfers, analyzes, and processes agency fishery data for reporting. AKFIN integrates and aggregates all state and federal harvest and value to produce data sets for FMP analyses and reports such as <i>Fisheries of the US</i> .	\$0.8	\$0.7	\$0.4	\$0.3
North Pacific Research Board (NPRB)	The NPRB's mission is to develop a comprehensive science program of the highest caliber to enhance understanding of the North Pacific, Bering Sea, and Arctic Ocean ecosystems and fisheries. It conducts its work through science planning, prioritization of pressing fishery management and ecosystem information needs, coordination and cooperation among research programs, competitive selection of research projects, increased information availability, and public involvement. The NPRB will seek to avoid duplicating other research. The NPRB expects to support \$5 to \$6 million in new research each year. Its annual administrative budget is about \$0.85 million budget. The groundfish estimate includes NPRB 2003 expenditures for groundfish projects already funded, matching funds provided by grantees, and a third of the agency's annual budget. Costs associated with the NPRB may also be reflected in budgets for other agencies. For example, the ABL has used funds from the NPRB for Aleutian Islands coral investigations. The NPRB reports the \$0.8 was expended on this project in 2003, and that there were \$0.3 in matching funds.		\$5.5	Not estimated	
Costs incurred by the private sector	The private sector incurs costs that could fairly be described as management costs. These include the costs of the paperwork associated with the management system, the private costs associated with the observer program, the costs of operating various cooperative or CDQ catch management programs, and the costs of participating in the Council and regulatory processes ¹ .	for paperwork:	\$3.7		
		for observers:	>\$10.8	> \$1.1	> \$9.7

¹ The line between the costs of management and the costs associated with advocacy in the Council process, or with the normal management of an independent business, can be hard to draw. Some of the more important components of this cost item include:

- Costs incurred by private citizens, fisheries organizations, environmental organizations, and other private parties for participation in the Council process.
- Costs of meeting observer requirements (about \$10.8 million per year - using 2002 observer days and a cost of \$365/day). These provide a low estimate of the total cost of the observer program to fishing operations because fishing operations incur economic and operational impacts that are not directly reflected in the money they must spend on observer coverage. Fishing vessel operators may have to alter their travel plans and schedules to pick up or drop off observers; the observers take up limited space on vessels. Provisions must be made to accommodate the necessary work of the observer on deck (e.g., observing gear setting and retrieval, recording and sampling of catch and bycatch).

The observer also occupies "living space" aboard, which otherwise could have housed additional crew members. These operational impacts may be reflected in both increased operating expenses and reduced harvests and revenues. It is not possible, with available information, to quantify these effects, but they may represent a substantial additional cost of operation.

- CDQ groups have significant responsibilities for managing target and non-target quotas. This quota management function may involve personnel and data processing contracts. AFA cooperatives similarly are involved in quota management.
- CDQ groups and AFA cooperatives, and other fishermen, contract with private firms to provide fishing companies with rapidly updated information about the location of PSC bycatch hotspots. Fishing companies are then able to alter their fishing behavior so as to avoid areas with high PSC bycatch. By reducing PSC bycatch, companies are able to extend fishing seasons and avoid other constraints on fishing activity.
- NMFS collects fees from fishermen to offset the costs of managing sablefish IFQ programs. In 2003, NMFS collected an estimated \$1.0 million in sablefish cost recovery fees. These costs are already reflected in NMFS spending described above, and should not be counted a second time. However, they do represent a management cost incurred by industry, and are reported here to capture this distributive effect.



Alaska Marine Conservation Council

Box 101145 • Anchorage, Alaska 99510
(907) 277-5357 • (fax) 277-5975
amcc@akmarine.org • www.akmarine.org

AGENDA C-2
JUNE 2004
Supplemental

June 1, 2004

Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 W. 4th Avenue, Suite 306
Anchorage, AK 99501-2252

**RE: Agenda Item C-2; Alaska Groundfish Fisheries DPSEIS – Development of
Timeline/ BSAI Rockfish**

Dear Chairman Madsen:

As the North Pacific Fishery Management Council (the Council) moves forward with implementing actions for the newly developed groundfish management policy, the Alaska Marine Conservation Council (AMCC) asks that the immediate timeline include plans for addressing Bering Sea and Aleutian Island (BSAI) rockfish. Addressing recognized concern for BSAI rockfish species and complexes is needed to meet the Council's management goals for preventing overfishing and reducing bycatch and waste. We request that the Council include in the PSEIS policy timeline, from the Fall of 2004 to the end of 2005, a process for considering new management actions designed to reduce and avoid rockfish bycatch and to address potential overfishing concerns.

The Council's scientific and statistical committee recognized the pressing need to address rockfish conservation issues during their October 2002 meeting, where they stated:

The SSC believes that rockfish assessment will become one of the critical stock assessment issues in the next few years. The combination of long-lived species, multiple species within an assessment group, issues of stock and species identification, insufficient information on abundance and life history, localized fishing pressure, limited movement and migration of adults, unknown larval dispersal patterns, habitat-specific associations, prior history of overexploitation (by Russian and Japanese trawlers in the 1960s), and limited ability to rebuild (only Gulf POP) creates fishery management difficulties unlike any species group...

The situation is analogous to the "other species" problem, in that some rockfishes fall within the highly vulnerable, low data scenario. **The recommendation that follows from consideration of that issue is that**

intensive data collection and alternate management measures are needed
[emphasis added].

There is not one simple way to address rockfish conservation. As the SSC notes, intensive data collection and alternate management measures are needed. The Council's current process for designating coral gardens and rockfish habitat as Habitat Areas of Particular Concern is a commendable step forward in addressing rockfish conservation issues. However, other management measures should also be considered in the immediate future.

Potential Overfishing:

Scientists with the Alaska Fisheries Science Center have noted that if certain rockfish species (most notably roughey and more infrequently, northern rockfish) were managed at a smaller geographic region that more closely matched their actual distribution, or as single species rather than in complexes, overfishing would have occurred numerous times in recent years (NPFMC 2001, NPFMC 2003).

Table 1. Catch of roughey rockfish (metric tons) in the Aleutian Islands that would have exceeded the allowable biological catch (ABC) and/or the overfishing level (OFL) if Aleutian Island roughey were managed as a single species and split from the Bering Sea.

Year	Aleutian Island Total Roughey Catch (mt)	Potential ABC/OFL (mt)
2002	252.11	230 (ABC)
2001	614.67	230 (ABC)
2000	255.54	239/319
1998	523.8	405/540
1997	957.99	440/587
1996	850.27	587/587
1994	750.71	632/632

Figure 1. Roughey rockfish are of particular concern since the population appears to be in a state of continual decline. The estimated biomass (t) dropped from 26,227 tons in the early 1980's to 10,379 tons in 2004 (NPFMC 2003).

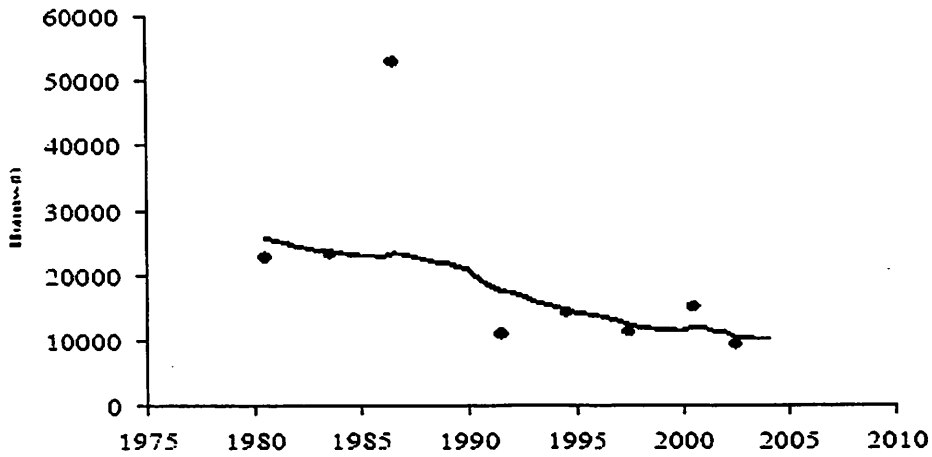
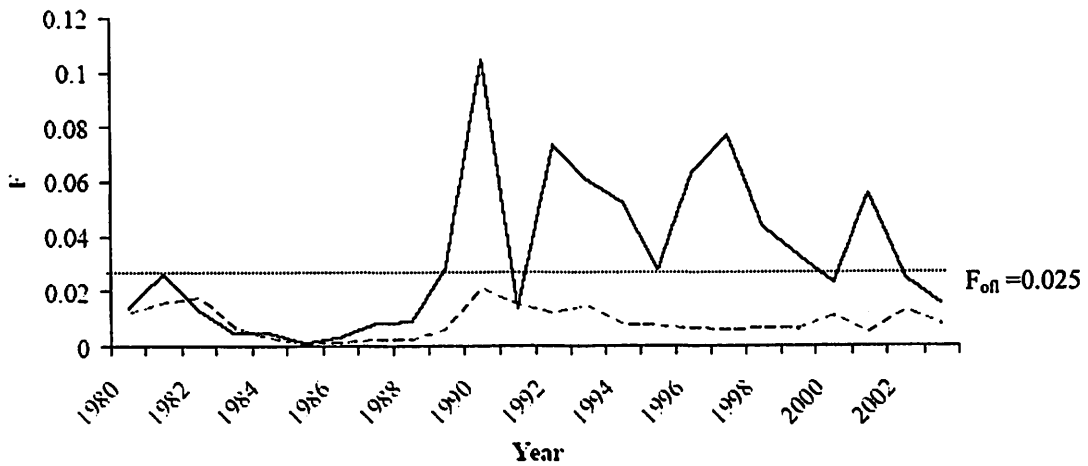


Figure 2. Estimated fishing mortality rate of BSAI roughey (solid line) and shortraker (dashed line) rockfish (NPFMC 2003). The solid line for roughey shows that the fishing mortality rate (F) has greatly exceeded the fishing rate that constitutes overfishing; F_{on} for Roughey = 0.025 (F_{on} = fishing mortality rate which, if applied constantly, would constitute overfishing).



Scientific Review of F_{40} :

One of the Council's management objectives for preventing overfishing is to, "initiate a scientific review of the adequacy of F_{40} and adopt improvements as appropriate." In the "Scientific Review of the Harvest Strategy Currently Used in the BSAI and GOA Groundfish Fishery Management Plans" (Goodman et al. 2002), the authors stated:

As suggested by Clark (2002), $F_{35\%}$ harvest rates may not be sufficiently conservative for stocks with very low productivity, such as rarely-recruiting and long-lived rockfish species. Lower rates, on the order of $F_{50\%}$ to $F_{60\%}$, may be more appropriate to balance yield and conservation objectives for such species. Another potential problem has to do with stock complexes. Because productivity of each species in the complex is likely to be different, a single $F_{\%SPR}$ proxy will not perform equally well for all stocks in the complex.

Bycatch and Waste:

Of serious concern is the continued high levels of bycatch and waste of rockfish in the BSAI fisheries. Rockfish bycatch is of concern in that it contributes to overfishing and because the discard rates and amounts have reached egregious levels. As part of the immediate timeline, the Council must address the continued high discard rates and amounts that occur in both trawl and longline fisheries. This would be consistent with the bycatch policy objectives to: "Continue and improve current incidental catch and bycatch management program"; "Develop incentive programs for bycatch reduction including the development of mechanisms to facilitate the formation of bycatch pools, VBAs, or other bycatch incentive systems" and; "Continue to manage incidental catch and bycatch through seasonal distribution of TAC and geographical gear restrictions."

Most of the BSAI sharpchin and northern rockfish are caught and discarded in the Atka mackerel trawl fishery. In 2001, over 12 million pounds of sharpchin and northern rockfish (mostly northern) were caught in the Atka mackerel fishery and 97.3% of those fish were discarded (FIS 2003). In 2002, 7.2 million pounds of sharpchin and northern rockfish were discarded in the Atka mackerel fishery (table 2). In comparison to all other BSAI trawl fisheries, the Atka mackerel fishery has the highest amounts of rockfish discards of all managed complexes.

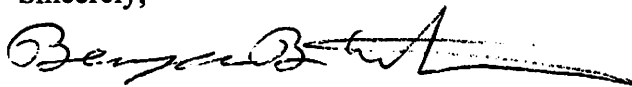
While vessels fishing with trawls accounted for the greatest discards of Pacific Ocean perch, sharpchin, northern, and "other rockfish", vessels fishing with longlines had the highest discards of shortraker and roughey rockfish, totaling 348,000 pounds in 2001 and 286,000 pounds in 2002. In comparison, the cumulative trawl discard of these species was 40,000 pounds in 2001 and 43,000 pounds in 2002. In 2001, 83% of the longline shortraker and roughey discards occurred in the Pacific cod fishery and in 2002, 66% occurred in the sablefish longline fishery (FIS 2003).

Table 2. 2002 Bering Sea/ Aleutian Island Rockfish Discards (lbs).

2002 Bering Sea/ Aleutian Island Rockfish Discards (lbs)			
	Atka mackerel fishery	All BSAI trawl fisheries combined	% Of all 2002 trawl rockfish discards that occurred in the Atka Mackerel fishery
Pacific Ocean Perch	2,130,000	3,473,000	61%
Sharpchin/ Northern Shortraker/ Rougheye	7,171,000	7,863,000	91%
"Other" rockfish	26,000	43,000	60%
	251,000	343,000	73%
Total	9,578,000	11,722,000	82%

It is critical that the Council move forward with implementing a new harvest strategy for rockfish species on an immediate timeline. A comprehensive approach should include intensive data collection and bycatch reduction measures, and take into consideration the recommendations made by Goodman et al. AMCC looks forward to working with the Council in the future to implement these measures and move Alaska groundfish management further along in meeting policy level goals and objectives.

Sincerely,



Ben Enticknap
Fishery Project Coordinator

FIS 2003. Discards in the North Pacific Groundfish Fisheries 2002. Fisheries Information Services. Alaska Marine Conservation Council, Anchorage, AK.

Goodman et al. 2002. Scientific Review of the Harvest Strategy Currently Used in the BSAI and GOA Groundfish Fishery Management Plans. Prepared for the North Pacific Fishery Management Council. Pg 62.

NPFMC 2001. Stock Assessment and Fishery Evaluation Report For the Groundfish Resources of the Bering Sea/ Aleutian Islands Region. November 2001. Pgs 11-13: 11-14. North Pacific Fishery Management Council, Anchorage, AK.

NPFMC 2003. Stock Assessment and Fishery Evaluation Report For the Groundfish Resources of the Bering Sea/ Aleutian Islands Region. November 2003. Pgs 653:680. North Pacific Fishery Management Council, Anchorage, AK.

DEPARTMENT OF COMMERCE

International Trade Administration

[A-351-832]

Carbon and Certain Alloy Steel Wire Rod From Brazil: Notice of Extension of the Time Limit for the Preliminary Results of Antidumping Duty Administrative Review

AGENCY: Import Administration, International Trade Administration, Department of Commerce.

ACTION: Notice of extension of the time limit for the preliminary results of antidumping duty administrative review.

EFFECTIVE DATE: June 2, 2004.

FOR FURTHER INFORMATION CONTACT: Carol Henninger or Constance Handley at (202) 482-3003 or (202) 482-0631, respectively; Office of AD/CVD Enforcement 5, Import Administration, International Trade Administration, U.S. Department of Commerce, 14th Street and Constitution Avenue, NW, Washington, DC 20230.

Time Limits

Statutory Time Limits

Section 751(a)(3)(A) of the Tariff Act of 1930, as amended (the Act), requires the Department of Commerce (the Department) to complete the preliminary results of an administrative review within 245 days after the last day of the anniversary month of an order/finding for which a review is requested and the final results within 120 days after the date on which the preliminary results are published. However, if it is not practicable to complete the review within these time periods, section 751(a)(3)(A) of the Act allows the Department to extend the time limit for the preliminary results to a maximum of 365 days after the last day of the anniversary month of an order/finding for which a review is requested, and for the final results to 180 days (or 300 days if the Department does not extend the time limit for the preliminary results) from the date of publication of the preliminary results.

Background

Companhia Siderúrgica Belgo Mineira, Belgo Mineira Participação Indústria e Comércio S.A. and BMP Siderúrgica S.A. (collectively, Belgo), a Brazilian producer of subject merchandise, requested an administrative review of the antidumping duty order on carbon and certain alloy steel wire rod from Brazil on October 31, 2003. On November 28,

2003, the Department published a notice of initiation of the administrative review, covering the period April 15, 2002, through September 30, 2003, (Initiation of Antidumping and Countervailing Duty Administrative Reviews, 68 FR 66799). The preliminary results are currently due no later than July 2, 2004.

Extension of Time Limit for Preliminary Results of Review

We determine that it is not practicable to complete the preliminary results of this review within the original time limit due to the complex issues that have been raised. Specifically, the Department is conducting a scope inquiry in conjunction with this review concerning exclusion language applicable to grade 1080 tire cord and tire bead quality wire rod. Therefore, the Department is extending the time limit for completion of the preliminary results until no later than November 1, 2004. We intend to issue the final results no later than 120 days after publication of the preliminary results notice.

This extension is in accordance with section 751(a)(3)(A) of the Act.

Dated: May 26, 2004.

Jeffrey May,

Deputy Assistant Secretary for Import Administration.

[FR Doc. 04-12427 Filed 6-1-04; 8:45 am]

BILLING CODE 3510-DS-P

DEPARTMENT OF COMMERCE

National Oceanic and Atmospheric Administration

[I.D. 052704A]

Mid-Atlantic Fishery Management Council Public Meeting

AGENCY: National Marine Fisheries Service (NMFS), National Oceanic and Atmospheric Administration (NOAA), Commerce.

ACTION: Notice of public meeting.

SUMMARY: The Mid-Atlantic Fishery Management Council's Atlantic Mackerel, Squid, and Butterfish Monitoring Committee will hold a public meeting.

DATES: The meeting will be held on Wednesday, June 16, 2004, beginning at 9 a.m.

ADDRESSES: This meeting will be held at the Mid-Atlantic Fishery Management Council Office at 300 S. New Street, Room 2115 Federal Building, Dover, DE 19904; telephone: 302-674-2331.

Council address: Mid-Atlantic Fishery Management Council, 300 S. New

Street, Room 2115, Federal Building, Dover, DE 19904.

FOR FURTHER INFORMATION CONTACT:

Daniel T. Furlong, Executive Director, Mid-Atlantic Fishery Management Council; telephone: 302-674-2331, ext. 19.

SUPPLEMENTARY INFORMATION: The purpose of this meeting is to make quota and management measure recommendations for the Atlantic mackerel, squid, and butterfish fisheries for the 2005 fishing year.

Although non-emergency issues not contained in this agenda may come before this group for discussion, those issues may not be the subject of formal action during this meeting. Action will be restricted to those issues specifically identified in this notice and any issues arising after publication of this notice that require emergency action under section 305(c) of the Magnuson-Stevens Fishery Conservation and Management Act, provided the public has been notified of the Council's intent to take final action to address the emergency.

Special Accommodations

This meeting is physically accessible to people with disabilities. Requests for sign language interpretation or other auxiliary aids should be directed to Deborah Donnangelo at the Council Office (see ADDRESSES) at least 5 days prior to the meeting date.

Dated: May 27, 2004.

Alan D. Risenhoover,

Acting Director, Office of Sustainable Fisheries, National Marine Fisheries Service.

[FR Doc. E4-1240 Filed 6-1-04; 8:45 am]

BILLING CODE 3510-22-S

DEPARTMENT OF COMMERCE

National Oceanic and Atmospheric Administration

[I.D. 052604B]

Fisheries of the Exclusive Economic Zone Off Alaska; Groundfish Fisheries Management in the Bering Sea and Aleutian Islands Management Area and the Gulf of Alaska

AGENCY: National Marine Fisheries Service (NMFS), National Oceanic and Atmospheric Administration (NOAA), Commerce.

ACTION: Notice of availability; request for comments.

SUMMARY: The North Pacific Fishery Management Council (Council) has submitted for Secretary of Commerce (Secretary) review Amendment 81 to the Fishery Management Plan (FMP) for the

Groundfish Fishery of the Bering Sea and Aleutian Islands Area (BSAI) and Amendment 74 to the FMP for Groundfish of the Gulf of Alaska (GOA). If approved, the amendments would implement a new management policy by revising the goals and objectives of the management of the groundfish fisheries. The goals and objectives would provide for a new ecosystem-based management framework that would serve as the management policy for the groundfish fisheries into the future. This action will promote the goals and objectives of the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act), the FMPs, and other applicable laws. Comments from the public are welcome.

DATES: Comments on Amendments 81 and 74 must be submitted by August 2, 2004.

ADDRESSES: Send comments to Sue Salvesson, Assistant Regional Administrator, Sustainable Fisheries Division, Alaska Region, NMFS, Attn: Lori Durall. Comments may be submitted by:

- Mail to P.O. Box 21668, Juneau, AK 99802;
- Hand delivery to the Federal Building, 709 West 9th Street, Room 420A, Juneau, AK;
- Fax to 907-586-7557; or
- E-mail to 8174-0648-

AS14@noaa.gov. Include in the subject line of the e-mail comments the following document identifier: 81-74 NOA. E-mail comments, with or without attachments, are limited to 5 megabytes.

Copies of Amendments 81 and 74 and the Programmatic Supplemental Environmental Impact Statement (PSEIS) for the Alaska Groundfish Fisheries may be obtained from the NMFS Alaska Region at the address above or from the Alaska Region website at <http://www.fakr.noaa.gov/sustainablefisheries/seis/default.htm>.

FOR FURTHER INFORMATION CONTACT: Melanie Brown, 907-586-7228 or melanie.brown@noaa.gov.

SUPPLEMENTARY INFORMATION: The Magnuson-Stevens Act requires that each Regional Fishery Management Council submit any FMP amendment it prepares to the Secretary for review and approval, disapproval, or partial approval. The Magnuson-Stevens Act also requires that the Secretary, upon receiving an FMP amendment, immediately publish a notice in the *Federal Register* that the amendment is available for public review and comment.

The Council prepared and the Secretary approved the FMP for Groundfish of the GOA in 1978 and the

FMP for the Groundfish Fishery of the BSAI in 1981. Both FMPs have been amended numerous times, and National Environmental Policy Act (NEPA) environmental documents have been prepared for each amendment.

In December 1998, NMFS issued an SEIS for the groundfish fisheries authorized by the FMPs. The U. S. District Court, Western District of Washington at Seattle (NO. C98-0492Z) ruled in *Greenpeace v. NMFS* that the 1998 SEIS was legally inadequate, and remanded the document to NMFS for further action consistent with the requirements of NEPA. After an extensive development and public review process, NMFS has completed a new PSEIS for the groundfish fisheries (see ADDRESSES). Amendments 81 and 74 are based on the preferred alternative in the PSEIS.

Amendments 81 and 74 were unanimously recommended by the Council in April 2004. If approved by the Secretary, these amendments would revise the goals and objectives of the FMPs to implement a new management policy for the groundfish fisheries. The new management policy would include consideration of community-based or rights-based management and ecosystem-based management principles that protect managed species from overfishing, and where appropriate and practicable, increase habitat protection and bycatch constraints. All management measures would be based on the best scientific information available. The fishery management goals are: (1) sound conservation of the living marine resources, (2) socially and economically viable fisheries and fishing communities, (3) minimal human-caused threats to protected species, (4) healthy marine resource habitat, and (5) ecosystem-based considerations in management decisions. To meet these goals and to focus the Council's consideration of potential management measures, Amendments 81 and 74 identify 45 objectives that are grouped under the following nine subjects: prevent overfishing; promote sustainable fisheries and communities; preserve the food web; manage incidental catch and reduce bycatch and waste; avoid impacts to seabirds and marine mammals; reduce and avoid impacts to habitat; promote equitable and efficient use of fishery resources; increase Alaska native consultation; and improve data quality, monitoring, and enforcement. The new management policy would begin to be implemented immediately upon Secretarial approval and would be applied to ongoing and future groundfish fisheries management. The

new management policy also would include adaptive management with regular and periodic reviews, including annual review of the objectives.

Public comments are being solicited on proposed Amendments 81 and 74 through the end of the comment period stated (see DATES). All comments received by the end of the comment period on the amendments will be considered in the approval/partial approval/disapproval decision. Comments received after that date will not be considered in the approval/partial approval/disapproval decision on the amendments. To be considered, comments must be received not just postmarked or otherwise transmitted by the close of business on the last day of the comment period.

Dated: May 26, 2004.

Alan D. Risenhoover,
Acting Director, Office of Sustainable Fisheries, National Marine Fisheries Service.
[FR Doc. 04-12437 Filed 6-1-04; 8:45 am]
BILLING CODE 3510-22-S

COMMITTEE FOR THE IMPLEMENTATION OF TEXTILE AGREEMENTS

Adjustment of Import Limits for Certain Cotton, Wool and Man-Made Fiber Textiles and Textile Products Produced or Manufactured in the Socialist Republic of Vietnam

May 27, 2004.

AGENCY: Committee for the Implementation of Textile Agreements (CITA).

ACTION: Issuing a directive to the Commissioner, Bureau of Customs and Border Protection.

EFFECTIVE DATE: June 2, 2004.

FOR FURTHER INFORMATION CONTACT: Naomi Freeman, International Trade Specialist, Office of Textiles and Apparel, U.S. Department of Commerce, (202) 482-4212. For information on the quota status of these limits, refer to the Quota Status Reports posted on the bulletin boards of each Customs port, call (202) 927-5850, or refer to the Bureau of Customs and Border Protection website at <http://www.cbp.gov>. For information on embargoes and quota re-openings, refer to the Office of Textiles and Apparel website at <http://otexa.ita.doc.gov>.

SUPPLEMENTARY INFORMATION:

Authority: Section 204 of the Agricultural Act of 1956, as amended (7 U.S.C. 1854); Executive Order 11651 of March 3, 1972, as amended.

**Public Testimony Sign-Up Sheet
and
Other Handouts Received**

PUBLIC TESTIMONY SIGN-UP SHEET FOR
AGENDA ITEM C-2 DPSEIS

	NAME (PLEASE PRINT)	AFFILIATION
1	Benjamin Entelberg	Alaska Marine Conservation Council
2	Donna Parker	Marine Conservation Alliance
3	Whit Sheard	The Ocean Conservancy
4	Janis Scoble	Oceana
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person "to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act.

Priority Objectives for Council action

for bringing groundfish management in line with the new management policy

NOTE: "→" indicates potential Council action; numbered bullets are objectives from the groundfish management policy**Prevent Overfishing:**

- no immediate action required, current management addresses objectives adequately

Promote Sustainable Fisheries and Communities:

- no immediate action required, current management addresses objectives adequately

Preserve Food Web:

- no immediate action required, current management addresses objectives adequately

Manage Incidental Catch and Reduce Bycatch and Waste:

14. Continue and improve current incidental catch and bycatch management program.
15. Develop incentive programs for bycatch reduction including the development of mechanisms to facilitate the formation of bycatch pools, VBAs, or other bycatch incentive systems.
16. Encourage research programs to evaluate current population estimates for non-target species with a view to setting appropriate bycatch limits as information becomes available.
17. Continue program to reduce discards by developing management measures that encourage the use of gear and fishing techniques that reduce bycatch which includes economic discards.
18. Continue to manage incidental catch and bycatch through seasonal distribution of TAC and geographical gear restrictions.
19. Continue to account for bycatch mortality in TAC accounting and improve the accuracy of mortality assessments for target, PSC bycatch, and non-commercial species.
20. Control the bycatch of prohibited species through PSC limits or other appropriate measures.
21. Reduce waste to biologically and socially acceptable levels.
 - review effectiveness of coop-managed PSC reduction (Objectives 14, 17)
 - explore mortality rate-based approach to setting PSC limits (Objective 14)
 - develop incentive programs for bycatch reduction (Objective 15)
 - consider reducing BSAI PSC limits (Objectives 17, 20, 21)
 - establish GOA PSC limits for salmon (managed by savings area), crab, and herring (Objectives 17, 18, 20, 21)
 - IR/IU for BSAI flatfish (Objectives 17, 21)
 - Council may wish to forward Objectives 16 and 19 as recommendations to NMFS

Avoid Impacts to Seabirds and Marine Mammals:

22. Continue to cooperate with USFWS to protect ESA-listed species, and if appropriate and practicable, other seabird species.
23. Maintain or adjust current protection measures as appropriate to avoid jeopardy to ESA-listed Steller sea lions.
24. Encourage programs to review status of endangered or threatened marine mammal stocks and fishing interactions and develop fishery management measures as appropriate.
25. Continue to cooperate with NMFS and USFWS to protect ESA-listed marine mammal species, and if appropriate and practicable, other marine mammal species.
 - trawl fleet to cooperate with USFWS to protect ESA-listed species (Objective 22)
 - review cumulative effects of opening AI pollock fishery on ESA-listed species (Objectives 23, 25)
 - Council may wish to forward Objective 24 as a recommendation to NMFS

Reduce and Avoid Impacts to Habitat:

26. Review and evaluate efficacy of existing habitat protection measures for managed species.
 27. Identify and designate EFH and HAPC pursuant to Magnuson-Stevens Act rules, and mitigate fishery impacts as necessary and practicable to continue the sustainability of managed species.
 28. Develop a Marine Protected Area policy in coordination with national and state policies.
 29. Encourage development of a research program to identify regional baseline habitat information and mapping, subject to funding and staff availability.
 30. Develop goals, objectives and criteria to evaluate the efficacy and suitable design of marine protected areas and no-take marine reserves as tools to maintain abundance, diversity, and productivity. Implement marine protected areas if and where appropriate.
- *review and evaluate efficacy of existing habitat protections (Objective 26)*
 - *designate EFH (Objective 27)*
 - *designate HAPC (Objective 27)*
 - *develop MPA policy with goals, objectives and criteria (Objectives 28, 30)*
 - *Council may wish to forward Objective 29 as a recommendation to NMFS*

Promote Equitable and Efficient Use of Fishery Resources:

31. Provide economic and community stability to harvesting and processing sectors through fair allocation of fishery resources.
 32. Maintain LLP program and modify as necessary, and further decrease excess fishing capacity and overcapitalization by eliminating latent licences and extending programs such as community or rights-based management to some or all groundfish fisheries.
 33. Provide for adaptive management by periodically evaluating the effectiveness of rationalization programs and the allocation of access rights based on performance.
 34. Develop management measures that, when practicable, consider the efficient use of fishery resources taking into account the interest of harvesters, processors, and communities.
- *develop rights-based management for fisheries (Objectives 31, 32, 34)*
 - *periodically evaluate the effectiveness of rationalization programs (Objective 33)*

Increase Alaska Native Consultation:

35. Continue to incorporate local and traditional knowledge in fishery management.
 36. Consider ways to enhance collection of local and traditional knowledge from communities, and incorporate such knowledge in fishery management where appropriate.
 37. Increase Alaska Native participation and consultation in fishery management.
- *develop analysis to increase use of local and traditional knowledge, and increase Alaska native consultation (Objectives 35, 36, 37)*

Improve Data Quality, Monitoring and Enforcement:

38. Increase the utility of groundfish fishery observer data for the conservation and management of living marine resources.
 39. Improve groundfish Observer Program, and consider ways to address the disproportionate costs associated with the current funding mechanism.
 42. Encourage a coordinated, long-term ecosystem monitoring program to collect baseline information and compile existing information from a variety of ongoing research initiatives, subject to funding and staff availability.
- *redesign the Observer Program funding mechanism (Objective 39)*
 - *Council may wish to forward Objectives 38 and 42 as recommendations to NMFS*
 - *no immediate action required for Objectives 40, 41, 43, 44, 45; current management addresses objectives adequately*

C-2 PGSEIS

The AP developed a workplan of the PGSEIS general priorities as follows and detailed in the attached motions.

1. Reduce and avoid impacts to habitat
2. Manage incidental catch and reduce bycatch and waste
3. Maintain or adjust current protection measures as appropriate to avoid jeopardy to ESA listed Steller Sea lions.
4. Prevent overfishing
5. Preserve food web
6. Improve data quality monitoring and enforcement

Motion passed 16/2

The following series of motions sets the specific priorities within the above list of general priorities.

1. Protection of Habitat

- A. Complete EFH action as scheduled
- B. Recommend to NOAA Fisheries increased mapping of benthic environment
- C. Develop and adopt definitions of MPS, marine reserves, etc.
- D. Review all existing closures to see if these areas qualify for MPAs under established criteria
- E. Evaluate effectiveness of existing closures

Motion passed 17/0

2. Bycatch Reduction

- A. Complete rationalization of GOA fisheries
- B. Complete rationalization of BSAI non-pollock fisheries
- C. Explore incentive-based bycatch reduction programs
- D. Explore mortality rate-based approach to setting PSC limits

Motion passed 18/0

3. Protection of Steller Sea Lions

- A. Continue to participate in development of mitigation measures to protect SSL including development of an EIS and participation in the ESA jeopardy consultation process
- B. Recommend to NOAA Fisheries and participate in reconsideration of SSL critical habitat

Motion passed 17/0

4. Prevent Overfishing

- A. Continue to participate in the development of "lumping and splitting" criteria
- B. Consider new harvest strategies for rockfish
- C. Set TAC at or < ABC

Motion passed 18/0

5. Ecosystem Management

- A. Revisit the calculation of OY caps
- B. Recommend to NOAA Fisheries and participate in the development and implementation of ecosystem indicators as part of stock assessment process

Motion passed 18/0

6. Improve Data Quality and Management

- A. Expand or modify observer coverage and sampling methods based on scientific data and compliance needs
- B. Develop programs for economic data collection that aggregate data
- C. Modify VMS to incorporate new technology and system providers

Motion passed 18/0

AP Prioritization of Objectives

#1. Reduce and Avoid Impacts to Habitat: (Protection of Habitat)

27. Identify and designate EFH and HAPC, pursuant to Magnuson-Stevens Act rules, and mitigate fishery impacts as necessary and practicable to continue the sustainability of managed species.

PA.1		PA.2	
Identify and designate EFH and HAPC	1A	Identify and designate EFH and HAPC	1A
		Determine extent of adverse effects from fishing, if any. Implement mitigation measures, if necessary.	1A
		Establish Aleutian Island management area to protect coral/live bottom habitats	

29. Encourage development of a research program to identify regional baseline habitat information and mapping, subject to funding and staff availability. 1B

28. Develop a Marine Protected Area policy in coordination with national and state policies.

PA.1		PA.2	
Executive Order 13158: Initiative establishes MPA Advisory Committee, MPA Center, MPA website, agency tasks and list of existing US MPAs			
Development and adoption of definitions of MPAs: marine reserves, marine fishery reserves, protected marine habitats etc.	1C		
Develop MPA efficacy methodology including program goals, objectives, and criteria, for establishing MPAs			

26. Review and evaluate efficacy of existing habitat protection measures for managed species.

PA.1		PA.2	
		Review all existing closures to see if these areas qualify for MPAs under established criteria. MPAs could include no-take reserves or have restrictions of specific gear types or specific fisheries or specific time periods	1D
		Evaluate effectiveness of existing closures	1E
		Develop appropriate inseason closure areas in GOA to address bycatch of halibut, salmon, and/or crab when PSC cap is reached for that species	
		Determine extent of adverse effects from fishing, if any. Implement mitigation measures, if necessary.	

30. Develop goals, objectives and criteria to evaluate the efficacy and suitable design of marine protected areas and no-take marine reserves as tools to maintain abundance, diversity, and productivity. Implement marine protected areas if and where appropriate.

PA.1		PA.2	
Develop MPA efficacy methodology including program goals, objectives, and criteria, for establishing MPAs	1E	Consider adopting 0-20% of BS, AI, GOA as MPAs and no-take marine reserves (e.g., 5% = no take, 15% = MPA) across a range of habitat types	
		Establish Aleutian Island management area to protect coral/live bottom habitats	

#2. Manage Incidental Catch and Reduce Bycatch and Waste: (Bycatch Reduction)

17. Continue program to reduce discards by developing management measures that encourage the use of gear and fishing techniques that reduce bycatch which includes economic discards.

PA.1		PA.2	
- Review effectiveness of coop managed PSC reduction			
- BSAI: Consider reducing PSC limits for herring, crab, halibut, and salmon to the extent practicable (0-10%) (for purposes of analysis will use 10%)	2B	- BSAI: Reduce PSC limits for herring, crab, halibut and salmon to the extent practicable (0-20% for analytical purposes)	
- GOA: Establish PSC limits on salmon (for example, NTE a 25,000 fish cap for Chinook and a 20,500 fish cap for 'other salmon'); establish PSC limits on crab and herring based on biomass or other fishery data	2A	- GOA: Establish PSC limits on salmon (for example, NTE a 25,000 fish cap for Chinook and a 20,500 fish cap for 'other salmon'); establish PSC limits on crab and herring based on biomass or other fishery data - GOA: consider reducing all PSC by 0-10%	2A
- IR/UU for Pollock and P. cod, yellowfin and rocksole (BSAI only), shallow water flatfish (GOA only)	2B	- Extend to other species as appropriate	

20. Control the bycatch of prohibited species through PSC limits or other appropriate measures.

PA.1		PA.2	
- Maintain existing inseason bycatch closures		- Evaluate effectiveness of existing closures. - Develop appropriate inseason closure areas in GOA to address bycatch of halibut, salmon, and/or crab when PSC cap is reached for that species	
- Maintain PSC limits for herring, crab, halibut, and salmon in BSAI; maintain PSC limit for halibut in GOA			
- BSAI: Consider reducing PSC limits for herring, crab, halibut, and salmon to the extent practicable (0-10%) (for purposes of analysis will use 10%)	2A 2B	- BSAI: Reduce PSC limits for herring, crab, halibut and salmon to the extent practicable (0-20% for analytical purposes) <i>Motion passed 18/0</i>	2B
- GOA: Identify salmon savings areas and establish PSC limits to manage - GOA: Establish PSC limits or other appropriate measures on salmon (for example, NTE a 25,000 fish cap for Chinook and a 20,500 fish cap for 'other salmon'); establish PSC limits or other appropriate measures on crab and herring based on biomass or other fishery data	2A	- GOA: Establish PSC limits on salmon (for example, NTE a 25,000 fish cap for Chinook and a 20,500 fish cap for 'other salmon'); establish PSC limits on crab and herring based on biomass or other fishery data - GOA: consider reducing PSC by 0-10%	
- For those PSC species where annual population estimates exist, explore a mortality rate based approach to setting limits	2D	- BSAI/GOA: For those PSC species where annual population estimates exist, explore a mortality rate-based and abundance based approach to setting limits	

32. Maintain LLP program and modify as necessary and further decrease excess fishing capacity and overcapitalization by eliminating latent licences and extending programs such as community or rights-based management to some or all groundfish fisheries.

PA.1		PA.2	
- Maintain existing restricted access programs (LLP and moratorium, AFA, IFQ sablefish, etc.)			
- Continue development of rights-based mgmt. on a fishery by fishery basis as needed including: (a) IFQs (b) Coops (i) community-based (ii) sector-based (c) CDQs (d) Other community-based programs (e.g. halibut community share program as applied to other species)		2A 2B	- Rationalize all fisheries (all GOA, BSAI non-pollock/sablefish) - Ensure CDQ program maximizes benefits in rural communities 2A 2B

21. Reduce waste to biologically and socially acceptable levels.

PA.1		PA.2	
- BSAI: Consider reducing PSC limits for herring, crab, halibut, and salmon to the extent practicable (0-10%) (for purposes of analysis will use 10%)		- BSAI: Reduce PSC limits for herring, crab, halibut and salmon to the extent practicable (0-20% for analytical purposes)	
- GOA: Establish PSC limits or other appropriate measures on salmon (for example, NTE a 25,000 fish cap for Chinook and a 20,500 fish cap for 'other salmon'); establish PSC limits or other appropriate measures on crab and herring based on biomass or other fishery data		- GOA: Establish PSC limits on salmon (for example, NTE a 25,000 fish cap for Chinook and a 20,500 fish cap for 'other salmon'); establish PSC limits on crab and herring based on biomass or other fishery data - GOA: consider reducing PSC by 0-10%	
- IR/UU for Pollock and P. cod, yellowfin and rocksole (BSAI only), shallow water flatfish (GOA only)		2B	- Extend to other species as appropriate

15. Develop incentive programs for bycatch reduction including the development of mechanisms to facilitate the formation of bycatch pools, VBAs, or other bycatch incentive systems.

PA.1		PA.2	
		- Incentive program for incidental catch and bycatch reduction, e.g. (a) Individual Bycatch Quota (b) Harvest Priority (10% of TAC reserved to reward clean fishing) (c) bycatch reduction standards established (d) Coop managed Harvest Priority (0-10% TAC or PSC reserved to reward clean fishing)	2C
- Maintain VIP program		- Repeal VIP program	
		- Repeal or modify MRAs and establish a system of caps and quotas	

14.

Continue and improve current incidental catch and bycatch management program.

PA.1		PA.2	
<ul style="list-style-type: none"> - Set group TAC for "other species". - Maintain species categories (target, "other species", PSC and non-specified species) 		<ul style="list-style-type: none"> - Develop criteria for 'splitting and lumping' of species in order to have a consistent approach over as wide a range as possible ('other species', rockfish, non-specified, etc.) - Consider breaking sharks and skates and additional groups out of "other species" group for TAC setting - Develop criteria to bring a non-specified species into a managed category 	
<ul style="list-style-type: none"> - Maintain current closed/ restricted areas such as Walrus Island closures, RKC Savings Area, Bogoslof, Pribilof Island closures, nearshore Bristol Bay closures, Kodiak Type I-III areas, EGOA trawl closures, closures for herring and salmon, Sitka Pinnacles, etc. 			
<ul style="list-style-type: none"> - Maintain existing inseason bycatch closures 		<ul style="list-style-type: none"> - Evaluate effectiveness of existing closures. 	
<ul style="list-style-type: none"> - Maintain PSC limits for herring, crab, halibut, and salmon in BSAI; maintain PSC limit for halibut in GOA 			
<ul style="list-style-type: none"> - Review effectiveness of coop managed PSC reduction 			
<ul style="list-style-type: none"> - For those PSC species where annual population estimates exist, explore a mortality rate based approach to setting limits 	2D	<ul style="list-style-type: none"> - BSAI/GOA. For those PSC species where annual population estimates exist, explore a mortality rate-based and abundance based approach to setting limits 	2D
<ul style="list-style-type: none"> - Maintain current bycatch and incidental catch restrictions. Full retention of DSR in SEO - Maintain coop managed 'hot spot' closures to control 			
<ul style="list-style-type: none"> - Maintain VIP program 		<ul style="list-style-type: none"> - Repeal VIP program 	
<ul style="list-style-type: none"> - Maintain MRAs 		<ul style="list-style-type: none"> - Repeal or modify MRAs and establish a system of caps and quotas 	

#3. Avoid Impacts to Seabirds and Marine Mammals: (Protection of SSL)

23. Maintain or adjust current protection measures as appropriate to avoid jeopardy to ESA-listed Steller sea lions.

PA.1		PA.2	
- B ₂₀ rule for prey species (pollock, P cod, Atka mackerel)	3A	- No change from PA.1	3A
- No directed fishery for forage fish (forage fish ban, Amendment 36/39)	3A	- No change from PA.1	3A
- Species TAC distributed spatially for some BSAI and GOA species	3A	- No change from PA.1	3A
- Maintain current closed/ restricted areas such as Walrus Island closures, RKC Savings Area, Bogoslof, Pribilof Island closures, nearshore Bristol Bay closures, Kodiak Type I-III areas, EGOA trawl closures, closures for herring and salmon, Sitka Pinnacles, etc.	3A		
- 2002 SSL closures: no fishing in Seguam Pass, 3nm no transit zones around rookeries, trawl and fixed gear closures in nearshore and critical habitat areas	3A	- Modify 2002 SSL closures and designation of Critical Habitat as appropriate scientific information becomes available	3A 3B
- Review cumulative impacts of opening AI pollock fishery	3A	- Modify AI SSL closures and designation of Critical Habitat as appropriate scientific information becomes available	3A

25. Continue to cooperate with NMFS and USFWS to protect ESA-listed marine mammal species, and if appropriate and practicable, other marine mammal species.

PA.1		PA.2	
- B ₂₀ rule for prey species (pollock, P cod, Atka mackerel)	3A	- No change from PA.1	3A
- No directed fishery for forage fish (forage fish ban, Amendment 36/39)	3A	- No change from PA.1	3A
- Species TAC distributed spatially for some BSAI and GOA species	3A	- No change from PA.1	3A
- Maintain current closed/ restricted areas such as Walrus Island closures, RKC Savings Area, Bogoslof, Pribilof Island closures, nearshore Bristol Bay closures, Kodiak Type I-III areas, EGOA trawl closures, closures for herring and salmon, Sitka Pinnacles, etc.	3A		
- 2002 SSL closures: no fishing in Seguam Pass, 3nm no transit zones around rookeries, trawl and fixed gear closures in nearshore and critical habitat areas	3A	- Modify 2002 SSL closures and designation of Critical Habitat as appropriate scientific information becomes available	3A
- Review cumulative impacts of opening AI pollock fishery	3A	- Modify AI SSL closures and designation of Critical Habitat as appropriate scientific information becomes available	3A

#4. Prevent Overfishing: (Prevent Overfishing)

5. Continue to improve the management of species through species categories.

PA.1	PA.2	
<ul style="list-style-type: none"> - Set group TAC for "other species". - Maintain species categories (target, "other species", PSC and non-specified species) 	<ul style="list-style-type: none"> - Develop criteria for "splitting and lumping" of species in order to have a consistent approach over as wide a range as possible ("other species", rockfish, non-specified, etc.) - Consider breaking sharks and skates and additional groups out of "other species" group for TAC setting - Develop criteria to bring a non-specified species into a managed category 	4A

1. Adopt conservative harvest levels for multi-species and single species fisheries and specify optimum yield.

PA.1	PA.2	
- Set ABC < OFL	- Set ABC < OFL	
- Sum of TACs has to be within OY range	- Set TAC =< ABC for all targets and "other spp." category	4C
- B ₂₀ rule for prey species (pollock, P.cod, Atka mackerel)	- No change from PA.1	
- Specify MSSTs for Tiers 1-3	- Initiate analysis of MSSTs for priority stocks based on the timeframe determined by additional availability of required resources taking into account SSC comments and concerns	
- Continue to use and improve current harvest control rules to maintain a spawning stock biomass with the potential to produce sustained yields on a continuing basis	- Improve collection of biological information necessary to determine spawning stock biomass estimates, particularly for species in Tier 4-5	
	- Develop appropriate harvest strategies for rockfish	4B
- Target species closures when harvest limit is reached	- No change from PA.1	
- Species TAC distributed spatially for some BSAI and GOA species	- No change from PA.1	

4. Initiate a scientific review of the adequacy of F₄₀ and adopt improvements as appropriate.

PA.1	PA.2	
- Conduct F ₄₀ review and adopt appropriate measures as necessary	- Develop, implement and update as necessary, procedures to account for uncertainty in estimating ABC, species-specific production patterns, and ecosystem considerations (<i>Motion passed 18/1/1</i>)	4B
	- Revisit the calculation of the OY caps to determine their relevancy to current environmental conditions and our knowledge of current stock levels	

#5 Ecosystem Management (Ecosystem Management)

2. Continue to use existing optimum yield cap for BSAI (as stated in current law) and GOA groundfish fisheries.

PA.1		PA.2	
- Sum of TACs has to be within OY range			
- OY specified as range for BSAI: 1.4- 2.0 mill MT and OY specified as range for GOA: 116,000 - 800,000 MT; BSAI OY cap: if the sum of TAC > 2 mill mt then TAC will be adjusted down		- Revisit the calculation of the OY caps to determine their relevancy to current environmental conditions and our knowledge of current stock levels	5A

11. Improve the procedure to adjust ABCs as necessary to account for uncertainty and ecosystem factors.

PA.1		PA.2	
- Develop ecosystem indicators for future use in TAC-setting	5B	- Develop and implement, as appropriate, criteria for using key ecosystem indicators in the TAC-setting process	5B
- Continue to use and improve current harvest control rules to maintain a spawning stock biomass with the potential to produce sustained yields on a continuing basis	5B		
		- Develop, implement and update as necessary, procedures to account for uncertainty in estimating ABC, species-specific production patterns, and ecosystem considerations	

4. Initiate a scientific review of the adequacy of F_{40} and adopt improvements as appropriate.

PA.1		PA.2	
- Conduct F_{40} review and adopt appropriate measures as necessary		- Develop, implement and update as necessary, procedures to account for uncertainty in estimating ABC, species-specific production patterns, and ecosystem considerations (<i>Motion passed 16/1/1</i>)	
		- Revisit the calculation of the OY caps to determine their relevancy to current environmental conditions and our knowledge of current stock levels	5A

#6 Improve Data Quality, Monitoring and Enforcement: (Improve Data Quality and Management)

39. Improve groundfish Observer Program, and consider ways to address the disproportionate costs associated with the current funding mechanism.

PA.1		PA.2	
- Continue existing Observer coverage or modify based on data and compliance needs		- Expand/modify observer coverage based on scientific data and compliance needs (applies to all vessels: <60' and > 60')	6A
- Modification should be scientifically-based (e.g., random placement, flexibility, variable rate)			
- Industry pays for observer deployment related costs		- Develop and implement alternate funding mechanisms (a) Federal funding (b) Research Plan (e.g. fee-based) <i>Motion passed 18/0</i>	6A

40. Improve community and regional economic impact costs and benefits through increased data reporting requirements.

PA.1		PA.2	
- Maintain current reporting requirements		- Develop programs for mandatory economic data collection while protecting confidential information	6B
(a) AFA requirement that all CPs and motherships to weigh all pollock catch on NMFS approved scales			
(b) CDQ requirement that all CDQ groundfish catch is to be weighed on NMFS-approved scales		- Explore programs that collect, verify, then aggregate economic data through independent third party (accounting firm/other) while protecting confidential information on an individual/firm basis	
		- Collect and verify aggregate economic data through independent third party (e.g. accounting firm)	

41. Increase the quality of monitoring and enforcement data through improved technological means.

PA.1		PA.2	
- Maintain mandatory VMS requirement for Atka mackerel, p.cod, and pollock fleets		- Modify VMS to incorporate new technology and system providers	6C

Handout AP C-2(b) Rpt
6/10/04 9am DRAFT

DRAFT

C-2 (b) Groundfish FMP Revisions

The AP recommends the Council update the current FMP drafts for review over the summer and final action in October. *Motion passed 16/0.*

The AP recommends the Council adopt changes 1-11 to the BSAI FMP, as suggested by staff. Motion passed 14/0. Additionally, the AP recommends the Council incorporate the recommended changes 1-8 to the GOA FMP, as suggested by staff. *Motion passed 16/0.*

Further, the AP recommends the Council adopt changes recommended by staff on the BSAI Management Approach in the FMP as noted in Item C-2 (b)4. *Motion passed 16/0.*

The AP recommends the Council adopt draft language for section 6.2.1 for the BSAI and GOA FMPs. *Motion passed 16/0.*

6/10/04 8:55a
C-2 SSC Rpt

**DRAFT
MINUTES
SCIENTIFIC STATISTICAL COMMITTEE
June 7-9, 2004**

The Science Statistical committee met June 7-9, 2004 at the Benson Hotel in Portland, Oregon.
Members present:

- | | | |
|---------------------|--------------------------|---------------|
| Rich Marasco, Chair | Gordon Kruse, Vice Chair | Keith Criddle |
| George Hunt | Doug Woodby | Ken Pitcher |
| Sue Hills | Terry Quinn | Franz Mueter |
| Farron Wallace | Pat Livingston | Steve Hare |
| David Sampson | Seth Macinko | |

C-2 DPSEIS

The SSC received staff presentations by Diana Evans and Steve Davis on this agenda item. No public testimony was received.

C-2 (a) Develop workplan for addressing management policy actions

The SSC considered the research needed to implement PSEIS policy objectives in the preferred alternative and identified the following high priority research items:

- Continued work to define and implement an improved system for non-target species management including observer-related issues,
- More effort by stock assessment scientists to incorporate ecosystem considerations into individual stock assessments,
- Research to define ecosystem-level reference points, which would necessitate improvements to predator-prey data and multi-species and ecosystem models and improved links to bottom-up processes,
- Research to evaluate present OY ranges, MSSTs for priority stocks, improvements in spawning stock biomass estimates for species in Tiers 4-5 and continued evaluation of harvest policies,
- Programs to review status of endangered or threatened marine mammal stocks and fishing interactions, and
- Research program to identify regional baseline habitat information and mapping.

C-2 (b) Groundfish FMP revisions

The SSC commends staff on their efforts to standardize the outline and format of different FMPs. The revised FMPs provide well structured and readable documents with excellent sections on the most pertinent characteristics of major stocks, fisheries, and fishing communities. While originally intended as a housekeeping amendment, the SSC concurs with others that this is a good time to review the document in its entirety and make changes as necessary. The majority of SSC concerns were in regard to definitions and specifications of OY, MSY, TAC, ABC, overfishing definitions, and harvest control rules in sections 3.2.1 and 3.2.2 of the FMP. Because of the importance of these issues, the SSC wishes to conduct a more thorough review of these sections before final action is taken. To this end, a SSC subcommittee consisting of Rich Marasco (chair), Terry Quinn, Gordon Kruse, Pat Livingston, Franz Mueter, and Farron Wallace was established and will conduct a review prior to the next council meeting.

In addition, the SSC noted a number of issues that may require either substantive changes or minor reorganization. The SSC recommends that the following changes be performed and a thorough review of the FMPs and language be conducted before final action.

- A rewrite of the procedures for setting TACs to clarify the Council process for annual TAC-setting and the role of the SSC in the Council process (see also specific suggestions below).
- An expansion of section 3.10 on Council review of the FMP. Currently, this section singles out management objectives (3.10.2), EFH components (3.10.3), and PSC catch limits (3.10.3, BSAI only) for periodic review. However, periodic review of all critical components of the plan should be performed on a regular basis. The SSC suggests that a schedule be developed to specify when, how often, and by whom other components of the FMP are reviewed, including MSY/OY definitions and specification, overfishing criteria, procedures for setting TACs, stock definitions, restrictions, and monitoring and reporting requirements.
- If possible, a mechanism to update section 4.1.2 on the status of stocks should be developed. Staff noted that any changes require an amendment to the FMP. SSC suggested updating stock status on the NPFMC website and reference the website in the FMP.
- The amount of habitat information in the FMP far exceeds information on the biology and dynamics of stocks, which is far more relevant to current management. The SSC suggests, if possible, shortening detailed habitat information and deleting Appendix I unless required by law.
- Current MSY and OY definitions and specifications are outdated and confusing. Moreover, the current definition of OY in GOA FMP, section 3.2.1.1. (*[OY]..is prescribed as such on the basis of the MSY from such fishery, as modified by any relevant economic, social, or ecological factors*), is inconsistent with the MSA, which reads: ... *as reduced by any relevant economic, social, or ecological factors*. The SSC subcommittee will review modifications suggested by Grant Thompson (Notebook, Item C-2(b)2).
- The organization seems to be fitting for easily updating the appendices when new information arrives, though some more thought might be given to including sections of the SEIS that provide overviews of non-fishing and cumulative impacts or threats to resources and to more clearly outline the other institutional components that may be involved in managing human activities in these ecosystems and what the SEIS said were some of the most important threats that might need to be considered.

A number of minor modifications were suggested, including:

- Chapter 2.2, Management approach, lacks a clearly identified policy statement. The 3rd sentence in section 2.2 appears to contain the Council's key policy statement. The SSC suggests changing the sentence to read: "*The Council's policy is to apply judicious and responsible fisheries management practices, based on sound scientific research and analysis ...*" and to highlight or move this statement to the beginning of the policy section.
- As noted in SSC minutes from April 2004, the jurisdictional authority with regards to finfish managed by the State of Alaska should be more clearly identified. This is covered in some detail in section 5.4. We suggest including the current section 3.1.2.1 on state regulation of demersal rockfish assemblage under section 5.4 and inserting a general statement with regard to stocks managed jointly with the State or by the State of Alaska in section 3.1.2. A table listing the agency that has jurisdiction of each stock/area combination may be helpful.
- The SSC suggests providing a brief rationale for important quantities specified in the FMP. For example:
 - The TAC of the other species category is set to 5% of the combined TACs for target species without a clear justification
 - Parameter 'a' under Overfishing Criteria (3.2.2) is set to default value of 0.05 without rationale.

- Section 3.2.3.1 of the GOA FMP is confusing because it combines the rebuilding plan for POP with a general procedure for setting TACs. The SSC suggests deleting the discussion regarding rebuilding of POP stocks as well as adding a general procedure for setting TACs (steps 1-3 in section 3.2.3.1) to the BSAI FMP.
- Section 3.2.3.3 of the GOA FMP, which specifies a reserve amount of 20%, should be reconciled with Table ES-2, which specifies a reserve amount of 15%.
- Section 3.3.1 of GOA FMP, which states that vessels less than 26' will be exempt from LLP should be reconciled with Table ES-2 (vessels less than 32').
- GOA FMP has a section on vessel safety (3.8.3), which presumably should be in the BSAI FMP as well.
- Table ES-2 in the GOA FMP should include definition of MSY, as in BSAI
- Some of the species descriptions in the GOA FMP refer to BSAI region (e.g. distribution of rock sole) and should be updated to reflect life history of species in the GOA.
- Section 4.1.1 (GOA FMP): Rock sole is listed as single species, should be northern (*L. polyxystra*) and southern (*L. bilineata*) rock sole.
- GOA FMP, Tables D.1.b/c: replace BSAI in title with GOA
- Section 4.2.3.2 in BSAI was written for GOA, not BSAI, and should be deleted or updated.
- BSAI FMP, section 4.3.2 lists ex-vessel value of GOA groundfish catch (p.85), should be BSAI groundfish catch.
- Boiler plate language needs updating in some sections so that it reflects the present and not initial implementation of each amendment
- Need referencing of the $F_{40\%}$ review and inclusion of the historical review of the council process contained therein
- Description of fishing communities needs updating and AFSC sociologist Jennifer Sepez may have information on Alaskan fishing community profiles. It also seems non-Alaskan communities have been ignored.
- Sometimes it is made clear what the source of the information was while other times it is not, making it unclear how recent some of the information was.
- Insufficient consideration of the role of climate in influencing ecosystem processes and species production is included in the descriptive parts of the FMP dealing with climate.
- Elements required of Fishery Ecosystem Plans might also be included in these plans more explicitly.
- A listing of other FMPs that are in place in the region would also be informative to readers of these FMPs.

Differences between the two plans that should be minimized are:

- Table ES-2 for BS makes clear that non specified species are not included in OY but GOA does not
- Table ES-2 for BSAI does not include mention of the fishing year as GOA does in section on Time and area restrictions
- Table 3-1 in BSAI lists some main groups of nonspecified species, GOA has no mention of non specified species in its table
- OY definitions differ between the two FMPs. Definition of BSAI OY does not seem to match the way OY is implemented in BSAI (as a range in which individual ABCs are not exceeded) p11 BSAI, p12 GOA
- No TAC definition was included in the BSAI FMP, p11
- There was no mention of PSC limits in the TAC setting procedures of Section 3.2.3 of BSAI, p. 14
- GOA FMP has section 3.6.3.3 on size limits (p.31) which was not contained in BSAI FMP.

- Appendices: GOA FMP is missing a section on marine mammals, neither has a section on seabirds

Draft Motion Handout
C-2- 6/10/04 8:30am

Motion:

Task staff to prepare a discussion paper that evaluates the Aleutian Islands for designation as a special management area, or separation from the Bering Sea area, as a separate FMP. The paper will include a discussion of current biological, social, economic, and management issues specific to the AI area, as well as an overview of ongoing research in the AI, and provide recommendations relative to potentially developing an ecosystem-based plan for this region. The paper would also examine the need to alter FMP provisions and regulations which apply to both areas. This paper would be reviewed by the council in December or February, pending availability.

Justification:

- The PGSEIS preferred alternative bookend calls for possible designation of the AI as a special management area.
- There are indications that ecosystem-based plans will be required as part of the MSA reauthorization, and the AI may lend itself to development as a pilot program.
- Interest in separation of some fish TACs (cod, for example) from BS area.
- Unique oceanographic features of this area, as well as importance of this area to certain fish populations (e.g. rockfish).
- Concentration of Steller sea lions, and associated critical habitat, in the AI.