

M E M O R A N D U M

TO: Council, SSC and AP Members

FROM: Jim H. Branson  
Executive Director

DATE: December 4, 1980

SUBJECT: Bering Sea/Aleutian Islands Groundfish Fishery Management Plan

*ACTION REQUIRED*

1. *Review of schedule for implementation of the FMP; recommendations to NMFS.*
2. *Incidental catch of salmon and herring by foreign fleets; information on court action, NMFS action and Council action; recommendations for further action.*
3. *Review of cod DAH; recommendations for change.*

BACKGROUND

1. Implementation of the FMP

The expected implementation date of the FMP, January 1, 1981, will not be met. The Regional office of NMFS has prepared a the revised schedule for implementation.

2. Incidental Catch of Salmon

An update on the court suit brought by Nunam Kitlutsisti against the Secretaries of State, Commerce and Transportation to close INPFC areas I and II in the Bering Sea (Figure 1) will be provided by Patrick Travers, NOAA General Council.

A statement summarizing action being taken by National Marine Fisheries Service regarding incidental catch of salmon is appended as Attachment I. The PMP is being extended for 1981 (Federal Register notice, November 28, 1980) and comments will be accepted until December 28, 1980.

The Council amendment to the FMP includes the proposed time/area closure of areas I and II (Figure I). Council action on the amendment package will be necessary in February, 1981 so that the amendment can be implemented by winter of 1981. If the Council wishes to make recommendations regarding this time/area closure at this time, it could forward comments on the PMP to the Secretary.

The Council will receive a status report from the Prohibited Species Working Group on the management of incidentally caught species by foreign fleets in the Bering Sea. This working group was formed at the recommendation of the Scientific and Statistical Committee during the September meeting to address the issue of reduction of incidental catch in the high sea fisheries. Their report will consist of several papers prepared by scientists from NWAF center in Seattle and ADF&G offices in Anchorage and Juneau. The final report is expected to be presented to the Council at the February meeting to be reviewed with the amendment package.

### 3. Cod DAH

The DAH survey for 1981 was carried out by NMFS Regional Office, in Juneau, in September, 1980. The estimate was similar to DAH for 1980 at 24,265 mt (See Table 1, Attachment II). Subsequently, the estimated DAH was increased to 50,000 after a survey of the fleet and its markets on November 25, by Natural Resource Consultants, (Attachment II).

The Regional Office of NMFS, Juneau forwarded an amendment to the PMP which would increase the cod OY from 58,700 to 70,700 mt, (Proposed Rules, October 24, 1980). An additional amendment was submitted extending the PMP and increasing the cod reserve by 12,000 mt to 14,935 mt. Thus, the total amount in DAH and reserve for 1981 would be  $24,265 + 14,935 = 39,200$  mt, leaving 31,500 mt for allocation to TALFF.

Comments can still be made on the final regulation which will be published within the next week.

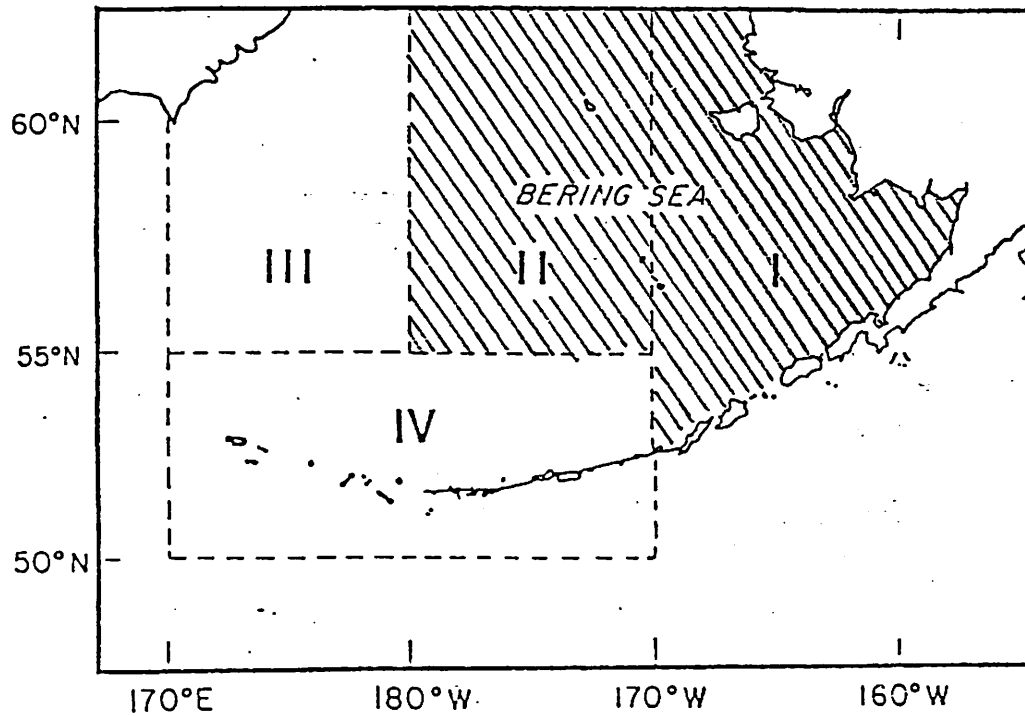


FIGURE I "Winter Salmon/Herring Savings Area"

Attachment I.

Letter from T. Leitzell to Jim Branson regarding PMP and court action on Salmon/Herring Savings area.



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
 NATIONAL MARINE FISHERIES SERVICE  
 Washington, D.C. 20235

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NOV 17 1980

Mr. Jim H. Branson  
 Executive Director, North Pacific  
 Fishery Management Council  
 P.O. Box 3136DT  
 Anchorage, Alaska 99510

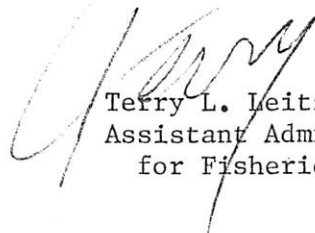
Dear Jim,

Please inform the North Pacific Council that Secretarial action to amend the PMP for the Trawl Fisheries and Herring Gillnet Fishery of the Eastern Bering Sea and Northwest Pacific Ocean has been under consideration since receipt of the Petition for a winter salmon savings area.

I share the concern of the Council and the petitioners regarding the incidental catch of salmon in the Bering Sea, and will seek to resolve the problem through the FCMA process. Like the Council, however, I will require a current analysis of all relevant factors before I can take any action.

On October 3, 1980, the National Marine Fisheries Service published an Advance Notice of Proposed Rulemaking which requests comments on the Petition. As soon as possible after the close of the comment period on October 31, 1980, I will decide what action, if any, should be taken. As you are aware, consideration is also being given to the alternative of delaying PMP action pending timely implementation of the FMP.

Sincerely yours,



Terry L. Leitzell  
 Assistant Administrator  
 for Fisheries

ACTION	ROUTE TO	INITIAL
	Exec. Dir.	<i>TL</i>
	Deputy Dir.	
	Assoc. Dir.	
	Exec. Dir.	
	Staff Asst. 1	
	Staff Asst. 2	
	Staff Asst. 3	
	Spec. Asst.	
	Sec./Clk.	
	Ess./Typist	

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**10TH ANNIVERSARY 1970-1980**  
**National Oceanic and Atmospheric Administration**  
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# North Pacific Fishery Management Council

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

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

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



Telephone: (907) 274-4563  
FTS 271-4064

October 10, 1980

Mr. Terry L. Leitzell  
National Marine Fisheries Service  
3300 Whitehaven Street, Page 2  
Washington, D.C. 20235

Dear Terry:

The Council has asked me to write to you and ask for expeditious consideration of the petition for an amendment to the PMP for the Trawl Fisheries and Herring Gillnet Fishery of the Eastern Bering Sea and Northeast Pacific Ocean submitted to you by 15 villages from the Yukon-Kuskokwim area and several advisory committees, fishermen's organizations, and village organizations, all represented by Norman A. Cohen and Donald C. Mitchell. The petition asks that the PMP be amended to close the groundfish regulatory areas (INPFC) numbers I and II from October 1, 1980 to March 31, 1981 in order to reduce the incidental catch of salmon taken by foreign groundfish trawlers. That same proposal is part of the current amendment package for the Bering Sea/Aleutian FMP, just beginning its public comment period prior to Council action in January or February.

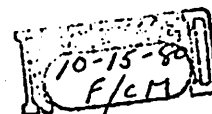
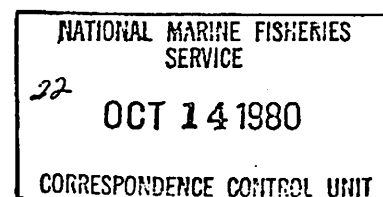
The Council has the Plan Development Team and the Scientific and Statistical Committee Subcommittee for the Plan analyzing the effect of such a closure, or other possible closures that would accomplish much the same thing -- that is a substantial reduction in the incidental take of Chinook salmon by foreign trawlers. The results of their analysis are not yet available, and probably will not be for another two months. Therefore, the Council is not prepared to make a recommendation on the petition at this time.

They do ask, however, that you expedite a decision on the petition, recognizing the seriousness of the problem which impacts a resource of great concern to the residents of Western Alaska. Salmon, particularly Chinook salmon, are probably the most important and valuable component of their commercial and subsistence fisheries. Any reduction in those stocks, or any fishery that tends to inhibit an increase in those stocks, affects them directly and immediately.

Sincerely,

  
Jim H. Branson  
Executive Director

cc: Mr. Robert W. McVey  
Mr. Norman A. Cohen



Attachment II.

1. Table on Cod, MSY, EY, OY, DAH, TALFF and Catch estimates for Gulf of Alaska and Bering Sea, 1978 to 1981.
2. Proposed change to DAH from Natural Resources Consultants; letter from D. Alverson to Jim Branson.

	GULF OF ALASKA				BERING SEA/ALEUTIAN ISLANDS			
	1978	1979	1980	1981	1978	1979	1980	1981
MSY/EY	34,800-69,120 <sup>1/</sup>	34,800-69,120 <sup>1/</sup>	88,000 <sup>2/</sup>	88,000 <sup>2/</sup>		58,700 <sup>1/</sup>	148,000 <sup>2/</sup>	160,000 <sup>2/</sup>
OY	34,800 <sup>3/</sup>	34,800 <sup>3/</sup>	60,000 <sup>4/</sup>	60,000 <sup>4/</sup>	58,000 <sup>3/</sup>	58,700 <sup>3/</sup>	70,700 <sup>4/</sup>	70,700-160,000 <sup>5/</sup>
DAH <sup>initial</sup> <sup>final</sup>	15,000 <sup>5/</sup> 15,500 <sup>5/</sup>	15,000 <sup>5/</sup> 4,000 <sup>5/</sup>	10,000 <sup>5/</sup> 6,558 <sup>5/</sup>	10,000 <sup>5/</sup>			24,265 <sup>6/</sup> 22,266 <sup>6/</sup>	24,265 <sup>6/</sup>
TALFF <sup>initial</sup> <sup>final</sup>	16,980 <sup>6/</sup> 25,100 <sup>5/</sup>	9,300 <sup>5/</sup> 29,300 <sup>5/</sup>	38,000 <sup>5/</sup> 53,442 <sup>5/</sup>	38,000 <sup>5/</sup>	56,500 <sup>6/</sup> 70,000 <sup>6/</sup>	56,500 <sup>6/</sup> 56,500 <sup>6/</sup>	31,500 <sup>6/</sup> 36,435 <sup>6/</sup>	
Foreign Catch	11,368 <sup>6/</sup>	13,274 <sup>6/</sup>	33,268 <sup>6/</sup>			37,849 <sup>7/</sup>	23,005 <sup>7/</sup>	
Domestic Catch	867 <sup>7/</sup>	1,658 <sup>7/</sup>	8,500 <sup>7/</sup>			587.2 <sup>8/</sup>	8022.5 <sup>8/</sup>	

<sup>1/</sup> FMP, 1978, 1979.

<sup>2/</sup> Low et al, condition of groundfish resource in GOA, INPFC, September 1980.

<sup>3/</sup> FMP, 1978, 1979.

<sup>4/</sup> Amendment #7, FMP, November 1979.

<sup>5/</sup> Pers. Comm. Janet Smoker, NMFS, Juneau, November 1980.

<sup>6/</sup> NMFS Catch Data Reports, (up to October 25, 1980)

<sup>7/</sup> Domestic catch and joint venture, pers. comm. Janet Smoker and Phil Rigby, from ADF&G Catch Reports and Best Blend Joint Venture Estimates.

<sup>1/</sup> FMP, 1979.

<sup>2/</sup> Proposed Amendment #1, October 1980.

<sup>3/</sup> FMP, 1979.

<sup>4/</sup> Amendment to PMP.

<sup>5/</sup> Proposed Amendment to FMP, October 1980.

<sup>6/</sup> Pers. Comm. Janet Smoker, NMFS, Juneau, November 1980.

<sup>7/</sup> NMFS Catch Data Reports, (up to Oct. 25, 1980)

<sup>8/</sup> ADF&G Groundfish Catch Data Report, August, 1980.



## VESSELS WHICH HAVE OR WILL ENTER COD FISHERY DURING 1981

VESSEL	APK SIZE (FEET)	OWNER(S)	PRODUCTION GOAL (TONS)	GEAR TYPE
Arctic Trawler	265	Trans Pacific	10,000	Trawl
Blue Ocean	160	Soren Sorenson	5,000	Trawl
American # 1	160	Petersen et al.	6,000	Trawl
Ocean Harvester	108	Ocean Spray Ltd.	1,500	Trawl
Great Pacific	128	Peter Pan	2,000	Trawl
Oceanic	120	Johansen	2,000	Trawl
Pacific Viking	108	Korry Ness	2,000	Trawl
Northern Aurora	150	M. Ness	2,000	Trawl
Intrepid	117	M. Ness	2,000	Trawl
Royal Atlantic	108	Johansen	2,000	Trawl
Royal American	108	Johansen	2,000	Trawl
Aleutian Mistress	129	Terry Sparks	2,000	Longline
Seattle Star	135	Skarr	2,000	Longline
Pavlov	164	Trans Pacific	3,000	Longline
Ocean Fury	108	Pedersen et al.	2,000	Trawl
Pacific Fury	108	"	2,000	Trawl
Nordic Fury	108	"	2,000	Trawl
Rainier	114	Uri	2,000	Trawl
Storm Petrel	123	George Fulton	2,000	Trawl

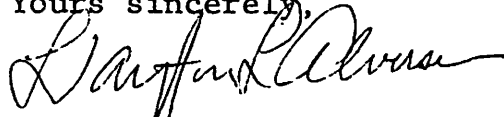
NRC/DLA/ems

November 1980

Senator Clem Tillion  
November 25, 1980  
Page 2

We hope you will bring this matter to the attention of the Council and alert them to the need to take early action to insure that U.S. fishermen have priority access to this resource. The intentions of the U.S. fleet to make a major effort to compete for the cod resources off Alaska may signal the beginning of a significant U.S. groundfish fishery. The U.S. fleet is most likely to prosecute the fishery in the waters from Kodiak Island west along the Aleutian Peninsula and adjacent to the Aleutian Islands. In view of the extent of the potential U.S. DAH in 1981 and the limited resource of the Gulf, consideration should be given to phasing out foreign cod fishing in the Gulf and within 20 nautical miles of the Aleutians. The Highliners Association will make a specific proposal to the Council before the January meeting for an OY aerial closure and reduction in TALFF.

Yours sincerely,



Dayton L. Alverson  
Managing Partner

Enclosure

cc: J. Branson  
B. Alverson  
D. Goldsmith



## NATURAL RESOURCES CONSULTANTS

4055 21st Avenue West • Seattle, Washington 98199, U.S.A. • (206) 285-3480

November 25, 1980

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

Dear Clem:

We have noted with considerable interest the rapid growth in numbers of U.S. vessels involved in harvesting Pacific cod in the Gulf of Alaska and adjacent to the Aleutian Islands. What started as an interesting experiment with the Arctic Trawler this year is rapidly becoming a major effort on the part of U.S. fishermen to enter the cod headed and gutted fillet and salted dry markets.

A number of fishermen have become increasingly concerned about the ability of the Council-NOAA management process to respond in a timely way to the increased U.S. commitment and commensurate greatly expanded DAH. In order that the Council may take this information into account in establishing the 1981 TALFF, reserves, etc., we have attached a Table listing vessels, which will enter the fishery, their approximate size (LOA), owners and production goals. All of these vessels, with the exception of the Storm Petrel, have purchased or ordered the necessary at-sea processing equipment, have markets and are committed to enter the cod fishery this year or early next year. The list is not complete but represents owners of vessels who have contacted our office.

We do not have a firm line on the 1980 U.S. Pacific cod production but the Arctic Trawler alone will have caught 5,000 tons. If we add in joint venture catches, several vessels which have and will fish for the salt cod market and the several shore-side operations, we may well exceed 15,000 tons in 1980. The estimated production goal of the fleet entering in 1981 exceeds 50,000 tons. If we add shore-side operations, joint ventures, and unlisted vessels which may enter the fleet, the figure becomes a substantial portion of the total OY for the Gulf and Bering Sea.

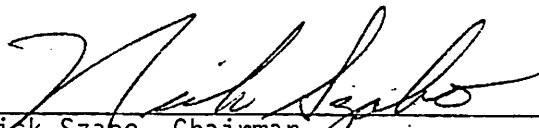
ALASKA BOARD OF FISHERIES  
Resolution 80-79 FB

REGARDING HIGH SEAS INTERCEPTION OF  
WESTERN ALASKA CHINOOK SALMON

- WHEREAS, the Alaska Board of Fisheries is responsible for the conservation and development of the fisheries resources of the state; and
- WHEREAS, the Fishery Conservation and Management Act of 1976 reserves to domestic fishermen all of the harvestable surplus of any species which can be taken by domestic fishermen; and
- WHEREAS, the chinook salmon runs of western Alaska are being fully utilized by the commercial and subsistence fishermen of that region; and
- WHEREAS, the commercial and subsistence fishermen of this region are dependent on the salmon resource as one of the mainstays of their economy and livelihood; and
- WHEREAS, high seas harvest of immature salmon of mixed stocks adversely impacts the State's management of these resources; and
- WHEREAS, estimates of foreign interception of western Alaska chinook by the Japanese mothership salmon fishery and the Bering Sea trawl fishery combined totaled 250,000 fish in 1980 and counting the effects of loss due to gillnet dropout and interception of an unknown proportion of western Alaska chinook from the Japanese landbased gillnet fishery (162,000 chinook caught in 1979) and the Gulf of Alaska trawl fishery (20,000 chinook caught in 1979) total high seas interception may well exceed 1/3 of the total catch from these stocks; and
- WHEREAS, the Board recognizes that matters relating to high seas salmon gillnetting by foreign vessels comes under the jurisdiction of the International North Pacific Fisheries Commission while the high seas foreign trawl fishery is regulated by the Department of Commerce under Fishery Management Plans prepared by the North Pacific Fishery Management Council; and
- WHEREAS, these entities and the Board share responsibility for the status of this resource and actions should be taken by each body as required to manage the portion of that fishery under their jurisdiction; and
- WHEREAS, the Alaska Board of Fisheries believes it imperative that these interceptions be reduced or eliminated insofar as possible; and
- WHEREAS, the Board understands that a scientific analysis of the effect of time/area closures and other alternatives to reduce catches of prohibited species by foreign trawl fisheries will be presented at the December Council meeting in Anchorage and that this analysis has been ongoing for over a year. The Board believes that it would be undesirable to delay taking action since this will result in further serious economic loss to domestic fishermen.

NOW THEREFORE BE IT RESOLVED the the Alaska Board of Fisheries request that the North Pacific Fishery Management Council take immediate emergency action to amend the Bering Sea/Aleutian Island Groundfish FMP in a manner to reduce or eliminate western Alaska chinook salmon interceptions in the Bering Sea trawl fishery; and

NOW THEREFORE BE IT RESOLVED that the Alaska Board of Fisheries requests that the Federal Government through both the NPFMC and INPFC support research to determine continent of origin of chinook salmon in the Japanese landbased drift net fishery and the Gulf of Alaska trawl fishery and such research as required to further study alternatives to reduce trawl interception of native Alaskan chinook salmon.

  
\_\_\_\_\_  
Nick Szabo, Chairman  
Alaska Board of Fisheries

ADOPTED: December 8, 1980  
Vote: 7-0  
GJ/CG

Anchorage, Alaska

# HALIBUT PRODUCERS COOPERATIVE

TELEPHONE 733-0120

(AREA CODE 206)

P.O. BOX 1235  
BELLINGHAM, WASHINGTON 98225

December 6, 1980

Mr. Jim Branson, Executive Director  
Mr. Clem Tillion, Chairman  
North Pacific Fishery Commission  
P.O. Box 3136 DT  
Anchorage, Alaska 99510

Sirs:

Halibut Producers Cooperative (HPC) is sincerely interested in seeing the Elimination of Foreign Trawl Fisheries in the Eastern Gulf of Alaska.

HPC has recently built a \$5 million processing plant at Sitka. One prime consideration for deciding to locate this plant in the Sitka area was the assumption that because of the Fisherman's Protective Act members would have access to the Gulf resources unhindered by foreign fishing vessels.

However, foreign trawl efforts, especially in regards to our long-lin bottom fishery, remain a problem to our fishermen. Species we are concerned with are primarily sablefish, salmon and halibut, but we are also concerned with true cod and other bottom species. We understand the incidental foreign trawl catch within this area included, among other species, 42,000 king salmon and 5,700,000 lbs. of halibut.

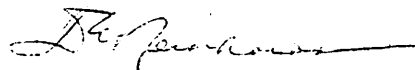
We are also concerned by the following:

- 1) The steady decline of both the size ratios and stock distribution of sablefish.
- 2) In view of stringent cutbacks in salmon and halibut quotas, we find the incidental catch to be intolerable.
- 3) The encroachment of the traditional U.S. longline fishery grounds by foreign trawlers.
- 4) Costly and expensive gear conflicts.

Thanks for your consideration in what we consider "survival" measures for our 494 members and Sitka plant.

Sincerely,

HALIBUT PRODUCERS COOPERATIVE



D.E. Reinhardt  
Manager

DER:gn

12-9  
went to  
Council &  
Board -  
need for  
staff

TESTIMONY BEFORE THE PUBLIC HEARING ON DRAFT AMENDMENTS TO THE  
BERING SEA / ALEUTIAN ISLAND GROUND FISH FISHERY MANAGEMENT PLAN

by  
Michael G. Stevens  
Marine Resources Co.  
Seattle, Washington

December 9, 1980  
Anchorage, Alaska

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Mr. Chairman, my name is Mick Stevens and I am the Manager of the International Division of Marine Resources Company. As some of you may be unfamiliar with Marine Resources I'd like to explain that we are a U.S. corporation established for and dedicated to the development of domestic fisheries for underutilized groundfish fishery resources in the North Pacific. During the calendar year 1980 we purchased from American fishermen more than 50,000 MT of fresh pollock, cod, yellowfin sole, Pacific whiting and other fish meal grade fish. Revenues to U.S. fishermen from these fisheries totaled over \$6 million for 1980. In terms of volume we are now the largest domestic buyers of bottomfish.

There are several comments we would like to make concerning the Bering Sea/Aleutian Island Groundfish Fishery Management Plan, the draft amendment package and its two attachments.

First of all, we feel that you as managers should have the maximum amount of flexibility possible in order to properly conserve and at the same time allocate to user groups the resources considered under this Plan.

In this regard, we feel that none of the three specific options as proposed provides for the necessary amount of flexibility to enable you to manage in a responsible manner. Certain components within each of the 3 options do reflect a positive approach to the management question. We would urge that an amendment package be constructed and adopted which contains the following positive features:

A) Establishing a reserve of 25% of the OY to assure that unanticipated needs of the domestic fishery can be met without exceeding OY and to provide in-season management flexibility to correct minor operational problems. This reserve would be withdrawn before allocations to DAH and TALFF are made.

B) If any reserves are to be released to TALFF they should be done in a gradual fashion such as 40% at beginning of month 4, 40% at beginning of month 6, and 20% at beginning month 8 with the provision that the Regional Director can holdback any or all of such re-allocation if the circumstances so dictate.

C) Estimates of domestic harvesting and processing capacity as well as their intent (which includes joint venture operations) should be made from the most recent data available. At a minimum, these sectors should be systematically surveyed before beginning of each fishing year.

D) We support changing the fishing year to begin January 1 and close December 31.



E) MSY, EY and ABC values for groundfish in the region during 1981 should be revised from 1979 figures taking into consideration the results of recent resource surveys conducted in the area in 1980.

F) We believe that management objectives of this Plan should specifically encourage participation in and the orderly development of domestic groundfish fisheries.

G) At the present time the Bristol Bay Pot Sanctuary and the Winter Halibut-Savings Areas are open to domestic trawling year-round on an experimental basis. We strongly urge the Council to leave these areas open to domestic trawling and thereby continue to give its support to the efforts of the pioneer domestic trawl fishermen who are in the very early stages of determining what specific domestic trawl fisheries may be viable in the future. American trawlers should not be excluded from grounds which must be given extensive operational and commercial study by the domestic industry. These two areas should continue to be designated in the new FMP as open for study and effort by domestic trawlers.

We don't feel it is reasonable to impose severe time/area restrictions on domestic trawlers in the Bristol Bay area to reduce incidental halibut catches when recent extensive surveys by the National Marine Fisheries Service show a more than doubling of biomass estimates for Pacific

halibut in the Bering Sea in 1979 over what 1975 surveys showed. With an increasing biomass the incidental catches of halibut may likewise increase as a direct result of higher availability of halibut. American trawlers deserve the opportunity to conduct operations and accumulate the most unbiased commercial fishery data ever made available for these areas. We feel any action to reclose these areas would be premature and could seriously stunt the development of needed domestic groundfish fisheries in this area.

Turning to the recommendations for controlling the incidental catch of prohibited species: Six options have been presented by the Plan Development Team for consideration. We believe that an effective way to inhibit incidental catches by the historically "dirty" fishing operations must be found, but not at the expense of "cleaner" operations with lower incidental rates. This seems necessary even more so at the present time as there is a wave of new domestic effort. Fishermen who are successful at minimizing their incidental harvests of prohibited species should not be penalized by the inability of others or the different nature of other fisheries. For this reason we do not feel Option 1, 2, 4 and 6 offer viable solutions. Economic disincentives (Option 3) and gear specific regulations (Option 5 - called Gear Restrictions) offer the clearest methods which would force "dirty" operations to clean up their act or face elimination from the grounds.

We therefore recommend Options 3 and 5 be given primary emphasis as methods to control the incidental catch of prohibited species.

Finally there is a proposed amendment to close Areas I and II in the Bering Sea to protect herring and salmon. We support the priority given subsistence fishermen in this region over herring and salmon as well as the rights we as Americans assume over all anadromous fish.

If the trawl interception of salmon is increasing, then the reasons for this must be analyzed. Is the abundance of salmon higher thereby naturally resulting in a higher incidental catch rate, or are there specific types of trawls or trawling techniques which are most consequential? Further, the trawl fishery appears to impact the coastal fisheries much less than other exclusively foreign efforts directed specifically on salmon by the Japanese High Seas Mothership Salmon Fishery and the Japanese Landbased Driftnet Fishery. From a management perspective, action should be taken to regulate an exclusively foreign fishery which targets on a specie controlled under United States law before any attempt is made to regulate (and subsequently negatively impact) a foreign or developing domestic fishery which targets on other species.

Clearly, not enough is known about the biomass and stock distributions of herring in the Eastern Bering Sea. Surveys of

spawning populations cannot adequately reflect total biomass, pre-spawning year class strengths, nor in times of adverse weather conditions can these limited surveys accurately determine the spawning biomass. A recent report on the status of the Eastern Bering Sea Herring Resource which was partly sponsored by the Alaska Department of Fish and Game concludes that "The total removal of herring by all nations since 1977 have probably been lower than at any time since 1960, except perhaps during the period 1965-1967."<sup>1</sup> Further, this same report notes that together with the great increase since 1977 of domestic commercial harvests of herring there has been a significant reduction in the allowable foreign catch.

Our conclusion, Mr. Chairman, is that a closure of the area and during the times proposed would not be a suitable action. The problem of interception of Western Alaska King Salmon should be solved through actions upon the exclusively foreign components which most significantly impact the resource. With regard to herring, we would suggest that a knee-jerk reaction by managers to a situation not sufficiently investigated or understood is not rationally appropriate and could prove very detrimental to the developing domestic intent to harvest groundfish species in the Bering Sea.

That concludes my comments. Thank you.

<sup>1</sup>Alverson, D.L. and Pruter, A.T. 1980. An Analysis of the Status of the Eastern Bering Sea Herring Resource. Sponsored study by Natural Resources Consultants. Seattle, Washington.