

North Pacific Fishery

Agenda Item 5, Dec 1977 Management Council

Elmer Rasmuson, Chairman
Jim H. Branson, Executive Director
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Post Office Mall Building

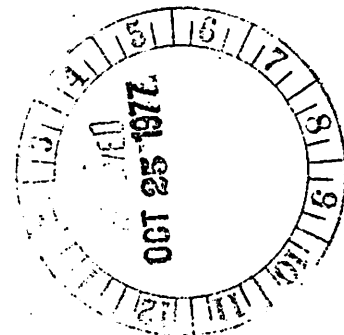


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October 21, 1977

Mr. Harold E. Lokken
Fishing Vessel Owner's Assoc.
Room 232, C-3 Bldg.
Fishermen's Terminal
Seattle, Washington 98119



Dear Harold:

Shortly after the last Council meeting (September 20-21) Steve Pennoyer gave me a briefing on the changes that the Council introduced into the Tanner Crab and Gulf of Alaska Trawl Plans. In both plans there were rather substantial changes from the earlier versions which were made by the Management Plan Development Teams. Such changes went directly to the Council for action and were not reviewed by the Scientific and Statistical Committee of the Council. Apparently a number of the Council members assumed that the SSC had reviewed the proposed changes and were in concurrence with them. Unfortunately, that is not the case and it is perhaps our fault for not having officially advised the Council that the SSC had not had the opportunity to review proposed changes.

This suggests that you, Mr. Branson and I need to sit down and more clearly define the procedures of plan development and the review process for both the advisory group and the SSC. If you feel it desirable we can, of course, call a special meeting of the SSC and draft formal comments to the Council on the changes, particularly that relate to the expected yield for biological catch of Bairdi and Opilio, as well as the change made in the yield value for blackcod and the established OY for this species. I realize that OY is primarily considered to be in the province of the Council but in this instance the OY was established on the basis of rebuilding the stock to levels which could produce the MSY.

Personally, I have a great deal of difficulty with the perception shown in the plan for rebuilding of stocks as it assumes a static model which does not appear to be the case for blackcod or any other species in the Northeast Pacific. It also assumes that 18,000 ton equilibrium value represents a substantial departure from MSY. As noted in my letter to Rasmussen on pollock, one should expect that the allowable biological catch should vary above and below the MSY value. If one were to apply the strategy of reducing the catch to a value lower than the equilibrium yield each time a stock size was less than the average established for MSY, it would not be possible to achieve MSY over time.

cc: Council (15)
Chairs: AP & SSC

My concern relates to establishing a policy that ultimately extends to the domestic fleet and/or which has questionable validity in terms of the underlying assumptions. Apparently we have assumed here that because the equilibrium yield is somewhat below MSY that the stock size has been driven down to a level that it can no longer produce the MSY even under good environmental conditions. The evidence for this, however, is not clear. Inasmuch as we cannot effectively differentiate between natural and man-imposed changes in stock size there is some legitimacy to act in a conservative manner as regards to establishing the OY value. However, from a biological perspective the consequence of reducing the catch from 18,000 tons (the Allowable Biological Catch) to 10,000 tons (OY) seems questionable. If we applied the same rationale and logic to many of our domestic fisheries it would call for a sharp curtailing of production any time the EY fell below the proposed MSY value rather than adjusting the Catch down as we have normally done in terms of anticipated stock productivity. It is a rather drastic management strategy that could lead to substantial underfishing rather than to achieving MSY. Of course in the end the Council must decide what constitutes an appropriate devaluation from ABC. In light of historical management practices and the models that I am familiar with, it would be difficult for the SSC to support a reduction to 10,000 tons. In addition, I do not see anything in the tabular material in the plan to support the rate of rebuilding of the stocks. That is, there is no analytical model upon which to make a judgment and the whole concept of rebuilding to achieve a certain size is unsupported in a biological or economic sense. The main point here, however, is that the SSC has not reviewed this action and is not in a position to support the shift on the basis of biological data submitted or referred to in the plan.

Sincerely,



Dayton L. Alverson, Chairman
Scientific & Statistical Committee
NPFMC

cc: J. Branson
All Members, SSC
D. McKernan