

Public Testimony

B-5 Steller Sea Lions

Bo Bricklemeyer, Greenpeace. They have submitted data and the request to include steller sea lions under endangered species act. Requested conservative action on the part of the Council, particularly in setting exploitation rates and harvest quotas for pollock.

C-3 Halibut Management

Perfenia Pletnikof, Ron Philemonof, St. Paul Island. Their proposal is a good program for them. They did not have anyone go out on oil charter clean-up and are still striving to develop their fishery. Prefer Alt. 2.

Bud Samuelson. The Pribilovians have demonstrated that they are able to take 70% of the quota and have had ample time to learn the fishery. Special consideration is no longer necessary.

John Bruce, DSFU. Support AP recommendation of status quo. Faced with shrinking resources, their fishermen are just as economically deprived as the Pribilovians. They have succeeded in harvesting 70% of the resource and special consideration should not be necessary.

Greg Williams, IPHC. IPHC staff is still completing a resource assessment. Stocks continue to decline in abundance and catch limits may be lower next year. IPHC staff recommendations not finalized yet but quota for 4C may be reduced for 1990. Suggested that a % of the quota be recommended rather than a poundage.

C-4 Domestic Observer Program

David Little, Pres., Clipper Seafoods. The size of a vessel is directly proportional to how much fish harvested; it's not fair that fixed gear vessels have to share the same economic burden as other vessels that harvest a much greater amount of the resource. Asked the Council to recommend that the Secretary of Commerce to take into consideration gear types in the implementation of the observer program; specifically, fixed gear vessels should be excluded from the 100% coverage group, based on the extreme economic impact.

Tyson Vogeler, observer. Expressed concern about the 30% coverage for shoreside trawlers; this figure was developed based on a model which assumed statistical randomness throughout the fleet. However, it's not going to be based on randomness, therefore the numbers are not going to represent truth. Also feels the program will not be as widely accepted because of the enforcement aspect. Observers are not trained to deal with the pressure and stress of enforcement and turnover may be higher than anticipated.

Michael Lake, Alaskan Observers. He still believes there will be an observer shortage when program goes on line in January. There should be some criteria for fairness in exemptions if observers are not available.

Brad Resnick, Aleutian Dragon Fisheries. Support observer program to monitor fishing but he and many others in shoreside processing feel that what has come out is not what the Council had in mind. Three vessels work for him requiring 30% coverage; now it looks like there will be and additional

30% coverage in the plant. All fish delivered to his plant will be from observed vessels and this constitutes double coverage in their case.

Paul MacGregor, AFTA. Supports the program but under the current plan vessels under 50' are exempt. He suggested maintaining the flexibility of putting an observer on these vessels if necessary.

Steve Hughes/Chris Blackburn. They have heard that funds which were lobbied for for this region's observer coverage may be diverted elsewhere. Industry here worked together to provide funding and now feel they're being penalized by funds going to other parts of country where industry is not willing to pay for coverage.

Bo Bricklemeyer/Dem Cowles. The environmental community wanted to get coverage of vessels interacting with marine mammals. At no time was that coverage to substitute for an observer program for marine fisheries. Cowles: If the \$1 million they lobbied for is somehow not going to fund the agreement industry worked out, then the Council should be involved in determining just where it does go. At a minimum, NMFS ought to be presenting the Council with their list of priorities where this money is going to go and the Council should be asked to comment to assure that the Alaskan ocean priorities are met.

Neil Shuckerow. The major point he has is the imbalance in observing at-sea and shorebased facilities. If there is going to be a shortage of observers, maybe there should be more on large factory trawlers and less on shoreside plants. The economic data report is a burden at this time; asked that implementation of that requirement be delayed for at least one year.

Bud Samuelson/Charlie Christensen. Small boats are going to have a very difficult time accommodating an observer. Suggesting changing size limit from 50 to 58 ft. Also would like to have accounting on a semi-annual basis instead of quarterly.

C-5 Inshore-Offshore

George Anderson, Fishing Co. of Alaska. If it is the Council's desire to conclude that there is a real problem to be addressed by allocation, they should consider the consequences to the nation if they ban factory trawlers in the Gulf of Alaska. There's also a small fleet that harvests rockfish that is responsible for jobs and economic benefit to communities. Also, consider the H&G rocksole and other flounder fisheries in the GOA.

Eric Silberstein, Emerald Seafoods. Thinks the analysis is crafted to cater to special interest groups. Ongoing stock assessments, roe-stripping abatement, a temporary moratorium and impacts on coastal communities must all be considered simultaneously.

John Iani/Chris Blackburn. PSPA/Alaska Groundfish Data Bank. Solidly behind the Council's effort and AP problem statement. Urged the Council to continue on schedule as planned. One thing they noted in the problem statement is that it does not address mobile vs onshore processing capacity.

Eric Maisonpierre, Emerald Seafoods. The true problem is that domestic harvesting and processing exceed capacity for all species in the Gulf of Alaska and Bering Sea & Aleutian Islands. The Council should once again consider a moratorium on entry into the groundfish fisheries. During such a respite a stock could be taken of current processing capacities, etc. This should be done in conjunction with a permanent roe-stripping ban and control of donut boundaries and harvests.

Frank Bohannon/Steve Hughes. MidWater Trawlers. Asked that the Council include their proposal in the analysis if it proceeds.

Vince Curry/Paul McGregor, AFTA. Suggest that the Council discontinue the effort on this amendment. The Council has worked over the last several meetings to spread the effort out. Do not believe this is an inshore/offshore problem, but one of overcapitalization. If the Council does go forward with this analysis they should devote adequate staff and resources to it.

Brad Resnick, Aleutian Dragon Fisheries. Doesn't understand why the plan team and SSC don't see the possibility of a biological problem. Problem is too much effort, certain types of gear which have excessive harvesting capacity over very short periods of time. Only legal method Council has to deal with problem is to adjust level of effort on the stocks.

Joe Plesha, Trident; Alec Brindle, Wards Cove; Ralph Hoard, Icicle Seafoods, and Rich Wilson, City of St George. Recommended Council approve AP recommendation; send problem statement out for public review. Believe that current management regime will not allow shoreside processing to continue in Alaska. Ability of factory trawlers to move across the state will make it impossible for them to continue under traditional CPUEs.

Wally Pereyra, ProFish Int'l. Recently teamed up with seven joint venture fishermen to convert a vessel as a processor. Not creating a new harvesting capacity, only a method of processing and creating an opportunity for joint venture fishermen to get into DAP fisheries. Their investment as well as jobs are now threatened by this issue. Let marketplace prevail or amend the package to include alternatives to address the real problem: lack of control of our fisheries.

C-6 Permits

Doug Gordon, AHSFA. Requested Council to go on record opposing the allocation to Poland. There is strong evidence that the product will come back into U.S. and dilute American markets. Bill Phillips, aide to Senator Stevens. Thinks there's been a lot of misunderstanding on this issue; unfair to blame Poles that there is fish still left on the table at the end of the year.

Ted Evans, AFTA. Certain countries are applying for joint venture permits but in reality are using them in support of donut hole catches and transshipments. Asked the Council to request that the Secretary issue permits only in support of joint venture activities.

Steve Hughes, Midwater Trawlers. Asked Council to approve requests only of traditional joint venture countries - no new countries. Also suggested that any special request exclusive to one nation not be approved.

Mick Stevens, ProFish. They work with companies from Korea, Poland, and Japan; asked the Council to support permit applications of these nations. They also support Icelandic request for a cod fishery if the request is still valid.

John Henderschedt, MRC. In support of Ted Evans' suggestions that permits only be issued in support of joint venture activities.

Gary Westman. Opposes special allocations whether to country or gear group.

D-2(a-b) Gulf Groundfish ABCs

Eric Olson, FVOA. Agrees with plan team recommendations with regard to sablefish.

George Anderson, Fishing Co. of Alaska. Slope rockfish is an important resource for them, a fully utilized resource. Their DAP needs are between 30,000 and 35,000 mt for 1990; however, halibut

bycatch rates will probably drive them to a much lower number. Would like to see the SSC and plan team recommendations with the two species broken out, provided they have observer coverage.

Steve Drage. Favors biannual or quarterly release of cod and pollock w/larger amounts released during first quarter. That's when they're most available and the quality's better. Spreading the harvest out more throughout the year will make more economic sense.

Chris Blackburn, Vince Curry, Joe Plesha. Support the two experimental fisheries recommended in AP and SSC recommendations; observers will be on board. Will help collect substantial biological data for future management. Slope rockfish-agreement with AP recommendation - 20,000 mt; Pacific cod - also agree with AP recommendations. Also support quarterly allocations of pollock with the exploratory fisheries limited to the roe season.

Vince Curry said he would rather see semi-annual apportionments of pollock rather than quarterly but really prefer other management schemes such as starting the season in fall.

Robert Wurm, Kodiak. Concerned about the sablefish resource in the Western Gulf; a survey shows stocks are down this year but the survey was done during the season while fishing was taking place. supports AP recommendation and apportionments.

John Bruce, DSFU. Favors AP and SSC blackcod recommendations.

Jerome Selby, Kodiak. Favors groundfish recommendations suggested by the AP and quarterly allocation for pollock in the GOA. Supports NMFS position for halibut bycatch plan for GOA; Roe-stripping - adopt the amendment and emergency rule; inshore/offshore - support the statement as written; continue with analysis of the issue. Also urged Council to continue with the observer program.

Robert Brodie. Agrees with AP recommendations for pollock and quarterly allocations for Gulf. Support NMFS' recommendation for halibut management. Observer program is much needed; only way to get adequate data. Feels that roe-stripping is unacceptable unless whole fish is used. Hopes will abandon limited access efforts; sympathize with overcapitalization, but let the market prevail.

Eric Silberstein, Emerald Seafoods. They are on record in support of Council policies aimed at conserving the groundfish resource. Urged Council to adopt macromanagement approach rather than micro.

Brad Resnick, Aleutian Dragon Fisheries. Supports quarterly release of pollock in GOA. Re: NMFS DAP figures - in the case of pacific cod, NMFS should have taken into account the oil spill and lack of ability of shore plants to work for a portion of the season. Proposed that the Council direct staff to investigate the possibility of using harvest fleet in order to acquire data needed.

Phil Chitwood, Arctic Alaska. Recommends against splitting the rockfish group. Recommend status quo for the TAC for that species for 1990. Will have observer data this year which will give a more clear picture of the stock.

Mel Morris, All Alaska Seafoods, Dave Harville, Neil Shuckerow. Their initial DAP request of 12,000 mt may cut them short; they may be looking at between 20,000 mt & 30,000 mt for deepwater and shallow flatfish for next year. The bulk of their request is for deepwater sole and their bycatch is quite low in that fishery.

Mr. Armstrong/Mr. Kim, Korean Fisheries Assn. Suggested joint venture presence be continued in the Bering Sea/Aleutians. Full utilization has been overwhelmed by economic decisions in Council deliberations. One advantage of continuing joint venture is the broad range of foreign countries still interested in American fisheries and fishery companies. Smaller Korean companies work with small Alaskan harvesters and they deserve to continue to work together for a few more year. Korea is not ignoring the Council's concerns over donut catches and other international concerns; they have responded to international concerns on driftnets even though they conduct the cleanest of activities. Displeased with the decision to allocate fish to Poland; Korea has been a good partner in fisheries for many years in free and open competition; discriminatory allocation to Poland disturbs those arrangements.

Dave Shoemaker. Thinks the 1990 Pacific cod ABC recommended by the plan team and SSC is very high compared to their catches. They fish the Pacific cod directed fishery 12 months of the year. In 1989 the TAC was not met. His fear is that a higher ABC will allow a reserve and invite joint venture operations or other directed fisheries that may endanger his established market.

Bert Larkins, AFTA/Steve Hughes, Midwater Trawlers Co-op. Agree with AP recommendations except the 80,000 mt pollock which might be allocated back to the Aleutians. Want a significant DAP in the Aleutians for pollock; there will be increased interest in targeting on pollock in the Aleutians this year. About 150,000 tons is their request. Also, 100,000 mt in the BS; and 50,000 in the AI.

Eric Olsen, FVOA. FVOA proposes that the ABCs for sablefish in the Bering Sea be 3,200 mt and 6,650 mt in the Aleutian Islands. Suggested the mid-point between the plan team and SSC recommendations for Pacific cod. There is a need for better CPUE information which should be coming with observer coverage.

Wally Pereyra, ProFish Int'l. Data supports the plant team recommendation for Bering Sea pollock harvest levels. Urged Council to take care of DAP needs when dividing between the Bering Sea and Aleutian Islands.

Mark Springer, City of Hooper Bay. re Sea Lions. People of the Bering Sea have similar concerns about many marine mammals. They are concerned about the effect on marine mammals of increased commercial fisheries harvests. Decisions made by this Council have a direct effect on their people who depend on these marine mammals. Take the needs of all species into account when setting TACs, etc. Very little research on small marine mammals. They are also very dependent on herring and urged the Council to set a bycatch limit on herring.

Mark Chandler. Support AP recommendations. Conservative number on pollock is necessary while allowing for bycatch in yellowfin sole and other fisheries.

Doug Gordon, AHSFA. Supports the AP recommendations and the compromises reflected by Larkins and Hughes recommendations. Agree that a balanced harvest strategy for the multi-species bottomfish complex is necessary. With regard to maximization of pollock, very concerned about the increased harvest strategy, especially when scientists are saying there is a 27% decrease of harvestable pollock over the next two years.

John Henderschedt, MRC. Supports Hughes/Larkins position.

Paul Clampitt, FVOA. BSAI sablefish - AP recommended 6650 in AI and 3200 in the BS. They took PT and SSC rec added and divided by two. He believes the survey is flawed; the research crew

sampled an area which had just been hit hard by commercial fishermen. Thinks they should be able to harvest at least at the '88 level.

D-3(c) Crab and Halibut PSC

Arni Thomson, ACC. 1989 groundfish catches demonstrates that caps in zone 1 are not putting anyone out of business.

Mick Stevens, ProFish Int'l. It's clear from first computer run (of the bycatch model) that the results are unacceptable in light of bycatch. From their perspective they would like to see some component of the solution to be a delayed opening. Some combination of restrictions on zones and time would be their choice.

MacGregor, Larkins, Chitwood, AFTA. From the outset, they have said the model underestimates the amount of crab needed to fund the groundfish fishery. Rewards people with worst bycatch; penalizes those with good record. Regarding Arni Thomson's statement that the cap in zone 1 hasn't cost any DAP fish - they disagreed, pointing out the amount of fish left unharvested; the zone closed down because of bycatch and they can't fish out in the Bering Sea/Aleutians now because of weather.

Steve Hughes, Midwater Trawlers Co-op. In 1989 there was over 200,000 mt fish left unharvested because of bycatch constraints at a cost of \$30 million. Constrained by the fact that processors can't change their schedules in a timely manner. If they are forced out of zone 2 or 3 they will need more halibut bycatch than they have now.

John Henderschedt, MRC/Peter Block. Alternative 1 provides almost no bycatch for a joint venture fishery. Those figures make an impossible fishery at any time of the year. Scenario 2 is a little more realistic, allotting for c. bairdi and halibut bycatch. A lot of American fishermen are planning to fish on January 1, the cost to delay will be extremely high.

Steve Drage, Midwater Trawlers Co-op. There are problems involved with delaying the season - many joint venture motherships are in the last days of preparation to leave for the fishery; they have other commitments and may just cancel this operation completely. Weather is better in January than February or March.

Gary Westman. Joint venture fishermen have shown that they can fish clean; these bycatch constraints are very difficult.

Dave Fraser, AHSFA. DAP needs more red king crab bycatch; JVP needs more halibut bycatch. JVP sole fishery in zone 1 had the lowest bycatch rate for halibut-400 t; if they are forced to move to zone 2, the rate goes up to about 800 tons; slightly less in zone 3. Bairdi rates vary by zone also; there's an almost ten fold increase in bairdi needs when the fleet is shifted out of zone 1 to zones 2 or 3.

D-4 Pollock roe-stripping

Ken Allread/Mel Morris. Kodiak processors turned in five amendment proposals, including quarterly allocations, shoreside preference, change in season starting date, etc. If the pollock quota hadn't been wiped out so early in the season they could have had another 30 days of work; 90 people were displaced as a result of the early closing of the pollock season in the Gulf. Quarterly allocation has to be initiated and roe-stripping stopped. Gulf and Bering Sea are different; by starting the season in the Bering Sea, they can then move to the Gulf and that's what has happened. It is an emergency - targeting on the females at such a rate will have an impact on future stocks.

Steve Hughes, Midwater Trawlers Co-op. Favor a ban on roe-stripping and quarterly allocations of 40%-10%-10%-40% for the Gulf.

Chris Blackburn, Alaska Groundfish Data Bank. Believes the roe-stripping issue is separate from the quarterly issue. The ability to target females in the Gulf is not good for the stocks; would need to adjust the exploitation rate if you're going to encourage roe-stripping.

Dave Fraser, Cape Flattery Fisheries. No significant net benefits demonstrated by a ban on roe-stripping in the EA/RIR. But that is mainly biological and socioeconomic. Definition of emergency should be that there is a consensus in industry in regulating the take of ore.

Joe Plesha, Trident Seafood. Strong supporter of emergency regulations to prohibit roe-stripping in the Gulf of Alaska and Bering Sea/Aleutian Islands. Concerned about the effects of continuing this practice. Roe-stripping reduces the concentration of spawning females. The pollock season in BSAI might end before end of year if roe-stripping is allowed to continue. That would have a great economic impact.

Bert Larkins/Wally Pereyra. AFTA supports ban on roe-stripping. The question of waste is one that should be looked at over a period of time and not only in one fishery. Seasonal allocation, i.e., quarterly, is not a roe-stripping issue. Factory trawler operations are such that the fewer openings and closings the better for efficiency of operations. Perhaps opening the seasons later in the year. Against quarterly allocations for efficiency reasons. Ban should apply to both onshore and at-sea sectors. There is an increased urgency now that the pollock supply is insufficient due to expanding capitalization. They have reorganized their factories to fully utilize the carcasses. If no pollock fishing is allowed during roe season, they would be greatly impacted economically. Regulations should be directed at banning discard of discards and allow NMFS to put in place a regulation that reflect the realities of the situation. They submitted a specific written proposal for wording of a roe-stripping regulation: "It shall be unlawful to harvest pollock in a directed pollock fishery for purposes of extracting roe unless the female and male pollock carcasses are further processed into products of commercial commerce." Souring of grounds can be a problem; but NEPA regulations will require grinding everything that goes over the side.

Eric Silberstein, Emerald Seafoods. Their company supports a total ban on roe stripping; until there are data to assess the effects of roe-taking on future stocks, the Council should act conservatively. Also, more information is needed on donut harvests. They have modified their operations to utilize male and females for fillet and not directly to meal. Thinks quarterly allocation is illegal and that there's no need if you're taking normal amt of fish.

Doug Gordon, AHSFA. Getting into a piece-meal method of fishery management. They continue to advocate that the Council adopt a policy towards full utilization. They oppose roe-stripping and would like to see banned, but in the short-term, 1990, would prefer quarterly allocations.