

M E M O R A N D U M

TO: Council, SSC, and AP members

FROM: Jim H. Branson
Executive Director

DATE: May 11, 1987

SUBJECT: King and Tanner Crab FMP

ACTION REQUIRED

The Council's Crab Management Committee will report progress on developing the new FMP.

BACKGROUND

The Crab Management Committee will meet on Monday evening, May 18, to review the most recent draft of the new FMP for king and Tanner crab in the Bering Sea and Aleutians. They will also discuss alternative management strategies for crab and then give direction to the plan team on which ones to analyze further. The team will be working up the associated EIS/RIR analyses during the summer. The draft plan should be ready for full Council review in September.

Crab Proceedings, May 1987 Council Meeting

Larry Cotter: I don't have a written report; I'll just deliver it verbally. The minutes will be typed up within a week or so and distributed at that time. The Crab Management Committee met on Monday night; the Goals and Objectives Subcommittee of that Committee met Tuesday during lunch and the Committee then reconvened Tuesday evening. The primary focus of the Committee's work at this time was to review the second draft of the FMP and to discuss various other items. I guess in summation, the FMP I think is on track. There seems to be general philosophic agreement between the State of Alaska and NMFS-NOAA that the FMP is developing in a fashion that each can live with, although there are areas where additional work, of course, needs to be done. One of those areas is goals and objectives. There's a feeling that they need to be more definitive and the approach that we've taken with that is to indeed attempt to make them more definitive. We are going to end up drafting a preamble that would then be followed by a single goal and underneath that goal would be various objectives broken down, at least at this time, in terms of categories. There would be an economic objective, then underneath the economic objective there would be various strategies that could be used to accomplish that objective. There'd be a biological objective; an ecological objective that deals with habitat; there would be a vessel safety objective that deals with our obligations under the amendment to the Act to take into account the safety of fishermen and their vessels. And additionally, Mr. Chairman, there would be an objective in there that would deal with, we haven't named it yet, but a human interaction type of objective that speaks to the need and the desire to provide for a full and equal participation in the process. The reason I mention that is that there has been concern that has developed recently, or reared its head in any event, regarding potential discriminatory actions and that type of thing that may occur as a result of this plan, and the Committee is bending over backwards to address those concerns in a positive fashion and I think that the plan is going to ensure that those folks who have those fears will never see them realized. One item along those lines is the Committee did take a look at developing an as yet vague entity that would serve as some type of advisory committee role to the Board in the area of shellfish regulations and would take into account participation directly on that committee of non-Alaska residents as well as Alaska residents. I think that's probably it. I can go further, of course, but

Thorn Smith: Good morning, Mr. Chairman, members of the Council. My name is Thorn Smith with the North Pacific Fishing Vessel Owners' Assn. Next to me is Arne Aadland, our president. In starting off this morning, I'd like to offer our sincere congratulations to the Council for the way you've handled the groundfish issues at this meeting. We're really impressed. We've also been very impressed by the performance of the Council staff, the plan teams, folks of the National Marine Fisheries Service and ADF&G in preparing the documentation which analyzed and supported your decisions. We'd also like to emphasize that we're very pleased with the continuing opportunity that we had to participate in this process. We were continually given the data that was available; we've participated in I think five separate public meetings; we feel that the RIR developed very well. We were all in there working very hard on it and we really think that's the way the Magnuson Act process and federal fisheries management should work.

Henry Gotsch: I don't have a written report, I'll just deliver it verbally. The minutes will be typed up within a week or so and distributed as usual. The Grand Management Committee met on Monday night, the 20th and 21st of November. The Grand Management Committee met Tuesday, during lunch and the Committee then reconvened in the evening. The primary focus of the Committee's work was to recover the boat and to discuss various other items. I guess the boat was recovered, and I'm not sure if it was or not. There needs to be a general description of the boat between the State of Alaska and NMFS-WAA and the boat is developing in a fashion that each can live with, although there are areas where additional work, of course, needs to be done. One of those areas is goals and objectives. There's a feeling that they need to be more definitive and a process that we've taken with them is to have a meeting to make them more definitive. We are going to end up building a plan that would then be followed by a single goal and underneath that goal would be various objectives that flow down, at least at this time, in terms of categories. There would be an economic objective, then underneath the economic objective there would be various strategies that would be used to accomplish that objective. There'd be a biological objective; an ecological objective that deals with fish with habitat, there would be a vessel safety objective that deals with our obligations under the agreement to the Act to take into account the safety of fisheries and their vessels. And additional, Mr. Chairman, there would be an objective in those that would deal with what we haven't covered it yet, but a human interaction type of objective that speaks to the boat and the boat's provision of a full and equal participation in the process. The reason I mention that is that there has been concern that has developed recently, or at least has been in my mind, regarding potential discriminatory action and that type of thing that may occur as a result of this plan and the Committee is handling other fisheries to address those concerns in a positive fashion and I think that the plan is going to ensure that those folks who have those concerns will never see them reinforced. The item about those things in the Committee and take a look at developing an equal opportunity that would serve as a basis of advisory committee role to the board in the case of the fishery regulations and would take into account participation directly on that committee of some Alaska residents as well as Alaska residents. I think that's probably it. I can go further, of course, but . . .

Thorn Smith: Good morning, Mr. Chairman, members of the Council. Welcome to our meeting with the North I Chukotka Fishing Vessel Owners' Association. Next to me is the Aleutian, our resident. In starting off this morning, I'd like to offer our sincere congratulations to the Council for the way you've handled the groundfish issues at this meeting. We're really impressed. We've also been very impressed by the responsiveness of the Council staff, the plan team, folks at the bottom, the Fisheries Service and NMFS. In presenting the document which is before you and supported your decision, I'd also like to emphasize that we're very pleased with the continuing opportunity that we have to participate in this process. It was continually given the data that was available; we've participated and I think it's a process that's working very well. The RIB developed very well. It was all the things working very well on it and we really think that's the way the program and process and Federal Fisheries management should work.

Quite frankly, we want crab management to work in the same way. Some materials were handed out to you yesterday which I regret I was unable to get to you earlier. Given the seriousness and sensitivity of these crab issues I had set out a period of two weeks during lunch hour to work with our people in Seattle, draft some comments and deliver them in time for you to read them before the Council meeting and quite frankly I had planned to spend a week on the road coming to see you individually so that we could discuss these things so you can better understand our point of view and our efforts to reach a compromise with respect to crab management. I hope that you've had the opportunity to read the materials which I think were not passed out to you until yesterday. They include a set of suggested modifications to the current FMP which we think are necessary from our point of view to assure that our interests will be looked after in the management process. Several pages from the newsletter in which we set out our position last October on crab management, a letter of April 20 to Bob McVey suggesting that the Tanner crab FMP be kept in place until we have developed a final FMP for king and Tanner crab, and then some documentation on the closure of the opilio fishery issue which has been an issue over the last few days. I would like to emphasize that we do have a broad spectrum of fisheries interests in Seattle which are very much concerned with crab management. If you'll look at the signature pages on our letter of April 20 you'll see, of course, Arne Aadland, our president who is a professional crab fisherman and has worked up here since 1962, Wally Pereyra, our vice president who heads up a large joint venture operation; many of the vessels in his fleet are the usual combination boats which can engage in both crab fishing and trawling; the same is true of Northern Deep Sea Fisheries, Westward Trawlers, Mid-Water Trawlers, Marine Resources, various joint venture operations. Konrad Uri, who is not with us, is the president of the Highliners Association and also heads up Trans-Pacific's crab division. We have the longliners on board along with the factory trawlers, people like Sam Hjelle of Glacier Fish and Terry Baker of Arctic Alaska Seafoods, who in your mind may be more associated with the factory trawlers group, in fact own crab boats which are members of our association. I think we've made it clear and reiterate that we really favor exclusive federal management of the crab resource off Alaska, however our board has indicated its willingness to work hard to develop a cooperative management arrangement. In that light we have gone over this most recent draft of the FMP at length and at our meeting last Wednesday we developed the comments that we have before you and we're here today to ask you to help get these implemented or placed in the FMP which is now being drafted. If we can do that we think that we at least have a fighting chance of convincing a reasonable spectrum of folks in Seattle that we should go ahead with this attempt at cooperative management.

I'd like to very briefly run through them with you in case you haven't had a chance to review them. Naturally, we want a plan and everyone's agreed that we're going to have one. We want a plan which essentially will be a plan and will guide management in a predictable manner so that we know how to plan our businesses. You're aware that we prefer that the plan include the Gulf of Alaska; we're aware that the Council has voted not to do that, but we're still very much concerned that there be an adequate expression of federal management policy in the Gulf; we work there; we were obliged at one time to bring a lawsuit to protect our interests. With respect to categories of management measures, our people looked long and hard at the various measures which will be utilized to manage the crab fisheries. At a minimum, we'd like to have

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these measures frameworked by the Council so that we have some idea as to where our management is going to go. We'd like the frameworking criteria to be as specific as possible, and we would like to have these frameworked management measures to give us a theme, a model, a formula, obviously something short of mathematical certainty, but something that will enable us to come up with hypotheticals and have some reasonably good ideas as to what management decisions will be made, which of course would affect our business. The draft FMP states that management of course will be consistent with the Magnuson Act and other federal law. We want to make sure that we also conform with the standards of the Executive Order 12291 and federal regulation. Specifically, we want to be sure that the measures adopted will be cost beneficial, and that the least burdensome alternatives on industry will be selected when we have to solve a problem. One issue which is perhaps a little more difficult to understand unless you've been involved in the technical documentation aspect of this, is our request for some documentation of the measures presented to the Board. There are a variety of reasons why we think we need some of this documentation. First of all, in order for us to participate meaningfully as industry representatives in the Board process, we need to have some idea as to what the problems are, what the alternative resolutions to the problems might be, and under federal standards of course, we need to know which ones are cost beneficial, what the biological and socioeconomic impacts are, and I think those of you who have worked with the Board have had the experience of receiving a very large number of proposals which come in. This one happens to be last year's finfish proposals, I think there were 693 specific changes to the regulations proposed. Many of them are justified by a single line of justification. That doesn't give us an awful lot of meat to get into in trying to discuss these things rationally with the Board. I want to rush ahead, though, to say that we're not suggesting by any means that anybody try to sit down and write EA/RIRs on 693 different propositions. My experience in working with these packages is that often 95% of the issues raised are of no concern whatsoever to out-of-state fishermen or that in fact they're beneficial to us because they're legitimate conservation issues and so forth, so most of these things are not going to need any sort of analysis as far as we're concerned. The other beneficial aspect of this is that usually you can, say you had 20 of these things left over that we were concerned about, they often will be focussing on a small number of generic problems. People tend to respond to the same problems; you get 10 or 15 individuals responding to that problem. I think we could probably select out a small number of generic issues which we would like to have some EA/RIR analysis on. We do not think that this would need to affect the Board in its workload or its processes in terms of delaying the process significantly. We think there are adequate resources available within the Council, NMFS in Juneau, NWAFC, and ADF&G to provide us with a certain amount of this analysis. We think that this would not only be in the best interest of the industry but would also serve the Board which would have some assurance that it had created a record which would be adequate to survive federal review, and of course it would protect the Board's action if anyone should decide to take them to Court. All in all, we think this approach would be the best for all of us and I should add that in making a determination as to whether an action comported with the FMP and federal law, the NOAA office of General Counsel and the managers at NOAA would have this sort of record to do the same of kind of analysis that we do with our regular fishery management actions under the Magnuson Act. We would like the responsibility for documentation supporting these actions to be spread out among the Alaska Dept.

of Fish & Game, NMFS-NOAA, and the Council staff, if possible. That would make sure that nobody got an incredible workload dumped on them and it would assure us that there would be adequate peer review. The draft FMP provides for attendance and participation of a NMFS and Council staff member at Board meetings. We think it would probably be a good idea for some member of the NOAA Office of General Counsel to attend as well since they'll be involved in the subsequent analysis for consistency. We would like to have an opportunity to appeal issues as they came up as necessary directly to the Secretary of Commerce or his representative in Juneau. Our concerns are two: First of all, timing. Some of these happen fast and we need to be able to get the field process underway. Second, we feel that the federal authorities are the ones that are most accustomed to analyzing actions under federal standards. Again, we don't think this would affect the Board process much. It's conceivable to us that it might be necessary to ask for these public submissions a little earlier if some time was need for analysis or for us to help with selecting those issues that might require analysis. We would hope that the Board deliberations on crab that are of concern to non-residents could be addressed within a relatively fixed and predictable time period and I understand the Board is doing pretty well on that these days. And we'd hope that the decisions that were made during that period of time wouldn't be subject to change at a later time and a later town as the Board moves.

We put a lot of work into this. There was a lot of argumentation, it took a fair amount of convincing, and so forth. We're hopeful that if these safeguards can be incorporated into this draft that we will be successful in essentially selling it in Seattle. The Crab Committee was not prepared to go along with us on all of these; I hope the Council will recommend to the Committee that they be incorporated into the draft at this time so that we can continue this process. It appeared to me that after our meeting last Wednesday that we're at a fork in the road here. We want to stay on board and the best way to assure that is to adopt these measures. Thank you, Mr. Chairman. Perhaps Arne or Rudy Peterson would like to say something at this point.

Larry Cotter: Mr. Chairman, may I ask one question? Thorn, you were talking about the fork in the road and you made a comment about staying onboard, you hope to be able to. Do I interpret that to mean that in the event that the Council doesn't adopt your recommendations and recommend to the Committee that they adopt these recommendations, that your organization might cease to participate in the Crab Management Committee?

Thorn Smith: Not at all, and if you understood that, you were wrong. We're going to hang in there and make the best of this. There are a lot of folks that I think it'll be a lot easier to have working with us if we can achieve these things, Larry, and we're very sincere in saying that.

Arne Aadland: Mr Chairman, and members of the Committee, I'd like to make a couple of brief comments. Last Council meeting I mentioned that Dr. Reeves has been actively looking at the legal size of king crab in the Bering Sea. His finding has not been finished at this date, but there are certain factors of the findings that will not change and for biological reason, you could go down to a 5" king crab, perhaps when the findings will be done by the end of the month we will be able to appeal to the Board of Fish & Game and perhaps go to maybe a 6" king crab to go together with the 6" brown crab that is

of Fish & Game, WMS-WAA, and the Council itself, if possible. They would make sure that nobody got an incredible workload dumped on them and I would assure us that there would be adequate peer review. The draft RFP provides for attendance and participation of a WMS and Council staff member or board member. We think it would probably be a good idea for some member of the RFP Office to attend as well since they'll be involved in the subsequent analysis for consistency. We would like to have an opportunity to appeal issues as they come up as necessary directly to the Secretary of Commerce or his representative in January. Our concerns are two: First of all, timing. Some of these happen later and we need to be able to get the draft process underway. Second, we feel that the federal authorities and the ones that are most accustomed to analyzing actions under federal standards. Again, we don't think this will affect the model process much. It's conceivable to us that in some cases it might be necessary to call for these public submissions a little earlier if some time was needed for analysis or for us to help with selecting those issues that might require analysis. We would hope that the board deliberations on that are of concern to non-residents could be addressed within a relatively fixed and predictable time period and I understand the Board is doing pretty well on that these days. And we'd hope that the decisions that were made during that period of time wouldn't be subject to change at a later time and a later law as the Board works.

We put a lot of work into this. There was a lot of experimentation, a lot of fair amount of consulting, and so forth. We're hopeful that if these safeguards can be incorporated into this draft that we will be successful in essentially selling it to Seattle. The draft committee was not prepared to go along with us on all of these. I hope the Council will recommend to the Governor that they be incorporated into the draft at this time so that we can continue this process. It appeared to me that even our meeting last Wednesday that we're at a fork in the road here. We want to stay on board and the best way to ensure that is to adopt these measures. Thank you, Mr. Chairman. Perhaps Anne or Bob Peterson would like to say a word at this point.

Chairman: Mr. Peterson, may I ask one question? When you were talking about the fork in the road and you made a comment about staying aboard, you hope to be able to. Do I interpret that to mean that in the event that the Council doesn't adopt your recommendations and recommend to the Governor that they adopt these recommendations, that your organization might cease to participate in the Fish Management Committee?

Bob Peterson: Not at all, and if you understood that you were wrong. We're going to hang in there and make the best of this. There are a lot of folks that I think will be interested to have working with us in we can achieve these things, sorry, and we're very sincere in saying that.

Anne Anderson: Mr. Chairman, and members of the Committee, I'd like to make a couple of brief comments. Last Council meeting I mentioned that Dr. Reeves has been actively looking at the legal state of being crab in the Sound. The finding has not been finished at this date, but there are certain factors of the findings that will not change and for biological reasons, you could go down to a 25 fish crab, but the findings will be done by the end of the month we will be able to appeal to the Board of Fish & Game and perhaps to go to a 50 fish crab to go together with the 25 fish crab that is

currently being harvested in the Aleutian Islands. In regards to the closure of the Tanner, we had a meeting Tuesday morning here. We've had conference calls between myself and some of the others, Dr. Reeves and Dr. Otto in Kodiak. There seems to me that Dr. Reeves at this point is recommending the possibility of an additional 20 million pounds of opilio that could be harvested in the Bering Sea in 1987. The State on Tuesday, as you know, announced the closure of the opilio at the end of this month with a recommendation that exploratory fishing would go on west of 178° and north of 60°30' latitude north. This is relatively a new area; there isn't a lot of acreage up there and for a 100 boats this seems a little bit far fetched. Now, as you all know, in 1985 we started the opilio season in the Bering Sea on November 1; we fished 'til December 31, continued fishing again after January 15 and finished the season on August 24 with 103 million pounds. This year at this point we're at approximately 65 or 67 million pounds as of Sunday and it looks to me like we'll end up with about 75 million pounds when the May 31 closure comes in and what we find up above is anybody's guess at this point in time. It's just very hard for me to understand, and some of the members of our group, that we have to take 75% or less of what we took last year when it appears that we're fishing that season in half the time. There is approximately 10 or 12 more boats in 1987 than in 1986, but the landings at this point are about half which indicates to me that the fish has got to be tremendous. The size on the opilio is holding up, the CPUE has to be very high in order for us to achieve that kind of fishing in that short a time.

Rudy Petersen: Mr. Chairman, as a member of the Committee I'm familiar with what the interaction is. I think the resident and non-resident, so-called, issue is much overly played. I think that basically what I hear is that there's concern for the different concept of management and just what should be done as far as how the resource is managed. I think that is the basic issue that concerns many of the fishermen, Mr. Chairman.

John Winther: Arne, I'd like to ask this question and set me straight if I'm right or wrong. This year when the opilio fisheries got started I'd heard that where the good fishing was last that there wasn't much there this year. That they basically started their fisheries this year on the northern part of the area where they ended up last year because there wasn't crab where they caught most of them last year. Is that true?

Arne Aadland: From my understanding, John, I haven't been up there too much this winter, but from my understanding there was a fairly heavy concentration of fishing around 168° southeast of St. George and approximately 57°N. The fleet are like sheep I guess you might call it, wherever they see the first boat they dump the boats and take the chance. By the time I got up there around the 20th of March there was no vessels in that area. We fished in that area until we had three trips in that area, very good fishing, I believe probably half of the quota was taken below 58° was taken out of the southeast area, which included west of 168°, through up to St. George and St. Paul.

John Winther: My understanding was that the fishing was in the northern part of that area whereas the year before some of it took place quite a bit further south.

Arne Aadland: Well, in the northern part, John, I think where you're talking to, is probably ten to twenty miles further north, a little bit shallower. When we first started opilio fishing we used to fish opilios in the 38 to 55-58 fathom range. Last year because of starting November 1 whereas in prior years we had started Bering Sea Tanner, Aleutian Island, Kodiak Tanner on the 15th of January, went on the bairdi first and got into the opilio in February or March, I believe the crab had a chance to walk up in shallower water, but starting November 1 the year before we started fishing in 68 to 75 fathoms and continued fishing there so the opilio last year didn't have a chance to walk up that hill a little bit onto the shallower ground.

John Harville: Mr. Chairman, I want to come back to the material we were given. I know it is appropriately addressed to the chairman of the Crab Committee. We just heard a report from the Committee that they're working hard on many of the issues that are identified here. I think I heard the Chairman say it was particular intent to make certain that appropriate relationships between various users would be maintained, equity would be maintained. Of course whether they say that or not, they have to because it's a National Standard that anything we do has to avoid discrimination. I'd like to go back to what Rudy just said, that any real differences that exist probably have to do with differences in philosophies of how you manage the crabs. Sometimes they get manufactured into differences that appear to be regional for one reason or another. Mr. Chairman, it just seems to be that since we've designated a committee to do this, and since the committee chairman has indicated that they're actively working on it, it would be premature for us to do anything but just let the committee go on with its work. It's useful to have this material brought before us, but that's why we set up committees and I think we should give them a chance to do their full deliberation and come come back to us with a report.

Arni Thomson: You might characterize our association, in distinction to the previous comments, as being an association that represents all fixed gear boats that are committed to pot fishing for crab. There's 65 boats in our Association and this issue of residency and non-residency seems to keep popping up, but basically our association is comprised of non-residents although we've got 15 boats in the association now that are Alaskan residents. Just a couple of comments about the plan as it's developing that I see as very positive. First would be that this plan encompasses not only the Tanner crab fisheries but the king crab fisheries. The State of Alaska has been effectively managing those fisheries, as I understand it, since 1959. In king crab they've been managing that without an FMP ever since '59. There have been repeated efforts to develop an FMP for king crab and I think that we're really moving in the right direction. I also think it's positive that both fisheries can be encompassed in one plan, that this holds a potential for simplifying management. We view the previous Tanner crab plan as being outmoded and another point that we favor very strongly is that encompassing the Bering Sea and Aleutian Islands while excluding the Gulf of Alaska. There are a lot of resident fishermen that fish the Peninsula and Kodiak areas and we recognize the Bering Sea/Aleutian Islands complex as kind of a geographic/political/ social entity, so to speak. In regards to safeguards for non-residents, as a member of the Crab Committee I see some very positive safeguards developing, for both inseason adjustments and appeal system and also for preseason regulatory proposals that come before the Board of Fisheries. It's developing that way -- a defined system of appeals that will

...in the northern part, I think where you're talking about. I think there's a little bit of shallow water there. I think we have started cutting back on the 25-30 foot depth. I think we have started cutting back on the 25-30 foot depth. I think we have started cutting back on the 25-30 foot depth.

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clearly address Magnuson Act standards. Another very positive thing about the new plan as it's developing is that there is probably going to be an ad hoc industry advisory group which we're rather enthusiastic about as it could provide input to the Board of Fisheries on regulations, inseason adjustments, so I think there's a very positive side to a lot of the things that are coming out of this new plan and I'm hopeful that it will continue to roll along.

Council Discussion/Action

Larry Cotter: Mr. Chairman, I did neglect to make a couple of comments, and I'll wrap it up rapidly. There have been suggestions that we ought to take a look at alternative management strategies for crab and we are doing that. Not "we" necessarily, but the plan team. The schedule that we're following now is that the plan team will be getting together some time in early June and at that meeting they will then begin to review the draft FMP for their comments as well. They'll take up the subject of alternative management strategies, begin to identify the range and scope of the various alternatives, identify a time line in which they can perform the necessary analysis to allow the Council or Board to make a decision whether to modify the management approach. Some of those analysis will probably take a fair amount of time and we may not have the benefit of them for perhaps a year or so. Others, hopefully, could be accomplished in a much shorter time period which would allow us to be prepared to put before the Council at the September meeting a first draft of the FMP at that point in time. So, I think we're on schedule; we may even be ahead of schedule and we ought to have our first major work completed in time for the September Council meeting.

Chairman Campbell: All right, I guess we're on track, taking John's comment as the Council position.

Don Collinsworth: Mr. Chairman, I'd just like to make a couple of remarks. The State of Alaska does not have an interest to acquire adverse possession of this management obligation. We will do it if the Council and the federal government and industry wants us to do it. We are faced with the same kind of problems that this Council faced with in terms of staff limitations and dollars to conduct our management and regulatory programs. The Board budget has been cut; they are going to have fewer days in which they can meet. The budget for my agency has been cut very drastically over the last couple of years, and to assume this obligation we are going to have to put dollars into the program and that means it's going to require some reallocation of effort. This Council is faced with an obligation to deal apparently with the halibut issue and we've discussed that a length and have pointed out that by acquiring that obligation the Council is going to need more staff time and maybe require another day meeting. For the State to accept the delegation of authority to manage and regulate crab, we're talking about an obligation that's going to be every bit as expensive, if not more so, because of the interest in that fishery and the intensity under which that fishery is managed. So, it's not without cost that the State would be accepting this delegation. And, while we still stand ready to do so, we want to do so in a way that is consistent with the desires of the Council. We also in accepting the obligation, we don't want to accept a process that is going to be extraordinarily costly to us and to be obligated to prepare extensive justifications and research and analysis and, EAs, RIRs, and hold to even perhaps a higher standard of performance than the Council, but it's probably not a situation we can just afford. I think

clearly... (mirrored text from reverse side)

Council Administration

Chairman... (mirrored text from reverse side)

Chairman... (mirrored text from reverse side)

Chairman... (mirrored text from reverse side)

that there does need to be accountability, there does need to be a record, and there does need to be justification for the actions taken, but I think, again, that that has to be reasonable in those terms. So, I just want to make it clear; we have a lot of financial obligations and if we assume another it's going to impact our program and while we still stand at this point willing to do that, it obviously is going to have to be subject to the fact that we're going to have to look at a document and make a determination whether we can afford to accept the obligation.

No other discussion or action.