


MEMORANDUM

TO: Council, AP, and SSC Members

FROM: Clarence G. Pautzke 
Executive Director

DATE: December 3, 1992

SUBJECT: Groundfish Plan Amendments - Final Review

ACTION REQUIRED

- (a) Consider final action on the Pribilof Island trawl closure proposal.
- (b) Consider final action requiring vessels to register to fish exclusively in either the GOA or BSAI management areas each year.
- (c) Consider final action on the proposal to explicitly allocate PSC allowances to the inshore, offshore and CDQ pollock fisheries.

BACKGROUND

Probilof Island Trawl Closure

This item, originally part of Amendment 21 to the BSAI FMP, is now Amendment 21a because additional analysis was required. The initial draft was reviewed by the Council, AP and SSC at the September meeting. The AP and SSC recommended that minor changes be made and that it then be released for public comment. It was released for public review on October 29, 1992. Item D-3(a)(1) is a letter from the Fish & Wildlife Service regarding the impact of the alternatives on seabirds.

Specific alternatives for these measures requested by the Council include the following:

- Alternative 1: status quo -no area closures adjacent to the Pribilof Islands.
- Alternative 2: close IPHC Area 4C to bottom trawling.
- Alternative 3: close IPHC Area 4C to all trawling.
- Alternative 4: close waters within a 25-mile zone around the islands to bottom trawling.
- Alternative 5: close waters within a 25-mile zone around the islands to all trawling.
- Alternative 6: close waters within IPHC Area 4C west of 169 W. to bottom trawling.
- Alternative 7: close waters within IPHC Area 4C west of 169 W. to all trawling.

The Council can review public comments on Amendment 21a at this meeting and take final action by recommending a preferred alternative.

Exclusive Registration

At its April 1992 meeting, the Council requested staff to prepare an amendment package that included: (1) alternatives to establish exclusive registration for vessels engaged in the GOA and BSAI trawl and longline groundfish fisheries; and (2) alternatives to establish a possible opening date in the BSAI "B" season pollock fishery. At the September 1992 meeting, the Council reviewed the amendment package and recommended that the two issues be separated and that additional alternatives be considered for an exclusive registration program for the groundfish fisheries. The exclusive registration analysis was released for public review in early November. Comments received are under Item D-3(b)(1).

The ten alternatives are:

Alternative 1: Status quo (no exclusive registration);

Alternative 2: Exclusive registration for trawlers and factory longliners for:

- a) all groundfish,
- b) pollock only, or
- c) Pacific cod only

Alternative 3: Exclusive registration for trawlers only for:

- a) all groundfish,
- b) pollock only, or
- c) Pacific cod only

Alternative 4: Exclusive registration for all vessels fishing for groundfish for:

- a) all groundfish,
- b) pollock only, or
- c) Pacific cod only

If the Council recommends to amend the FMP in December, and the amendment is approved by the Secretary, regulations could be implemented sometime after mid-1993.

Inshore/Offshore and CDQ PSC Catch Limit Allowances

Amendment 18 established community development quotas (CDQs) of up to 7.5 percent of the Bering Sea and Aleutian Islands area pollock TACs and, for 1992, allocated the remainder of the pollock TACs as follows: 35 percent for vessels delivering pollock for onshore processing and 65 percent taken by or delivered to vessels that process at sea. Revised Amendment 18 imposes the same allocation between catch for onshore and at-sea processing for 1993 - 1995. The onshore processing, at-sea processing, and CDQ pollock fisheries will be referred to jointly as the pollock allocation fisheries.

At its June 1992 meeting, the Council requested staff to prepare an amendment package that included alternatives to allocate the pollock fishery prohibited species catch limit allowances among the three pollock allocation fisheries established by Amendment 18 and Revised Amendment 18. The initial draft was reviewed by the Council, AP and SSC at the September Council meeting. The AP and SSC recommended that minor changes be made to the draft and that it then be released for public comment. The Council endorsed these recommendations but also asked that additional options for two alternatives be analyzed and the draft be released for public review. It was sent to you on November 19, 1992.

Three alternatives are being considered. The two alternatives to the status quo include several options.

Alternative 1 is the status quo with no explicit allocations of the pollock fishery PSC allowances among the three pollock allocation fisheries. Once a PSC allowance is taken, the appropriate pollock fishery would be closed to all three pollock allocation groups.

Alternative 2 would make three changes to the existing bycatch management regime:

1. Establish separate PSC allowance fisheries for
 - Atka Mackerel/other groundfish,
 - bottom trawl pollock, and
 - mid-water pollock
2. Establish the authority for the Secretary, in consultation with the Council, to determine whether the attainment of either the halibut or crab PSC allowance for the mid-water pollock fishery would trigger a closure of that fishery, and similarly whether the attainment of the halibut, crab or herring PSC allowance for the Atka mackerel/other groundfish fisheries would trigger a closure of those fisheries.
3. Establish an explicit allocation of each pollock fishery PSC allowance among the three pollock allocation fisheries. That is, the onshore processing, at-sea processing, and CDQ pollock fisheries would each receive a fixed percent of the mid-water and bottom trawl allowances for crab, halibut and herring. The formula to be used annually to set the percent for each PSC allowance and each pollock allocation fishery would be specified in the regulations. For 1993 and until changed, the PSCs would be distributed in proportion to the expected pollock catch in each fishery.

Alternative 3 is similar to Alternative 2 but would apply only to the herring PSC limit and allowances. It would establish Atka mackerel/other groundfish and bottom trawl pollock as separate PSC allowance fisheries for herring. It would establish explicit allocations of the bottom trawl and mid-water trawl pollock fishery herring PSC allowances among the three pollock allocation fisheries.

Options that could be added to Alternative 2 or 3, requested at the September meeting, are listed below.

1. Each CDQ allocation of a pollock fishery PSC allowance would be allocated explicitly among the individual Community Development Programs.
2. Exempt CDQ pollock fisheries from the PSC limit closures.
3. Eliminate the primary halibut PSC limit that closes Zones 1 and 2H, but retain the overall halibut PSC limit that closes the entire BSAI.

The Council can review public comments and take final action on this amendment at this meeting. If the Council recommends specific changes to the FMP at this meeting, and if those recommendations are approved by the Secretary, they probably would not be in place before mid-1993. A large part of the pollock TACs will have been taken by then; therefore, any change that is implemented probably would not be fully effective until 1994.



IN REPLY REFER TO:

United States Department of the Interior

AGENDA D-3(a)(1)

DECEMBER 1992

FISH AND WILDLIFE SERVICE
Alaska Maritime National Wildlife Refuge
2355 Kachemak Bay Drive, Suite 101
Homer, Alaska 99603
October 29, 1992

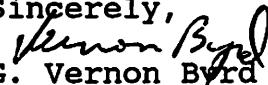
Brent Paine
North Pacific Fishery Management Council
P.O. Box 103136
Anchorage, Alaska 99510

Dear Mr. Paine:

As you requested, I have reviewed the draft Environmental Assessment/Regulatory Impact Review for the proposed no-trawl zone around the Pribilof Islands. As you state, the direct impact of the trawl fishery on seabirds is not well understood. Nevertheless, all of the proposed alternatives would reduce disturbance, if indeed any occurs, to most species of seabirds during summer when they feed relatively near the nesting islands.

I have attached a series of maps showing the densities of birds of various species around the Pribilofs in summer. You may use these to evaluate the proportion of high-density areas enclosed within the boundaries of each alternative no-trawl zone. A cover letter on the maps explains how they were generated.

If we may be of additional assistance, please call.

Sincerely,

G. Vernon Byrd
Wildlife Biologist

enclosure



IN REPLY REFER TO:

United States Department of the Interior

ALASKA FISH AND WILDLIFE RESEARCH CENTER

Fish and Wildlife Service

1011 E. Tudor Rd.

Anchorage, Alaska 99503



Art Sowls
Alaska Maritime National
Wildlife Refuge
202 Pioneer Ave.
Homer AK 99603

September 21, 1992

Dear Art,

As per your request, I have compiled some maps on the at-sea distribution of seabirds around the Pribilof Islands. I trust you will pass copies on to Larry Mercurief for his consideration.

The enclosed maps include: i) an effort map which shows the distribution of historic OCSEAP survey effort in 5 minute latitude-longitude blocks, and includes data on the abundance of all seabird species found around the Pribilofs, and, ii) contour maps of the distribution of all common breeding seabirds on the Pribilofs. Contour maps were made by first grouping the data into 10 minute lat/long blocks and then using a program to interpolate between missing data blocks (up to only one missing block).

All mapping was done with the software program "CAMRIS" created by Glenn Ford (Ecological Consulting Inc., Portland, OR). You must also be aware that Hunt, Gould, Forsell, and Peterson also published a paper in 1981 on the "Pelagic Distribution of Marine Birds in the Eastern Bering Sea", in "The Eastern Bering Sea Shelf: Oceanography and Resources", Hood and Calder (Eds.). All of that data should be included in the OCSEAP database used for the enclosed maps, and you can see that the results are similar (although the CAMRIS maps are of much better quality).

All maps are coded to show the bird densities found in the shaded, contoured areas. Bathymetric contour lines are indicated--showing the edge of the continental shelf to the south of the islands. These abundance maps represent average bird densities for the months of May through September, inclusive. Such an analysis is biased, of course, by the total survey effort in each month. Nonetheless, these maps provide a fair idea of the distribution of seabirds around the Pribilofs during the breeding season. As you know, Common and Thick-billed Murres are difficult to distinguish at sea, so all unidentified and identified murres are combined to map Murre (spp.) distribution. I have provided separate maps for the individuals species also, but these are based on far fewer observations than the combined map.

I applaud the efforts of Mercurief and others to limit the activities of bottom-trawling fishing vessels within 25 miles of the Pribilof islands. As you can see by the enclosed maps, many species of seabirds (including cormorants, murre, auklets and puffins) are most abundant in the immediate vicinity of the colonies at St. Paul and St. George Islands. Some other species (fulmars, kittiwakes) apparently forage more away from the colonies.

Recent research by myself and Russian biologists around the Diomed Islands in Bering Strait, and the Barren Islands in lower Cook Inlet, revealed that these islands not only provide breeding habitat for large numbers of seabirds, but they also appear to create a diverse and productive foraging habitat for seabirds right next to their colonies. Upwelling, fronts, eddies, bottom substrate, shallow waters, and macro-algae around these islands enhance local production, concentrate prey species, and generally create situations favorable to foraging seabirds. Indeed, just a few weeks ago I was discussing this often overlooked aspect of seabird colonies with my Russian colleagues.

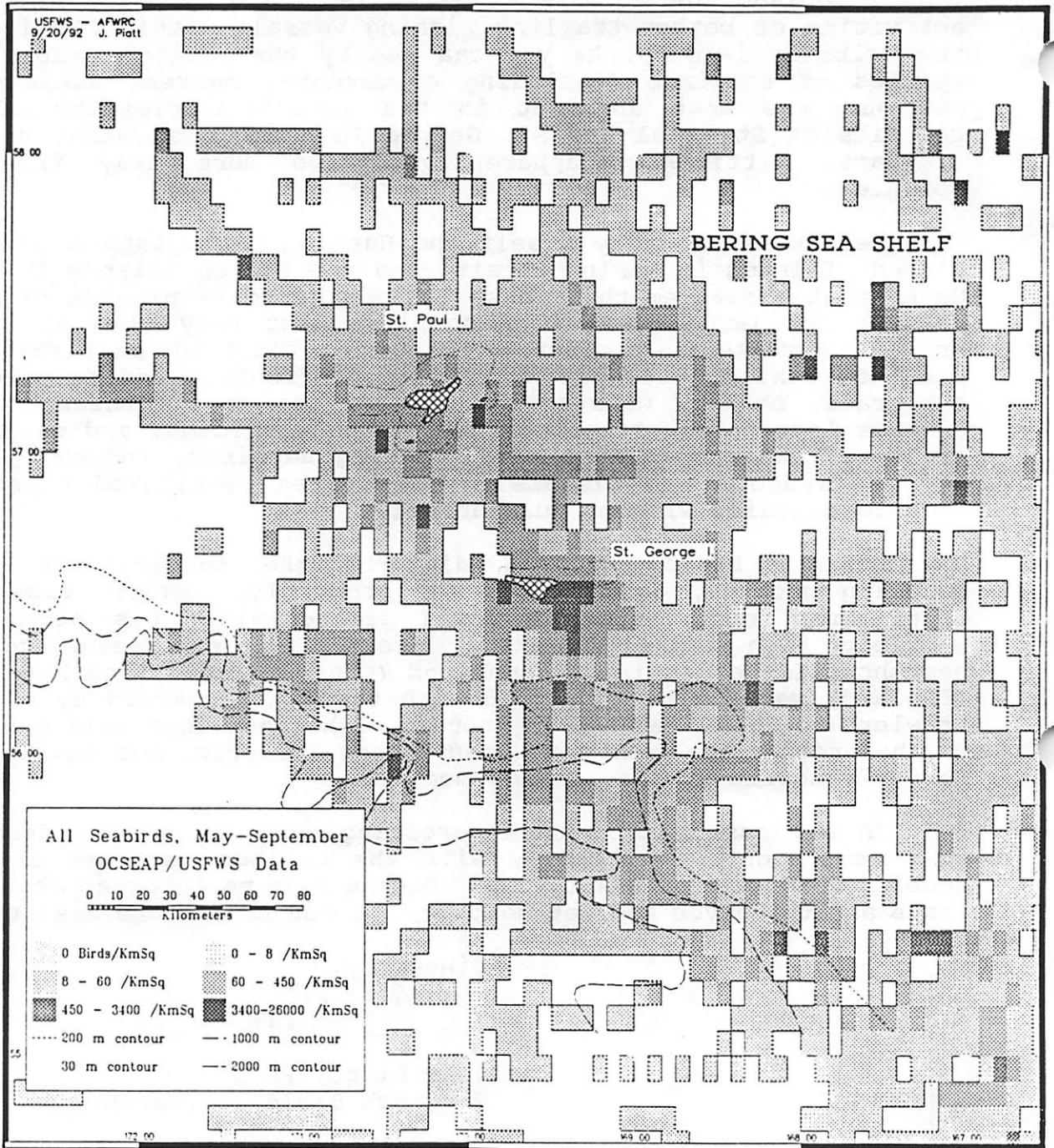
Whether bottom-trawling disturbs the seabirds on their foraging grounds, or disturbs the productive benthic flora and fauna which contributes to local productivity, has not to my knowledge been studied in Alaska. I recall from some years ago that nearshore fishermen in Newfoundland (Canada) and in the North Sea (England) were quite concerned with the damage caused by bottom-trawlers to nearshore fishing grounds. I believe that some research on the problem has been conducted in the Atlantic, but can't point to any specific studies at the moment.

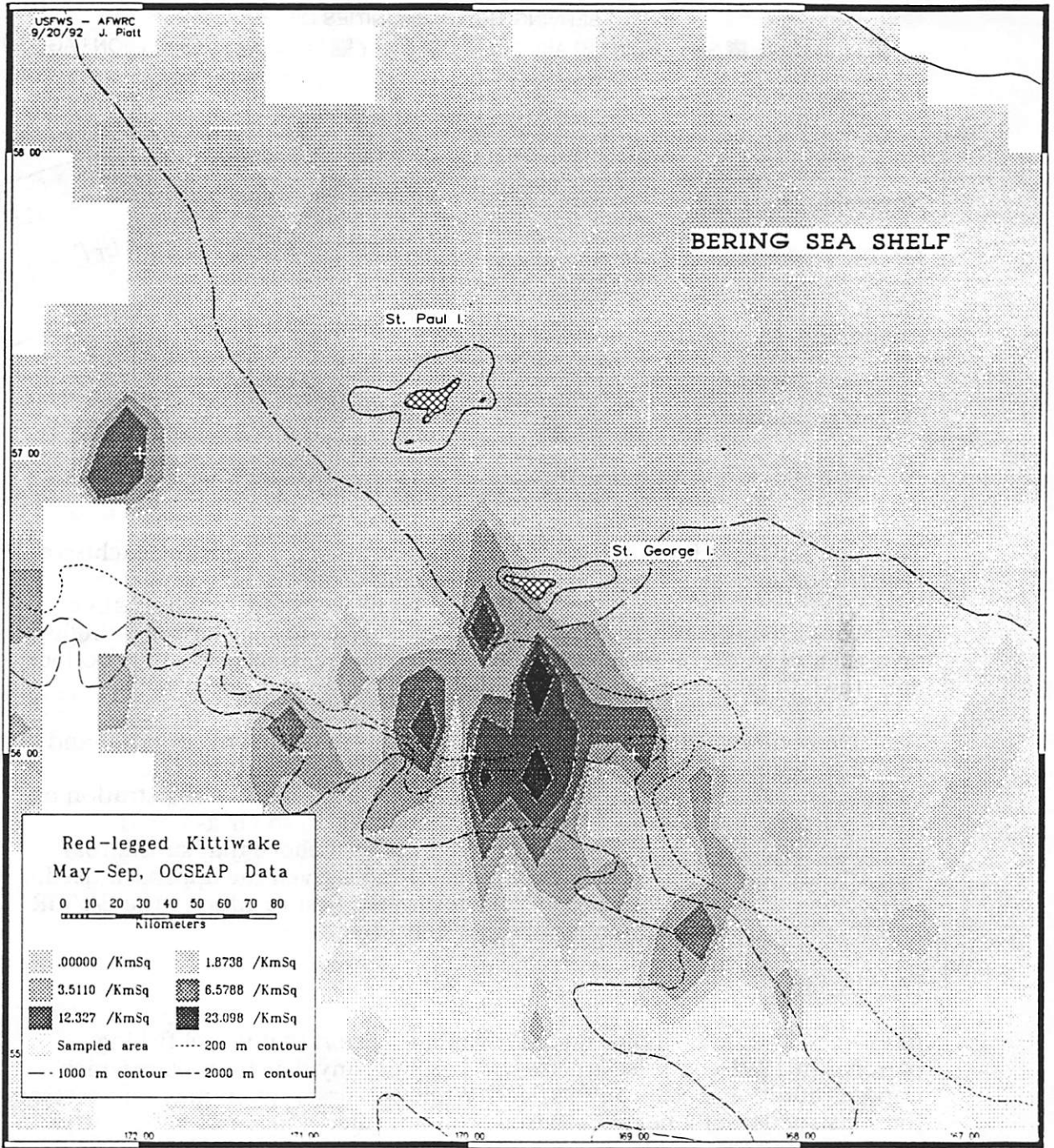
In any case, it is an interesting question and it deserves some attention... especially with the serious declines in some seabird species at the Pribilofs. Please keep me informed about the issue as it evolves and let me know if I can be of more assistance.

Sincerely,



John Piatt, Ph.D.
Research Biologist, AFWRC





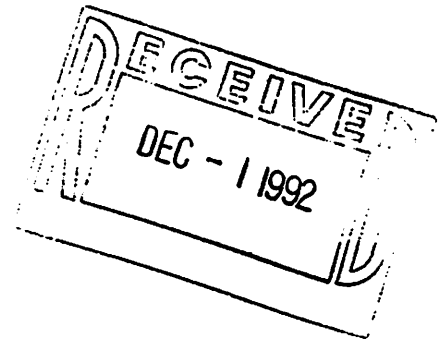
ALEUTIANS EAST BOROUGH

SERVING THE COMMUNITIES OF

■ KING COVE ■ SAND POINT ■ AKUTAN ■ COLD BAY ■ FALSE PASS ■ NELSON LAGOON

November 30, 1992

Mr. Richard Lauber, Chair
North Pacific Fishery Management Council
P.O. Box 103136
Anchorage, AK 99510



Dear Mr. Lauber:

Re: Exclusive Area Registration

The Aleutians East Borough would like to go on record supporting exclusive registration for vessels participating in the Gulf of Alaska or Bering Sea/Aleutian Islands groundfish fisheries. While we prefer an alternative that would require all vessels fishing for any species to register for a single area each year, our immediate concern is for trawl vessels fishing for pollock and trawl, longline and pot vessels fishing for Pacific cod.

We have reviewed the draft EA/RIR/IRFA for this amendment proposal and find that, while it provides some interesting information, it does not completely assess the ramifications of not imposing exclusive registration on these burgeoning fisheries. The technical analysis, in so far as it and available data go, may be well constructed but we believe that substantial benefits are not considered or are not measurable given the approach used. Our comments, below and in brief, are formatted first to address the EA/RIR and then to illustrate a number of other considerations.

EA/RIR/IRFA

In essence, the "area choice model" assumes *a priori* that vessel fishing patterns in 1991 comprise an efficient baseline, any deviation from which imposes additional costs on the fleet. While this assumption may be necessary for construction of a behavior-based economic model, it is not necessarily correct. It is conceivable, and even likely, that a requirement for vessels to fish and become more familiar with one management area will result in ultimately lower, rather than higher, unit costs of fishing in future years.

The area choice model also assumes that gross revenues remain constant--an "all-other-things-being-equal" assumption supported by the present over-capacity of the fleets. It is arguable, however, that potentially longer seasons resulting from exclusive registration may actually enhance revenues, due to greater predictability and stability in supply of product to the market.

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The area choice model also does not compare respective cost structures of various fleet components to each other, but only to themselves across time. Therefore, it is not possible to address the potential changes in overall efficiency (respective costs and benefits) of having one or the other of several user groups increasing or decreasing their proportion of the harvest.

Results of the various area choice modeling runs, as presented, indicate total net costs ranging from \$5.2 million to \$23.5 million (Tables 3.15-3.17). Even if these represent something close to reasonable estimates, they should be compared to anticipated increases in direct income to the U.S. ranging from -\$300,000 to +\$38 million (Tables 3.24-3.28).

Finally, the models explicitly do not account for previous actions of the Council to allocate catches of pollock and Pacific cod between the onshore and offshore fleets. Given the current implementation of "inshore/offshore," comparisons made in the analysis before you (without inshore/offshore) are not applicable; they do not compare benefits and costs that would occur in 1993 with or without exclusive registration.

Other Considerations

The Council must apply its judgment on the costs and benefits of any regulatory proposal, bringing to bear your knowledge and educated inferences on issues not included in, or dealt with well, in staff analyses. We believe that there, indeed, are a number of benefits that would accrue from exclusive registration which are not illustrated in the EA/RIR.

Perhaps the primary issue that has not been addressed is that of costs and benefits of maintaining parallel seasons between the Gulf and the Bering Sea. The current attempt to change the Bering Sea pollock "B" season has been made much more difficult because of concerns that an otherwise unoccupied Bering Sea fleet will be free to come in to the Gulf of Alaska and upset current fishing patterns. Given the Council's apparent desire to prevent disruption to such fishing patterns, while increasing the benefits derived from a more appropriately timed pollock "B" season, it is reasonable to ascribe substantial benefit to the assistance of exclusive registration in this process.

Exclusive registration would promote a number of environmental benefits. First, given that much of the GOA P. cod TAC is taken within 20 miles of Ugamak Island by vessels that may well choose to fish in the Bering Sea if required to make a choice, then less fishing activity would occur nearby this sea lion rookery (even without proposed action to enlarge the island's no-trawl zone). Moreover, without exclusive registration and with an expanded no-trawl zone around Ugamak, these vessels can be anticipated to move more easterly within the Western GOA, intensifying fishing pressure there and consequently pressure on "local" stocks.

Also, with the anticipated amount of effort to be expended in fisheries like western GOA P. cod, managers' abilities to prevent harvests above the TACs is strained, as evidenced in 1992. Exclusive registration will act to enhance their ability to keep catches within quota. And, seasons could be expected to lengthen, at least somewhat, hopefully promoting more careful fishing practices that might allow reductions in bycatch and discards.

Another issue that the Council might wish to consider is how exclusive registration may even assist with other programs to rationalize the GOA and BS/AI groundfish fisheries. Assuming that the Council will eventually institute some form of individual quota or limited access program (which we have not endorsed), it is very likely that "grandfathering" will still provide for excess capacity and thus higher than necessary overall costs to efficiently harvest the resource. If, however, exclusive registration were effectively combined with a moratorium on entry prior to implementation of full-blown limited access, then any immediate corrections to fleet size would reduce the overcapitalization embraced by the ultimate limited access program. In this sense, exclusive registration now would reduce the costs of imposing IFQs or some similar program in the future.

Summary

In sum, we believe that exclusive registration for vessels fishing in either the Gulf of Alaska or the Bering Sea/Aleutian Islands would promote longer seasons, acceptance of a pollock "B" season delay, better management capabilities, greater protection for sea lions, enhanced ability to reduce bycatch, and even act to better prepare the fleet for some future form of limited access. Many of these benefits, while either unmeasurable or even intangible, are nevertheless real. The Council, in its collective judgment, could well find that such benefits exceed what may be overstated costs outlined in the EA/RIR.

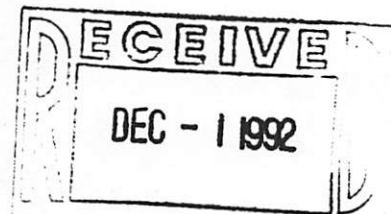
We hope that you and the Council will give serious consideration to this amendment proposal.

Sincerely,



Beth Stewart
Director, Natural Resources

**KODIAK LONGLINE
VESSEL OWNERS' ASSOCIATION**



326 CENTER AVENUE, P.O. BOX 100
KODIAK, ALASKA 99615
(907) 486-3781 FAX (907) 486-2470

HALIBUT • SABLEFISH • PACIFIC COD • CRAB

December 1, 1992

Mr. Rick Lauber, Chairman
North Pacific Fishery Management Council
P. O. Box 103136
Anchorage, Alaska 99510

SENT BY FAX: 271-2817

RE: EXCLUSIVE REGISTRATION PROPOSAL

Dear Rick,

We would like to submit comments on the exclusive registration analysis which is before the Council at the December meeting for a decision.

We would first like to comment on Section 1.3, Purpose of and Need for the Proposed Action. The document states that this proposal was motivated by recent relocation of pollock and cod harvesting vessels from the BSAI to the GOA upon bycatch of TAC closures. This same paragraph indicates that the preemption problem described was primarily the result of factory trawl effort from the offshore processing fleet. It is apparent that since we now have inshore/offshore to protect the inshore fleet, that this problem no longer exists.

It has been discussed recently that exclusive registration might solve concerns with recent TAC overages in the Western Gulf area for cod. Page 2-3 of the analysis states that annual TAC overruns in the pollock or other groundfish fisheries would be equally likely under these (exclusive registration) alternatives than under the status quo alternative.

Tables 3.6 through 3.11 have a note which indicate that they assume no inshore/offshore amendment and that inshore/offshore would result in additional relocations. Since we have inshore/offshore in place in the Gulf of Alaska, it would seem appropriate that these tables be revised to show the current regulatory status.

One of the options which may have seemed appropriate at the time is the inclusion of freezer/longliners along with trawlers for groundfish, pollock only, or Pacific cod only. Table 3.1 clearly shows that freezer/longliners harvested just 2.6% of the entire 1991 catch of Pacific cod in the Gulf of Alaska.

KLVOA

Exclusive Registration Comments

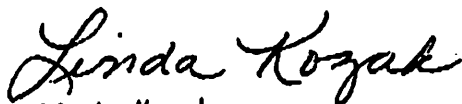
Page Two

This is not a preemption in anyone's wildest dreams. Furthermore, the document does not speak to the current regulatory structure which restricts the entry of most freezer/longliners into the Gulf cod fishery. It also doesn't recognize that those freezer/longliners under 125' which are allowed to fish in the Gulf have a catch capacity of 18 metric tons per day. This further limits their ability to "preempt" the fishery in the future.

The Cost-Benefit Conclusions on page 3-22 indicate that the total sum of costs is projected to greatly exceed the sum of benefits for all exclusive registration alternatives.

In our view, the analysis clearly shows that this proposal is without merit and at the very least, freezer/longline and other fixed gear interests have no significant impact on the possible "preemption" problems of the future.

Sincerely,

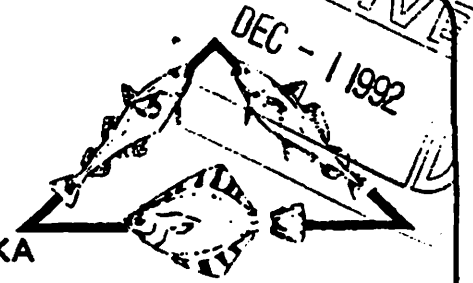


Linda Kozak
Director

Alaska Groundfish Data Bank

TO: CLARENCE PAUTZKE, EXECUTIVE DIRECTOR
NORTH PACIFIC FISHERY MANAGEMENT COUNCIL

RE: COMMENTS ON EA\RIR\IRFA FOR
EXCLUSIVE REGISTRATION PROPOSAL
BERING SEA/ALEUTIAN ISLAND AND GULF OF ALASKA



DATE: NOVEMBER 30, 1992

SENT BY FAX: 9 PP - EXPRESS MAILED HARD COPY TO FOLLOW

COMMENTS ON THE EXCLUSIVE REGISTRATION PROPOSAL FOR THE BERING SEA/ALEUTIAN ISLANDS AND GULF OF ALASKA EA\RIR\IRFA

IN GENERAL our goal is to create a stable Gulf fleet which is dependent on the Gulf resources and in control of its own future. As long as some vessels fish the Gulf "for something to do" when the Bering Sea is closed and have no vested interest in reducing waste and halibut bycatch the Gulf, fisheries will become increasingly chaotic, wasteful and, in the case of pollock, unmanageable.

I. SUMMARY

Following a brief summary of the detailed comments which follow:

EA\RIR\IRFA DOCUMENT: NOT RELEVANT TO PROPOSAL

Though the economic analysis in the document was undoubtedly done with standard economic methods and best available information, the fishery has changed so rapidly the economic analysis presented in the document is not relevant to the proposed plan amendment. The many problems with the assumptions and analysis are detailed in the last section of this document. The most glaring problems include

1. Assumption that inshore/offshore is not implemented.
2. Use of 1991 as a snapshot year, though the current fishing patterns differ substantially from those seen in 1991.
3. Failure to consider in the cost/benefit analysis the 7,000 MT of pollock left on the grounds in the combined Kodiak/Chirikof subareas 4th Quarter 1991 because the effort was unmanageable and the fishery was closed early.

4. Failure to recognize that this proposal, in large part, is an attempt to prevent future problems rather than correct current problems. In other words, this is a proactive rather than a reactive proposal.

GULF POLLOCK

PROBLEM: Influx of catcher-boat effort from the Bering Sea created unmanageable fisheries 4th Quarter 1992. TAC's not fully harvested in Shumagin and Chirikof Areas, TAC exceeded in Kodiak area. Problem expected to increase with delay of Bering Sea pollock B season opening.

SOLUTIONS: Synchronous openings with the Bering Sea or exclusive registration.

PACIFIC COD - PRE-EMPTION OCCURRING IN WESTERN GULF

PROBLEM: When the trawl fishery for Bering Sea Pacific cod reaches its halibut cap, catcher boat effort swings over to the Gulf side and makes short work of the Western Gulf quota. The vessels who lose the largest percentage of their potential catch as the result of the Bering Sea Pacific cod halibut cap are the Western Gulf fleets. This loss of catch and income to the Western Gulf fleet is expected to increase as the Western Gulf Pacific cod stocks decline.

SOLUTION: Provide enough halibut cap for the Bering Sea Pacific cod to allow the fishery to operate through first quarter or exclusive registration.

FLATFISH AND ROCKFISH - DISCARDS WASTE HALIBUT

PROBLEMS: There were periods during 1992 when the at-sea fleet's discard rate in the deep flatfish fishery was more than twice that of the shorebased fleet's. The overall halibut bycatch rates were the same for both fleets, but it took the at-sea fleet twice as much halibut as the shorebased fleet for the same amount of retained deep flatfish.

The use of halibut to catch fish that are then discarded deprives all Gulf users of income - particularly when one group of vessels discards 48% its catch and the other group discards 20% of its catch. Vessels that "drop into" the Gulf, perhaps after rocksole closes in the Bering Sea to wait for yellowfin to open, have no incentive to get the most for their halibut.

One of the reasons for high discard rates is believed to be the deliberate taking and discarding of a low halibut bycatch species, such as pollock, to reduce the vessel's overall halibut bycatch rate.

SOLUTIONS: Calculate halibut bycatch rates against retained catch for the VIP program to discourage discards (assuming the VIP program can be made to work), increase the Gulf halibut cap or implement exclusive registration.

Our preference is for an all species exclusive registration program that requires vessels either to spend their year in the Gulf or in the Bering Sea. The Gulf fleet will be stabilized, catch predictable and all vessels will have an incentive to reduce discards and halibut bycatch.

As long as the Gulf is where vessels go because they ran out of their favorite fish in the Bering Sea, fished dirty and hit the halibut cap or are just between fisheries, the fleet that stays in the Gulf has no opportunity to benefit from its own efforts to control and reduce discard and halibut bycatch rates.

II. POLLOCK DETAILS

Inshore/Offshore corrected the problems of pre-emption of the Gulf shorebased operations by at-sea operations. Had the Bering Sea and Gulf pollock seasons remained synchronous, no further protections would be needed.

However, the Bering Sea now operates on a split season pollock fishery, the second half of which is proposed for delay until late summer, while the Gulf, to protect marine mammals is tied into four quarterly pollock openings.

The Gulf 1992 pollock fishery became unmanageable fourth quarter due to catcher boats coming into the Gulf from the Bering Sea.

Shumagin subarea: During the six weeks Jan. 20 and March 1 only 2,304 MT of pollock was taken. The Bering Sea closed March 6 and during the next for days 10,268 MT of pollock was taken. First quarter quota exceeded by 7,742 MT.

Second Quarter 1,400 MT was taken the first week and only small amounts in subsequent weeks. The fishery closed in late June. Quota exceed by 500 MT

Third quarter, 1,830 MT taken during the first week. Quota exceeded by 300 MT.

Fourth Quarter fishery declared unmanageable and the area was not reopened. 1,193 MT left on the grounds.

Chirikof subarea: 2,962 MT left on the grounds. Area closed early fourth quarter due to unmanageable effort.

Kodiak subarea: First three quarters catch close to quota. Fourth quarter quota exceeded by 3,306 MT due to influx of effort by Bering Sea catcher boats, including those delivering to a mothership which transferred in from the Bering Sea.

We expect the influx of catcher-boat effort from the Bering Sea to increase in future years and increasing amounts of quota to be left on the grounds in the face of unmanageable effort.

Either the Gulf and Bering Sea pollock openings must be synchronous or exclusive registration must be implemented if the Gulf's pollock TAC's are to be fully harvested and no quarterly apportionment exceeded. Marine mammal concerns in the Gulf appear to preclude synchronous openings with the Bering Sea.

III. PACIFIC COD IN DETAIL

The Western Gulf is a buffer between the Bering Sea and the Central Gulf. When Pacific cod closes in the Bering Sea, effort switches to the Western Gulf and those in the Central Gulf pray the Western Gulf quota will hold out until the Central Gulf fleet has taken its Pacific cod quota.

Inshore/Offshore was not in effect during the 1992 Pacific cod fishery in the Western Gulf. To get some idea of the potential change in effort we looked at the shorebased catch only. For the first three weeks of the trawl fishery, Jan. 20 to Feb. 9 only 1,620 MT of Pacific cod were taken.

The Bering Sea closed to Pacific cod fishing Feb. 16. Shorebased catch subsequently jumped to 3,000 - 4,000 MT per week. Any shortening of the Bering Sea Pacific cod first quarter fishery will add more effort into the Western Gulf and, considering the reduced TAC for 1992 and subsequent reductions in the future, create an unmanageable fishery.

IV. FLATFISH AND ROCKFISH IN DETAIL

The delay of the rockfish fishery opening until July 1 showed potential in 1992 to eliminate the excessive halibut and salmon bycatch seen in this fishery in 1991.

However, there is still excessive waste in the flatfish fisheries - particularly the at-sea flatfish fishery which takes (and discards) substantially more arrowtooth flounder than the shorebased component which results in a high halibut bycatch rate against retained catch.

Choice of April 12-May 10 for comparative purposes

During the time April 12-May 10, only flatfish were open for target fishing and all other species were in bycatch status. On April 25 Pacific Ocean Perch became a prohibited species. Inshore/Offshore was not in effect. AGDB looked at this time period to determine if there were substantial differences in the at-sea and shorebased fisheries.

Shorebased Arrowtooth Discard Correction

We checked with National Marine Fisheries Service, Juneau, to see if there were any large discrepancies between shorebased reported discards and observed discard rates in the flatfish fisheries. Juneau reported that the only problem was with arrowtooth. The observer data indicated the actual discard rate at-sea was about five times that reported. We accordingly adjusted the shorebased arrowtooth flounder catcher boat at-sea discard estimates by multiplying the discard by 4.75 and adding the in plant discards.

**COMPARATIVE CATCH COMPOSITION - CENTRAL GULF (620 + 630) TRAWL
APRIL 12 TO MAY 10**

SPECIES	SHRBSD CAT-MT	CAT-PROC CAT MT	SHRBSD %TOT CAT	CAT-PROC %TOT CAT
POLLOCK	228	415	5.78	5.90
ARRWTH	761	3560	19.30	50.63
DEEP FLAT	1914	2050	48.55	29.16
SHLW FLAT	292	46	7.41	0.65
FLTHD	199	176	5.05	2.50
POP	15	191	0.38	2.72
SR/RE	10	24	0.25	0.34
O. ROCK	44	91	1.12	1.29
P. COD	201	360	5.10	5.12
PS ROCK	77	17	1.95	0.24
SBLFSH	201	101	5.10	1.44
TOTAL	3942	7031	100.00	100.00

Both modes appeared to be targeting deep flats and took nearly equal tonnage. At-sea took more rockfish species than shorebased and four times the arrowtooth flounder.

COMPARATIVE DISCARDS - CENTRAL GULF (620 + 630) TRAWL
APRIL 12 TO MAY 10

SPECIES	SHRBSD DISC-MT	CAT-PROC DISC- MT	SHRBSD %TOT DISC	CAT-PROC %TOT DISC
POLLOCK	41	410	17.98	98.80
ARRWTTH	694	3527	91.20	99.07
DEEP FLAT	222	469	11.60	22.88
SHLW FLAT	55	40	18.84	86.96
FLTHD	54	6	27.14	3.41
POP	13	162	86.67	84.82
SR/RE	1	1	10.00	4.17
O. ROCK	0	69	0.00	75.82
P. COD	11	77	5.47	21.39
PS ROCK	0	8	0.00	47.06
SBLFSH	1	11	0.50	10.89
TOTAL	1092	4780	27.70	67.99

The biggest difference between the shorebased and at-sea operations appears to be the catch (and discard of arrowtooth). At-sea operations also show a higher rate of discard of deep flats, pollock, Pacific cod and shallow flatfish. Pacific Ocean Perch discards can be assumed to be the result of the PSC status.

We then looked at the target catch and halibut bycatch for the same period, subtracted the discards and calculated halibut bycatch against retained catch. The only at-sea target fishery was deep flats, which means all the other species were bycatch in the deep flat fishery. Shorebased had targets for deep flats, shallow flats, other rockfish and Pacific cod.

CENTRAL GULF TRAWL HALIBUT BYCATCH - APRIL 12-MAY 10 BY MODE

	SHOREBASED	CAT-PROC
TARGET CAT-MT	4074.15	7059.55
HALIBUT - MT	200.49	315.88
% HALIBUT	4.92	4.47
RETAINED CATCH	2982.15	2279.55
% HALIBUT	6.72	13.86

The overall halibut bycatch rates indicate the at-sea operations were slightly cleaner than the shorebased operations. However, in terms of retained catch, at-sea operations' halibut bycatch rate was twice that of shorebased operations.

If at-sea operations had the same discard and halibut bycatch rates as the shorebased operations, their halibut bycatch would have been about 160 MT's less. This 160 MT's translates into at least an additional 5,000 MT of catch (5% bycatch rate, 60% mortality).

**1992 COMPARATIVE CATCH BY MODE - TRAWL
CENTRAL GULF - EXCLUDING POLLOCK**
Pollock was excluded so that halibut bycatch would be comparable

	SHOREBASED	CAT-PROC
TARGET TOT-MT	31904.79	32563.08
DISCARDS	8008.00	14115.00
%DISC	21.71	45.85
HALIBUT	889.32	1206.94
% HAL	2.79	3.71
RETAINED CAT-MT	23896.79	18448.08
%HAL	3.72	6.54

Moving the rockfish fishery opening back to July 1 should reduce the overall halibut bycatch taken by factory trawlers in 1993; but the apparent excessive discards will continue to consume halibut which could be used by less wasteful vessels, catcher and catcher-processor, for additional retained catch and benefit to the nation.

If all modes operated with around 20% discards, about 500 MT less of halibut would have been taken -- halibut which would have "bought" the trawl fleet another 20,000 MT of catch.

Is There A Less Drastic Measure?

We've given this considerable thought and at one time felt that a VIP program in which the halibut bycatch rate was calculated against retained catch might work. However, the VIP program isn't really flying and discussions with NMFS during the November Cap Committee meeting indicated that there are severe impediments to calculating halibut bycatch rates against retained catch.

Raising the trawl halibut cap in the Gulf would resolve the allocative issue surrounding inadequate halibut to take the available flatfish -- however, this solution appears unlikely.

Until someone has a better idea, it seems that exclusive registration is the only avenue with a prayer of working. Vessels that have to stay in the Gulf will have a greater incentive to maximize the value of their catch and increase their fishing time than vessels that just drop in until things pick up in the Bering Sea.

V. OTHER METHODS (LIKE IFQ'S)

All the right words -- unmanageable effort, incentive to maximize the value of the catch and minimize discards and bycatch -- that trigger the "IFQ's are the answer" tape occur in the above problem descriptions. IFQ's may be the answer; a viable incentive program would be a big help too and as would using halibut bycatch rates against retained catch.

The VIP program gives all evidence of being dead on arrival. Using retained catch to calculate halibut bycatch may not even arrive. An IFQ program is at least two years off.

Exclusive registration admittedly is a crutch for a crippled industry, but a crutch is better than nothing and we urge this interim measure be recommended for all species at least until a better cure is implemented.

VI. TENDERING AND DEFINITION OF FISHING

During our conversations with other groups the questions were raised as to whether exclusive registration would prohibit tendering fish between the Bering Sea and Gulf and whether taking fish from one area and delivering them in the other area would be legal.

We have discussed these issues with NMFS Juneau and the tentative answers seemed to be:

1. Tendering is defined as "fishing" under the Magnuson Act, so a vessel that tendered pollock from the Gulf to the Bering Sea would be considered as "fishing" the Gulf and could not "fish" pollock in the Bering Sea under Exclusive Registration.
2. There can be no legal restriction on where catcher boats deliver their product. A vessel could fish pollock in the Bering Sea and deliver to a Gulf processor, but could not then fish pollock in the Gulf under exclusive registration.

Exclusive Registration does not guarantee that product taken in one area is processed in that area; it does prevent sudden effort shifts which create unmanageable fisheries and/or quota overruns and prevents dirty vessels from closing down a fishery in the Bering Sea and then running over to the Gulf to continue fishing the same species or vice-versa at the expense of the existing local fleet.

VII. THE EA/RIR ANALYSIS

The economic analysis was done with the best available data at the time, but changes in the fisheries have rendered much of the analysis irrelevant. We understand that, should the Council select any of the exclusive registration alternatives, a new cost/benefit analysis, additional public review periods and council review time will probably be necessary.

Though the implementation of any exclusive registration plan will be delayed, we feel this should be viewed as an opportunity to refine the document and use any new ideas brought forward to solve the problems discussed above.

The economists have pointed out in the past that a cost/benefit analysis is only a part of the picture. Our following discussion is not intended as criticism of the analysts or their work, but as an opportunity to discuss how the fisheries have changed and to raise issues that are not part of any standard economic analysis and are not addressed in the EA/RIR, but have bearing on the issue and may be considered by the Council.

1. MODEL PROBLEMS

- a. The model assumes that inshore/offshore is not implemented. Since inshore/offshore has been implemented, most of the costs associated with the offshore fleet in the model will not exist in reality if exclusive registration is adopted.

- b. The model uses 1991 as the "snapshot year." However, the model does not factor in the 7,000 MT of pollock left on the grounds in Kodiak because the 4th quarter fishery was unmanageable due to too much effort.
- c. It takes little increase in effort in the Gulf to create unmanageable fisheries - this is not a part of the cost/benefit analysis, but is certainly a Council consideration.
- d. Though the EA/RIR discussion indicates that Gulf vessels tend to stay in the Gulf and most of the catcher-boat switching comes from Bering Sea catcher vessels moving into the Gulf, the text does not identify the number of vessels switching nor their impact on the area into which they switched. It would be useful to know if we're discussing the impact on 10 catcher vessels that run to the Gulf when Bering Sea Pacific cod closes or 100 that routinely move back and forth. We also feel impacts should be treated separately for the Bering Sea, Western Gulf and Central Gulf fleets to offer more detailed information to decision makers.
- e. Much of the impetus for exclusive registration is to prevent problems which we believe will occur in the future. Certainly the inability to synchronize Gulf and Bering Sea pollock seasons has a serious potential to create unmanageable second and third quarter Gulf pollock fisheries. This concern cannot be handled by a cost/benefit model but certainly may be considered by the Council.

1. MODEL RESULTS - TRAWL ONLY - COD AND POLLOCK DISCUSSION

A result of a trawl only exclusive registration would be the expansion of seasons in the Gulf "for all species covered, since most of the relatively more efficient trawl operations would move to the BSAI. The increase in effort projected for the BSAI is probably not sufficient to change seasons in that region."

The cost/benefit analysis shows substantial "costs" associated for all trawl catcher under every option -- this appears to be the result of the fact that whenever small vessels take catch which could be taken by a large vessel, the result is net loss to the nation.

The behavior model indicates that for trawl catcher vessels "the distance for the home port is a deterrent to participation for smaller vessels . ." (p.3-13). The projected effects section states that the trawl catcher-vessels principally affected by exclusive registration will be "the large segment primarily based in Dutch Harbor and Akutan (which) often switches back and forth among several fisheries between the GOA and BSAI during the year" (p. 3-14). Later the analysis states that it is "costly" to foreclose the ability of the Dutch/Akutan shorebased fleet to fish both sides of the islands (p.3-19). This statement ignores that it is also "costly" to the Gulf fleets when the Dutch/Akutan fleet "switches" into the Gulf. Again, though, in terms of net benefit to the nation, small boats are a net cost when taking product which could be taken by large boats.

That it is only vessel size which determines cost/benefit is substantiated by the impact analysis which states that the landings in Dutch Harbor and Akutan were overwhelmingly Bering Sea and Aleutian fish, while the landings at each of the Gulf ports was overwhelmingly Gulf fish (p3-25).

The issue is whether those who choose to remain "small," and, usually "diversified" so that they can most easily fish whatever is available -- crab and shrimp, cod and pollock, salmon and herring tendering -- and also, often, choose

to fish near their families and homes, are important to maintain as part of a diverse fishing fleet or should be forced out by larger vessels.

Traditionally the Gulf fleet has been a small boat fleet sized to the Gulf quotas and often vessels whose families live in the same community to which the vessel delivers. The Bering Sea has attracted large boats sized to Bering Sea quotas and the operating style has been a "distant water" style.

In the case of Pacific cod and pollock it is usually only when the Gulf fleet can't take its quotas faster than the Bering Sea fleet takes its quotas that "switches" occur. It's rather a case of "I finished my dinner, you've got some left on your plate so I'll eat that too."

Exclusive registration would allow the Gulf fleet to eat its dinner in peace.

2. MODEL RESULTS - TRAWL ONLY - ALL SPECIES DISCUSSION

"All species" for the Gulf mainly means including flatfish and rockfish along with pollock and Pacific cod under exclusive registration. There is no question that there will be economic losses to the factory trawl fleet which has depended on fishing the low quota rockfish species in both the Gulf and Bering Sea and used rex sole in the Gulf to fill in periods when higher value species weren't available.

As we have stated above, our intent is to get the most for every pound of halibut bycatch and that is measured in terms of halibut bycatch rates calculated against retained catch. We are open to discussing other methods which will reduce halibut bycatch and discards.

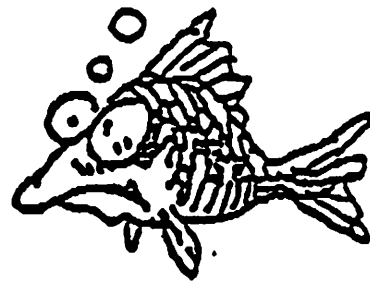
Discards and halibut bycatch are not factored into the cost/benefit model, but certainly are a concern of the council. In terms of the impact model, exclusive registration for all species is projected to increase U.S. direct income by \$37.9 million.

Thank you for the opportunity to comment.



Chris Blackburn, Director
Alaska Groundfish Data Bank

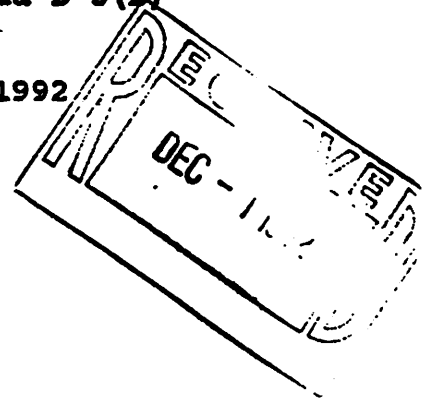
**North
Pacific
Longline
Association**



Agenda D-3 (b)

December 1, 1992

Mr. Richard B. Lauber, Chairman
North Pacific Fishery Management Council
P.O. Box 103136
Anchorage, AK 99510



RE: Exclusive Registration Proposal

Dear Rick:

The North Pacific Longline Association represents freezer-longline vessels which fish for groundfish in the Bering Sea and Gulf of Alaska. We would like to offer the following comments on "THE EXCLUSIVE REGISTRATION PROPOSAL IN THE BERING SEA/ALEUTIAN ISLANDS AND THE GULF OF ALASKA."

I. Problem Statement

The "Purpose of and Need for the Proposed Action" section of the EA/RIR for this proposal does not appear to state a problem requiring federal regulation.

One suggested problem is "premature closures (relative to the historical fishery) of the Pacific cod and pollock fisheries in the Gulf of Alaska...primarily the result of factory trawl effort from the offshore processing fleet." As the document states, however, "this problem should be remedied by the recent inshore/offshore allocation", which gives 100% of the pollock and 90% of the cod to inshore harvesters and processors.

It is speculated that "there still exists the potential for inshore sector harvesting effort to shift from Bering Sea areas to the Gulf," and that species other than pollock and cod might be involved. Speculation is questionable grounds for regulation.

There is no allegation nor any evidence in the EA/RIR that freezer-longliners have caused any historic "preemption" in the Gulf fisheries. Inshore/offshore has assured that the vast majority of the freezer-longliners, like the factory trawlers, are virtually excluded from the Gulf fisheries. Those few vessels which do qualify to fish

the "inshore" apportionment are constrained by the 18 ton per day limit. No justification is presented to support the proposal that freezer-longliners should be subject to exclusive registration.

II. Environmental and Biological Impacts

Section 2.1, Background, states that in 1992 there was a first quarter overrun in the western GOA pollock trawl fishery, because more vessels participated than NMFS had anticipated. Also, 93% of the GOA cod TAC was taken in the first quarter, due to the relocation of trawlers from the BSAI due to halibut bycatch. There is no allegation nor any documentation suggesting that freezer-longliners contributed in any significant way to these occurrences. Inshore/offshore will prevent factory trawlers from again accelerating harvest. The only "potential" problem might come from shoreside delivery vessels.

This section discusses commercial fisheries and Stellar sea lion management, but points out that substantial buffer zones have been established to protect sea lion rookeries and to disperse fishery effort. Section 2.3 concludes, "total catches of prohibited and exploited species should be no different under the status quo or any of the exclusive registration alternatives."

The problem statement and the environmental assessment simply do not make a case for exclusive registration.

III. Economic Analysis

The result of the cost-benefit analysis is clear and simple: "We project that the total sum of costs greatly exceeds the sum of benefits for all alternatives...These projected losses in profitability for the groundfish fleet represent real losses to society." (Section 3.3.5, emphasis added)

The income impact analysis projects that the only possible net impact on direct income would be due to increased onshore landings of "other groundfish" in the Gulf of Alaska. However, the authors state that, "Projections of the net income impacts of changes in the allocation of landings due to exclusive registration are based on so many assumptions - many of them undocumented - that it is difficult to know to what extent the model results may derive from questionable assumptions rather than from actual effects that would occur under exclusive registration." (Section 3.4.3) These results offer no legitimate foundation for federal regulation.

IV. Conclusion

The analysis does not justify imposition of any of the exclusive registration alternatives proposed. Any significant "preemption" by the offshore trawl fleet will be prevented by the terms of the inshore/offshore allocation. There is no suggestion nor any evidence in the document that freezer-longliners have historically caused "preemption" problems, and inshore/offshore has effectively eliminated them from the Gulf fisheries. There is speculation only that at some unspecified time in the future there might be a shift of shoreside delivery effort from the BSAI to the GOA. No real biological case is made for exclusive registration. Any of the proposals would run afoul of National Standard 4, which encourages efficiency in the use of fishery resources, and forbids those which have economic allocation as their sole purpose. Finally, costs of any of the proposals greatly exceed benefits, and any projected increases in direct income are based on so many questionable assumptions as to be unreliable.

The analysis does not demonstrate that there is any real need for exclusive registration - the status quo should be maintained.

Sincerely,



Thorn Smith



Indigenous Council for Marine Mammals

P.O. Box 200908
Anchorage, Alaska 99520
(907) 279-2511
Fax (907) 279-6343

RESOLUTION NO. 92-01

MEMBERS:

Alaska Eskimo
Whaling Commission

Alaska & Inuvialuit
Beluga Whale Committee

Arctic Marine
Resources Commission

Alaska Sea Otter
Commission

Eskimo Walrus
Commission

N. Slope Borough
Dep. Wildlife Mgmt.

Pribilof Aleut Fur
Seal Commission

Southeast Native
Subsistence Commission

RurAL CAP STAFF:

Robert Polasky
Subsistence Director

Carol Torsen
Subsistence Coordinator

Lisa Rotterman, Ph.D.
Marine Mammal Biologist

ENTITLED:

IN SUPPORT OF NO HARD BOTTOM TRAWL ZONE
AROUND THE PRIBILOF ISLANDS FOR
CONSERVATION PURPOSES.

WHEREAS:

the North Pacific Fishery Management
Council advises the Secretary of Commerce
for management and use of the bottom
fishery of the Bering Sea; and

WHEREAS:

the Aleuts of the Pribilofs are concerned
about the further declines of the marine
bird populations and the Northern Fur
Seals, Steller Sea Lions, and the prey
items upon which they depend; and

WHEREAS:

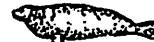
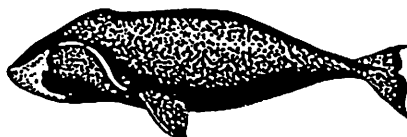
the bottom fish industry, through the use
of hard bottom trawl techniques, destroys
the ocean floor where immature crab and
fish stocks mature and seek safe habitat
from predators, and further where U.S.
ocean vegetation provides nutrients for
the entire health of the Bering Sea
ecosystem; and

WHEREAS:

there are documented declines of fish
stocks which are targeted in the fishery
as well as the food source for the
majority of animal life in the Bering Sea;
and

WHEREAS:

the Aleuts of the Pribilofs have requested
a no hard bottom trawl zone be implemented
out to 25 nautical miles around the
Pribilof Islands as a buffer zone to help
protect the sensitive ecosystem within
these islands as well as the majority of
the Bering Sea;



INDIGENOUS COUNCIL FOR MARINE MAMMALS
RESOLUTION NO. 92-01
Page 2

NOW THEREFORE BE IT RESOLVED THAT

the Indigenous Council for Marine Mammals (consisting of the Alaska & Inuvialuit Beluga Whale Committee; Pribilof Aleut Fur Seal Commission; Eskimo Walrus Commission; Alaska Sea Otter Commission; Alaska Eskimo Whaling Commission; Southeast Native Subsistence Commission; North Slope Borough Department of Wildlife Management; and the Arctic Marine Resources Commission) supports the Pribilof Aleuts in their request for the no hard bottom trawl zone around the Pribilof Islands for conservation purposes.

ADOPTED unanimously in Anchorage, Alaska on September 10, 1992 by members of the Indigenous Council for Marine Mammals.



Matthew Iya, Acting Chairman
INDIGENOUS COUNCIL FOR MARINE MAMMALS

September 10, 1992
Date

RURAL ALASKA RESOURCES ASSOCIATION

P.O. Box 200908
Anchorage, Alaska 99520
(907) 279-2511
Fax (907) 279-6343

MEMBERS:

Aleutian/Pribilof
Islands Association, Inc.

Association of Village
Council Presidents

Bristol Bay Native
Association

Central Council,
Tlingit & Haida Indian Tribes

Copper River Native
Association

Kawerak, Inc.

Kodiak Area Native
Association

Kuskokwim Native
Association

Maniilaq Association

The North Pacific Rim

North Slope Borough

Tanana Chiefs
Conference, Inc.

Tyonek,
Native Village of

ASSOCIATE MEMBERS:

Alaska Sea Otter Commission

Bering Sea
Fishermen's Association

Nunam Kitlutsisti

RurAL CAP STAFF:

Bob Polasky

Carol Torsen

December 1, 1993

Mr. Richard B. Lauber, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue
Anchorage, Alaska 99501

Dear Mr. Lauber,

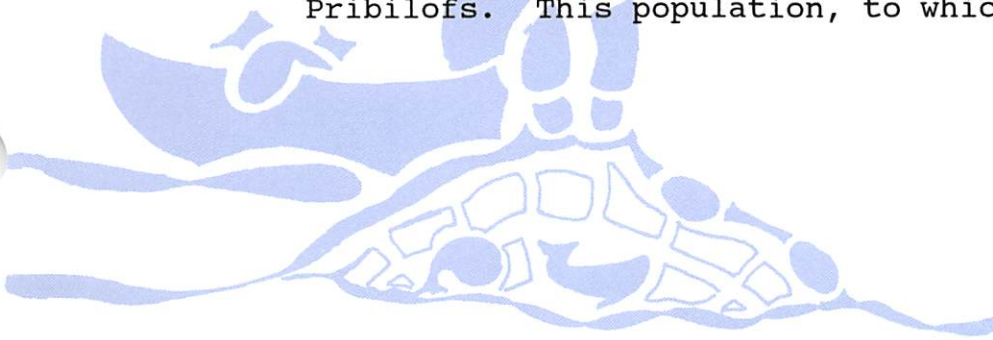
I am writing on behalf of the Rural Alaska Resource Association (consisting of the Alaska Sea Otter Commission, the Aleutian/Pribilof Islands Association, the Association of Village Council Presidents, the Bering Sea Fishermen's Association, the Bristol Bay Native Association, the Central Council, Tlingit and Haida, the Copper River Native Association, Kawerak, Inc., the Kodiak Area Native Association, the Kuskokwim Native Association, Maniilaq Association, the North Pacific Rim, the North Slope Borough, Nunam Kitlutsisti, Tanana Chiefs Conference, Native Village of Tyonek, and the Unga Tribal Council). We are writing to comment on the proposed establishment of a no bottom trawl zone around the Pribilof Islands.

We raise the following points:

1) The North Pacific Fishery Management Council advises the Secretary of Commerce for management and use of the bottom fishery of the Bering Sea.

2) It has been documented that there are substantial declines in populations of sea birds in the vicinity of the Pribilofs.

3) Additionally, it has been documented that there have been substantial declines in populations of marine mammals in the vicinity of the Pribilofs. Over 70% of the world's population of Pribilof Fur Seals breed on Saint Paul and Saint George Islands in the Pribilofs. This population, to which walleye pollock



is an important prey species, began to decline in the late 1950's and the decline continued at least through 1980. In May of 1988, the Pribilof Fur Seal was listed as depleted under terms of the Marine Mammal Protection Act. This species is crucially important to the cultural, spiritual and physical well-being of the people of the Pribilof Islands, as well as an important component of the Bering Sea ecosystem.

There is a rookery of Steller Sea Lions on Walrus Island in the Pribilofs. Recently there have been substantial declines in the number of northern sea lions in the Pribilof Islands as well as other areas throughout coastal areas of Alaska. Walleye pollock is also an important prey species to this marine mammal, which is now listed as a Threatened Species under the Endangered Species Act of the United States. As the population decline of this species appears to be continuing, it is likely that its status will be changed to that of an Endangered Species in the next several years.

3) Part of the stated purpose of the proposed trawl zone closures are to protect sea bird and marine mammal populations.

4) There is evidence that marine mammal and sea bird populations may be negatively affected by bottom trawling activities in many ways including: a) entanglement in trawl netting and other debris associated with the trawling activity; b) noise associated with trawling activities; c) displacement from the feeding grounds due to trawling activity; and d) loss of present and future food resources.

The members of the Rural Alaska Resources Association believe the North Pacific Fishery Management Council has an obligation to ensure that its recommendations are consistent with the long-term health of the Bering Sea ecosystem. Therefore, the Rural Alaska Resource Association recommends to the North Pacific Fishery Management Council that it establish a 50 nautical mile no bottom trawl zone around the Pribilof Islands to ensure the health of the sea bird and marine mammal populations that use and depend upon this important habitat.

Thank you for your consideration of this matter. We reiterate that we urge the Council to act so as to ensure the long-term health of the ecosystem around the Pribilof Islands, upon which the Pribilof Island residents depend.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Matthew Iya", with a long horizontal flourish extending to the right.

Matthew Iya, Chairman.
Rural Alaska Resource Association