

Aleutian/Pribilof Islands Association, Inc.

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Anchorage, Alaska 99501
Phone (907) 278-3567



December 1, 1977

Presented to The North Pacific Fishery Management Council

The Aleutian/Pribilof Islands non-profit association serving the Native people throughout the entire Aleutian/Pribilof Region realizing that fisheries has been our livelihood for hundreds of years and that these same areas our people have lived in and fished will continue to be our main source of income in the changing world ahead- We have established a Fisheries Cooperative within our non-profit organization.

RESOLUTION 77-12

- WHEREAS, The Board of Directors of the Aleutian/Pribilof Islands Association, Inc., deems it important and necessary to take advantage of all human, economic and environmental resources available to its people and within its region, and
- WHEREAS, it is known that the most valuable resource available to the residents of the Aleutian/Pribilof region is the fisheries and the by-products of the fisheries, and
- WHEREAS, it is felt that in order to take full advantage of the fisheries potential in the Aleutian/Pribilof region that immediate steps be taken to set up an office, council, and/or regional fisheries cooperative, so as to become totally familiar with, and to take full advantage of, all State and Federal programs associated with, or concerning fisheries, fisheries development, and/or fisheries marketing potentials.
- NOW THEREFORE, BE IT RESOLVED, by the full Board of Directors of the Aleutian/Pribilof Islands Association, Inc., that there be caused to be formed, a fisheries office, or regional fisheries council, or a regional fisheries cooperative, to better serve the people of the Aleutian/Pribilof region, and further, the Executive Director is instructed to begin working on this project and that the Executive Director has full authority to implement this program.

Our mission is to represent, participate, watch dog legislation, and oversee the interests of our people in the Aleutian and Pribilof Fisheries. We intend to assist our people in obtaining training, learning new technology and changing their methods with the demand of the times.

One primary thrust at this time is to train our Native people to fish these waters with their own boats. Boats designed for the rough waters of area A, of the Bering Sea as well as throughout the Chain. Our goal is to have ten - 90 + feet vessels operating in the Pribilof's with the most modern and sophisticated equipment within two years and at least 20 smaller vessels of the 40 to 60 ft., class within a 3-5 year period supported by a floating processor competitive with anything now afloat.

We look to cooperative financing and training agreements with our foreign neighbors in becoming fully operational throughout the region. We intend to fully and completely fish these waters. No longer will we sit back comfortably while the rest of the world carries away our livelihood.

Arrangements are now being negotiated for foreign fishing interests to teach our people ground fishing techniques and to serve aboard our vessels as teachers and consultants in the realm of bottom fishing.

A planning group will meet in March to outline the details of our upcoming Bottom Fisheries Conference to be held in Anchorage in February of 1979, representation is expected from all International Fishing countries. The emphasis will be on new techniques and practices in bottom fishing. Training opportunities will highlight this conference.

If Americans are to become active in the Bottom Fishing Industry it is imperative that proper docking facilities be built as soon as possible particularly in the Pribilof's.

We see ahead great opportunities for international cooperative fishing ventures and intend that the Aleutian Fisheries Cooperative will be right in the middle of what happens.

We will push hard for the development of docking facilities in the Pribilof's and at least one dry dock for our vessels built central to the Aleutian Fishing Fleet within the next two years.

We expect to represent approximately 13 fisheries, 11 villages along the Chain and about 800 fishermen in the months ahead.

It is important to note that though domestic concerns may be somewhat leary of joint ventures with foreign nations, this country must face the fact that without the expertise and technical assistance of those nations who know bottom-fishing, this domestic fishing may never become competitive in the world market. Along these lines we have insisted on domestic ownership, but have opened our arms to foreign financial and technical assistance.

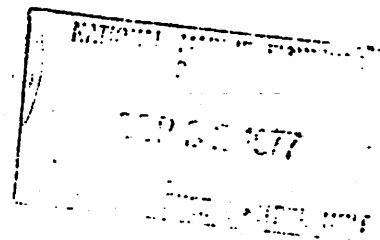
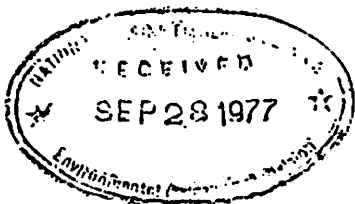
From the foregoing comments we hope you draw the same conclusion we do: Alaskans will be active in bottom fishing in a matter of months. If a domestic bottom-fishery is to be born and live, the Government must be of assistance in providing opportunities for cooperative ventures and the physical plants and facilities necessary to dock and maintain such a fleet. We must prepare now for tomorrow.

One major decision we hope to get from The North Pacific Fishery Management Council is a recommendation to close area A to foreign fishing now as called for in the 200 mile limit law.



National Coalition for Marine Conservation, Incorporated

CHRISTOPHER M. WELD, SECRETARY
18TH FLOOR
100 FEDERAL STREET
BOSTON, MASSACHUSETTS 02110
617-338-2909



September 14, 1977

Mr. Richard Gardner
U.S. Department of Commerce, NOAA
Office of Coastal Zone Management
Page Building No. 1
3300 Whitehaven Street, N.W.
Washington, D.C. 20235

Re: Proposed Marine Sanctuary in Georges Bank Area

Dear Dick:

Further to our conversation of September 9, I would like to reiterate our position in favor of the concept of marine sanctuaries while again sounding our concern that the management of sanctuaries in offshore areas must not in any way impair or impinge upon the authority or freedom of action of the Regional Fishery Management Councils.

The Coalition began urging NOAA to implement the Marine Sanctuaries Act as early as 1974, because we saw the establishment of sanctuaries as a means of diverting ocean dumping and offshore mineral development from areas essential to maintaining high natural biological productivity or at least minimizing the adverse environmental impact in ecologically sensitive areas from which such activities could not be excluded. We saw sanctuaries also as a logical and desirable extension of wildlife refuges and national parks, and we continue to favor the designation of areas, such as the area immediately adjacent to Cape Lookout, North Carolina, for that purpose.

At the same time, we are deeply concerned that a whole new grant of authority which apparently includes the power to regulate fishing and fish habitats will have the effect of limiting Councils even before the concept -- which is a novel one -- is given a fair

FAK 2

trial. In our opinion the enforceability of fishery management regulations largely depends upon the degree to which the need for, and feasibility of, the regulations is accepted by the fishermen. In the absence of a general will to comply only a vast, impractical and thoroughly unpopular surveillance effort will assure general compliance. We submit that unless the fishermen are made a part of the management regime in the manner permitted by the Council system no such general will to comply can be assured.

At an early period in the effort to get a 200 mile limit, it became obvious that the establishment of extended jurisdiction would be tied to federal fishery resource management authority. The fishermen acceded to this linkage only when they were assured that the fishing industry would have a substantial say in how the fisheries were to be managed. This is the bed from which the concept of the Regional Councils sprang, and with this in mind I read Section 303(b) and (c) as an encouragement to the Councils to be imaginative and innovative in their choice of how fisheries are to be regulated. (So far as marine sanctuaries are concerned, it is relevant also to note that the term "marine resources" -- which is used in the definition of "conservation and management" -- is defined to include "any habitat of fish".) In our view anything which tends to inhibit that ability to be innovative is inconsistent with the intent of the Act.

Specifically, 16 U.S.C. 1431(f) is the source of most of our misgivings concerning the proposed designation of Georges Bank as a marine sanctuary. This section requires that the Secretary of Commerce consult with "other interested Federal agencies" before issuing any regulations "controlling activities permitted within sanctuaries", which raises the spectre of additional steps being added to the bureaucratic nightmare attendant to the implementation of a fishery management plan. The phrase "regulations to control any activities permitted within the designated marine sanctuary" clearly creates overlapping authorities under the Marine Sanctuaries and Fishery Conservation and Management Act, and the requirement that any "authorization issued pursuant to any other authority" be certified as "consistent" with the purposes of the Marine Sanctuaries Act would obviously include regulations implementing a management plan.

It would appear reasonable to suppose that activities permitted by the New England Regional Management Council would be "consistent with the purposes" of the Marine Sanctuaries Act so long as the term "conservation" as used therein is understood to mean "conservation" as the term is used in the Fishery Conservation and Management Act (i.e., "wise use" as opposed to "preservation"), particularly in view of the fact that the Secretary of Commerce is responsible for promulgating regulations under either act. However, the term is not defined in the Marine Sanctuaries

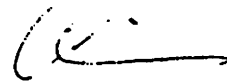
Mr. Richard Gardner
September 14, 1977
Page Three

Act and could come to mean something quite different. Moreover, responsibilities have a way of changing hands as agency functions are reshuffled from time to time, and it is at least conceivable that the two acts could in time come to be administered by different agencies.

For these reasons we strongly urge that consideration be given to the adoption of a regulation which provides that any fishing activity conducted in any part of a marine sanctuary that lies within the Fishery Conservation Zone shall be deemed to be consistent with the purposes of the Marine Sanctuaries Act if it is consistent with regulations promulgated pursuant to the Fishery Conservation and Management Act. We further recommend the adoption of a regulation defining the term "conservation" as used in the Marine Sanctuaries Act, at least so far as it relates to the management of fish stocks and fish habitats, in a manner which is consistent with the term as it is used in the Fishery Conservation and Management Act.

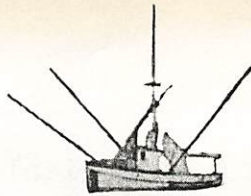
In the absence of an unequivocal clarification of fishery management authority, it is doubtful that the designation of Georges Bank as a marine sanctuary would be desirable or that this organization could support such a designation.

Sincerely yours,



Christopher M. Weld
Executive Vice President

CMW:cjb



ALASKA TROLLERS ASSOCIATION

P.O. BOX 5825

KETCHIKAN, ALASKA 99901

907-225-9638

Mister Chairman, members of the Council, my name is Jon Rowley. I have seined, gillnetted and trolled in S.E. Alaska for sixteen years. I initiated and am presently the Director of the Alaska Troller's Association Logbook Program.

Two years ago the Alaska Troller's Association realized that reliable data on our fishery and the ecology of the Eastern Gulf of Alaska is sparse. We initiated a Logbook Program hoping to make real contributions to the ocean science of the area and to gain a scientific understanding of the resource we are harvesting. The results of our Logbook Program show that we are in a position to make meaningful contributions to management decisions that are designed to maximize protection for both the resource and the fishery. Once we identify and document problem areas, we are confident that our fishermen will accept conservation measures as they are needed.

The Alaska Troller's Association began their Logbook Program in 1976 with 53 fishermen participating. The Alaska Sea Grant Program, National Marine Fisheries Service, and the Alaska Department of Fish and Game cooperated by providing technical and scientific expertise. The results have been excellent from a scientific standpoint, but especially considering the atmosphere of cooperation that the project has achieved between the fishermen and the scientific community.

The success of the 1976 program led to an improved Logbook and increased participation (160 fishermen) in 1977. Participating agency scientists are enthusiastic about the number, variety, and quality of observations in the Logbooks. As you know, the cost of putting research vessels to sea for an extended period of time is prohibitive. Through our Logbook Program we are providing over 150 point data sources every day from April through September from Dixon Entrance to the Central Gulf of Alaska.

The data from the 1977 Logbooks when subjected to statistical analysis and compared with the 1976 data will begin to show trends and correlations. We may begin to get a handle on the complex ecological interrelationships of the area. Important

to us is an understanding of biological, oceanographic, and meteorological factors affecting salmon abundance, distribution and behavior.

The Troll Management Plan as formulated by the North Pacific Fisheries Management Council is disappointing to me for several reasons:

1. The Alaska Troller's Association was not asked to participate in the drafting process.
2. We were not asked to review the plan during the drafting stages.
3. The drafting team did not review our 1976 Logbook data even though it was available.
4. The fish ticket data reporting system used to compile the catch statistics upon which many of the Plan's conclusions are founded is grossly inaccurate and should not be regarded as "scientific evidence".
5. The radical proposal to close waters north of Cape Spencer will unnecessarily disrupt the fishery and totally alienate the fishermen from the management and scientific communities.
6. Because of the acrimony that will be felt by fishermen towards scientists, I am afraid we will lose our Logbook Program if waters north of Cape Spencer are closed.

The catch statistics are grossly inaccurate. An explanation of the fish ticket reporting system will clarify the matter. A fisherman delivers his fish to a cold storage after a "trip" of 6 to 10 days. A troller may fish in several Alaska Department of Fish and Game statistical areas during one trip. The fish are weighed by cold storage personnel and the weight slips are sent to the office. While the fisherman scrubs down his boat, the cold storage bookkeeper receives the weight slip and proceeds to make out the fish ticket recording weight per species and dollar value. When the fisherman arrives in the office to receive his check and fish ticket he is often not asked where he fished. It is often the bookkeeper who must guess where the guy was fishing. If you will look closely at the catch statistics appendix in this plan you will notice in some years there is more fish reported caught in 114 (Icy Straits) than area 157 (Fairweather Grounds). Anyone even peripherally involved with the S.E. Alaskan Troll fishery will recognize this data as absolute nonsense, because there is negligible effort in Area 114. If a Fairweather boat happened to deliver in Ketchikan the fish would most likely show up as being caught in Area 101.

The A.D.F.&G. catch data is unreliable, so many of the conclusions in the Troll Plan must be rejected. The most dramatic of these is the statement that based on landing data only 6% of the average

annual troll coho catch comes from waters outside of three miles. Based on my experience, I suggest the actual figure is closer to 60%. In fact, a closure of waters north of Cape Spencer could eliminate the troll coho fishery if oceanographic conditions were such that most of the cohoes in the eastern Gulf of Alaska were feeding north of Cape Spencer as has happened in 1967 and 1968.

Appended to this testimony are graphs that show the relative importance of the various ports to H.P.C. trollers during the coho seasons since 1967. These graphs show that

1. Pelican cold storage has consistently received the larger percentage of H.P.C. coho deliveries.
2. Coho distribution in S.E. Alaska each year is variable (dependent on oceanographic conditions)

Area closures do not adjust to variable oceanographic conditions. Oceanographic monitoring should be an integral part of salmon management once research has established the basic correlations.

I am quite confident that if the status quo can be maintained in the fishery the trollers will introduce, both collectively and individually, conservation practices that will be much more effective than the radical measures prescribed by the Troll Plan as presently drafted. There is already strong indication that trollers will frown heavily on fishermen that deliver trips of small fish.

Education is always a prerequisite to viable conservation measures. I have observed and been impressed with a new degree of sensitivity towards the resource since the implementation of our logbook program.

Mortality of shakers is largely a question of how much care each individual fisherman takes in releasing the fish. An education program by this Association on the importance of releasing fish with care would substantially reduce mortality. We would also like to conduct a thorough study during the season of mortalities attributable to different types of hooks. Funding generated by our logbook program has enabled us to hire Dr. Stephen Fried, whose area of specialization is fish ecology and behavior. He is enthusiastic about getting out on boats and doing several in depth studies, including shaker mortality and ways to reduce it.

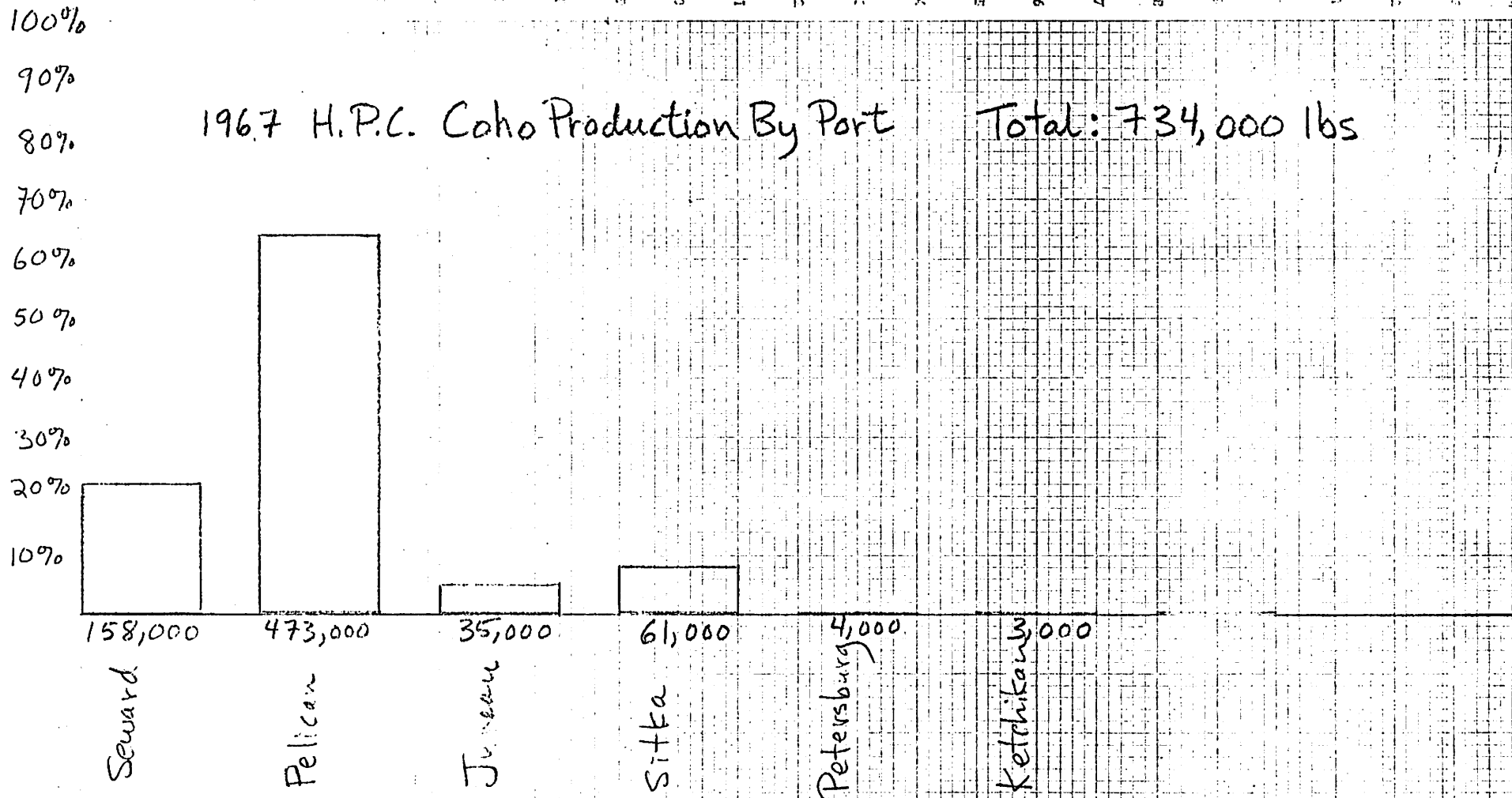
HABITAT

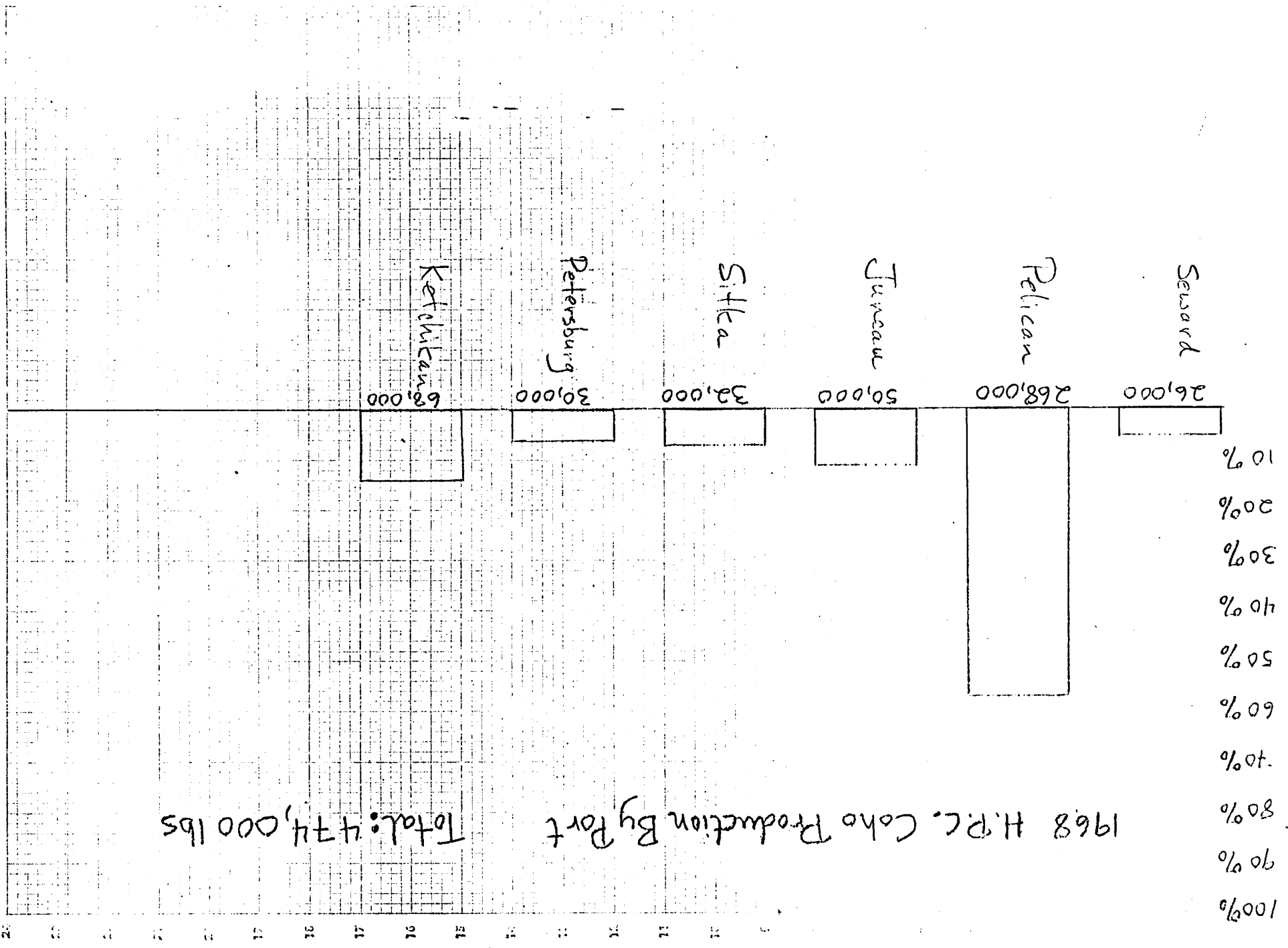
While acknowledging that habitat degradation reduces salmon populations, the Plan does not propose a habitat management scheme or address the Council's responsibilities in this area. If the Council is responsible for managing a species "the full extent of its range", a comprehensive management plan would provide for managing spawning and rearing habitat as well as the fishery. It is pointless to regulate a fishery for escapement if that escapement is to be impacted by habitat degradation. The issue is exceedingly com-

plex because of agencies with overlapping jurisdiction. One possibility would be to create through legislative means "salmon management zones" contiguous to all anadromous fish streams. Primary management would be given to A.D.F.&G., N.M.F.S., or the North Pacific Fisheries Management Council.

It is inconsistent to see^a severely restrictive management scheme proposed for the troll fishery while a green light is given to a large open-pit molybdenum mine development south of Ketchikan that will eventually virtually eliminate king salmon production in as many as three rivers (Wilson, Blossom, and Keta). I suggest it would behoove the Council to address the consequences of this type of development vis-a-vis the fisheries resource.

In view of the depleted S.E. Alaska king salmon stocks it would seem appropriate to nominate all S.E. Alaska king salmon rivers and estuaries for sanctuary status.

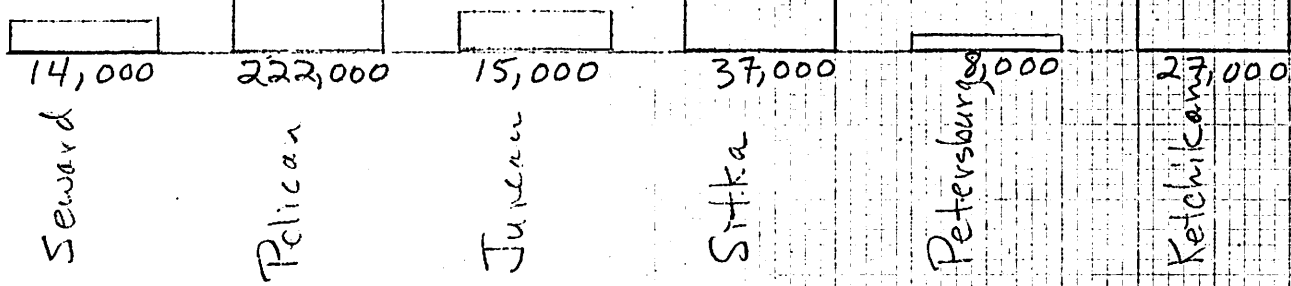




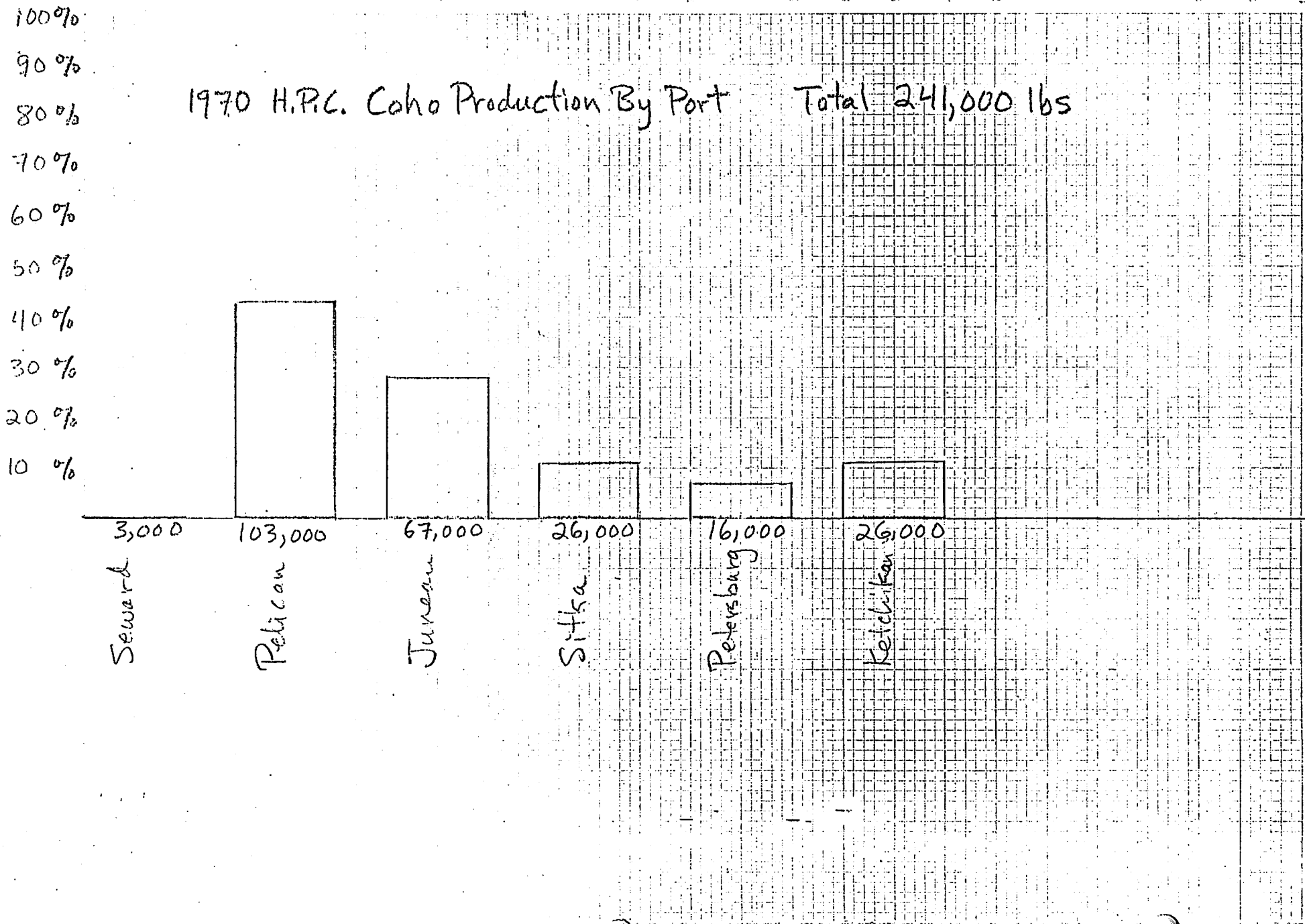
1968 H.P.C. Coho Production By Port
 Total: 474,000 lbs

100%
90%
80%
70%
60%
50%
40%
30%
20%
10%

1969 H.P.C. Coho Production By Port Total: 323,000 lbs

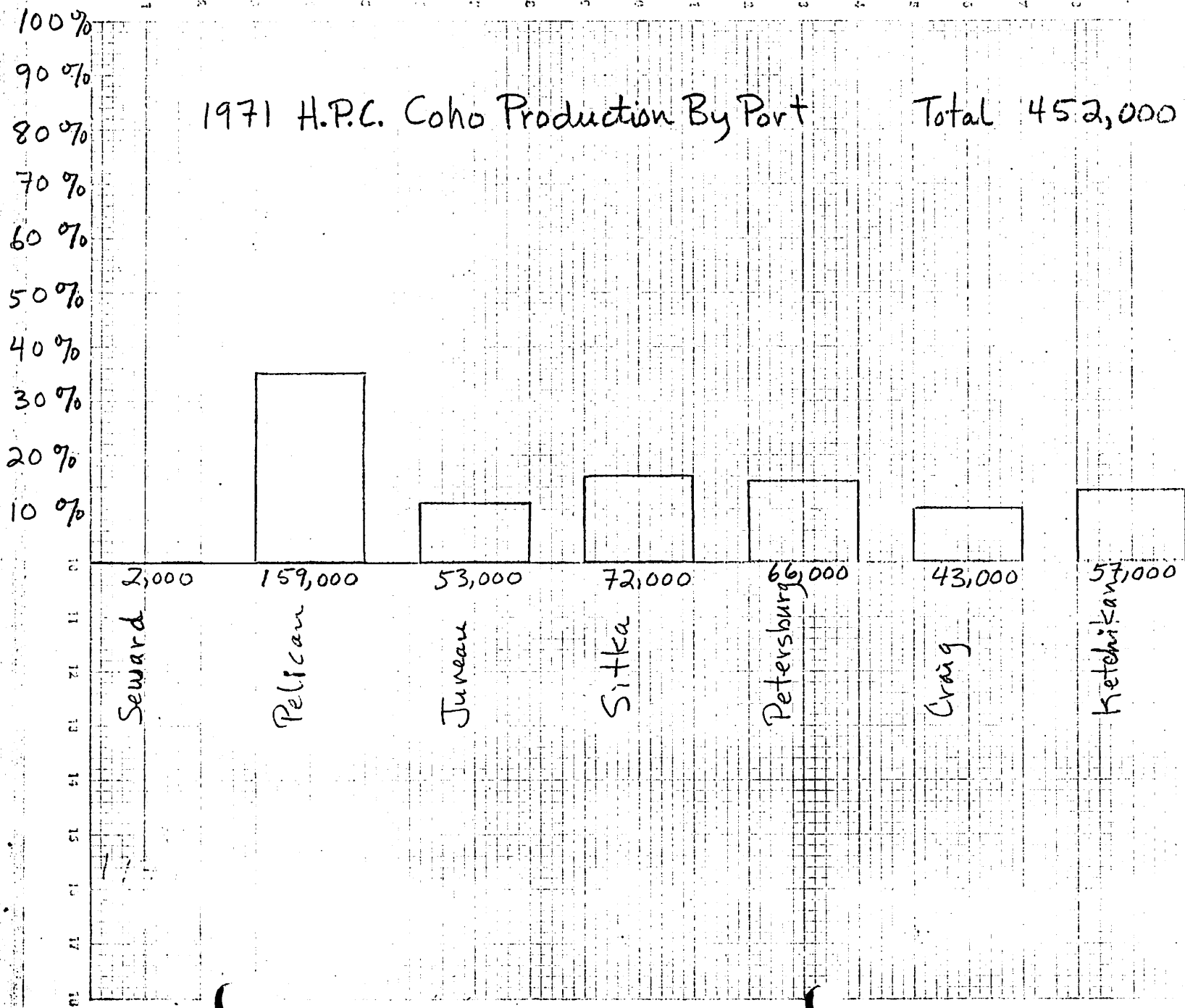


1970 H.P.C. Coho Production By Port Total 241,000 lbs



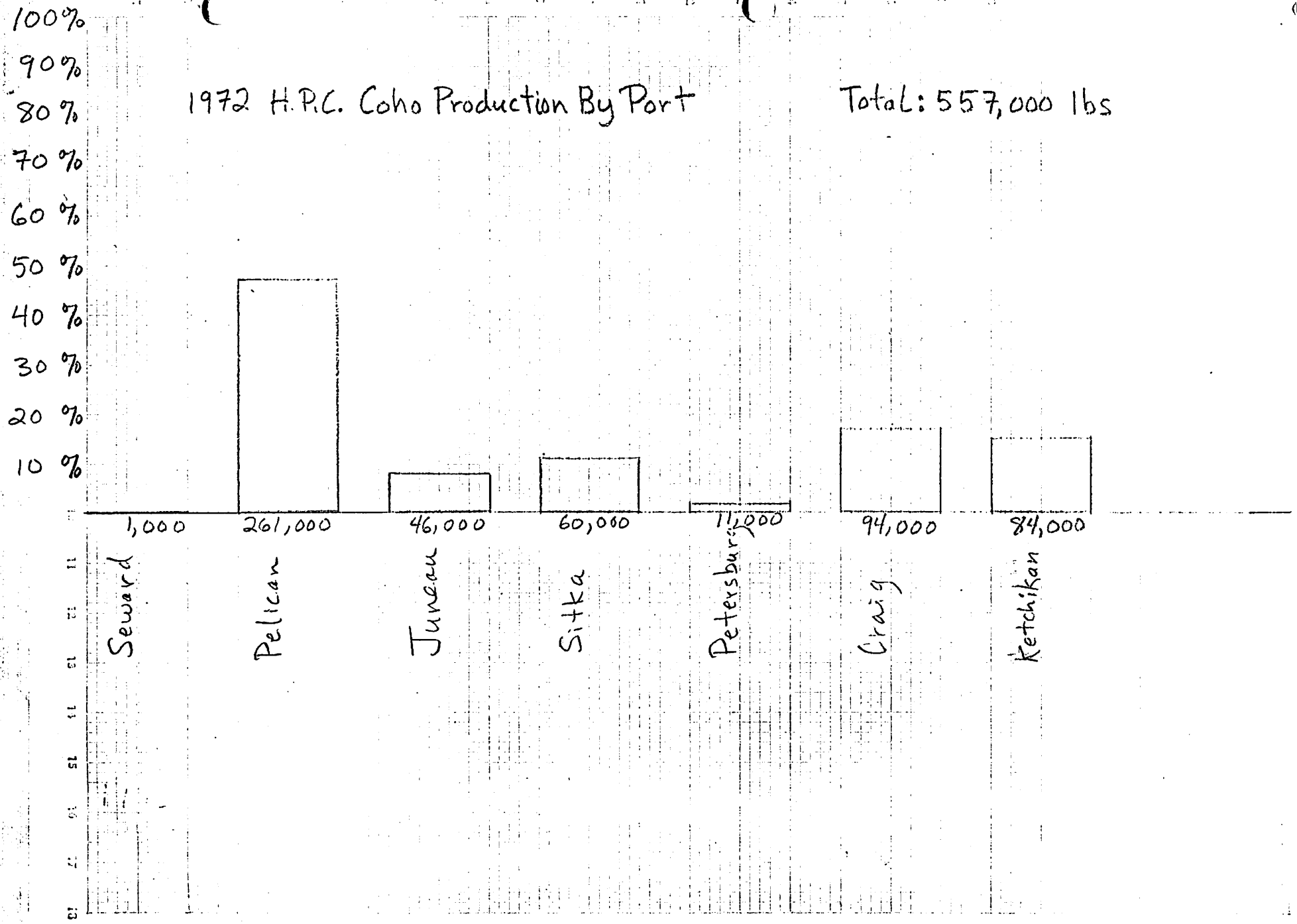
1971 H.P.C. Coho Production By Port

Total 452,000 lbs

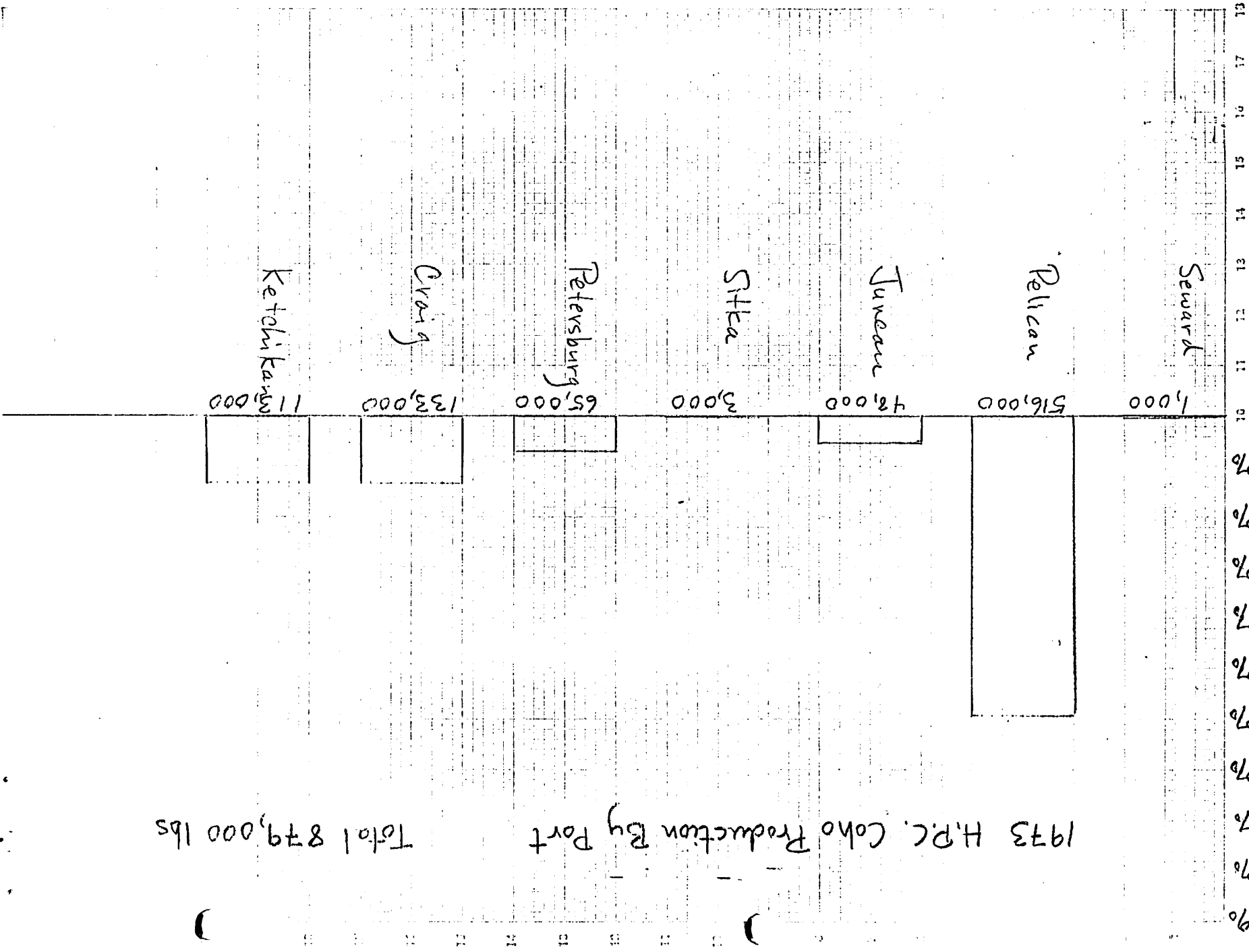


1972 H.P.C. Coho Production By Port

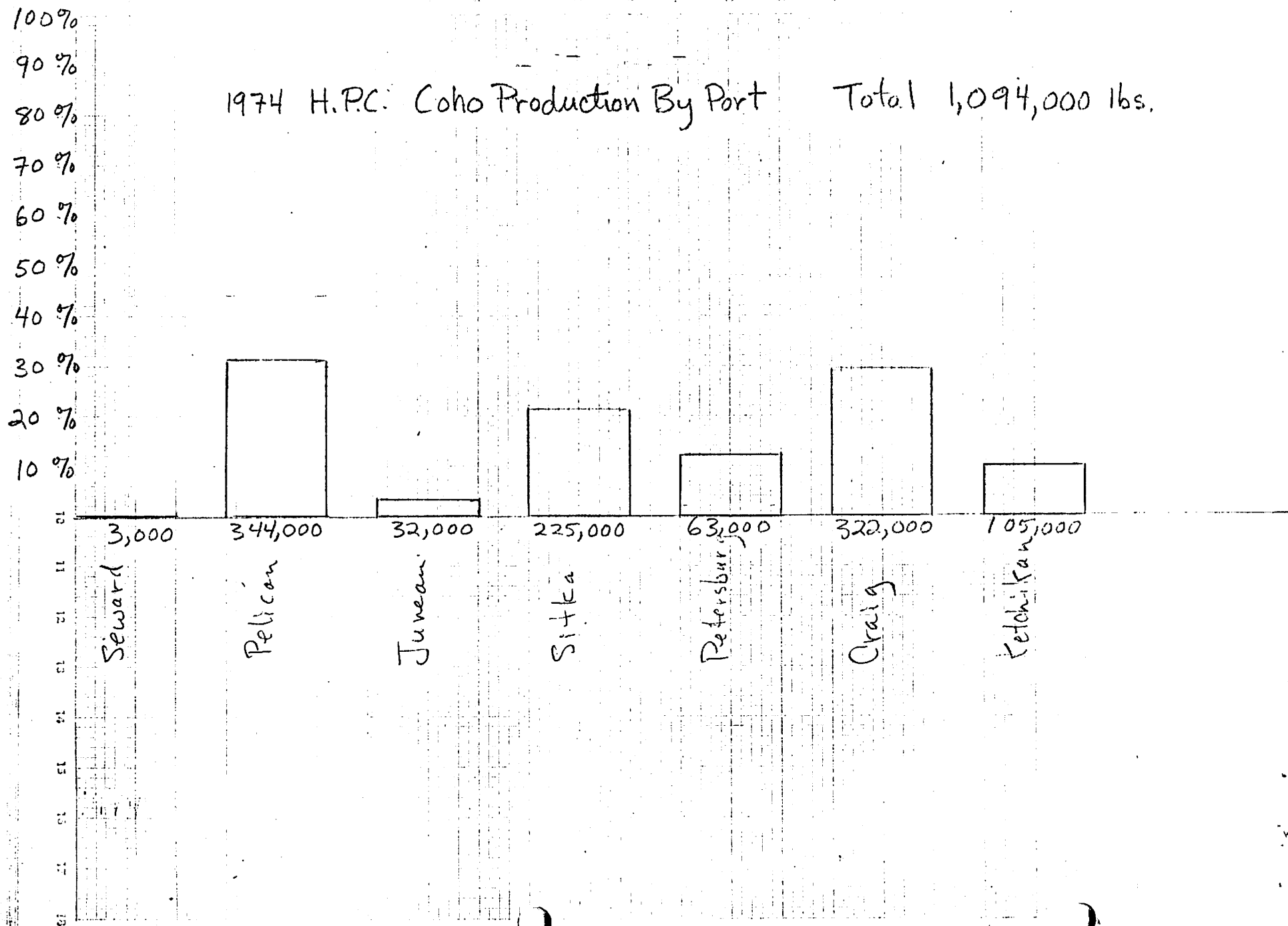
Total: 557,000 lbs



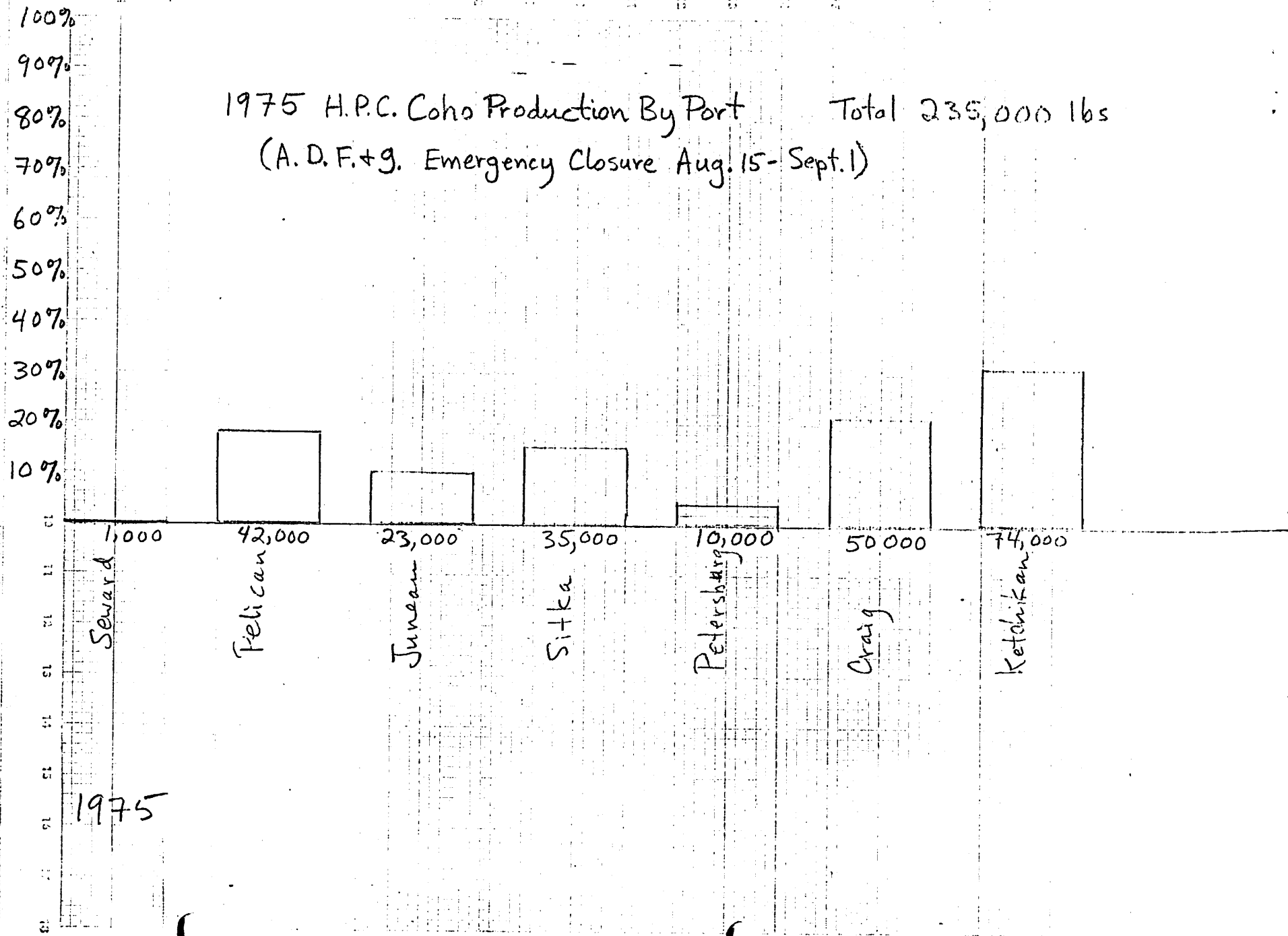
1973 H.P.C. Coho Production By Port
 Total 879,000 lbs



1974 H.P.C. Coho Production By Port Total 1,094,000 lbs.



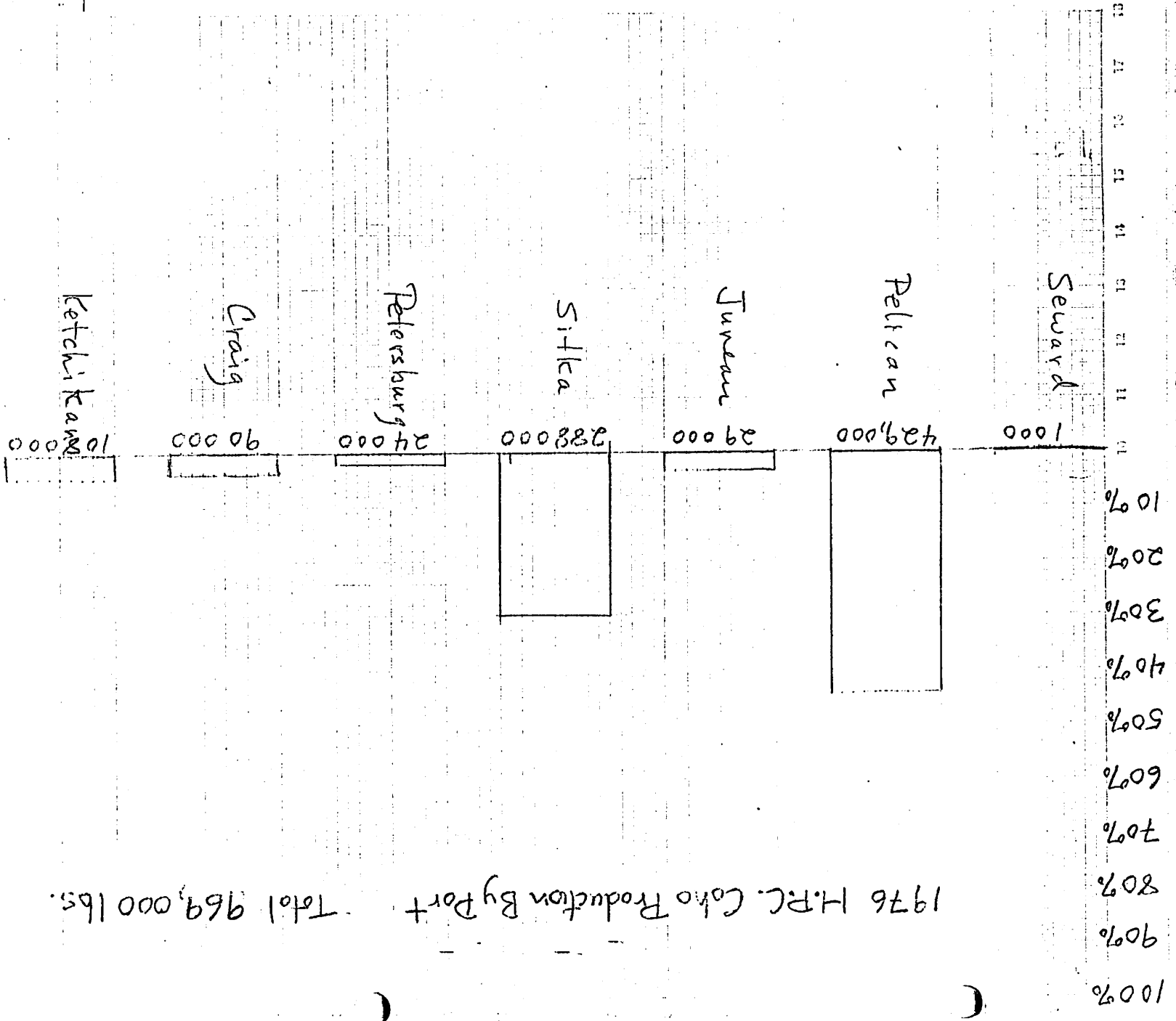
1975 H.P.C. Coho Production By Port Total 235,000 lbs
(A.D.F.+g. Emergency Closure Aug. 15-Sept. 1)



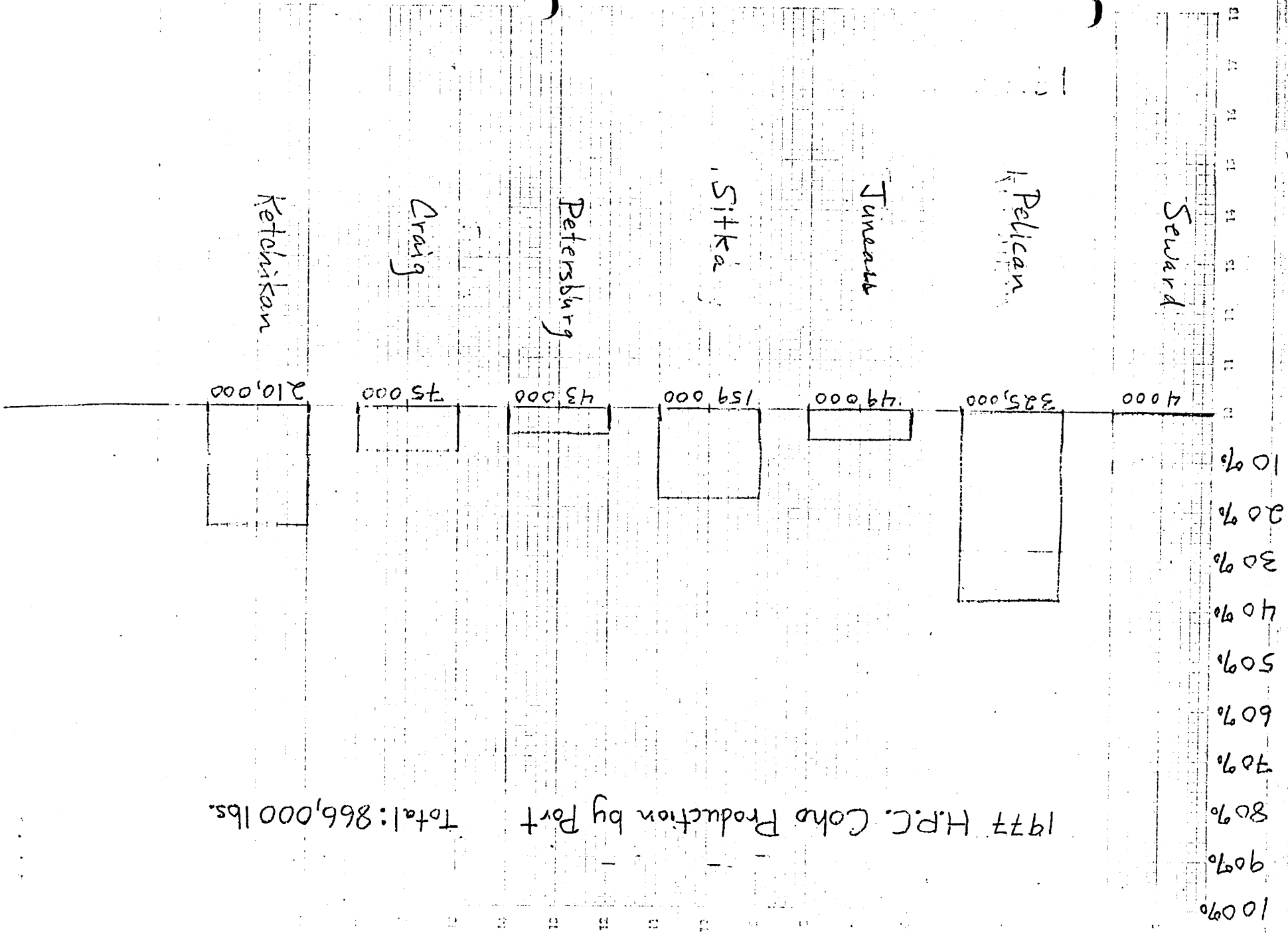
1975

total: 235,000

1976 H.R.C. Coho Production By Port Total 969,000 lbs.



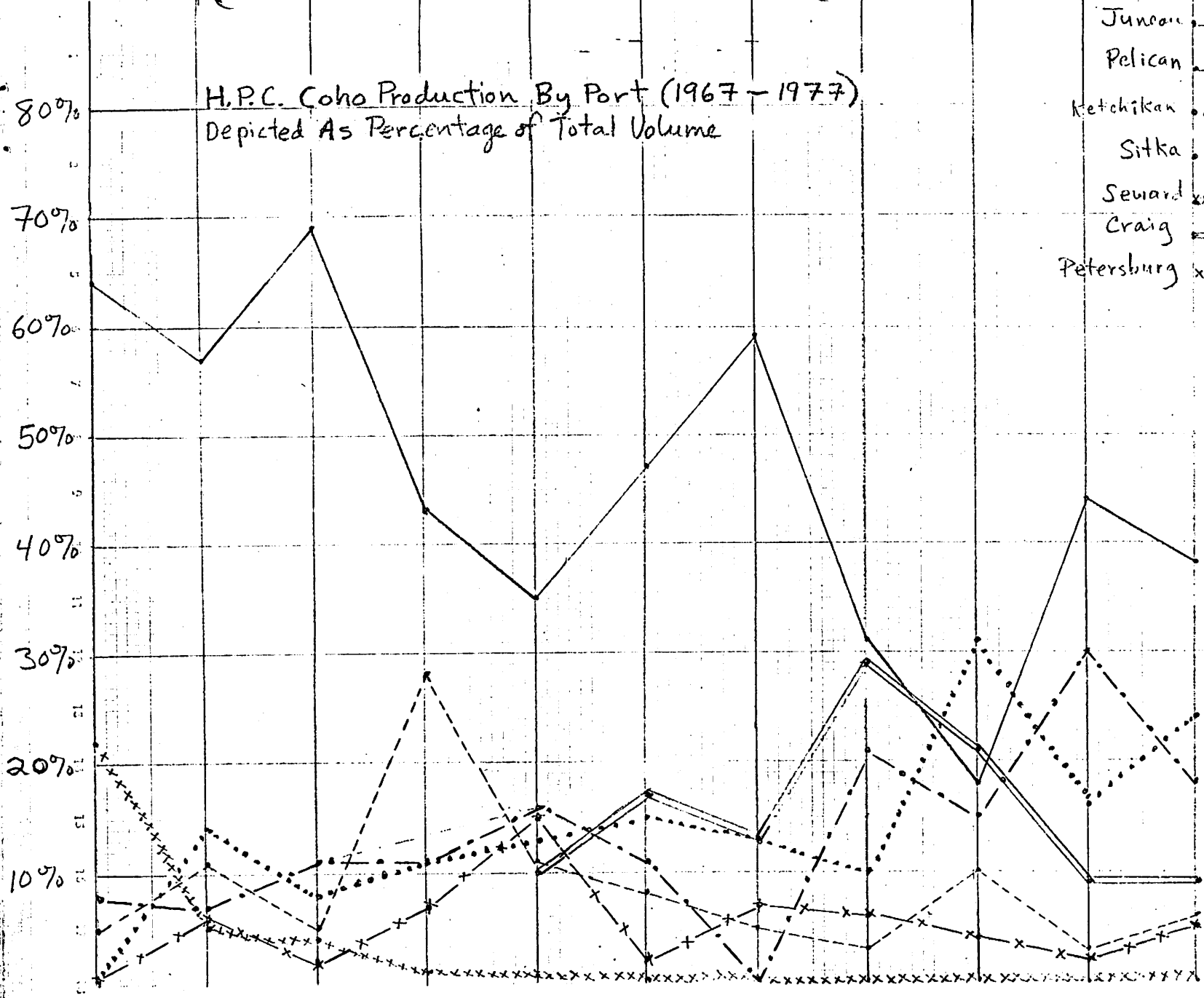
1977 H.P.C. Coho Production by Port Total: 866,000 lbs.



1967 1968 1969 1970 1971 1972 1973 1974 1975 1976 1977

H.P.C. Coho Production By Port (1967-1977)
 Depicted As Percentage of Total Volume

- Juneau -----
- Pelican _____
- Ketchikan (dotted)
- Sitka - - - - - (dash-dot)
- Seward xxxxxxxxxxxx
- Craig - - - - - (dash-dot-dot)
- Petersburg x - x - x - x



Ed Linkous

December 1, 1977, Statement to the North Pacific Fishery
Management Council

Anchorage, Alaska

Represent ATA

You have heard from the SSC, Advisory Panel

Your problems are not solved

Data base

What we are doing

Caustic remarks

They have come from both sides, partially justified.

Appreciate support

Our remarks were predicated

Frustrations

Fears

Personal cost

Criticism of Trollers justified because:

we did not understand process full unprepared

Learning process for all of us

Dr. Alverson's flow diagram addresses the problem
of interaction

Council responsibilities

1. Adequate time frame
2. Adequate goals and objectives
that addresses
have been reviewed
Biological and Socio economic
3. Self Policing for small fish

Commend all who have been a part of the system --
especially the drafting team.

12-1
GENTLEMEN:

ON BEHALF OF THE ALASKA TROLL LEGAL FUND, MAY I SAY THAT WE APPRECIATE HAVING THE OPPORTUNITY TO COMMENT ^{HERE} ON THE DRAFT TROLL PLAN AND TO PRESENT TO YOU A SUMMARY OF THE ECONOMICAL AND SOCIOLOGICAL DATA WHICH WE HAVE BEEN ABLE TO COMPILE ^{MOST OF} ~~AND~~ WHICH IS INCLUDED IN THE "INDUSTRY'S APPRAISAL OF THE ALASKA SALMON TROLL PLAN". WE BELIEVE IT IS INFORMATION VITAL TO YOUR DECISION-MAKING PROCESS.

I AM SARA HEMPHILL AND I AM REPRESENTING THE ALASKA TROLL LEGAL FUND. THE FUND, IF YOU RECALL, REPRESENTS A VARIETY OF INTERESTS INCLUDING TOWNSPEOPLE, FISHERMEN, PROCESSORS AND CONSUMERS ACROSS THE NATION. THE FOCUS OF MY TESTIMONY IS THE ECONOMIC AND SOCIAL CONSIDERATIONS WHICH NECESSARILY FIGURE INTO ~~THE DECISIONS~~ CONSIDERATION ~~AND~~ ADOPTION OF A PROPOSED FISHERY MANAGEMENT PLAN.

FIRST, I FOCUS MY COMMENTS ON THE LEGISLATIVE HISTORY FOR THE F.C.M.A., NOTING THE PURPOSES AND POLICY OF THE LEGISLATION. SECONDLY, I WANT TO BRIEFLY ^{COMMENT ON} ~~REVIEW~~ THE DATA WHICH HAS BEEN COMPILED IN THE LAST FEW MONTHS THROUGH THE COOPERATIVE EFFORTS OF FISHERMEN, INDUSTRY, CONSUMERS AND OTHER INTERESTED PERSONS. AS WE ARE ^{ALL} AWARE, THE STATE OF THE ART OF QUALIFYING IN DOLLARS AND CENTS, THE ECONOMIC AND SOCIAL COSTS OF GOVERNMENT ~~BEING ACHIEVED FOR THAT MATTER~~ ACTION, SUCH AS YOU ARE CONTEMPLATING, IS NOT WELL-DEVELOPED. THE ACT, NEVERTHELESS, MANDATES THAT SUCH INFORMATION BE "ACHIEVED" BY THE COUNCIL AND BECOME A BASIS FOR ANY DECISION TO PROMULGATE A PROPOSED MANAGEMENT PLAN. ~~THIS~~ IS NOT AN ENVIALE ASSIGNMENT.

FINDINGS, PURPOSES, AND POLICY OF THE F.C.M.A.

IN THE SCRAMBLE TO PROMULGATE FISHERY MANAGEMENT PLANS UNDER THE F.C.M.A., THE MAIN PURPOSE FOR THE LEGISLATION APPEARS, SOMETIMES, TO BE FORGOTTEN. WITHOUT INTENDING TO BE PRESUMPTUOUS, I WANT TO REMIND ALL THOSE CONCERNED THAT THE ORIGINAL AND PRIMARY FOCUS OF THE ACT, THE RAISON D'ETRE FOR THE LEGISLATION, IS THE PRESERVATION AND ENHANCEMENT OF OUR DOMESTIC FISHING INDUSTRY, BOTH COMMERCIAL AND RECREATIONAL.

THE ACT, THE RAISON D'ETRE FOR THE LEGISLATION IS THE PRESERVATION AND ENHANCEMENT OF THE DOMESTIC FISHING INDUSTRY, BOTH COMMERCIAL AND RECREATIONAL.

THE LEGISLATIVE HISTORY IS REplete WITH DISCUSSION FOCUSING ON THE DEPRESSED STATE OF THE DOMESTIC COMMERCIAL FISHING INDUSTRY AND NOTING THE GROSS IMBALANCE BETWEEN DEMAND AND DOMESTIC CAPACITY AND CONSEQUENTLY, INTEREST IN HARVESTING VIS-A-VIS THE RAPIDLY EXPANDING FOREIGN CATCH FROM WATERS OFF OUR COASTS. FOR EXAMPLE, THE SENATE REPORT NOTES

1/ THE SCOPE OF THE MANAGEMENT PLANS UNDER F.C.M.A. IS ADDRESSED AT TWO DIFFERENT PLACES IN THE ACT: (A) AT SECTION 2, FINDINGS, PURPOSES AND POLICY AND (B) TITLE III SEC. 301(A) AND 303(B), THE NATIONAL STANDARDS FOR THE PLANS.

2/ SEE: HOUSE REPORT, COMMITTEE ON MERCHANT MARINE AND FISHERIES, NO. 94-445, AUG. 20, 1975: BACKGROUND AND NEED FOR THE LEGISLATION, II; AND SENATE REPORT, COMMITTEE ON COMMERCE NO. 94-416, SEPT. 11, 1975; ISSUES (4) THE IMPORTANCE OF FISHERIES TO THE UNITED STATES; HOUSE REPORT, COMMITTEE OF CONFERENCE, NO. 94-948, MARCH 24, 1976.

AND ENFORCED TO PREVENT OVERFISHING WHILE ACHIEVING, ON A CONTINUING BASIS, THE OPTIMUM YIELD FROM EACH FISHERY. THE TERM "OPTIMUM" IS DEFINED IN THIS CONTEXT (IN SECTION 3(18) TO MEAN THE AMOUNT OF FISH FROM A FISHERY WHICH, IF PRODUCED, WILL BENEFIT TO THE NATION (ESPECIALLY IN TERMS OF FOOD PRODUCTION AND RECREATIONAL OPPORTUNITIES) AND WHICH IS PRESCRIBED FOR THAT FISHERY ON THE BASIS OF THE MAXIMUM YIELD SUSTAINABLE THEREFROM (A BIOLOGICAL MEASURE) AS MODIFIED BY ANY RELEVANT ECONOMIC, SOCIAL, OR ECOLOGICAL FACTOR." (EMPHASIS ADDED)

ANOTHER FACTOR WHICH IS ADDRESSED AT SEVERAL PLACES IN THE ACT AS BEING A REQUISITE CONSIDERATION FOR THE MANAGEMENT OF FISHERY RESOURCES IS THAT OF BASING ANY MANAGEMENT PLANS ON THE BEST SCIENTIFIC INFORMATION AVAILABLE. THE SENATE REPORT STATES CLEARLY THAT SCIENTIFIC INFORMATION INCLUDES ECONOMIC AND SOCIAL INFORMATION. ~~AT THE RISK OF BEING QUOTED~~ THE SENATE REPORT COMMENT BEARS REPEATING:

"THE SECOND STANDARD STATES THAT MANAGEMENT AND CONSERVATION MEASURES SHALL BE BASED UPON THE BEST SCIENTIFIC INFORMATION AVAILABLE. THIS MUST ALSO BE RECOGNIZED AS ONE OF THE MOST IMPORTANT STANDARDS."

"AS JUST STATED, A BASIC MANAGEMENT OBJECTIVE IS TO HARVEST A STOCK OF FISH AT THE LEVEL OF OPTIMUM

J. Scales as well as J. Scales

AT PAGE 12, THAT AS A RESULT OF THE INCREASE IN THE U. S. CONSUMPTION OF FISH AND FISHERY PRODUCTS, THERE IS AN ADVERSE BALANCE OF PAYMENTS UP 43% OVER THE 1972 FIGURES AND 318% SINCE 1960.

THE IMPETUS BEHIND EXTENSION OF JURISDICTION FROM 12 TO 200 MILES WAS THE NEED FOR A STOPGAP MEASURE IN ORDER TO INSURE PRESERVATION OF OUR RESOURCES DURING THE ARDUOUS AND DRAWNOUT LAW OF THE SEA NEGOTIATIONS. THE NATIONAL MANAGEMENT PROGRAM OF THE FISHERY RESOURCES FOLLOWED AS AN INTEGRAL PART OF THIS EXTENSION OF JURISDICTION. BUT NOTE I SAID FOLLOWED. THE MANAGEMENT PROGRAM BECAME ^{POSSIBLE AND} ~~POSSIBLE AND~~ NECESSARY ~~ONLY~~ AS A RESULT OF THE JURISDICTIONAL EXTENSION. IN ITS DISCUSSION OF NATIONAL STANDARDS FOR THE PROMULGATION OF THE PLANS, THE CONFERENCE REPORT FOLLOWS THE VERBAGE OF THE SENATE REPORT AND STATES:

"THESE STANDARDS, OR BASIC OBJECTIVES FOR A VIABLE CONSERVATION AND MANAGEMENT PROGRAM FOR THE NATION'S FISHERY RESOURCES, ARE DESIGNED TO ASSURE THAT MANAGEMENT PLANS AND REGULATIONS TAKE INTO ACCOUNT THE VIABILITY OF FISH RESOURCES, THE INDIVIDUALITY OF FISHERMEN, THE NEEDS OF CONSUMERS AND THE OBLIGATIONS TO THE GENERAL PUBLIC, NOW AND IN GENERATIONS TO COME. THE FIRST OF THESE NATIONAL STANDARDS IS REGARDED BY THE CONFEREES AS BEING OF PARTICULAR IMPORTANCE. IT DECLARES THAT CONSERVATION AND MANAGEMENT MEASURES SHALL BE DESIGNED, IMPLEMENTED,

UTILIZATION. IF LITTLE IS KNOWN ABOUT THE SIZE OF THE STOCK OR ENVIRONMENTAL EFFECTS ON OTHER STOCKS OF SIMILAR RELATIONSHIPS, HOWEVER, EVEN THE BEST MANAGEMENT SCHEME WILL FAIL. THEREFORE ANOTHER PRIMARY GOAL MUST BE TO ACHIEVE THE BEST AVAILABLE SCIENTIFIC INFORMATION ABOUT THE STOCKS. THE TERM "SCIENTIFIC INFORMATION" IS MEANT TO INCLUDE NOT ONLY BIOLOGICAL AND ECOLOGICAL DATA BUT ALSO ECONOMIC AND SOCIOLOGICAL INFORMATION AS WELL."

(EMPHASIS ADDED)

THE ACT CLEARLY MANDATES THAT ECONOMIC AND SOCIOLOGICAL DATA BE CONSIDERED BY THOSE WHO ARE DRAFTING A PROPOSED PLAN. ALSO THE STATED PURPOSE FOR THE LEGISLATION AND THUS CREATION OF UNBIASED MANAGEMENT PLANS IS THE REHABILITATION AND PRESERVATION OF A VARIED AND VIABLE U.S. COMMERCIAL AND RECREATIONAL FISHING INDUSTRY. THE DRAFT TROLL PLAN FALLS

ALARMINGLY SHORT OF THESE STANDARDS and purposes. ~~This is not~~ ~~the intent~~ WISH TO POINT FINGERS OR MONDAY MORNING QUARTERBACK. ECONOMIC AND SOCIAL DATA I only want to be certain that the best decision is made - for that we need more information.

AS TESTIMONY IN PELICAN AND OTHER SOUTHEASTERN ALASKAN CITIES AND THAT OF JIM FERGUSEN TODAY POINTS OUT, THE SOCIAL AND ECONOMIC IMPACT ON AREA RESIDENTS OF A CLOSURE OF THE FAIRWEATHER GROUNDS WILL BE OVERWHELMING. THOUGH QUALIFYING SUCH POTENTIAL CONSEQUENCES IS FAR FROM EASY THE PROBLEM CAN NO LONGER BE IGNORED. UNDER THE LAW YOU ARE BOUND TO CONSIDER AND AT THE VERY LEAST ESTIMATE THE COST OF

As I stated at the last presentation a part of the burden for lack of accurate data must be born by the fishermen. They accept responsibility for this and have taken action.

THE DEMISE OF PELICAN WHICH HERETOFORE IT WOULD APPEAR YOU SIMPLY HAVE NOT BEEN ABLE TO DO. TWO HUNDRED AND FIFTEEN PEOPLE LIVE IN PELICAN; EACH IS SIGNIFICANTLY DEPENDENT ON FAIRWEATHER TROLL SALMON. VIRTUALLY ALL WOULD BE FORCED TO RELOCATE IF THIS RESOURCE BECAME UNAVAILABLE.

I TRUST THAT ORAL TESTIMONY COUPLED WITH THE INDUSTRY APPRAISAL HAS HELPED TO FILL SOME OF THE GAPS WHICH EXIST IN THE DRAFT PLAN GIVING YOU A VIVID PICTURE OF WHAT LIFE WILL BE LIKE IN PELICAN UPON ADOPTION OF EITHER OPTION I OR II. AS THE APPRAISAL INDICATES, TROLL CAUGHT SALMON IS THE SINGLE MOST IMPORTANT COMPONENT OF PELICAN'S ECONOMIC STRUCTURE. REVENUES GENERATED FROM THE SUMMER TROLL FISHING TRAFFIC KEEP THE CITY RUNNING TWELVE MONTHS A YEAR.

AS FAR AS THE IMPACT OF SUCH ACTION ON INDIVIDUAL TROLLERS IS CONCERNED THE FUND IN CONJUNCTION WITH THE ALASKA TROLLER'S ASSOCIATION AND THE HALIBUT PRODUCER'S COOPERATIVE SENT OUT QUESTIONAIRES TO TROLLERS IN ORDER TO BEGIN TO EVALUATE THESE MEMBERS OF THE COMMUNITY. ONE OF THE QUESTIONS WE ASKED WAS AN ESTIMATE OF THEIR COST TO MOVE INTO ANOTHER FISHERY OR OUT OF FISHING ALTOGETHER. WITH AN AVERAGE CAPITALIZATION IN OF \$100,000 FOR BOTH GEAR AND VESSELS OVER HALF ESTIMATED BETWEEN \$50,000 and \$100,000 TO MOVE TO ANOTHER FISHERY. THE MAJORITY OF THOSE WHO RESPONDED AT ALL TO THE QUESTION OF MOVING OUT THE FISHERY ALTOGETHER ESTIMATED A COST OF BETWEEN \$100,000 - \$500,000. THAT IS A

STAGGERING SUM. I VENTURE TO SAY THAT FEW AMERICANS WOULD EVER CONTEMPLATE SUCH A CHANGE, AND YET THE OPTIONS OF THE DRAFT PLAN WOULD FORCE SUCH A SITUATION ONTO NOT ONLY THE RESIDENTS OF PELICAN BUT ON TROLLERS UP AND DOWN THE COAST WHO EARN THE MAJORITY OF THEIR INCOME FROM THE FAIRWEATHER GROUNDS.

IT SHOULD BE NOTED THAT THE IMPACT OF TROLL SALMON RESTRICTIONS WON'T STOP AT PELICAN'S CITY LIMITS OR EVEN LISIANSKI INLET, THE STATE BORDERS NOR THE PACIFIC NORTHWEST. RESTRICTION OF TROLL CAUGHT SALMON WILL IMPACT ON CONSUMERS ACROSS THE NATION AND ABROAD. LETTERS FROM SMOKERS AND PROCESSORS RAISE A SINGLE CRY; THAT THERE IS A GREAT DEMAND FOR THE TROLL CAUGHT SALMON WHICH CANNOT BE SATISFIED WITH ANOTHER PRODUCT. THE SIGNIFICANCE OF TROLL SALMON IN THE INDUSTRY IS BEST EVALUATED IN DOLLARS RATHER THAN POUNDS DUE TO THE PREMIUM PRICE IT COMMANDS IN THE MARKET. FOR ONE COMPANY, VITA FOODS, IT IS ESTIMATED THAT TROLL SALMON AMOUNTS TO SEVERAL MILLION DOLLARS OF THEIR GROSS REVENUES. THIS IS AN ELEMENT WHICH CANNOT BE IGNORED DURING YOUR DELIBERATIONS.

TWO OTHER ISSUES BEAR MENTIONING. FIRST IS THE ENHANCEMENT QUESTION. HATCHERY PRODUCTION OF CHINOOK AND COHO, TO AN EXTENT, HAS PROVEN SUCCESSFUL - BOTH BIOLOGICALLY AND ECONOMICALLY. YET VIRTUALLY NONE IS BEING UNDERTAKEN IN SOUTHEASTERN ALASKA, ~~A CURIOUS SITUATION GIVEN THE STATE'S~~

~~CONCERN OVER THEIR CONCLUSION THAT THE RESOURCE IS DEPLETED.~~

WE BELIEVE THAT SUCH A PROGRAM SHOULD BE GIVEN SERIOUS CONSIDERATION BEFORE OTHER DRASTIC MEASURES ARE TAKEN. THE SUCCESS WHICH HAS FOLLOWED THE TRANSPORT PROGRAM ON THE COLUMBIA RIVER ILLUSTRATED ^{PA} ~~GRAPHICALLY~~ THAT THE GREATEST THREAT TO THE RESOURCE OCCURS BEFORE THE OUT-MIGRATING FISH EVER REACH THE OCEAN. IT IS ESTIMATED THAT THE RETURNS IN THE FUTURE, BECAUSE OF THE TRANSPORT PROGRAM ON THE COLUMBIA WILL SHOW THAT SIGNIFICANTLY MORE FISH ^{WILL BE} ~~ARE~~ AVAILABLE FOR

OCEAN HARVEST. ~~I~~ ^{WE} NOTE THAT ONLY A SMALL NUMBER OF THESE WILL BE TAKEN ^{IN ALASKA.}

SECONDLY, ^{WE BELIEVE THAT THE FOREIGN} ~~THE HIGH SEAS GILLNET FISHERY~~ HAS HAD ~~IN THE PAST~~ A SIGNIFICANT IMPACT ON ^{THIS CATCH OF CHINOOK} ~~THE TOTAL FOR ALL OF~~ 15,000,000 POUNDS OF SALMON LAST YEAR; ~~THE TOTAL FOR ALL OF~~ ^{RESOURCES} ~~THIS CONCLUSION IS~~ ^{borne out by the situation} ~~SOUTHEASTERN ALASKA WAS 3,500,000 POUNDS.~~ THIS YEAR, ^{WHERE} WITH

~~THE~~ RECORD RUNS ^{OF} ~~OF~~ SALMON THE FISHERMEN THROUGHOUT THE ^{SE} ~~AREA~~ REPORTED LITTLE OR NO NET-MARKED FISH. THIS SITUATION WOULD CERTAINLY SUGGEST THAT THE RESOURCE ^{has been} ~~WAS~~ IMPACTED BY ^{HARVESTING} ~~CAUSES~~ OTHER THAN THE TROLL EFFORT.

WHEN THE SCORE IS TALLIED IT APPEARS THAT PROMULGATION OF A TROLL PLAN, ^{AT THIS TIME} ~~WHICH WOULD RESTRICT~~ ^{RESTRICTING} TROLL EFFORT ON THE FAIRWEATHER GROUNDS, WITH THE ATTENDANT ECONOMIC AND SOCIAL REPERCUSSIONS ~~GIVEN THAT THE STOCKS HAVE NOT BEEN SHOWN TO~~ ~~BE IN JEOPARDY,~~ ^{AND THE EMELTING REPORTS ON THE STATUS OF THE STOCKS} IS PREMATURE ~~AND INAPPROPRIATE.~~

THE TROLL FISHERMEN ~~HAVE~~ CLEARLY INDICATED AT THE PUBLIC HEARINGS AND THROUGH THEIR ASSOCIATIONS THAT THEY ARE NOT ONLY PREPARED BUT ARE EAGER TO WORK WITH EACH OTHER AND

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WITH THE REGULATORY AGENCIES TO CONTINUE TO COLLECT DATA AND INFORMATION.

THUS THOUGH THEY HAD APPEARED TO MANY TO BE THE CRUX TO THE PROBLEM IN FACT THE TROLLERS CAN BE PART OF THE SOLUTION. STANDARD SEVEN OF THE ACT CALLS FOR ECONOMIZING ON RESEARCH AND STUDIES. THE HONSF MERCHANT MARINE AND FISHERIES REPORT NOTES THAT THIS STANDARD HAS BEEN IGNORED BY MOST COUNCILS. THE TROLLERS OFFER A UNIQUE VEHICLE TO FACILITATE THE COMPILATION OF PERTINENT DATA. ON BEHALF OF THE FUND AND THE ATA I EXTEND AGAIN THEIR INVITATION TO YOU TO USE THEIR VESSELS FOR OBSERVATION AND MONITORING.

THE ASPECT OF THE FISHING INDUSTRY WHICH HISTORICALLY HAS BEEN PASSED-OVER BY THE MANAGERS OF THE RESOURCE IS THE HUMAN ELEMENT. THE RESOURCE WHICH THE ACT WAS DESIGNED TO PROTECT IS THE FISHERMEN THEMSELVES.

THANK YOU FOR YOUR TIME AND ATTENTION, I AM HAPPY TO ANSWER ANY QUESTIONS I CAN.

If I may I would like to offer a personal comment. ~~last summer I didn't laugh at your comment this morning with regard to fishermen using their hands & not their heads. I understand that you made it in just over 20 years of school~~
I'm a city-east-coast creature, and I must say that I am more impressed with the heads of the fisherpeople ~~with whom I've worked. They just go on and on~~
~~I've been involved with in the past six months that those of slick white-collar businessmen.~~ I am with most, ^{Smiled.} ~~businessmen.~~
I've ~~not~~ been with anyone. ^{ven.}

This notes that to contemplate must be effort.

I want real less year ago in the shoes. Those who worked hard the draft plan

~~We~~ ^{we} smarted you ^{Don} at the jobs the trollers took in the draft plan - I don't think any of us wants anything but the optimum ^{right} for the resource ~~that~~

Stamps as well as stamped

Statement of

Mr. H. Nakamura, Vice-President,

North Pacific Longline and Gill-net Association, Japan.

Prepared for Public Hearings before the North Pacific Fishery Management Council
on the Draft Fishery Management Plans for Groundfish

Mr. Chairman, members of the Council, Ladies and gentlemen:

I am much honored and happy to be able to attend this public hearing this afternoon at this beautiful city of Anchorage from Japan and wish to express my sincere gratitude for your kindness and understanding in giving me this opportunity to make some comments on behalf of Japanese longliners on the groundfish longlining in the North Pacific Ocean.

1. Japanese longliners suffered a great financial loss in 1977 due to the reduction on sablefish quota in the Gulf of Alaska, and in this light, we respectfully request that in establishment of OY and FAC for 1978 in the Gulf of Alaska on the sablefish at least the same 22000 mt level for 1977 be maintained.

2. If our understanding is correct with respect to one of NPFMC resolutions which indicates allocation of quota for particular species according to INPFC statistical areas, we would simply have to ask for continuation of the provisions made as before covering the entire region of the Gulf of Alaska.

Japanese scientists support this request from biological point of view that the resource of sablefish in the North Pacific is believed to constitute one stock and it should be treated as such.

Moreover, we seriously doubt feasibility of such statistical arrangements because if the quota is to be divided into respective statistical areas, the longline association of Japan would certainly face extreme difficulty in making their plans for fishing in 1978 as the application of which would necessitate them to apportion the quota equally for individual member vessels on limited set length of vessel days, to the extent that fishing operations cannot be conducted.

3. In regard to foreign longlining with sablefish as target in the Gulf of Alaska seaward of the 500 m isobath, we should like earnestly to seek the possibility of your considering moving the west end of the closed area from 141 W further to the east.

4. As has been agreed upon in one of NPFMC recommendations, we will be most grateful if Sablefish fishing at Davidson Bank (166.04W-166 00W) is permitted for Japanese longlining.

5. We are also grateful for your decision made in one of RC recommendations to the effect that foreign longliners may operate in the area landward of the 500 m isobath, west of 157 W targeting on Pacific cod. However, our request on this matter would be to codify 15000 mt catch of Pacific cod specifically allocated to the longliners in the pertinent paragraphs of the Regulations.

Thank you.

North Pacific Longline and Gillnet Association respectfully submits the above statements to your attention and consideration and urgently asks these may be taken into account in your deliberations at this Council meetings.

H. Nakamura

Signed by H. Nakamura, Vice-President,
North Pacific Longline-Gillnet Association,

for Yoshiro Okazaki, President,
North Pacific Longline-Gillnet Association,
Tokyo, Japan.

TESTIMONY OF J. G. FERGUSON
PRESIDENT, PELICAN COLD STORAGE COMPANY, SEATTLE
PRESENTED TO THE NORTH PACIFIC FISHERIES MANAGEMENT
COUNCIL

GENTLEMEN:

MY NAME IS JIM FERGUSON. I AM PRESIDENT OF THE PELICAN COLD STORAGE COMPANY. I WOULD LIKE TO THANK THE COUNCIL FOR HOLDING THE PUBLIC HEARING IN PELICAN RECENTLY. I WOULD ESPECIALLY LIKE TO THANK THE COUNCIL MEMBERS AND STAFF WHO TOOK THE TIME FROM THEIR BUSY SCHEDULE TO ATTEND THE HEARING IN PELICAN.

I APPRECIATE THE OPPORTUNITY TO PRESENT MY VIEWS ON THE FISHERY MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT FOR COMMERCIAL TROLL FISHERIES OFF THE COAST OF ALASKA.

PELICAN COLD STORAGE COMPANY IS THE LARGEST EMPLOYER IN PELICAN. IN ADDITION TO A COLD STORAGE FACILITY, WHICH INCLUDES A FISH HOUSE AND CRAB PLANT, WE OPERATE A GENERAL STORE, THE LOCAL UTILITY AND THE STANDARD OIL MARINE DOCK. WE ALSO OPERATE A STANDARD OIL MARINE DOCK IN ELFIN COVE.

THE PLANT ORIGINALLY OPERATED 6 TO 9 MONTHS A YEAR PRIMARILY ON TROLL SALMON AND HALIBUT. RECENTLY WE HAVE BEEN FORCED TO OPERATE 12 MONTHS A YEAR TO COVER OUR RAPIDLY INCREASING COSTS AND DECREASING MARGINS IN THE PROCESSING OF FISH.

PELICAN IS THE LARGEST TROLL SALMON PORT IN THE WORLD. OTHER SEAFOOD COMPANIES MAY OPERATE MORE THAN ONE PLANT LOCATION AND HAVE MORE TROLL SALMON

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TO SELL THAN PELICAN, BUT NO OTHER SINGLE PORT HAS THE TONNAGE OF TROLL FISH THAT PELICAN PROCESSES ON AN AVERAGE YEAR. AS A RESULT OF THIS PRODUCTION AND THE CLOSENESS TO CAPE SPENCER, THE PROPOSED FISHERY PLAN WILL AFFECT PELICAN MORE THAN ANY OTHER COMMUNITY. THE PLAN STATES THAT ONLY 15% OF THE TROLL FISH ARE CAUGHT IN THE OFFSHORE AREA. THE PLAN DOES NOT STATE THAT 50 TO 60% OF PELICAN'S TROLL FISH ARE TAKEN IN THE OFFSHORE AREA. THESE 50 TO 60% OF THE LANDINGS REPRESENT A MAJOR SHARE OF OUR PROFIT POTENTIAL EACH YEAR. IF WE CUT BACK ON THE MAJORITY OF OUR TROLL LANDINGS, IT WILL BECOME VERY DIFFICULT TO MEET OUR FIXED COSTS. AS THE COUNCIL MEMBERS AND STAFF WHO ATTENDED THE HEARING IN PELICAN MORE THAN LIKELY NOTICED, PELICAN HAS A RESIDENT TROLL FLEET, BUT WE DO NOT HAVE GILL NET BOATS, SEINE BOATS, CRAB BOATS OR HERRING BOATS THAT HOME PORT IN PELICAN. WE ARE REQUIRED TO MAKE IT ATTRACTIVE ENOUGH SO OUTSIDE FISHING BOATS WILL TRAVEL TO PELICAN TO FISH. IF YOU CLOSE THE MOST PRODUCTIVE FISHING GROUNDS, WE WILL BE UNABLE TO ATTRACT THE NECESSARY OUTSIDE VESSELS WHICH ARE REQUIRED FOR THE CONTINUING OPERATION OF THE COMPANY. AT FIRST, ONE COULD SAY, YOU HAVE OTHER FISHERIES. I ASK MYSELF, "WHAT OTHER FISHERIES COULD PICK UP SUCH A VOID?" HALIBUT IS NOT GOING TO DO IT. BLACK COD IS NOW IN TROUBLE. DUNGENESS CRAB AND KING CRAB ARE NO WINNERS THE PAST THREE YEARS IN SOUTHEASTERN. SNOW CRAB IS MARGINAL AT BEST. THE HERRING FISHERY IS PRODUCTIVE BUT SPOTTY. THE GROUND FISH POTENTIAL IN NORTHERN SOUTHEASTERN ALASKA IS QUESTIONABLE FOR THE NEXT 4 TO 5 YEARS. THE RESULTS FROM THE R/V JOHN N. COBB ON THE 35 DAY RESEARCH CRUISE THIS PAST SUMMER WERE MOST DISAPPOINTING, ESPECIALLY FROM YAKUTAT TO CAPE SPENCER. ADDITIONAL RESEARCH IS NEEDED IN THIS AREA FOR AN ACCURATE ASSESSMENT OF THE POTENTIAL.

WE HAVE RECENTLY ADVERTISED IN THE SITKA AND JUNEAU PAPERS FOR POLLOCK AND GRAY COD FISHERMEN, BUT TO DATE WE HAVE NOT RECEIVED A POUND OF FISH,

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AND WE ARE OFFERING 34¢ PER POUND FOR GRAY COD AND 5¢ PER POUND FOR POLLOCK.

THE LARGE COLD STORAGE BUILDINGS AND SUPPORT EQUIPMENT IN PELICAN ARE GREAT ASSETS THAT COULD BECOME VERY SERIOUS LIABILITIES WITHOUT ENOUGH PROFITABLE PRODUCTION. THIS COMPANY WAS BUILT FOR TROLL SALMON, ALL OTHER FISHERIES WERE OF SECONDARY IMPORTANCE. NOW IT APPEARS THE STATE AND FEDERAL GOVERNMENTS ARE ATTEMPTING TO ISSUE REGULATIONS THAT WILL FORCE US OUT OF BUSINESS.

THE LIFE STYLE OF THE TROLL FISHERMEN IS A VERY IMPORTANT SUBJECT THAT SHOULD NOT BE TAKEN LIGHTLY. THE INDEPENDENCE, AND BELIEVE ME, I HAVE BEEN DEALING WITH THEM FOR 18 YEARS NOW, AND THEY ARE AN INDEPENDENT LOT, IS SOMETHING THAT SHOULD BE PRESERVED. THE FISHERY PLAN AND THE ENVIRONMENTAL IMPACT STATEMENT DOES NOT TAKE THIS UNDER CONSIDERATION.

FOR A FISHERY TO BE PRODUCTIVE AND HEALTHY, IT MUST GROW AND ATTRACT NEW FISHERMEN, BOTH YOUNG AND OLD. IF THIS PLAN IS ADOPTED AS PRESENTED IN OPTIONS I OR II, IT WILL BECOME DIFFICULT TO ATTRACT NEW EMPLOYEES, FISHERMEN, AND INVESTORS IN THE COMPANY AND INDUSTRY. WE HAVE 140 DIFFERENT STOCKHOLDERS, AND I AM SURE THAT IF THIS PLAN GOES THROUGH AS PRESENTED IN OPTIONS I OR II, THE PRICE OF OUR STOCK WILL DECREASE. THIS IS NOT A SMALL PROBLEM FOR THE 140 STOCKHOLDERS.

THE SUGGESTED MANAGEMENT PLAN HAS A NUMBER OF AREAS IN WHICH I FEEL VERY UNCOMFORTABLE. A NUMBER OF THEM HAVE ALREADY BEEN DISCUSSED IN THE WEEK OF PUBLIC HEARINGS. IF WE COULD TURN TO THE PLAN, IN THE SUMMARY IN THE FRONT OF THE PLAN, PAGE 8 (ROMAN NUMERAL) AT THE TOP OF THE PAGE, THE LAST SENTENCE IN THE FIRST PARAGRAPH. "NO STATISTICS ARE AVAILABLE ON TOTAL ANNUAL EMPLOYMENT AND LABOR INCOME RELATING TO FISH PROCESSING." THERE ARE SEVERAL PLACES TO FIND THE NECESSARY INFORMATION: THE FIRST PLACE I WOULD START WITH WOULD BE OUR OFFICE.

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WE WILL BE MORE THAN HAPPY TO CO-OPERATE WITH THE STATE AND FEDERAL STAFF TO PROVIDE THIS INFORMATION FROM OUR OPERATION AND I FEEL MOST OF THE OTHER SEAFOOD COMPANIES IN THIS FISHERY WOULD DO THE SAME.

THE OBJECTIVES OF THE PLAN AS OUTLINED ON PAGE 92 STATE THAT THE DOLLAR VALUE OF THE SALMON FISHERY MUST BE CONSIDERED. THE WAY THIS PLAN IS WRITTEN, THE POUNDS OF SALMON ARE THE MAJOR CONSIDERATION, THE QUALITY OR VALUE TO THE FISHERMEN AND INDUSTRY IS NOT ADDRESSED. AS A RESULT, THE POUNDAGE ONLY FIGURES GIVE A VERY DISTORTED VIEW OF THE ENTIRE FISHERY. IF WE COULD LOOK TO PAGE 75, LAST PARAGRAPH, LAST SENTENCE, "APPLYING THESE PERCENTAGES TO THE CURRENT ALASKA TROLL FISHERY CATCH OF CHINOOK WOULD INCREASE THE AVERAGE ANNUAL YIELD OF 3.5 MILLION POUNDS TO 5.7 -6.9 MILLION POUNDS." I HAVE PROJECTED THE VALUE OF THE RESOURCE INTO DOLLARS RETURNED TO THE INDUSTRY. IF 3.5 MILLION POUNDS OF TROLL FISH WERE TAKEN AT TODAY'S PRICES, THE TOTAL VALUE WOULD BE \$12,425,000.00, BASED ON A WHOLESALE PRICE FOB DOCK SEATTLE OF \$3.55 PER POUND.

IF THE SAME FISH WERE NOT CAUGHT AS TROLL AND WERE ALLOWED TO MATURE TO AN AVERAGE WEIGHT OF 6,300,000 POUNDS AND TAKEN AS NET FISH IN THE COLUMBIA RIVER FISHERY, THEIR VALUE WOULD BE \$11,970,000.00. THIS IS BASED ON 50% BEING NUMBER ONE GRADE, \$2.10 PER POUND AND 50% NUMBER TWO GRADE AT \$1.70 PER POUND. (NUMBER TWO DUE TO WATERMARKS AND POOR MEAT COLOR.) THIS IS A LOSS TO THE INDUSTRY OF \$455,000.00.

ANOTHER WAY TO FIGURE THE SAME THING ON A FISH BY FISH BASIS IS: IF YOU CATCH 100 KING SALMON IN THE TROLL FISHERY WITH A 15 POUND AVERAGE, THE VALUE AT THE PROCESSOR WHOLESALE LEVEL WOULD TOTAL \$5,325.00. IF THE SAME 100 KING SALMON WERE ALLOWED TO TRAVEL TO THE COLUMBIA RIVER AND WERE TAKEN IN THE NET FISHERY AT 20 POUNDS PER FISH, THEY WOULD HAVE A VALUE OF \$3,800.00 (50% NUMBER

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ONE GRADE @ \$2.10, 50% NUMBER TWO GRADE \$1.70). The EFFECT WOULD BE A LOSS TO THE INDUSTRY OF \$1,525.00 OR \$15.25 PER FISH. IN ADDITION, WE WOULD HAVE UNHAPPY CUSTOMERS DUE TO A POOR GRADE AND A POTENTIAL LOSS OF FUTURE SALES.

THE MAJOR WEAKNESS IN MANY OF THE FISHERY PLANS AND ENVIRONMENT IMPACT STATEMENTS IS THE ECONOMIC CONSIDERATION. I AM NOT SURE IF THE STAFFS ARE NOT PRESENTED WITH THE DATA, OR THAT THE DOLLAR VALUE TO THE FISHERMEN, PROCESSOR, STATE AND INDUSTRY AS A WHOLE IS CONSIDERED UNIMPORTANT. IN ANY EVENT, ADEQUATE ECONOMIC CONSIDERATIONS WERE NOT TAKEN INTO ACCOUNT WHEN THE TROLL PLAN WAS DRAWN UP.

NOW IF WE COULD TURN TO PAGE 84, NOTE THE SENTENCE ON THE FIFTH LINE FROM THE BOTTOM OF THE PAGE, "AN UNDETERMINED NUMBER OF--" I THINK WE SHOULD KNOW HOW MANY FISH WILL BE INTERCEPTED BY CLOSING THE FAIRWEATHER GROUNDS AND/OR ALL TROLLING WEST OF CAPE SPENCER. IF THE AMOUNT OF FISH CAUGHT BY THE CANADIAN TROLL FLEET AMOUNTED TO 50% OF THOSE FISH NORMALLY CAUGHT BY FAIRWEATHER FISHERMEN, I WOULD CONSIDER IT A POOR MANAGEMENT DECISION TO CLOSE THE FISHING NORTH AND WEST OF CAPE SPENCER AND TURN THE FISH OVER TO A FOREIGN FISHERY. IF WE COULD TURN TO PAGE 102, I DIFFER WITH THE STATEMENT IN THE SECOND COMPLETE SENTENCE STARTING ON LINE 3. "THE LONG RUN ECONOMIC IMPACT SHOULD BE MINIMAL--". THE LONG RUN IMPACT COULD BE THE END OF A \$7 MILLION INVESTMENT BY ONE COMPANY PLUS OTHER BUSINESSES AND HOMES IN PELICAN. I HARDLY CALL THAT MINIMAL.

ON ANOTHER SUBJECT, THE UNDERWATER CLEARCUTTING BY FOREIGN FISHING FLEETS SHOULD BE A MAJOR CONSIDERATION WHEN CONSIDERING THE TROLL FISHERY. WE HAVE BEEN ADVISED THAT THE NUMBER OF NET MARKS ON TROLL SALMON OFF OF CAPE FAIRWEATHER HAS BEEN CONSIDERABLY REDUCED THIS PAST YEAR. WITH THE INCREASED OBSERVER PROGRAM, I AM HOPEFUL THAT THE NUMBER OF NET MARKED TROLL SALMON WILL CONTINUE TO DECREASE.

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OTHER AREAS CONCERN ME THAT I WILL NOT GO INTO DETAILS ON AT THIS TIME. THEY ARE THE FACT THAT ALASKA STOCKS MAKE UP LESS THAN 10% OF THE OFFSHORE HARVEST, THAT THE TAKU RIVER RUN DURING 1977 WAS THE HIGHEST IN 18 YEARS, THE PROBLEM OF GEAR CONCENTRATIONS IF THE AREAS NORTH OF CAPE SPENCER ARE CLOSED, THE EFFECTS OF HEAVY SPORTS AND COMMERCIAL FISHING CLOSE TO THE SPAWING STREAMS AND THE FACT THAT REPRESENTATIVES OF THE DEPARTMENT OF FISH AND GAME HAVE STATED IN ALASKA PUBLICATIONS THAT THE COASTAL RIVERS NORTH OF CAPE SPENCER ARE IN GOOD CONDITION WITH HIGH ESCAPEMENTS THE PAST SEASON.

BASICALLY, I THINK THE PLAN IS BIASED AND UNSOUND. IT NEEDS ADDITIONAL WORK IN MANY AREAS, ESPECIALLY THE SOCIAL-ECONOMIC ENVIRONMENTAL CONSIDERATIONS. THE 1977 DATA SHOULD ALSO BE INCLUDED. OUR COMPANY IS FIGHTING FOR ITS SURVIVAL DUE TO THE PROPOSED PLAN'S RESTRICTIONS.

THE PELICAN COLD STORAGE COMPANY MOTTO IS "CLOSEST TO THE FISH". IF THIS PLAN IS ADOPTED UNDER OPTION ONE OR TWO, WE STILL MAY BE CLOSEST TO THE FISH, BUT THE FISHERMEN WILL NOT BE ALLOWED TO HARVEST MOST OF THE RESOURCE AND WE WILL NOT BE ALLOWED TO PROCESS THEIR CATCHES AT A GREAT LOSS TO THE COMMUNITY, THE COMPANY AND DOMESTIC FISHERY.

I URGE THE COUNCIL TO CONSIDER ADDITIONAL ALTERNATIVES FOR THE COMMERCIAL TROLL FISHERIES PLAN OFF THE COAST OF ALASKA AND TO REQUEST THE DRAFT TEAM TO DRAW UP A NEW ENVIRONMENTAL IMPACT STATEMENT THAT GIVES MORE DETAILS OF THE EFFECTS ON THE LOCAL COMMUNITY, INDUSTRY AND THE FUTURE OF THE ESTABLISHED PRODUCER AND PROCESSOR.

I APPRECIATE THE OPPORTUNITY TO PRESENT THESE COMMENTS AND I WILL ATTEMPT TO ANSWER ANY QUESTIONS WHICH YOU MAY HAVE.

Lee Krause, 64

December 1, 1977 Statement to the North Pacific Fishery
Management Council

Anchorage, Alaska

Gentlemen:

I did not plan on testifying at this time, but after hearing Mr. McKernan's statements, I wish to address the Council on this matter.

The Trollers are very much aware of the declining stocks and the need for proper management, all we are really asking for is qualified data and the right to be involved in management decisions.

Mr. McKernan stated we were trying to intimidate the drafters of this plan. He is right!

The Trollers have spent in approximately \$25,000 trying to defeat a plan that calls for closure of 75% of the State to protect 5 or 6 thousand fish which the plan states will be available later on in the troll fisheries.

To even attempt this plan without any social-economic data was a waste of time and money.

I hope we have intimidated the drafters of this plan enough so that in the future we can work more constructively.

Statement at North Pacific Fishery Management Council
on Dec. 1st 1977 by Mr. Shoji Ono
representing Tanner Crab Fishery Industry of Japan

Mr. Chairman, the Members of the Council, my name is Shoji Ono.

I deeply appreciate that today we are given the opportunity for the third time to speak on our views regarding the Tanner crab fishery of Japan.

Our representatives have already stated our comments to your Council at the meetings of Aug. 24th and Sept. 22nd 1977 and I would like to summarize our statement of Aug. 24th.

1. The tanner crab resources in the eastern Bering Sea are rich
2. This O.Y. should be determined on a rational basis.
3. The Japanese fishery should be allowed to operate in the same areas of water as last year, and also be permitted an allocation of *C. bairdi*.
4. In order to maintain a high market price for *C. bairdi* in Japan, it is necessary for us to continue producing and supplying our own products of *C. bairdi*.

And, on Sept. 22nd furthermore, we expressed to you the following with additional points.

If you adopt severe regulation for Japanese fishery, it is likely to deal a fatal blow, not only to our own fishery, but also it would ruin the *C. bairdi* market which you are expecting.

For the reason, we hoped you would reconsider and increase the catch quota.

Today, what I wish to say, among mentioned points, is our comment about the market which was mentioned as No.4. point on Aug. 24th and Sept. 22nd meeting. I believe it should be paid attention.

And I would like to stress the following point.
S.S.C. and A.P. were held here before the R/C meeting.

We heard you had discussion about new regulation of fishing ground for us, which content is that the south boundary is 57,10° North latitude in the area between 164° and 168,45°W.

Our comment for this is as follows.
Firstly, this area used to be covered with drifting ice early and essential stage of our operation period.

Secondly, the crab distribution in this fishing ground is uneven, and the quality of the crab is not good for the reason of thrender meat, so that we cannot expect effective operation in the area so called dip.

Under these facts, we hope you understand enough that this area scarcely brings any merit to our operation.

In order to manage our operation and maintain the market, we hope to be allowed to operate in the water north 56° N over. In this case, in the area between 56° and 58° N which has been used as our important fishing ground. I consider a certain kind of regulation will happen to our operation in the east area which is the highly concentrated area of *C. bairdi* and in our important fishing ground.

However, regarding that west area between 56° and 58° N, we wish to be recognized as needing the area north of 56° N for escaping from drifting ice and continuing our operation.

According to PMP plan, in the area west of 173° W, it is stated to allow to operate north of 56° N, but actually this near area west of 173° W is deep so that the range being possible to operate is narrow.

Therefore, it is slightly effective to deliver us from the difficulty of our operation.

Finally, I should like to request again that in order to survive our traditional fishery, which has been developing and managing for many years, and to expand the market which you are looking forward to, you allow us to allocate *C. bairdi* and operate our boats in the area of the water North of 56° N.

Thanks for sparing your precious time and your attention.

Statement at North Pacific Fishery Management Council on Dec. 1st, 1977, by Mr. Shoji Ono, Representing Tanner Crab Fishery Industry of Japan.

Mr. Chairman, the members of the Council, I am Shoji Ono.

I deeply appreciate that today we are given the opportunity for the third time to speak on our views as regards the Tanner Crab Fishery of Japan.

Our representatives had already stated to your Council at the time on Aug. 24th and Sep. 22nd, 1977, and I would like to summarize again here on Aug. 24th's statements as follows:

1. The Tanner Crab resources in the eastern Bering Sea are quite rich.
2. This O.Y. should be determined on the basis of the national grounds.
3. The Japanese fishery should be allowed to operate in the same area of waters as last year, inclusive of the allocation of the catch quota of C. Bairdi.
4. To stabilize and realize high market price for C. Bairdi in Japan, it is necessary for us to continue producing and supply our own products of C. Bairdi

And, on Sep. 22nd, furthermore, we expressed to you the following with additional points:

If you adopt severe regulation for Japanese fishery, it is likely to deal a fatal blow, not only to our own fishery, but also it would ruin the C. Bairdi market which you are expecting.

For that reason, we hoped you would reconsider and increase the catch quota.

What I wish to say today was fully expressed by the above points.

Finally, I should like to request again that in order to make survive our traditional fishery, which has been developing and managing for many years, and moreover, to expand the market which you are looking forward to, you allow us to allocate C. Bairdi and operate our boats in the area of waters north of 56° North Latitude.

Thank you for your sparing precious time and your attention.

Latitude $132^{\circ}24'$
Longitude $223^{\circ}32'$

①

Statement at North Pacific Fishery Management Council
on Dec. 1st 1947 by Mr. Shoji Ono
representing Tanner crab Fishery Industry of Japan.

Mr. Chairman the members of the Council
My name is Shoji Ono.

I deeply appreciate that today we are given the opportunity
for the third time to speak on our views regarding
the Tanner crab Fishery of Japan.

Our representatives have already stated our comments
to your Council at the meetings of Aug. 24th and Sep. 22nd
1947, and I would like to summarize our statement of
Aug. 24th.

1. The Tanner crab resources in the eastern Bering Sea are rich.
2. This O.Y. should be determined on a rational basis.
3. The Japanese fishery should be allowed to operate
in the same areas of water as last year, and
also be permitted an allocation of *C. bairdi*.
4. In order to maintain a high ~~price~~ market price for
C. bairdi in Japan, it is necessary for us to continue
producing and supplying our own products of *C. bairdi*.

And, on Sep 23rd, furthermore, we expressed to you the following with additional points

(=)

If you adopt reverse regulation for Japanese fishery, it is likely to deal a fatal blow, not only to our own fishery, but also it would ruin the C. Council's market which you are expecting.

For the reason, we hoped you would reconsider and increase the catch quota.

Today, as what I wish to say, every mechanical points, it is our comment about the market which was mentioned in our point on Aug. 22th and Sep. 2nd, and I believe it should be paid attention.

And I would like to the following point.
8.8.0 and A.P. were holes here or before the R/C meeting.

We heard you had discussion about your regulation of fishing ground for us, which content is that the south secondary is 57¹⁰ North latitude is in the area between 164 and 168.45° west. (2) So

(三)

Our comment for this is as follows.
Firstly, this area used to be covered with drifting ice early and essential stage of our operation period.

Secondly, the crab distribution in this fishing ground is uneven and the quality of the crab is not good for the reason of tender meat, so that we cannot expect effective operation in this ^{area} so called dip.

Under these facts, we hope you to understand enoughly that this area scarcely bring any merit to our operations.

In order to manage our operation and maintain the market, we hope to be allowed to operate in the water north 56° north.

In this case, in the area between 56° and 58° north which has been used as one important fishing ground,

I consider it ^{a certain kind of will happen} ~~not necessary~~ ^{regulation} ~~available~~ ^{highly concentrated area} to be ~~regulated~~ ^{regulated} to our operation ⁱⁿ ~~at~~ the ~~area~~ ^{east area} which is the ~~most~~ ^{most} dense place of *C. bairdi* and ^{is} our important fishing ground ~~at point out by T.M.P. Dept. that east area~~

However regarding that ~~west area~~ west area between 56° and 58° north, we wish to be recognized to need the area north of 56° north for escaping from drifting ice and continuing our operation.

(12)

According to PMP plan, in the area west of 173° west, it stated to allow to operate north of 56° north latitude, but actually, this near area west of 173° west latitude is deep so that the range being possible to operate is narrow.

Therefore, it is be slightly effective to deliver us from the difficulty of our operation.

Finally, I should like to request again that, in order to make survive our traditional fishery, which has been developing and managing for many years, and to expand the market which you are looking forward to, you allow us to allocate 1 baide and operate our boats in the area of ^{the} water north of 56° north.

Thank for sparing your precious time and your attention.

I have bad news for Don McKernan, the National Marine Fisheries Service, and the State Department. The United States cannot afford for them to play Japanese Santa Claus with Alaska fish this year.

The U.S. trade deficit will exceed \$30 billion in 1977. That's more than a 200% increase over 1976's, \$9.3 billion deficit.

Japan, on the other hand, will record a \$16 billion trade surplus in its current fiscal year ending March 31, 1978. Half of that surplus will come at the expense of the United States economy. And U.S. Deputy Special Trade Representative Wolf, speaking in Washington on November 17, has predicted that even if Japan reduces its balance of payments surplus by \$3 billion next year, the U.S. will still register a \$10 billion trade deficit with Japan in 1978.

This is clearly not the time for another Don McKernan, bargain-basement give-away of Alaska fisheries. Instead, the Japanese should be encouraged to buy from Americans the Alaska fish that Japanese consumers demand. Japan has more purchasing power today than she's ever had since WW II. Since January 1, the Japanese Yen has increased in value 18% against the American Dollar.

This means that Japanese importers can buy for 82¢ today what cost them \$1 on New Years Day 1977.

And Japan has more Dollars with which to buy Alaska Tanner crab than any other time since 1945. In fact, Japan's Gold and Foreign Currency reserves now exceed \$20 billion.

Some people have argued that if the U.S. cuts-off the Japanese Tanner crab fleet from the bairdi grounds in the Bering Sea, the Japanese will react by stopping all imports of Tanner crab from Alaska. This was not the case with King Crab. The U.S. stopped Japanese King Crab fishing in Alaska waters in 1975. Yet, just last month the Japanese bought more than 3 million pounds of processed King Crab from Americans in Dutch Harbor, Alaska. The value of this transaction was over \$10 million...to the benefit of the U.S. trade account. This large purchase of U.S. King Crab by Japanese buyers occurred while the ex-vessel price payed to U.S. fishermen reached an all-time high of 90¢ per pound in Dutch Harbor.

You can be sure that the Japanese have more than enough Dollars to buy the Tanner crab that their consumers want in 1978.

I told you earlier that the U.S. Dollar has suffered an 18% devaluation against the Yen this year. The U.S. is not the only victim of this loss. King Khalid of Saudi Arabia and the Shah of Iran took a bath with the Americans when the Dollar collapsed. You see, the King and the Shah accept only U.S. Dollars for their oil. And the Dollars they've received in the past year are buying much less industrial and technological equipment in Japan and Germany where the King and the Shah do a lot of business today.

I'm sure that the King and the Shah aren't going to continue losing money on the U.S. Dollar much longer. In January, when OPEC meets to set 1978 oil prices, you can be sure, despite their public statements to the contrary, that Iran and Saudi Arabia will want more dollars for each of their barrels of oil.

By giving Japan opilio Tanner crab from the Bering Sea , instead of making Japan buy U.S. Tanner crab from Alaska fishermen and processors, we are increasing the likelihood of Japan exporting some opilio Tanner crab back to the U.S. (they've done it before)...forcing the U.S. trade account further into the red... causing a further devaluation of the U.S. Dollar...which encourages a further increase in oil prices...which further threatens U.S. economic growth.

Japan sold 1,536,000 pounds of canned Tanner crab meat abroad from January to August this year. That's almost a 400% increase over 1975's 442,000. As we increase the Bering Sea opilio Tanner quota for Japan, she will ship more Tanner crab back to us. And that's not good for our economy now.

The Council and the Secretary should remember that the 200-mile limit law defines Optimum Yield of any species as that amount "which will provide the greatest overall benefit to the Nation." I believe that Japan's 1978 opilio Tanner crab quota should not be increased. For by increasing Japan's quota we are unnecessarily risking more trade problems at a time our Nation is extremely vulnerable.

So I encourage Don McKernan, NMFS, and State to send a stack of McDonald's gift certificates to the Japanese this Christmas...instead of another 8,000 tons of Alaska Tanner crab.

Our economy cannot afford a multi-million dollar Christmas gift for Japan this year. And I encourage Don, NMFS, and State to adjust their Christmas spirit accordingly.

Tom Casey Dec 1 1977

I've got bad news for Don McKernan, NMFS, and the State Department. The UNITED STATES TREASURY can't afford to let them play Japanese Santa Claus with Alaska fish this year.

The U.S. trade deficit will exceed \$30 billion in 1977. That's more than a 200% increase over 1976's, \$9.3 billion deficit.

(3)

This is clearly not the time for a Don McKernan bargain-
treatment give-away of valuable
Alaska fisheries. Instead, the
Japanese should be made to
buy Alaska fish... Japan has
more purchasing power today
than she's ever had since
WW II. ~~The~~ Since Jan 1 alone
the Japanese ¥ has increased
in value 1870 ~~times~~

That means that Japanese
importers of Alaska ~~the~~ Tanner crab
need only shell-out 82¢ worth

of their currency to purchase the same amount of Alaska Tanner crab they paid \$1 for at the start of this year.

And Japan has more dollars with which to buy Alaska Tanner crab ~~than~~ ^{than} any time since 1945.

In fact, Japan's Gold and foreign currency reserves now exceed \$20 billion, a post WWII record.

We've witnessed ~~in~~ ^{last month} ~~recently~~ the exportation of more than 3 million pounds of processed

Alaska King Crab sections

from Dutch Harbor to Japan.

The value of this transaction

was nearly \$10 million dollars

... to the benefit of the

U.S. trade account.

This ~~importantly~~ large Japanese

purchase of U.S. King Crabs

occurred while the price to

U.S. fishermen ^(90%) reached its historic

high in Dutch Harbor.

You can ~~see~~ be certain

that Japan has more than

enough \$ to buy the former

crab that its consumers
demand in 1978.

I told you earlier that
the U.S. \$ has suffered an
18% devaluation against the
¥. ~~the~~ ~~the~~ ~~the~~ ~~the~~

The U.S. is not the only victim
of this devaluation. King

Khalid of Saudi Arabia and
the Shah of Iran lose when
the \$ drops in value, too.

The King & the Shah accept
only U.S. \$ for their oil.

And the \$: they've received

in the last year are buying

significantly less industrial

and technological equipment

in Japan and Germany today.

I'm sure the Shah and King

Khalid aren't going to ^{continue} losing

money on US \$ much longer.

In January when OPEC

meets to set 1978 oil prices,

you can see the ^{are}, despite

public statements, the Iranians

+ Saudis will want more \$

for each of ^{their} barrels of oil.

threatens U.S. economic growth.

oil prices... which further

encourage a further increase in

of the U.S. \$ which

causing a further devaluation

further into the red.

... forcing the U.S. trade account

oil imports back to the U.S.

the likelihood of Japan exporting

leakage we are increasing

Japan buy ~~the~~ Japaner cars from

cars instead of making

By giving Japan a Japaner

U.S. oil

9.
Japan sold \$ 1,536,000 lbs. of

canned Tanner crab meat

ABROAD
~~the~~ from January
to August ~~this~~ year. Up from 442,000 lbs in 1975.

increase the BS quota for

Japan, Japan will ~~sell~~ more

Tanner crab back to us. And

that not ~~is~~ good for our

economy now. ~~The~~

The Council & the Secretary should remember
The 200-mile limit law

defines optimum yield as

the amt of any fishery " which

will provide the greatest overall

benefit to the Nation "

of Alaska Tanner
crab.

Our economy cannot
afford a multi-million
dollar Xmas gift for Japan
this year. And we urge
Don ^{DMFS, and STATE} to adjust their Xmas
spirits accordingly.

submitted 0900 12/1/77 by Mel Morris

Pacific Pearl

AN **Amfac** COMPANY

November 30, 1977

TO THE NORTH PACIFIC REGIONAL COUNCIL

Gentlemen:

Subject: Domestic Tanner Crab Allocation

The purpose of this letter is to express Pacific Pearl's position regarding the 1978 Domestic Tanner Crab quota. Pacific Pearl is now and always has been firmly in favor of soundly based biological quotas designed to protect the renewable seafood resources in Alaska.

The intent of the Fisheries Management and Conservation Act of 1976 clearly established domestic industry's preferential right to harvest Tanner Crab to the industry's capability and desire within the biologically based parameters of seasons, quotas, sex and size limitations. Recent reports have indicated some disparity as to the amount of *Chionoecetes bairdi* which could be safely harvested from the Bering Sea area during the 1978 season. These estimates have ranged from between 60 to 105 million pounds. It is the firm conviction of Pacific Pearl's production and marketing personnel as well as the company's top management that domestic industry is fully capable of processing and marketing up to 145 million pounds of *C. bairdi* during 1978.

It would be a grave mistake and contrary to the purpose of the Fisheries Management and Conservation Act of 1976 to allow any foreign government any portion of this catch in view of domestic industry's capabilities and desire to both process and market whatever production is available.

Sincerely,



William K. Deshler
President

WKD:lp

PACIFIC PEARL SEAFOODS
BELLEFIELD OFFICE PARK C-10220
1450 114th AVENUE S.E.
BELLEVUE, WASHINGTON 98004
(206) 453-4600 TELEX 32-0068

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Report to the North Pacific Fisheries
Management Council, Dec. 1, 1977

by Lawrence Cotter ^{Bot} 3662 Juneau

My name is Larry Cotter. I am a representative of the International Longshoremen and Warehousemen's Union, and a Trustee to the Alaska Cold Storage IHWU Health and Welfare, and Pension Trust Funds.

Due to the recommendations given this morning by the S.S.C. and A.P. committees, the status of the Fairweather Troll Plan appears to have been altered from a plan dominated by a potential closure to a plan dominated by an intensive statistical research effort. In view of the extreme economic consequences of a troll closure in the Fairweather area, a massive statistical information effort is imperative before any major regulating plan - i.e. a closure - should be put into effect. The IHWU supports this concept entirely.

We also support the concept of limited entry on the Fairweather Grounds, a 28 inch size limit, and log book recording.

I would also like to make one suggestion to the ~~council~~ council regarding the gathering of pertinent information as to the Fairweather Grounds:

You should endeavor to create a task force, place on board observers, or whatever is necessary to determine the extent of the

relationship between Fairweather Ground fish and the fish harvested by the Japanese High Seas Gillnet Fishery. In

1971 140,000 fish were taken by the JHS GF. In 1972 240,000 fish were taken, 1973 40,000 fish, 1974 274,000 fish, and 1975 175,000 fish. It is interesting to

note the decrease ~~between~~ in harvest

from 1972 to 1973. It is also interesting to note that 1973 was a bumper year

on the Fairweather Grounds.

The conclusion thus, is that there is

a relationship between the two fisheries,

but to what extent? I believe it

chooses the council to investigate

this relationship and include the results

of such an investigation in future

management plans for the Fairweather Grounds.