


MEMORANDUM

TO: Council, AP, and SSC Members

FROM: Clarence G. Pautzke   
Executive Director

DATE: December 2, 1992

SUBJECT: Groundfish Regulatory Amendments - Final Review

**ACTION REQUIRED**

Consider final action on the proposed pollock 'B' season delay.

**BACKGROUND**

Last April, the Council requested staff to prepare an amendment package with alternatives to establish exclusive registration for groundfish vessels and postpone the opening date of the BSAI 'B' season pollock fishery. The draft analysis was presented to the Council at the September 1992 meeting. The Council recommended separating the two issues and sending them out for public review prior to this meeting. The EA/RIR/IRFA for the 'B' season delay proposal was sent to you early in November.

A season delay in the BSAI 'B' season pollock fishery would require a regulatory amendment. The analysis before you considers the following alternative starting dates:

- Alternative 1: status quo (i.e., June 1 start date)
- Alternative 2a: July 1 start date
- Alternative 2b: August 1 start date
- Alternative 2c: September 1 start date

The Council also may choose some intermediate date. The Council needs to review public comments and take final action on this regulatory amendment proposal. Any written comments received on this amendment are included in Item D-2(a)(1).

## SOUTHEAST ALASKA SEINERS ASSOCIATION

[ ] Ketchikan Office  
P.O. Box 9579  
Ketchikan, Ak. 99901  
225-5156  
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9226 Long Run Drive  
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November 30, 1992

Rick Lauber, Chair  
North Pacific Management Council  
P.O. Box 103136  
Anchorage, Alaska 99510

SENT VIA FAX # 271-2817

Dear Chairman Lauber and Council Members,

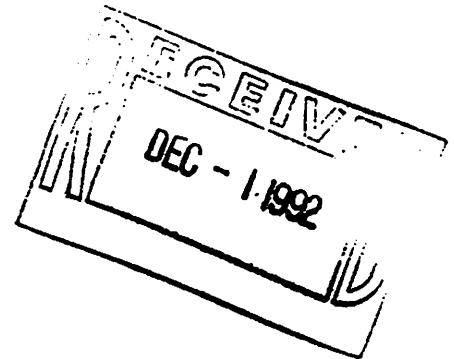
Southeast Alaska Seiners (SEAS) represents 350 fishermen who are struggling to make a living seining pink salmon in Southeast. SEAS Executive Committee directed me to submit these comments encouraging you to delay the pollock "B" season to mid-August. This delay action by the North Pacific Management Council would create several economic opportunities within the North Pacific fishing industries one of which could include Southeast seiners. More competition for pink salmon is one solution that we need in Southeast Alaska, particularly with a 50 million plus harvest forecast for 1993.

In order for Southeast Alaska to benefit significantly from trawlers shifting into salmon fisheries, the scheduled opening would need to be pushed back to September 1 or later. Yet, after reviewing the assessment of the biological impacts in the Environmental Assessment for the Proposed Delay of the Pollock "B" Season, SEAS does not support a September 1 date. Since biologically, August 1, is the preferred date SEAS wondered if a mid-August date would work well enough to avoid or minimize:

- a) fishing effort concentration in sea lion foraging areas during a time critical to juvenile survival
- b) the highest period of herring by-catch
- c) increasing halibut bycatch rates
- d) salmon bycatch in late October and November.

It is hard to determine from the report whether a mid-August date would still be biologically acceptable. But if in your deliberation, you find that the biological risks are low enough to warrant a mid-August date, SEAS strongly urges you to delay the pollock "B" season til mid-August.

SEAS believes that a mid-August date could still work for factory trawlers entering the Southeast Alaska's pink salmon fishery. The

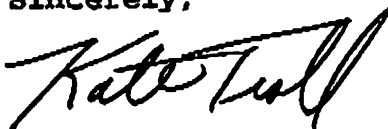


high 1993 forecast (50+ million) comes from a large parent escapement that was well distributed in all districts. Another strong season (good returns '89-'92), combined with consistent harvest deliveries (regular two-on, two-off harvest pattern since '90) makes Southeast an appealing option for offshore processors seeking to diversify into salmon. While the Southeast seine fishery usually opens the last week in June, it is well underway by the second week of July. As such, a mid-August date would provide processing competition for 4 to 6 weeks.

The status quo scenario for Southeast does not bode well for better prices, products, and markets. Change is not only needed, but needed soon if the Southeast seining is to remain a viable occupation. In addition to encouraging competition, diversity of product form and market will be enhanced by new offshore processors. SEAS recognizes that it will take more than a few factory trawlers in Southeast to turn the situation around; but it is a move in the right direction. We all recognize that more competition and diversity is healthy for industry.

SEAS believe that Southeast's quality and quantity of pink salmon deserve more processing attention. Creating opportunity for other processors is an essential step. We hope that the Council will give serious consideration to delaying the pollock "B" season to mid-August.

Sincerely,



Kathryn Troll  
Executive Director



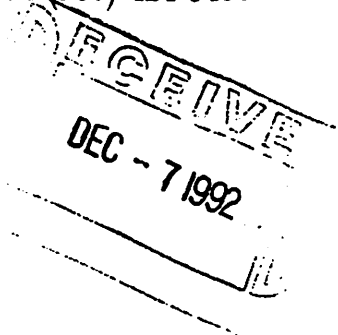
DECEMBER 1992

# CORDOVA DISTRICT FISHERMEN UNITED

P.O. Box 939

Cordova, Alaska 99574

Phone (907) 424-3447 Fax (907) 424-3430



December 1, 1992

Mr. Rick Lauber, Chairman  
North Pacific Fishery Management Council  
POB 103136  
Anchorage, AK 99510-3136

Re: Pollock B

Dear Mr. Lauber:


I am writing on behalf of Cordova District Fishermen United (CDFU), it's Board of Directors and membership. We request the Council delay the start date for the pollock non-roe "B" season from June 1 to September 1.

We feel that the factory trawl fleet could significantly enhance the value of the pink salmon in PWS and elsewhere in the state. The inability of the canned market to absorb existing pink salmon at some reasonable exvessel value has become obvious during the last few years. Last year we had over 40 seiners that did not have markets.

A number of factory trawl operators have expressed interest in buying our pink salmon if the "B" season for pollock is delayed until September 1.

Thank you for considering this vital issue.

Sincerely,

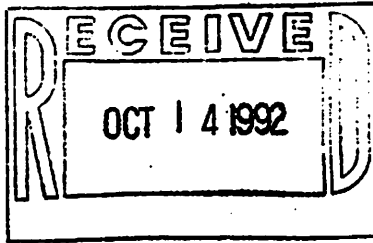
  
James Kallander  
Chairman Seine Division

CDFU



## BIRTING FISHERIES, INC.

October 2, 1992



ORIGINAL

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

RE: 1993 POLLOCK "B" SEASON OPENING DATE

We would like to formally express our opinion on an optimal start date for a delayed 1993 Pollock B season in the Bering Sea/Aleutian Island areas.

The best opening date for the 1993 B season is OCTOBER 15, 1993.  
The reasons for this follow:

1. Biologically, the fish quality is best (larger size and better meat quality) during this time, and therefore the quality of production is optimal, bringing the maximum benefit from the pollock quota. With better quality fish, we can produce a wider range of products, not having to rely on one export market, but rather having the option to move the various products around the globe to the strongest market at the time. With better quality, we can produce high quality IQF, deepskinned block, regular block, surimi, or a mix of the above, and maximize the export value - thereby maximizing revenues to each individual company (both onshore and offshore) and to the industry as a whole. This would also increase the total value of US exports and have a positive net effect on our balance of trade.

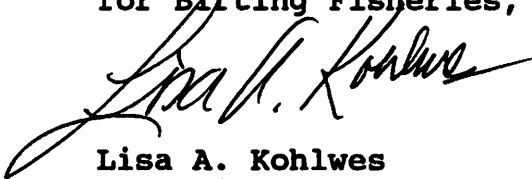
2. The recovery for each and every fish is higher during this time, so the value of the entire quota multiplies. To date, we have not maximized the quota, but rather wasted its value by fishing when the recovery is not at its highest (ie June through August). ~~By delaying the season until you can get more out of the same quota, the industry will be seen as being more responsible.~~ There is more benefit from this valuable resource when recovery is at its highest level.

3. The way the seasons are scheduled is inefficient. Currently, the vessels have to plan other opportunities around the opening and closing of the split seasons. By delaying the B season until October 15th (we could run the seasons almost back-to-back) we could eliminate the wasteful trips to and from Alaska from other grounds where we are trying to fill in between the closures in Alaska with other opportunities. Many of us have the opportunity to fish in other fisheries, some of which are in other countries, but with the current schedule we are discouraged from these other opportunities because of the uncertain time (ie not enough time to travel to and from foreign fishing grounds) between seasons. If the vessels could supplement the Alaska fishery with foreign opportunities, it would also take some of the over-capacity away from the Alaskan fisheries - an idea that the Council should be encouraging instead of discouraging. In summary, we are currently deterred from trying other ventures that would ultimately maximize the benefit back to the United States.

4. Starting and stopping seasons is inefficient in regards to crewing the vessels and running the shore plants. Currently, we are wasting money on plane fares back and forth from the vessels and on increased efforts to maintain processors. Our employees can not afford to have the amount of time off between the seasons. If the seasons run almost simultaneously, people will have the opportunity to work in other factions when the pollock season is closed; the time between the seasons now is too long to just wait for the next season and too short to gain other employment. Because of this, the industry is losing the best employees to other industries where employment is more predictable and better planned. In the shore plants and possibly on some vessels, seasons closer together would make it so the workers are not required to stay in remote areas of Alaska for almost the entire year - the way the system works today is to make them stay in Alaska even between the seasons to decrease the airfare expenses - this verges on inhumane and can be avoided if the seasons run closer together.

We hope you will put politics aside and seriously consider the above points when deciding the opening date for the 1993 Pollock B Season. A later start date will definitely have a net benefit effect for the entire industry.

With Best Regards,  
for Birting Fisheries, Inc.

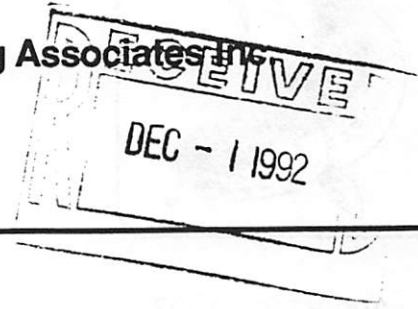


Lisa A. Kohlwes  
Operations Manager



# A.D.S.M.A.

Alaska Domestic Salmon Marketing Associates Inc.  
P.O. Box 110521  
Anchorage, AK 99511  
Phone (907) 346-1277



November 26, 1992

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

Dear members of the council.

**Reference:**

**In favor of moving the "B" portion of the pollock season starting date, to September 1, beginning 1993.**

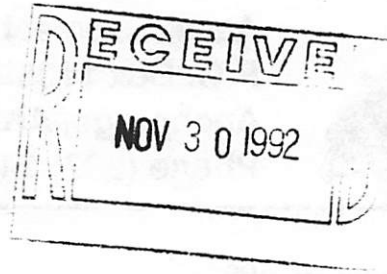
The benefits are numerous in moving the "B" portion of the pollock season to September 1, among them, bigger fish, firmer fish, better quality fish, higher recovery rate, and no interception of salmon during the months of June, July and August when the salmon are moving towards the spawning grounds.

In Bristol Bay I see a need for: Additional processing capability, diversified processing methods, development of consumer-oriented product forms and transportation of the processed product to a domestic market. I believe this can be accomplished by moving the "B" portion of the pollock season to September 1, starting 1993, and making the American flagged factory trawler fleet available for this task.

Sincerely

*Jorgen W. Bogdanoff, Bristol Bay Fisherman*

Jorgen W. Bogdanoff  
C.E.O.



August 25, 1992

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

Dear members of the council.

**Reference:**

**In favor of moving the "B" portion of the pollock season starting date, to September 1. beginning 1993.**

The benefits are numerous in moving the "B" portion of the pollock season to September 1, among them, bigger fish, firmer fish, better quality fish, higher recovery rate, and no interception of salmon during the months of June, July and August when the salmon are moving towards the spawning grounds.

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Sincerely

Bob Ryan /# EG

Po Box 110521

Anchorage, AK 99511

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Clarence Pautzke, Executive Director  
North Pacific Fishery Management Council

Dear Mr. Pautzke

This letter is to relate to you a situation regarding the 1993 B Pollack season.

The members of the Seiners Association strongly urge you to consider fully the movement of the B Pollack season to the month of September for the following reasons.

In 1991 the salmon fisherman of Prince William Sound were faced with the improbable dilemma of an extremely low price and lack of interest by the local shore-based processors, the result was a disastrous 1991 salmon season including the disposal at sea of millions of salmon.

It is the feeling of members of the Seiners Association that a full utilization of the salmon production in Prince William Sound as well as Alaska as a whole would best be provided if the B Pollack season were moved to the September time period. In personal discussions with factory trawler representatives it would seem that they for the most part agree.

The resultant provision of new innovative processing and marketing for all Alaska salmon fisherman could be the key to freeing us from the market manipulations of the largely foreign controlled shore-based Alaska salmon processors.

Any consideration you may give this issue will be greatly appreciated.

Thank You  
*David P. Clarke*

David P. Clarke pres.  
Prince William Sound Seiners Association  
P.O. Box 1072  
Cordova, Alaska 99574

