

## Public Testimony

### Agenda C-8 Inshore-Offshore Allocations

Eric Silberstein, Emerald Seafoods. Need to work together to solve a problem which has reached crisis proportions. Recommended an immediate across-the-board moratorium on additional processing capacity. Amend the MFCMA necessary. Thinks a prohibition on roe-stripping would do more to assure fish for the future than a shoreside preference measure. Suggested that Council members with a special interest in this issue should not vote on it.

John Roos, PSPA. With the rapid expansion of both onshore and offshore interests, the Council or Congress must take action to ensure fair allocations between both sectors in order to conserve the resource while maximizing economic and social benefits to the nation. They are not seeking to eliminate offshore interests, only to regulate. They want a solution that will guarantee long-term stability of the resource for all user groups.

Joe Plesha, Trident Seafoods. Support the Fishery Planning Committee's recommendation to send out for public comment. The Council should pursue a legal opinion on their ability to regulate the processing industry before spending too much time and energy on this issue. Every management regime will have a related economic impact; Trident is worried that the fishery in BSA may be depleted and negatively impact their new plant in Akutan. Does not agree with the suggestion that this issue be tied to the limited access analyses - it could take years and they need a solution now. Regulations similar to those in Amendment 14 may be a possibility for a more timely response.

Wally Pererya, Stan Hovik; representing the Ocean Phoenix group. Concerned that the majority of the options before the Council will limit their mobility and access to fishing grounds. Their operation could go bankrupt causing hundreds of people to lose their job. If there is any preference, it should be to the offshore sector - the quality of their product is higher, they have more efficient operations, and there is more competition to keep the price stable. Feels the Council should defer going forward with this analysis and clearly define the problem. The short-term solution involves resolving the roe-stripping issue. For the long-term, he recommends an immediate moratorium on further entry to both harvesting and processing sectors, and creation of a buyback program.

Eric Maisonpierre, Emerald Seafoods. Opposes limited entry under the guise of allocation but would support some sort of moratorium on entry to both at-sea and onshore sectors. If there is no moratorium, then conservation must be the main consideration. The domestic observer program will help. Any allocation scheme should reduce adverse impacts of one fishery on another.

Dave Harville, Kodiak Westward Trawlers. It is imperative that shorebased fisheries survive. High bycatch and stripping roe closed the pollock season. The Council has to take action now; strongly urged the Council to approve Alternative 3c and urge Congress to include a shorebase preference in the amendments to the MFCMA.

Jeff Stephan, United Fishermen's Marketing Assn. UFMA supports proposal 3a, the S/W Municipal Conference proposal, because of concern for the resource if the factory trawlers are allowed to continue in the Gulf. Other nations have eliminated or restricted factory trawler operations for socioeconomic and conservation-related reasons. These same practices by foreign factory trawlers in the U.S. EEZ led to the passage of the Magnuson Act.

Robert Shasteen, Unalaska/Dutch Harbor. The situations in Kodiak and Dutch Harbor are not the same; what is good for Kodiak may not be good for Dutch Harbor. Shoreside allocation is not the answer; the Council needs to stop capitalization in both the catching and processing sectors.

Terry Baker, Arctic Alaska. Factory trawlers were encouraged to develop the DAP industry; now that they have, they are being penalized. It's a complete waste of taxpayers' time to continue with this when the problem has not been defined. Cannot agree it's a conservation problem; there are quotas and reporting mechanisms which work well. The problem is overcapitalization and inshore/offshore allocations should not be addressed by the Council. If there is a problem, it should be looked at by Congress.

Harold Sparck, Yukon-Kuskokwim Task Force. They have a limited economy north of Bristol Bay; their fisheries are limited, and 11,000 people live directly off coastal resources. They have developed their wharfs and fish houses with the intent to move into the offshore fisheries - halibut and then cod. A joint venture fleet moved into the area and took 9,000 tons of cod in an area where local residents were expanding their operation; since then their cod CPUE has fallen. Their situation is unique and needs to be addressed.

Jerome Selby, Pres., S/W Alaska Conference; John Sevier, Alaska Pacific Seafoods. Cannot manage conservationally without inshore/offshore preference regulations. The problem is not only conservation of the resource; decisions on this issue will be significant to survival of coastal communities in the U.S. Most nations already have an inshore-offshore provision. Inshore interests have no alternative; factory trawlers can move.

Ken Allread, Chris Blackburn. Asked the Council to send the analysis out for public review, and to make sure that what happened in Kodiak (pollock roe-stripping closing the fishery prematurely) never happens again. It is not only the fact that jobs were lost as a result, but also the problem of pulse fishing on one component of the stock. Kodiak has had basically the same annual amount of processing for about 20 years; they are not expanding or overcapitalizing, only maintaining. Processing capacity controls the amount harvested.

Reed Wasson, Eagle Fisheries; Mark Barham, F/V TOPAZ. Concerned that continued unrestricted fishing by the factory trawler fleet is going to deplete the resource. The most important minimization factor in bycatch is knowledge of the grounds which the Kodiak fishermen have; they are able to avoid bycatch to a great degree. It's highly unlikely that the skipper of a factory trawler that moves in for a couple of weeks will have that kind of knowledge. They support Coastal Coalition proposal.

Harold Jones, All Alaska Seafoods. Doesn't ever want to see again what happened this spring with the factory trawlers taking the whole quota in such a short period of time. Would like to see separate bycatch quotas for shoreside and factory trawlers.

Doug Gordon, AHSFA. They have advocated some reasonable consideration of the shorebased problem. In June they wrote a letter requesting some action; Council did not react and they have since made similar requests of Congress with no response to date. They have requested that a temporary quota for U.S.-owned and operated vessels which have DAP markets be considered and

have advocated a moratorium in the past. Should any preference or limited entry program be implemented, they asked that their catch history be recognized. Also requested that some sort of preference system which rewards American content be included in the proposal package.

Brad Resnick, Aleutian Dragon Fisheries. Doesn't think the Government should tell people whether they can enter a business. Thinks the factory trawler harvesting capacity, not the processing cap is exacerbating the problem, and suggested time/area restrictions may be the answer to the problem. Halibut bycatch will close fisheries down much faster. Supports the Coastal Coalition proposal. There are conservation concerns but the Council also must address the level playing field aspect. If one sector of fishery must pay a raw fish tax within the EEZ, then everyone should have to pay.

Spike Jones. The amendment package should go out for public review. Problem is not unique to Alaska; Oregon also has some concerns over the factory trawler fleet. The problem is not only socioeconomic but is also conservation-oriented because of the huge amounts the factory trawler fleet can harvest.

Ted Evans, AFTA. Primary request is that the Council not proceed with the proposal framed in its present form. Asked the Council for a clear and concise statement of the problem and an opportunity to propose a possible solution once the problem has been defined. There is a broader range of possibilities. The Council should consider a moratorium on further harvesting and processing of bottomfish. If allocating among user groups, there are other considerations: history, economic dependency, economic efficiency, amount of effort, economic contribution to the U.S., and the ability to market.

Dave Fraser, Midwater Trawlers Cooperative. The compelling sentiment among their members is that if you're going to allocate between groups, it should be among catchers, not processors. He has submitted an amendment proposal on the basis of allocating between harvesters.

Bill Orr, Golden Age Fisheries. This issue should be included in the ongoing limited access analyses.

#### **Agenda C-10 Halibut Management**

Terry Johnson, Alaska Airlines Air Cargo, FISH. Challenged the Council to bring some order out of the chaos of the halibut fishery. Dumping large amounts of fish on market in a short period of time is inefficient and wasteful. An orderly flow of halibut to market should help get a better price for fishermen.

Mark Snigaroff, Atka Fishermens Assn. Asked the Council to maintain the status quo for Area 4B. The early openings they had last year were very beneficial to their fishermen; they had 14 openings and fished 11, and doubled their halibut take from the previous year.

Tom Behan, FISH. Present system needs to be changed. Their objections are conservation of the resource, to provide consistent quality to consumers, a 12-month season for halibut by 1990, to provide a continuous supply of fresh halibut to the end-user, and reduce waste. A 12-month season would allow fishermen to fish when it is the safest rather than when they're told, thus increasing safety.

John Melchior, Washington State Chef's Assn./FISH. Consumers want fresh, high quality halibut all year. Urged the Council to think in the long-term; mismanagement and waste of a natural resource cannot be tolerated.

Jon Rowley, Fishworks!/FISH. When fresh halibut is not available, the restaurants choose not to use it. Urged the Council to watch the IQ system in Canada and to follow with one of its own as expeditiously as possible, if only on an experimental basis. It is urgent to act swiftly and decisively. Also, there seems to be some confusion as to the division of responsibility between the IPHC and Council; he suggested that there should be a ruling from the Secretary of Commerce on the issue.

Don Prater, Pacific Fish, Seattle. He is a distributor of fresh fish in the Pacific Northwest and ships product across the U.S. Under the 24-hr openings the system backs up; product sits waiting for pick-up and often is turned down by quality fish buyers; he rejected 14 lots of halibut in the last two openings. The real crime is waste of resource. Need to extend the season and expose more people to the product.

Harold Kalve, Seward. He is a longliner and processor; extending the halibut season would help him. If he could retain halibut caught in other fisheries all year round, it would save him the 10 days he normally fishes during the halibut season and he could just concentrate on other fisheries.

Ron Philemenof, St. Paul/St. George Islands. They support proposal #5, to extend the 10,000 trip limit in Area 4C for the full season. He's not sure the plan teams completely understand their proposal. The proposal also addressed market concerns, the trip limit assures them of 15 steady days of top quality product to the market. It's not just a big vs small boat or local vs non-local issue. He also favored later openings due to weather problems.

Jack Knutsen/John Bruce, FVOA/DSFU. Mr. Knutsen said he has had some experience fishing in the new proposed area, and suggested that the Council should include the Slime Bank area in the proposal. In their experience in the late 1950s, they found some good concentrations of fish in the Slime bank area, but not in the new proposed area. The Council should be cautious about changing Area 4C; most of their people just aren't interested in fishing in Area 4C with 10,000 lb trip limits. If all the proposed changes are made, that area will basically be reserved for local residents. Support the Atka people in their request for status quo in Area 4B. On the Area 4C issue, they disagree that it is not a big-vs-small problem; if so, leave it as is. Originally this arrangement was made to allow local communities to learn how to harvest the resource and they have; they took 70% of the resource last year; now the advantage to them is unfair. John Bruce mentioned that, regarding the Area 4E fishery, two years ago IPHC did a charter there and found that there were not commercial quantities of halibut; what they really need is research later in the year to determine whether the fish move there.

Harold Sparck, Yukon-Kuskokwim Fisheries Task Force. They support the proposal for Area 4B, and the position of the Pribilovians on continuing the 10,000 lb. trip limit in 4C. They also support Atka's proposal. There are no proposals for Area 4E, but Mr. Sparck pointed out that the plan team has shown concern that the allocation was not been taken in 1988 and 1989. The quota was not taken in 1988 because there were unusual oceanic conditions and the fish weren't available in the areas accessible to local fisherman. In 1989 the total allocation wasn't taken because there was no gasoline available at a reasonable price, so vessels could not fish. Suggested plan team should have contacted a processor or someone to see why the quota was not taken.

### **Agenda D-3(a) Amendment 14/19, Pollock Roe-Stripping**

Eric Silberstein, Emerald Seafoods. According to the scientists, there is not enough data to paint a clear picture of this issue. He believes that "opinion leaders" believe taking roe negatively impacts the future of the fishery and are concerned about the waste of protein. His fleet targeted pollock for roe in part for economic reasons. He personally feels the immediate threat to the resource is from at-sea and onshore overcapitalization and that the Council should take immediate action. They propose that onshore processors don't take any more fish than the plant can process. Suggested voluntary restraint program to start this season if the Council can't implement regulations in time.

Eric Maisonpierre, Emerald Seafoods. Emerald Seafoods is against stripping for the use of only eggs. The Council should framework some plan to institute by January 1, 1990 to require use of the whole pollock carcass. He hopes the problem can be seen as a conservation problem allowing emergency action.

Doug Gordon, AHSFA. Urged the Council to adopt a policy towards full utilization of all fish managed under the OY for the bottomfish fishery, including pollock. Supports roe stripping only when other parts of the carcass are used for food or industrial products. Suggested making meal plants mandatory. Urged full accountability for withdrawals with a policy of full utilization and an onboard observer program to account for all fish caught and to measure behavior modification. Supports Alternatives #2, 3 without the phrase "or portions thereof."

Wally Pereyra, Ocean Phoenix Group. Feels the EA/RIR is deficient; some of the conclusions just don't reflect the real world. Supports a ban on roe stripping, Alternative 2. If at all possible, suggested the Council make it illegal to dump damaged carcasses; regulations should pertain to vessels in pollock fishery during roe season; 1/15-4/15. If it is difficult to implement regulations, they would volunteer to refrain from roe stripping and request that others make a similar pledge. Any regulation should apply to at sea and on shore processors. Gulf of Alaska should be treated separately from the Bering Sea/Aleutian Islands. Suggested a semi-annual division of quota in the Gulf - 60% from January 1-15; then no directed harvesting between 4/15-6/15 (quality of flesh poor during this time); then 40% allocation from 6/15-12/31. Single-species rule would be applied for bycatch needs. In the Bering Sea, there should be no division of quota or allocations because stocks are in good shape. Believes data to date show that roe stripping at the present rate does not have a negative impact on the stock. Roe is a very important part of their revenue.

Chris Blackburn, Alaska Groundfish Data Bank. Prefers Option 5 for the Gulf, but with a quarterly allocation beginning January 1. The EA/RIR does not begin to look at economics of a shorebased plant. Also prefers a ban on roe-stripping.

Dave Fraser, Cape Flattery Fisheries. Has submitted a frameworked Alternative 4 which would allow annual adjustments of apportionments as judged against a defined set of criteria. He feels this is the only action justified by the draft analysis.

Mike Hyde, Vince Curry, AFTA. Favor Alternative 2. A roe-stripping prohibition should only be applicable to directed pollock fisheries and allow for discard of fish that would ordinarily be discarded - undersized or damaged. If the Council wants semi-annual apportionments, then they should only apply to the Gulf. For the Gulf they recommend a 60% apportionment during the roe season and 40% during the next opening, as set by the Council.

#### **Agenda D-4 Gulf of Alaska Groundfish**

Bob Trumble, IPHC. The IPHC considers halibut a single migratory stock and manage them as such and should be managed with a single bycatch PSC limit. They recommend 6,000 lb limit for halibut bycatch based on the historical pattern of the fishery. Bycatch also has international implications as halibut travel through Alaska are on the way to British Columbia. They believe that the high bycatch rate is caused by the Olympic system and the race for fish which doesn't allow fishermen to search for areas with less bycatch. Management should provide incentives to allow fishermen to find clean ways and be rewarded for their efforts. The IPHC proposal for Bering Sea bycatch management suggests a series of incentives and the Commission plans to participate actively in the process of developing bycatch management.

Dave Harville, Kodiak Westward Trawlers. His vessels fished for Eagle this past year. They proved they can fish with a low bycatch rate in the flatfish fishery. They carried observers and cooperated, but now they're shut down. The information generated by observing this fishery is essential for future management. Not sure what good it is to cooperate and work hard when there's no reward. Asked that the Council ask the Regional Director to allow the deep water groundfish fishery to continue. Regarding pollock, his fishermen have told him there are more pollock outside Shelikof than there have been in years; something has to be done to prove that resource exists.

Dave Fraser, MTC. Incentives to reduce bycatch are important to them as well as separate caps for longline and trawl; no one should be shutting someone else down.

Chris Blackburn, Alaska Groundfish Data Bank. Most of the research on pollock has been done in Shelikof; this year for the first time they surveyed the east side and pollock was found. Requested a test fishery in Chirikof with the restrictions suggested by the SSC. Alaska Groundfish Data Bank has submitted a formal proposal based on those criteria.

Vince Curry, AFTA. They have equipment on board which could be used for exploration and research purposes and are willing to cooperate in such a fishery.

Mark Barham, F/V TOPAZ. They fished for Eagle Fisheries in the flatfish fishery with observers. If they are allowed to continue fishing with their proven low bycatch rates, it would establish the much needed incentive to fish clean. The halibut cap is going to be the driving force in the management of the groundfish fisheries in the Gulf in the future.

Reed Wasson, Eagle Fisheries. Requested that the Council clarify the implications of some of its recent actions and inactions in terms of the incentive program that Eagle Fisheries has operated this year. This program is the only bycatch incentive program this year. Eagle fishermen made a tremendous effort; they had to forego significant hot fishing to avoid halibut but preferred to create a savings which would allow them to fish all year. Steve Pennoyer has said that the 2,000 mt cap has tied his hands in pursuing this any further. Pennoyer also said there aren't reasonable and acceptable standards by which to judge this program, but the SSC gave standards by which the operation should be guided, and Eagle Fisheries followed those guidelines. Requested that the Council instruct the Regional Director that the 2,000 mt cap does not preclude action under the regulation.

Linda Kozak, KLVOA. Regarding the ADF&G study in the Gulf of Alaska SAFE document, they have concerns with the longline portion of information in the study. Specifically, they have concern about the variance in the sablefish bycatch rates in the document which they don't believe are representative. KLVOA recommends that the 1989 assumed bycatch and mortality rates be

continued for 1990. For 1991, update with observations from 1990, and actively pursue options to reduce bycatch in the longline fisheries. Also recommended that an industry and management workgroup be formed to discuss options and incentives to reduce bycatch. They submitted a written list of options they would like to have considered to eliminate or reduce bycatch in the longline fisheries.

Mark Lundsten, FVOA. He agrees with Linda Kozak that the sablefish longline bycatch figures in the SAFE document are not representative.

Jack Knutsen/John Bruce, FVOA/DSFU. Thinks the Council is spending a lot of time compiling statistics when they should be spending more time on practical solutions. Blackcod is a very clean fishery; one solution may be a depth restriction or a gear limit. Agree with KLVOA regarding the ADF&G survey - they don't agree with those figures at all. Would like to see status quo for bycatch and mortality rates for 1990 and wait for observer data for next year.

Charlie Christensen, PVOA. The 2,750 mt number for bycatch is a fictitious number; until the observer program is under way, it shouldn't be changed.

Brad Resnick, Aleutian Dragon Fisheries. He's very concerned about the way the pollock surveys have been done. The western portion of the Central District and the Western District of the Central Gulf are very undersurveyed for a substantial period of time. He processes cod, but last year his boats begged him to harvest pollock because there was so much.

#### **D-5 Bering Sea/Aleutian Islands Groundfish**

Vince Curry, AFTA. With regard to pollock in the Bering Sea, he urged the Council to set the initial TAC at the high end of the range and to make sure those fish are available to American fishermen.