

MEMORANDUM

TO: Council, AP and SSC Members

FROM: Clarence G. Pautzke  
Executive Director



DATE: April 19, 1991

SUBJECT: Future Management Planning

**ACTION REQUIRED**

- (a) Initial consideration of a general moratorium for all fisheries within the Council's purview. The Council will receive Fishery Planning Committee recommendations and develop a schedule for analysis and implementation.
- (b) Consider schedules for groundfish and crab limited access.

**BACKGROUND**

(a) Moratorium

The Fishery Planning Committee, chaired by Joe Blum, was delegated the task of designing specific alternatives and options for the proposed moratorium and reporting their recommendations to the Council at this meeting. The Committee met on March 20 and approved the objective, elements, and options shown in Item C-5(a). They worked from the document in C-5(b) which I have since annotated with their decisions on each element.

If the Council directs the staff to proceed with analyzing the moratorium, I would put together an analytical team, consult out the economics portion, and bring back an analysis by the September meeting. We could work with the FPC over the summer for guidance as we did on inshore-offshore. The Council could then consider approving the analysis for public review at the September meeting and take final action in December.

At this meeting the Council needs to pass off on the elements and options so I can proceed with the analysis. There could be further fine-tuning at the June meeting before going into the intensive analytical period over the summer.

(b) Schedules for Groundfish and Crab Limited Access

The Council has had several schedules in the past to examine limited access for the other fisheries, but these have been delayed, pending completion of work on other issues such as inshore-offshore, the moratorium, bycatch, and sablefish and halibut limited access.

I had envisioned beginning work on groundfish and crab in early 1992, because that is when we would have staff available after the heavy load of 1991 was behind us. Bill Fox announced at the Council Chairman's meeting in February that he would be providing support for Dr. Lee Anderson, an economist from Delaware, to do some initial spade work on IFQ systems for various fisheries around the U.S. Dr. Anderson is particularly interested in working on North Pacific groundfish fisheries and would be of great value to us if we decide to proceed. We would still need to find additional economists to do the intensive analysis, either on our staffs or through consulting. I will be prepared to talk further on staffing requirements at the meeting.

REVISED  
OBJECTIVE AND ELEMENTS OF A PROPOSED MORATORIUM

Moratorium Objective: To control continued growth in fishing capacity while the Council assesses alternative management measures including, but not limited to, limited- and open-access measures to address the overcapacity problem and to achieve the optimum yield from the fisheries.

Key Elements

1. Earliest Qualifying Date: Must have made landings at least once during or after:

- Option 1: 1980
- Option 2: 1976
- Option 3: No date

2. Latest Qualifying Date: Must have made landings on or before:

- Option 1: September 15, 1990
- Option 2: January 15, 1992 if contracts by September 15, 1990 (or contracted by January 1, 1991, if disadvantaged by January 19, 1990 cutoff).

3. No minimum qualifying poundage, just a legal landing in any qualifying year.

4. Exemptions for Small Vessels

- Option 1: No exemptions for smaller vessels.
- Option 2: Exempt vessels less than 40' LOA
- Option 3: Exempt vessels less than 43' LOA in GOA and/or BSAI
- Option 4: Exempt vessels less than 60' LOA in GOA and/or BSAI

5. Exemptions for Disadvantaged Communities

- Option 1: No exemptions.
- Option 2: Use size exemption approach above assuming that disadvantaged communities will use smaller vessels.
- Option 3: Define disadvantaged communities, define vessels, and then exempt its vessels. (Could include additional landings requirements)

6. Exemptions for Qualifying Vessels Lost or Destroyed Immediately before Moratorium Begins  
(Two options for defining "immediately": since 1/1/90 or since 6/15/89)

- Option 1: Can be replaced with similar capacity.
- Option 2: Can be replaced with increased capacity limited to, for example, 20% more in LOA and/or width.

7. Moratorium will be applied equally to all sectors of industry  
(Sectors tentatively defined to include catcher/processors, catchers, and mothership processors.)

8. Length of Moratorium

- Option 1: Until Council rescinds or replaces, not to exceed 4 years from implementation.
- Option 2: Same as Option 1, but Council may extend for 2 years if limited access is imminent.

9. Fisheries Crossovers during Moratorium

- Option 1: Any boat that qualifies to fish at all, may fish in any fishery (groundfish, crab or halibut).
- Option 2: Same as Option 1, but Council would be able to use a regulatory amendment to limit participation in specific fisheries to those who participated in the fishery before the moratorium was imposed.

10. Replacement of Vessels Lost or Destroyed during Moratorium

- Option 1: Can be replaced with similar capacity.
- Option 2: Can be replaced with increased capacity limited to, for example, 20% more in LOA and/or width.

(Caveat: replaced vessels cannot be salvaged and come back into fishery)

11. Replacement or Reconstruction of Vessels during Moratorium

- Option 1: Can replace with similar capacity but replaced vessel must leave fishery.
- Option 2: May increase capacity of vessel by 20% in LOA and/or width, once during moratorium years.
- Option 3: May reconstruct vessel to upgrade processing equipment and stability, but not increase fishing capacity through changes in LOA, width or horsepower, or other suitable index of fishing capacity.

12. Appeals Procedure: Use adjudication board of government persons.

MEMORANDUM

**TO:** Fishery Planning Committee

**FROM:** Clarence G. Pautzke  
Executive Director

**DATE:** March 14, 1991

**SUBJECT:** Moratorium

Status of Moratorium

The Council published in the Federal Register on August 24, 1990, its intent to prepare a supplemental environmental impact statement to assess the potential effects of a moratorium on new entry into the groundfish, crab, and halibut fisheries off Alaska.

Shortly thereafter, a control date of September 15, 1990, was published with the explanation that the Council would not assure participation for vessels that had not entered the fishery by September 15, but would give due consideration to those that had some financial commitment that could be lost. There are two categories of "due consideration" circumstances for vessels "in the pipeline", and vessels in either have to be active by January 15, 1992:

- a. Vessels contracted for or already under construction, reconstruction, or purchased by September 15, 1990, for the purpose of participating in the crab, halibut, or groundfish fisheries; and
- b. Vessels that were under written option or contract for purchase, construction or reconstruction by September 15, 1990, which was canceled because of the January 19, 1990 announced cutoff date. These vessels once again had to be under written contract by January 1, 1991.

This is as definitive as the Council has been to date on the structure of a potential moratorium. The Council delegated the task of designing specific alternatives to the Fishery Planning Committee and requested they report back in April 1991.

Alternatives for Analysis

Twelve elements of a prospective moratorium are listed, with options, in the attached table. The analysis will be better focused if the options are narrowed. Each element is discussed below.

1. Earliest Qualifying Date

So far the Council has focused its attention on a control date by which a vessel will have to have participated in the fisheries. But there may be vessels that are not currently in the fishery, but were active off Alaska some time ago. Owners of those vessels would have a hard time claiming dependency on the fisheries, but what if someone wants to buy a vessel that fished off Alaska in the

late seventies, but not recently? Does the vessel automatically qualify even though it would be adding to the current capacity?

Is going back to 1985 sufficient to capture the current composition of the fleet? The number of halibut boats increased significantly from 1985 on, the sablefish fleet increased rapidly from 1983, and major increases in the rest of the groundfish fleet began in 1986. The crab fleet was at its peak earlier. How far back does the Council want to go in letting vessels qualify for the moratorium?

[FPC: Deleted 1985 as a possible date.]

## 2. Latest Qualifying Date

The moratorium is a form of limited access management and Magnuson Act Section 303(b)(6) requires the Council and Secretary to take into account present participation in the fishery. Under the most stringent option, option #1, the Council could require that a vessel have operated in the fishery by the September 15, 1990, cutoff date. That would limit the fleet to the numbers and capacity that caused the Council concern in the first place.

Option 2 has the "due consideration" provisions announced with the cutoff date. It is unclear how many vessels might be in the pipeline, but in the past twelve months, we have had inquiries from owners/builders representing 60-70 vessels. Their circumstances fall into six general categories:

- a. Qualified for moratorium; active by September 15, 1990: 5 vessels.
- b. Category (a); but depends on being active by January 15, 1992: 38 vessels.
- c. Category (b); also depends on being active by January 15, 1992: 1 vessel.
- d. Probably will not qualify - had no contracts: 6 inquiries.
- e. Insufficient data to classify situation: 5 vessels.
- f. Special cases that are difficult to classify: 6-10 vessels

Special Cases. Here are some of the 6-10 special cases that are tough to classify and will depend in large part on Council largess in handling other components of the moratorium, such as replacement provisions.

- Case 1: Person loses otherwise fully qualified vessel by sinking in 1990 and has not had time to contract for a replacement vessel. Two vessels were in this category.
- Case 2: Person has done design work on or has started constructing a new vessel, may have no construction contract, but may have time and money invested in the project. Will not have ready to operate until spring of 1992. Three vessels in this category.
- Case 3: Similar to Case 2 but person has purchased several thousand pounds of steel for a keel. It is in his back yard and he is looking for a place to build the vessel by himself over the next 4-5 years.

- Case 4: Person has tender vessel and wants to convert to fishing vessel. Has no contracts yet.
- Case 5: Person caught some ling cod during directed halibut fishery, but had to discard because he did not have groundfish permit. Wants to qualify for groundfish under moratorium.
- Case 6: Person has boat that fished for salmon before September 15, 1990 and now wants to move into groundfish.
- Case 7: Person has longlined for halibut and sablefish and now wants to use same vessel to trawl for groundfish.
- Case 8: Person has evidence of negotiations with banks and architects, etc, but no written contracts. He put off buying vessel to await Council decision on sablefish IFQs.

Option three under this alternative is the most lenient. Every vessel that operates by January 15, 1992, regardless of when contracts were signed, would be allowed to participate during the moratorium years. The January 15, 1992, performance deadline is meaningful only for fisheries whose seasons open on January 1:

Gulf of Alaska: Pollock, Pacific cod, flatfish, rockfish, Thornyhead

Bering Sea and Aleutians: Pollock, Pacific cod, rocksole, sablefish, POP, rockfish, Atka mackerel, squid and other species.

To qualify for sablefish in the Gulf of Alaska, Bering Sea flatfish (other than rocksole), halibut, and Tanner or king crab will require participation this year.

**[FPC: Deleted Option 3, January 15, 1992, without any contract requirements.]**

### 3. Minimum Qualifying Harvests

There will be some vessels that only dabbled in a particular fishery, taking small harvests, and did not really contribute significantly to the excess harvesting capacity in the fishery. Does the Council want to give full privileges to such vessels, or should there be a minimum qualifying poundage? If so, what weights should the analysts examine, 10 mt, 100 mt, 1,000 mt? And how should bycatch be treated? Does bycatch before the moratorium fully qualify a vessel for the directed fishery after the moratorium?

**[FPC: Deleted need for minimum poundage to qualify; only need a legal landing.]**

### 4. Exemptions for Small Vessels

Various industry proposals have included exemptions for smaller vessels. These vessels add greatly to the size of the fleet, but not necessarily to the capacity. In the industry proposal of December 1989, vessels less than 40' were exempted. Council discussion in April 1990 was the source of the 60' limitation. The Advisory Panel offered up 43' in June 1990.

We've not made current runs to determine groundfish catches by size class, but we do have information from other studies. Table 21 of the 1990 SAFE shows that for 1989, vessels under 60' were:

- 90% of the hook and line vessels
- 80% of the pot vessels
- 16% of trawl vessels

NMFS' study of observer costs on smaller vessels, presented at the September 1990 Council meeting, indicated that in 1989, 0.5% of the groundfish catch was by vessels under 49', and 1.6% by vessels under 60'. In 1990 through July, 0.7% of the catch was by vessels under 49' and 2.8% by vessels under 60'.

In 1989, in the fixed gear sablefish fleet, 28% of the vessels were under 40', 67% under 50', and 81% under 60'. Vessels under 50' accounted for about 15% of the sablefish landings in 1989.

We would need to make more data runs for all vessel sizes and fisheries to determine the impacts of exempting smaller vessels. Are there other size classes that should be examined?

**[FPC: Retained all options but added qualifiers on areas.]**

#### 5. Exemptions for Disadvantaged Communities

Some coastal communities have not had a chance to develop their fisheries opportunities. If the Council provides no exemption, communities would be required to purchase qualifying vessels during the moratorium. Option 2 is premised on the assumption that exempting smaller vessels would serve the purposes of disadvantaged communities.

Option 3 would require the Council to define a disadvantaged community, as we are doing now under sablefish IFQs. This could serve as a template for other fisheries, however, there is still the requirement that the Governor must recommend which communities to place in the category. Is a community that is disadvantaged for one species, such as sablefish, automatically defined as disadvantaged for halibut and groundfish and crab?

**[FPC: Changed Option 3 by adding the requirement to define vessels and then exempt them.]**

#### 6. Exemptions for Qualifying Vessels Lost or Destroyed Immediately before Moratorium Begins

As noted earlier, we've had several cases where fishermen have lost their vessels just before the September cutoff date, and have not had time to sign contracts. Also, vessels that otherwise would have qualified, may be lost in the next 12 months before the moratorium begins. Can these fishermen replace the vessels without loss of standing? Can they upgrade the vessels in size or capacity, and if so, is there a limit on the incremental upgrade?

**[FPC: Deleted Option 1, cannot replace; added two definitions of "immediately".]**

#### 7. Differential Application of Moratorium to Sectors of Industry

The simplest moratorium would freeze all sectors of the fishing industry. It has been argued however that only some sectors pose the biggest problem with overcapitalization. The Council needs to decide how much growth there should be in the fleet and its sectors. Is there a reason to limit motherships



that process only? Is the moratorium only limited to harvesting capacity? The final decision on differential application of the moratorium may need to await the outcome of the inshore-offshore decision. Certainly the analysis of the moratorium will be impacted by the inshore-offshore outcome.

**[FPC: Deleted Option 2, to apply moratorium differentially.]**

#### 8. Length of Moratorium

The option submitted by industry is for the moratorium to expire after four years unless replaced or rescinded earlier. That would give the Council time to develop alternative access systems for all fisheries. An alternative would be for the Council to place no expiration on the moratorium but leave it unspecified pending further action on each fishery.

**[FPC: Added 2-year extension if limited access is imminent.]**

#### 9. Fisheries Crossover during the Moratorium

Industry has recommended that any vessel that qualifies for one fishery under the moratorium rules, should be able to fish all fisheries. While this would give fishermen increased flexibility, it would tend to exacerbate capacity problems, if, for example, groundfish vessels could cross over into crab fisheries which may have their own capacity problems. An alternative would be to partition the fisheries into crab, groundfish, sablefish, and halibut. To qualify for one or more of these fisheries, a vessel could be required to have landed fish in the respective directed fishery before the moratorium, possibly a minimum amount.

A corollary issue relates to gear type or area. For example, should all 1,353 vessels that have designated only longline gear on their Federal groundfish permits be allowed to join the 217 vessels that are exclusively trawl gear operators under the moratorium? Should any or all of the 1,058 vessels permitted to operate only in the Gulf of Alaska groundfish fishery be allowed to transfer to the Bering Sea groundfish fishery?

**[FPC: Added the use of a regulatory amendment procedure to limit cross-over.]**

#### 10. Replacement of Vessels Lost or Destroyed during the Moratorium

Should someone that loses a vessel be able to replace the vessel with similar capacity or even enhanced capacity during the moratorium? What if a vessel is lost, insurance pays for the boat, and the owner replaces it in the fleet. What if the lost boat is salvaged later - can it be brought back into the fishery? Or is it banned until the moratorium ends?

**[FPC: Deleted Option 1, cannot be replaced and Option 4, a differential application of replacement requirements.]**

#### 11. Replacement and Reconstruction of Vessels during the Moratorium

What flexibility should the owner have in replacing or enlarging a vessel that is not lost or destroyed. Industry has recommended that the increase be limited to 20% in length once during the lifetime of the moratorium. Others have included width and other indices of capacity such as horsepower. If a vessel is replaced, must the old vessel leave the fishery if the new vessel has not operated in the

fishery before? Should there be any special provisions for fishermen who have been setting aside money in the federal Capital construction Fund for future vessel acquisition?

**[FPC: Deleted options that allowed for no replacement, no limitations on replacements, and differential applications of replacement provisions.]**

## 12. Appeals Procedures

Industry has suggested there be an adjudications board to take appeals. Should there be one? And should it be made up of government or industry members?

**[FPC: Deleted use of industry representatives on appeals board.]**

## Schedule for Analysis

No staff is immediately available to complete the analysis of the proposed moratorium. Therefore, I plan to use consulting economists to do the job, which will require from May to September. By the September meeting, we would have an analysis that could go out for public review. The Council's final decision then could be scheduled for December. How soon the moratorium could take effect would depend on whether or not the Secretary was willing to implement an emergency rule.

**ORIGINAL**  
**ELEMENTS OF A PROPOSED MORATORIUM**

1. Earliest Qualifying Date: Must have made landings at least once during or after:

- Option 1: 1985
- Option 2: 1980
- Option 3: 1976
- Option 4: Before 1976

2. Latest Qualifying Date: Must have made landings on or before:

- Option 1: September 15, 1990
- Option 2: January 15, 1992 if contracts by September 15, 1990 (or contracted by January 1, 1991, if disadvantaged by January 19, 1990 cutoff).
- Option 3: January 15, 1992, without any contract requirements.

3. Qualifying Minimum Landings

- Option 1: No minimum poundage, just a landing in any qualifying year.
- Option 2: Minimum landings requirement of ??

4. Exemptions for Small Vessels

- Option 1: No exemptions for smaller vessels.
- Option 2: Exempt vessels less than 40' LOA (C 12/89)
- Option 3: Exempt vessels less than 43' LOA (AP 6/90)
- Option 4: Exempt vessels less than 60' LOA (C 4/90)

5. Exemptions for Disadvantaged Communities

- Option 1: No exemptions.
- Option 2: Use size exemption approach above assuming that disadvantaged communities will use smaller vessels.
- Option 3: Define disadvantaged communities and then exempt its vessels.

6. Exemptions for Qualifying Vessels Lost or Destroyed Immediately before Moratorium Begins

- Option 1: Cannot be replaced.
- Option 2: Can be replaced with similar capacity.
- Option 3: Can be replaced with increased capacity limited to, for example, 20% more in length and/or width.

7. Differential Application of Moratorium to Sectors of Industry

- Option 1: Apply moratorium equally to all sectors.
- Option 2: Apply moratorium differentially depending on needs of the fisheries.

(Are support service vessels such as tenders, transports, etc. included in moratorium?)

8. Length of Moratorium

- Option 1: Until Council rescinds or replaces.
- Option 2: Four years.

9. Fisheries Crossovers during Moratorium

- Option 1: Any boat that qualifies to fish at all, may fish in any fishery (groundfish, crab or halibut).
- Option 2: Vessel may fish only in those fisheries for which they participated in a directed fishery to qualify for the moratorium. Could include restrictions on gear and area.

10. Replacement of Vessels Lost or Destroyed during Moratorium

- Option 1: Cannot be replaced.
- Option 2: Can be replaced with similar capacity.
- Option 3: Can be replaced with increased capacity limited to, for example, 20% more in length and/or width.
- Option 4: Apply above options differentially by sector.

(Caveat: replaced vessels cannot be salvaged and come back into fishery)

11. Replacement or Reconstruction of Vessels during Moratorium

- Option 1: Cannot replace or reconstruct vessels.
- Option 2: Can replace with similar capacity but replaced vessel must leave fishery.
- Option 3: May increase capacity of vessel by 20% in length and/or width, once during moratorium years.
- Option 4: May reconstruct vessel to upgrade processing equipment and stability, but not increase fishing capacity through changes in length, width or horsepower, or other suitable index of fishing capacity.
- Option 5: No limitations on reconstruction.
- Option 6: Apply one or more of above options differentially by sector.

12. Appeals Procedures

- Option 1: Use adjudication board of government persons.
- Option 2: Use appeals board that includes industry representatives.

SEA LION CORP FAX 9077584815

AGENDA C-5  
APRIL 1991  
SUPPLEMENTAL

To: NPFMC

From: Made Spingler

Hi Folks -

Four pages of testimony for C-5 Maxtorium.  
If Clarence has a chance, could he call  
me at 758-9429? Just ask whoever answers  
to call me to come to the phone.

Thanks,

Mark

Mr. Chairman, as you know many people here for several years now been advocating Council action that while meeting the needs of the Bering Sea ecosystem would not pre-empt the eventual development of a viable fishery economy ~~for the~~ by the villages and communities of the BS/AI.

The Council and Staff continues to recognize the needs of the residents of the Aleutians and Pribilofs and the Bering Sea coast throughout the discussions and deliberations of management schemes that would limit entry and participation in the fishery.

We are all very grateful for this consideration, rest assured.

At this point I will direct my comments to specific components of the framework of the moratorium, as outlined in Dr. Pautzke's memorandum to the FPC and accompanying Elements of a Proposed Moratorium.

#### Item 5, Exemptions for Disadvantaged Communities -

I urge the Council to adopt the exemption in the form of Option 3. A blanket exemption of vessels from "disadvantaged" communities will meet the immediate needs and long term planning requirements of our area. Speculation on the size and type of vessels that might enter the fishery under this exemption is limited to the thought that overall additional capacity in the harvesting sector would probably not be greatly increased by our participation. Nevertheless, that should not be construed as suggesting

any time in the future, enter the Alaska groundfish fleet without needing to meet the new American control provisions." Effects On The U.S. Fishing Industry By The Anti-Reflagging Act of 1987 MR/EN March, 1991 p. 26

Mr. Chairman, the spectre of hundreds of factory trawlers is the stuff of nightmares. But, the potential is all too real.

By imposing a moratorium not only will your action benefit the North Pacific, but by discouraging additional construction/conversion you will alleviate somewhat the threat the industrial fleet poses to other U.S. EEZ fisheries. Thus, the moratorium decision has national consequences.

On the other hand, of course, you will be cursed by the American shipbuilding industry because, as the article I cited concludes, regardless of ownership/control of new factory trawlers, the Act DOES require that rebuilding must be performed in U.S. shipyards.

A moratorium decision, with the economic effect I suggest might also be viewed as slowing the growth of an American-flag "distant water" i.e. overseas fleet, and because of this you might hear from the White House calling the moratorium "socialistic," a form of allocation.

Please don't be swayed by these macro economic considerations. The very survival of the living marine resources of the Bering Sea and the Gulf of Alaska depend upon the imposition of the moratorium.

that a specific vessel length limit should be established for a BS/AI exemption. It should not.

Item 7, Differential Application of Moratorium -

The moratorium should apply equally to all sectors. I assume the word "sectors" means harvesting elements.

The parenthesized question as to whether or not the support and service elements are included should be answered in the negative. Growth or reduction in the size of this sector is entirely at the will of the marketplace. Keeping support and service entry open may also offer a much needed route of employment for vessels that might suffer negative impacts from the moratorium.

To summarize, then, implement the moratorium. Quite frankly, Mr. Chairman, even if you don't put an exemption in place, we can probably live for four years (assuming that for the life of the action) with it, only in the realization that a moratorium is the first real step in saving the North Pacific ecosystem.

I hope my comments are helpful, and I appreciate this opportunity to once again address the Council on a very important issue.

Sincerely,



Mark Edward Springer



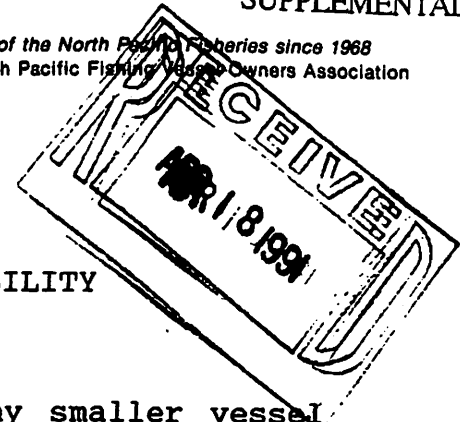
# Ocean Spray Fisheries, Inc.

SUPPLEMENTAL

April 12, 1991

Clarence Pautzke, Executive Director  
North Pacific Fisheries Management Council  
605 West 4th Ave.  
Anchorage, AK 99501

Harvesters of the North Pacific Fisheries since 1968  
Member of North Pacific Fishing Vessel Owners Association



RE: MORATORIUM/VESSEL 20% RECONSTRUCTION & STABILITY

Dear Clarence & Council Members:

There is a serious concern on the part of many smaller vessel owners, because of proposed new stability standards for fishing vessels, that the 20% vessel add-on limitation as put forth in the proposed moratorium will not be workable for them. Simply put, to put many of these older vessels into stability compliance and supposedly safe, whether they widen or lengthen, 20% is very often not enough leeway to bring them into conformity. What many of us feel makes more sense than an arbitrary 20% restriction is that the Coast Guard's proposed stability standards be used on each boat for its intended use and then a 20% Council imposed limitation be put on any thing over the new stability regulations. This way vessel safety is assured and the Council will have its 20%, or whatever, restriction as a workable item without compromising vessel stability and the safety of its constituents. Certainly a win/win situation for all concerned.

As it presently stands, were the Council to go with the 20% restriction on reconstruction, lives would certainly be jeopardized if one can fully have confidence in the Coast Guard's proposed stability calculations. I, for one, would not be ready to bet my life or my five crew's lives because the two entities had not gotten their heads together on this proposed moratorium reconstruction restriction/stability requirement.

Therefore, please be appraised that there is strong feeling from industry, and especially the smaller vessel owners, that this section of the proposed moratorium must be considered very carefully prior to any final regulations being made. I would suggest that it would be incumbent on the Coast Guard member on the Council to take the lead when addressing this issue and that he be prepared to address it at the Kodiak meeting.

Thank you all for your consideration of this concern and please be appraised that there will be some testimony on this portion of the moratorium by others at the Kodiak confab.

Respectfully submitted,

  
Dennis Petersen