

MEMORANDUM

TO: Council, SSC and AP Members

FROM: Clarence G. Pautzke
Executive Director



DATE: September 15, 1992

SUBJECT: Sablefish and Halibut IFQs

ACTION REQUIRED

- (a) Status report on proposed IFQ system.
- (b) Initial review of block proposals and 1,000-pound floor.
- (c) Review proposed Conservation Management Techniques submitted by Kodiak Island Borough.

BACKGROUND

- (a) Status report on proposed IFQ system

Preparation of the Secretarial Review package for the IFQ system for halibut and sablefish is in its final stages. The NMFS Regional Director expects to transmit the package to the Secretary of Commerce no later than the last day of September, possibly earlier. The complexity of the proposed IFQ system, an overloading of staff, along with the deferred NEPA review (at Council request) has caused this unfortunate delay. Additionally, a change in NMFS policy in the Washington D.C. office requiring additional review before submittal has contributed to the problem. Despite the late transmission to the Secretary of Commerce, the plan still could be implemented in 1994 if approved by the Secretary.

- (b) Initial review of block proposals and 1,000-pound floor.

When the Council approved IFQs for halibut and Sablefish in December 1991, it stated its intent to examine two revisions in the plan; 1) a minimum allocation of 1000 lbs. to all initial recipients, and 2) the so-called "Sitka Block" proposal. This intention was reiterated in June 1992 when the staff was asked to develop a document which would examine these changes, and which would give the Council enough information to decide whether or not to pursue an amendment to the proposed IFQ program. Also at the June meeting a third proposal, the so-called "Hegge Block" proposal was added to the list. Economists with the State of Alaska Commercial Fisheries Entry Commission were asked to develop a discussion paper on these three proposals and to present their findings at this meeting.

After hearing their report the Council could decide to develop any of the proposals into an amendment to the IFQ plan. This would require an EA/RIR/IRFA (at a minimum) be developed for the chosen proposals. The EA/RIR/IRFA could mirror the findings in the discussion document with some additions, or could be a completely new document. If it was determined that the

discussion paper presented was sufficiently close to being complete as an EA/RIR/IRFA, the Council could ask the staff to make necessary changes and send the document out for public review. This would allow for final action in December 1992 or January 1993. If the discussion paper needs more work to be an EA/RIR/IRFA, then the Council may wish to task the staff to develop an appropriate document for their review at a future Council meeting. The Council may also choose to drop any of the proposals or delay any action as they see fit.

(c) Review proposed Conservation Management Techniques submitted by Kodiak Island Borough.

Kodiak Island Borough has requested that a suite of "conservation management techniques" be considered to address "immediate" concerns in the halibut and sablefish fisheries. Given the uncertainties for those fisheries pending possible approval and implementation of the IFQ program, the proposers believe some interim management approaches should be taken. These are described in item C-6(c)(1).

Kodiak Island Borough

710 MILL BAY ROAD
KODIAK, ALASKA 99615-6340
PHONE (907) 486-5736

September 11, 1992

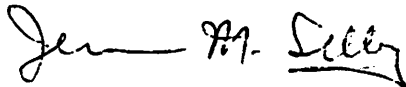
Mr. Rick Lauber, Chairman
North Pacific Fisheries Management Council
P.O. Box 103136
Anchorage, AK 99510

Dear Mr. Lauber:

Enclosed is the proposed Sablefish and Halibut Conservation Management Plan which we previously advised you we would submit for the September North Pacific Fisheries Management Council meeting. We sincerely appreciate the fact that you have placed this on the agenda. We look forward to the opportunity for a lot of public input and hope for a decision by the Council to conduct an analysis and continue discussion on this plan to develop a final management plan which would be implemented for the 1993 season. If you have any questions concerning this plan prior to the meeting, please give me a call. We look forward to the opportunity to discuss this plan with the Council.

Sincerely,

KODIAK ISLAND BOROUGH



Jerome M. Selby
Borough Mayor

Enc.

SABLEFISH AND HALIBUT CONSERVATION MANAGEMENT PLAN

There are several Conservation Management Techniques available that will adequately address any problems that realistically exist in the sablefish and halibut fisheries. Following is a brief outline of a plan that we suggest be applied to conserve and manage the sablefish and halibut fisheries. This plan needs to be analyzed and developed by the North Pacific Fishery Management Council to determine the best application of the elements of this plan that will conserve the sablefish and halibut resource, and address the management problems in these fisheries. The plan that we have suggested will adequately address:

1. Allocation conflicts.
2. Gear conflicts.
3. Deadloss from lost gear (fishing mortality due to lost gear).
4. Bycatch loss (of halibut in other fisheries, and of sablefish, to some degree).
5. Discard mortality (for halibut and other retainable species in the halibut and sablefish fisheries).
6. Excess harvesting capacity.
7. Product wholesomeness (as reflected in halibut and sablefish prices).
8. Safety.
9. Economic stability in the fisheries and communities (in the fixed gear halibut and sablefish fisheries and communities).
10. Rural coastal community development (maintenance) of a small boat fleet (small boat fishery).
11. Slowing down the pace of the halibut and sablefish fisheries.
12. Eliminating crowding on the grounds, and spreading the fleet and the fishery over time and area.
13. Achieving quality objectives.
14. Providing that more fresh fish is available for the marketplace on a more frequent basis throughout the year.

1.0. GEAR LIMITS.

1.1. Establish a "Hooks-Per-Vessel-Limit" of 24,000 (twenty four thousand) hooks for vessels that participate in the sablefish fishery.

1.1.1. This "Hooks-Per-Vessel-Limit" for the sablefish fishery applies to all vessel-class-sizes.

1.1.2. This "Hooks-Per-Vessel-Limit" for the sablefish fishery applies to all sablefish Regulatory/Management/Reporting Areas.

1.2. Establish a "Hooks-Per-Vessel-Limit" of 12,000 (twelve thousand) hooks for vessels that participate in the halibut fishery.

1.2.1. This "Hooks-Per-Vessel-Limit" for the halibut fishery applies to all vessel-class-sizes.

1.2.2. This "Hooks-Per-Vessel-Limit" for the halibut fishery applies to all halibut Regulatory/Management/Reporting Areas.

2.0 REGISTRATION AREAS.

2.0. NOTE 1: For purposes of this section, we use the following 6 sablefish Regulatory Areas as the basis for our recommendations: (1) GOA Southeast Outside (650); (2) GOA West Yakutat (640); (3) GOA Central [Kodiak (630) and GOA Chirikof (620)]; (4) GOA Western (610); (5) Bering Sea (511, 512, 513, 514, 516, 517, 518, 519, 521, 522, 530); and (6) Aleutians (540).

2.0. NOTE 2: For purposes of this section, we use the following 4 IPHC halibut Regulatory Areas: (1) IPHC 2C, (2) IPHC 3A, (3) IPHC 3B, and (4) IPHC 4 (4A, 4B, 4C, 4D, 4E).

2.1. Permit a vessel to register and fish for sablefish in no more than 4 (four) sablefish Regulatory Areas.

2.1.1. Require a vessel that wishes to participate in the sablefish fishery to "Pre-Register" at least 30 days (thirty days) in advance of the first opening for the sablefish fishery.

2.2. Permit a vessel to register and fish for halibut in no more than 2 (two) halibut IPHC Regulatory Areas.

2.2.1. Require a vessel that wishes to participate in the halibut fishery to "Pre-Register" at least 30 days (thirty days) in advance of the first opening for the halibut fishery.

3.0 TIME/AREA CLOSURES.

3.1. Divide the Gulf of Alaska ("GOA") sablefish fishery into two "Seasons".

3.2. Apportion the GOA sablefish TAC between two "Seasons".

3.3. The first GOA sablefish season will begin on May 15.

3.3.1. No less than 50% (fifty percent) of the GOA sablefish TAC will be available during the first sablefish season.

3.4. The second GOA sablefish season will begin on September 15.

3.4.1. No more than 50% (fifty percent) of the GOA sablefish TAC will be available during the second sablefish season.

3.5. The apportionment of the Bering Sea/Aleutian Islands ("BSAI") sablefish TAC will remain as it is now, that is, on a yearly basis.

3.6. A "Depth-Restriction" for the sablefish hook-and-line fishery may warrant consideration to address any concerns that may exist regarding (1) halibut bycatch in the sablefish hook-and-line fishery, and (2) mortality of halibut that is taken as bycatch in the sablefish hook-and-line fishery.

3.0. NOTE 1: The division of the GOA sablefish fishery into two "Seasons", and the apportionment of the GOA sablefish TAC between two "Seasons" may have the effect of reducing the rate of halibut bycatch, and reducing total halibut bycatch in the GOA.

4.0. TRIP-LIMITS.

4.0. NOTE 1: There are several issues regarding the application of "Trip-Limits" in the sablefish and halibut fisheries that should be analyzed:

(a) The potential benefits of "Trip-Limits" in the sablefish and halibut fisheries should be analyzed to determine their usefulness as a conservation and management tool in these fisheries.

(b) The issue of whether to apply "Trip-Limits" in the sablefish fishery throughout the entire sablefish season(s) should be analyzed.

(c) The issue of whether to apply "Trip-Limits" in the halibut fishery during every opening should be analyzed.

(d) The issue of how to determine the amount of a specific "Trip-Limit" in the sablefish and halibut fisheries should be analyzed.

(e) The issue of the "Maximum-Time-Period" to harvest a sablefish and/or a halibut "Trip-Limit" (i.e., 24 hrs., 48 hrs. or 72 hrs.) should be analyzed.

4.0. NOTE 2: IPHC Vessel-Class-Size-Categories "A" thru "H": "A" = 0' to 25'; "B" = 26' to 30'; "C" = 31' to 35'; "D" = 36' to 40'; "E" = 41' to 45'; "F" = 46' to 50'; "G" = 51' to 55'; "H" = 56'+).

4.1. The "Vessel-Class-Size-Categories" that have been established by the International Pacific Halibut Commission ("IPHC") for use in the halibut fishery should be used as a starting point in determining the "Vessel-Class-Size-Categories" that are applicable for use with "Trip-Limits" in the sablefish fishery. The question of whether to use the IPHC "Vessel-Class-Size-Categories", or some other "Vessel-Class-Size-Category" should be addressed during an analysis to determine what makes the best sense from a conservation and management perspective.

4.2. The "Vessel-Class-Size-Categories" that have been established by the International Pacific Halibut Commission ("IPHC") for use in the halibut fishery should be used as a starting point in determining the "Vessel-Class-Size-Categories" that are applicable for use with "Trip-Limits" in the halibut fishery. The question of whether to use the IPHC "Vessel-Class-Size-Categories", or some other "Vessel-Class-Size-Category" should be addressed during an analysis to determine what makes the best sense from a conservation and management perspective.

4.0. NOTE 3: The Council should analyze "Trip Limits" from the standpoint that, when applied in conjunction with vessel "Pre-Registration", split seasons and seasonal TAC apportionment, "Trip Limits" provide an improved ability to be precise in managing effort and in staying on target in the achievement of the sablefish and halibut TACs.

5.0. GENERAL.

5.1. Change the current IPHC Regulations [IPHC Pacific Halibut Fishery Regulations 1992; Section 16(7) and Section 16(8)] that restricts a person and gear from fishing for halibut during a specific halibut fishing period if that person or gear used setline gear to fish for any species of fish during the 72 hour period immediately before the opening of such halibut fishing period. The 72 hour period (3 days) should be changed to a 120 hour period (5 days).

5.1. NOTE: Changing the 72 hour period to a 120 hour period as suggested above is a limiting factor and may result in the reduction of effort in the halibut and sablefish fisheries due to the fact that vessel operators must make the decision to either, (1) continue to harvest sablefish or p. cod and, therefore, forego the opportunity to harvest halibut during a particular halibut opening or, (2) curtail the harvest of sablefish or p. cod for 5 days so that the vessel operator may participate in the harvest of halibut during a particular halibut opening. Changing to a 120 hour period will also minimize the benefits of prospecting for halibut prior to the halibut opening.

5.2.1. The Council should address the option of establishing a process that would provide for the postponement of a halibut opening to achieve a safety objective in cases where weather may present a safety concern.

5.2.2. The Council should evaluate the options regarding what entity would be given the authority to postpone a halibut opening in cases where weather presents a safety concern.

5.2.3. The Council should evaluate the options regarding what criteria and standards should be established on which to base a postponement of a halibut opening in cases where weather presents a safety concern.

5.3. "Tank/Gear Inspections" should be instituted in the halibut fishery.

5.4. In the halibut fishery, provide for the retention and sale of bycatch. A provision for the retention and sale of bycatch during each halibut opening may be achieved in several ways, among them: (1) provide that an adequate amount of the TACs for sablefish and p. cod are kept in reserve to allow for the retention and sale of all bycatch (100% retention) of sablefish and p. cod that is incurred during each halibut opening, (2) provide that an adequate amount of the TACs for sablefish and p. cod are kept in reserve to allow for the retention and sale of a realistic rate (natural rate) of bycatch of sablefish and p. cod that is incurred during each halibut opening, (3) provide that an adequate amount of the TACs for sablefish and p. cod are kept in reserve to allow for the hook-and-line fisheries for sablefish and p. cod to open and close concurrent with each halibut opening.

Concerning Block Proposals.

CFEC's analysis appears to ignore consideration of all societal costs associated with consolidation not related to harvesting and managing these fisheries. In particular most of the concerns of coastal communities are not analysed. The societal costs associated with displacement of employment opportunities especially of crew should be considered.

NPFMC C-6 September 1992

Jere Murray, Box 237, Seldovia AK 99663

Concerning 1000 lb minimum QS allocations:

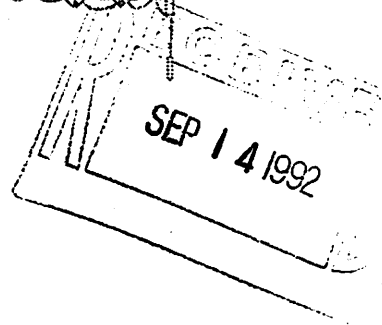
You may remember an analysis I submitted for your April meeting which estimated that the requirement of the final preferred alternative that there be participation in one of the years 1988-1990 desfranchised 2500 participants and distributed the 4.2 million pounds of QS to, predominantly, recipients of 20K lbs or more. Thus about 1700 lbs of QS was stolen from ^{each of} 2500 little guys and distributed to the big guys - a reverse Robin hood scheme. The 1000 lb floor amounts to a redistribution of 55% of this 4.2 million lbs to the smallest classes of recipients - those allocated less than 1000 lbs. 1.9×10^4 million lbs still goes to the fat cats. Since the biggest & smallest operators may represent the most likely to have illegally come by their QS allocations either by fishing early and or late in the case of the big guys or by fishing false fish tickets claiming fishing activity which didn't exist this floor amounts to rewarding the illegal activity preferentially.

I recommend you scrape the 1000 lb floor entirely and remove the requirement of participation in one of the magic years 1988-1990. Let the market place determine final distribution of QS. Jere Murray

Alaska **L**ongline **F**ishermen's **A**ssoc.

P.O. Box 1229 Sitka, AK 99835 (907) 747-3400

The Honorable Barbara H. Franklin
Secretary of Commerce
Washington, D.C. 20230



September 10, 1992

Dear Secretary Franklin,

I am writing on behalf of the Alaska Longline Fishermen's Association (ALFA), an organization composed primarily of members from southeast Alaska's small coastal communities. I am writing in reference to the Individual Fishing Quota (IFQ) system for the North Pacific sablefish and halibut fisheries; in particular, I would like to take this opportunity to address the letter sent to you by the Alaska Congressional delegation (dated August 12) and to better acquaint you with the Sitka Block proposal.

ALFA, along with a number of other fishery organizations, has worked with the North Pacific Fishery Management Council for the past five years to develop a management system that would resolve the safety, waste and quality problems plaguing the fixed gear sablefish and halibut fisheries. As the Secretary is aware, the process has been long and arduous due to the complexity of the issue and the diversity of the fishing fleet. While the Council struggled to develop a system, problems in the fisheries worsened. Clearly open access and traditional management techniques are not working--a fact that is becoming increasingly obvious in marine fisheries on a national-scale. Public attention, and particularly public scrutiny from the environmental community, is now focused on the mismanagement and deplorable condition of many marine fisheries. A new approach to fisheries management is urgently needed, one which will foster careful harvest and resource stewardship among fishers. IFQs provide the framework for that new approach, allowing fishers a vested interest in protecting the long-term productivity of the resource. IFQs encourage sustainable and efficient harvest. IFQs are the management strategy supported by ALFA and other industry organizations committed to resource conservation.

In reference to the Alaska Congressional Delegation's letter addressing IFQs: the IFQ program submitted to you by the North Pacific Council is the product of many meetings and many drafts, and can be expected to continue to evolve as industry and managers tune the program to better suit the fixed gear sablefish and halibut fisheries. The Council's willingness to review the Sitka Block proposal, an amendment developed by fishers concerned about the socioeconomic impact of the program on Alaska's small coastal communities, should be applauded as evidence that the Council will continue to tune the IFQ program in response to industry concerns. Hopefully this tuning process will be endless, as changes in management are made to match changes in the fisheries or changes in the scientific understanding of the resource. If the Congressional Delegation views the Council's consideration of the Sitka Block amendment as a sign of uncertainty, it is only because the Delegates fail to understand the progressive, adaptive nature of fisheries management in general and the IFQ system in particular.

In closing, the Alaska Longline Fishermen's Association urges you to adopt the IFQ program for the North Pacific sablefish and halibut fisheries, and to view additional amendments as commitments, on the Council's part, to endless scrutiny of all management strategies. For your information, I have enclosed a copy of the Sitka Block, as initially proposed by ALFA, and a copy of a documentary produced last spring by our organization on IFQs and the Sitka Block system.

Thank you for your attention to this important issue.

Sincerely,



Linda Behnken
(Exec. Director, ALFA)

cc: Senator Stevens
 Senator Murkowski
 Congressman Young
 North Pacific Fishery Management Council

B.C. HALIBUT

AGENDA C-6
SEPTEMBER 1992
SUPPLEMENTAL

by T.J. Doherty

When Canadian longliners voted to experiment with a two-year trial run of Individual Vessel Quotas (IVQs) in the halibut fishery along the B.C. coast, they effectively unraveled the fabric of a market structure through which halibut has been sold for decades. The intent was to weave a new system that would result in better quality fish and higher prices. In the process of change, however, a lot of loose ends still remain as the Canadian halibut industry shifts from selling frozen to fresh product.

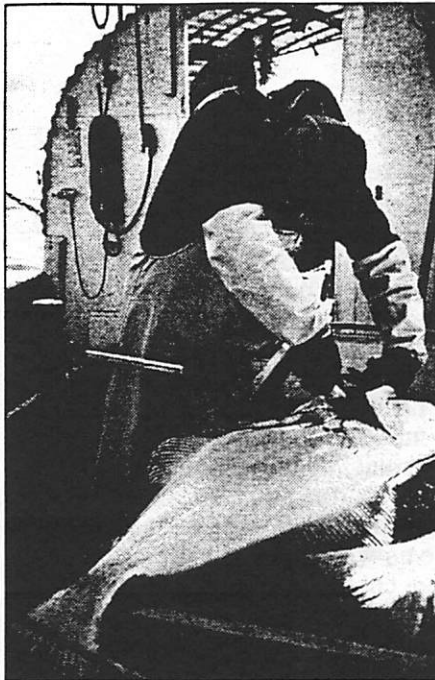
The catalyst for the changeover occurred in 1990 with B.C.'s halibut fishermen voting to approve the new system for two years. Four hundred and thirty-five vessels received quota and the season lengthened from two 10-day openings to an eight-month season. Norm Black, owner of Black's Seafood, Ltd. which

has been one of Canada's major distributors of halibut for over 10 years, notes that this simple shift in licensing immediately altered the way the market operated. When Canada had derby openings (as are still the norm in the U.S.), the halibut industry's fishing, processing and marketing systems needed to be able to accept nearly 8 million pounds of fish in two intense periods. Even with the establishment of limited entry for halibut in 1979, this merely limited the number of boats which could participate but did not cut down on the huge volume of fish arriving at the dock over very short periods of time.

While a small percentage of the halibut landed during derby openings could be sold on the fresh market, the bulk of it was frozen and put into cold storage. Despite the limited opportunity for fresh sales, however, the halibut derbies did afford some marketing advantages. Black said that because he knew exactly how much fish he could expect and when it was coming he could execute big ad campaigns to entice large supermarkets into purchasing quantities of fresh halibut. Says Black, "You need a lot of lead time to set up that kind of ad campaign."

It worked, says Black's assistant Rachel Verhauf, because the fresh fish, though more expensive, could be sold as something to spice up the family menu. Says Verhauf regarding supermarket sales of fresh fish, "Fresh can be a novelty item but if it is around all the time that wears off." The large volume of frozen fish resulting from the derby openings was held in storage and pumped onto the market on an ongoing basis.

The system presented advantages and disadvantages. Processors were able to handle huge volumes of fish over a short period of time, and the short derbies often occurred conveniently between other fisheries. Large retailers and distributors like Black were assured of a steady supply of fish which they could market



More fresh halibut means higher prices and more negotiating.

throughout the year simply and with little phone work. The disadvantage, of course, was the price; frozen fish brought in a lot less than fresh fish.

Coupled with the lower value of frozen fish was the cost of storing it in freezers for long periods of time. Such large capital investments tended to cut the smaller processors out of the halibut picture altogether.

Fishermen garnered some benefit from the derby openings since the short seasons tended to fit in around other fisheries like salmon and brought in a chunk of cash for a short period of work. But along with the cost of bringing in more crew to fish the short openings and the pressure of enduring whatever weather happened to accompany the opening, there was also the fact that the price rarely ran to more than \$1.50/lb. and was subject to considerable fluctuation when hundreds of tons of American fish inevitably and suddenly glutted the market each year.

When an IVQ system first came under consideration years ago, its marketing potential was as much a point in its favor with the industry as the opportunity for a safer fishery and the potential improvements in resource management. Specifically,

longliners expected they would be able to market fresh fish for at least 50 cents more per pound than they were receiving for frozen. They also expected they could plan their trips to avoid the biannual glut of halibut resulting from the American derbies.

Distributors also anticipated immediate benefits. They planned to sell fresh to high-end retailers and restaurants during the long Canadian season, shift to American fish during U.S. openings and then revert back to Canadian fish after a few weeks when the fresh product from Alaska had been sold. They fully expected to reap higher returns in this manner. Among the various players in the Canadian halibut industry, from catchers to processors to sellers, the only ones who stood to lose out were the large processors who simply were not set up to deal with small lots of fish on a continuous basis and did not feel that it would be financially worthwhile to adjust their operations.

After operating under the new AIVQ system for almost two years, the industry has had time to evaluate its success. Most participants say they are happy with it, though many note there are still a lot of bugs to work out.

Peter Degrief is a longliner operating out of Victoria, B.C. who says much of the promise held out by IVQs has been realized. His operating costs are down and the working environment is safer. Furthermore, his crew is working longer and receiving higher shares.

He says all is not roses, however. Things have changed. Where once he simply went out and fished, now he also has to watch market trends and plan his fishing trips accordingly. He also has to negotiate a great deal more over the price he receives since market conditions change so rapidly. Degrief says he and other longliners are being forced to become more astute businessmen as well as good fishermen.

But Degrief is not complaining. He

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B.C. HALIBUT

says this is part of the learning process the industry faces and the effort is offset by the jump in prices fishermen have been receiving. These have ranged from 50 cents to three dollars per pound over the price of frozen fish.

Black says things have changed for seafood distributors like himself, as well. For one thing, he spends a lot more time on the phone talking to longliners, processors and retail clients. He rarely sells to chains or supermarkets anymore because they need several weeks lead time to run a promotion and he can't guarantee that prices won't fluctuate over a short period of time. Instead, he and virtually every other broker of Canadian halibut now sells to restaurants and specialty fish shops. In fact, Black says the fresh market is split evenly between white tablecloth restaurants in the Northwest, California and on the East Coast, and specialty fish shops throughout North America.

"It is a very pleasant market for the distributors to work with," says Black. At the same time, however, he acknowledges that the existing market only needs 300,000 to 400,000 pounds of halibut weekly and is easily glutted.

A case in point, observes Bruce Turriss of the Department of Fisheries and Oceans (DFO), occurred during B.C.'s herring roe season. Prior to that, the market had a steady supply of halibut. When many of the vessels suddenly concentrated their efforts on herring, this drove the price of halibut up to nearly four dollars a pound as supplies of the flatfish dried up. Responding to the high price, many boats quickly returned to longlining immediately following the herring season. This resulted in a catch of over a million pounds. Furthermore, says Turriss, the skippers all started to call buyers at the same time and many called several buyers. "This created the impression there was even more fish out

there than there really was," says Turriss.

For example, Turriss explained, a vessel might call and offer 10,000 pounds to three processors giving the impression to each that they had that fish locked up. A broker contacting one might get a price of \$3.50. The next processor would offer at \$3.40, and so on. In the meantime, fishermen are watching the price fall.

During the glut in question, the price dropped within days to as little as \$2.40/lb. from processors. (Some fishermen did appreciably better selling their product from the dock directly to the public. Turriss says there were over 20 boats in the Vancouver and Victoria areas which sold their fish for up to \$4.00/lb. this way.) The market then suffered another swing as low prices discouraged fishermen from setting their longline gear. This drove the price back up to \$3.50 over the space of another week. Again, a larger than usual number of boats headed to sea and the price plummeted.

Degrief says these kinds of fluctuations cause problems for fishermen but adds that, notwithstanding the drops, they are still getting more than the \$1.00/lb. offered for frozen product. Black says the fluctuations put him in the position where he is loathe to quote any price to a vessel before it actually arrives at the dock. Both say that this underscores the industry's need to improve communication among fishermen and between buyers and fishermen to smooth out the volume of deliveries and stabilize the price.

Some steps have already been taken to address this problem. DFO has established a hotline which details fishing activity over the last 24 hours as well as communicates who plans to fish over the next week. Furthermore, there are ongoing discussions about setting up a halibut marketing board to increase the demand for fresh fish.

Turriss suggests that this is entirely

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AFTA MEMBER

B.C. HALIBUT

possible. He says the present market size is not an absolute limit and illustrates his point by saying, "Keep in mind that even when we had a million pounds come in, it all sold fresh." He believes there is a greater market potential than is presently exploited, and that the industry, particularly the brokers, will have to establish the distribution channels to expand it.

Black suggests that fishermen should form small groups, perhaps connected to a specific processor or broker, so fishing trips could be spread out and more consistent prices maintained. Some brokers are already moving toward that by offering a minimum price while the vessel is at sea to guarantee delivery on a certain date. Degrief agrees that better communication between fishermen and processors would smooth out many of the problems and allow for more consistent prices. In fact, the overwhelming response to IVQs seems to be optimism for the future.

One unsettling cloud looming on the horizon is the prospect of a similar system being created in the Alaskan fishery. The prospect of American halibut fishermen attempting to move an additional 30 to 40 million pounds on the fresh market annually is unsettling to many Canadian fishermen, but DFO's Turriss takes another view. When asked what impact this might have on the Canadian market, Turriss said, "Well, my own opinion, gazing into my crystal ball, is that we could do quite well."

Turriss says it could be anywhere from three to seven years before the American IFQ system is established and allows for a significant increase in halibut entering the fresh market. This leaves the Canadian industry with lots of time to expand into new distribution channels, particularly in the Midwest of the U.S., which many see as the greatest untapped market area. He says the Canadians also enjoy an advantage because they are closer to the American markets than

the Alaskans so their shipping costs are less.

While Black believes there is definitely room to expand the fresh halibut market, he doubts whether it can absorb all of the halibut caught in the U.S. and Canada. He says that processors and brokers need to educate the consuming public about the value of frozen halibut as well. Regardless of the percentage of the product that ultimately goes to fresh or frozen markets, Black, Turriss and Degrief all see the eventual influx of American fish under an IFQ system as a boon to the entire halibut industry. Elimination of all derby fisheries will allow fish to come to market over a longer period of time which will, in turn, allow brokers to establish long-term relationships with large retailers who need continuous supplies of product at consistent prices and time to implement ad campaigns. Turriss notes that the Canadians are already building a solid reputation for delivering quality halibut on a continuous basis. "Buyers tend to stay with people they trust and who can provide them with consistent quality supplies," he said.

Whether the future proves to be this bright remains to be seen; but based on their experiences so far, most halibut fishermen would likely endorse the IVQ program. In November, they will get an opportunity when DFO and the Halibut Advisory Board present all license holders with a proposal detailing how a permanent IVQ system could be put in place and ask them to vote on it. The results of that vote along with input from processors and the United Fishermen and Allied Workers Union will go before the Minister of Fisheries and Oceans for final approval. If the proposal gets the nod, fishermen, processors, brokers and retailers will continue to have the opportunity to knit together a new marketing system for halibut that delivers a better product and reaps a higher price. **PF**

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translates into extra
the rope.





SENATOR FRED F. ZHAROFF

ALASKA STATE LEGISLATURE

P. O. BOX 405, KODIAK, ALASKA 99615 (907) 486-5259

DURING SESSION:

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DISTRICT N

ALASKA PENINSULA • ALEUTIAN CHAIN • BRISTOL BAY • KODIAK ISLAND • LAKE CLARK/LAKE ILIAMNA • PRIBILOF ISLANDS • SHUMAGIN ISLANDS

September 25, 1992

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

Dear Mr. Lauber:

I wish to offer my strongest endorsement for the 1993 Sablefish and Halibut Conservation and Management Plan proposed by the Kodiak Island Borough and other interested organizations.

I respectfully recommend that the council seriously examine traditional management techniques in an effort to develop rational management systems for the sablefish and halibut fisheries. This plan -- or a modification of it -- will enable the council to achieve many of its management goals while minimizing social and economic disruption in Alaska's coastal communities.

The proposed plan is the result of a considerable amount of work and discussion on the part of many concerned individuals. I urge the council to take it up at the September meeting and approve it for analysis and consideration. The entire industry would benefit from an opportunity for a formal review of the suggested management measures.

Thank you for your consideration of my comments.

Yours truly,

A handwritten signature in black ink that reads "Fred F. Zharoff".

Fred F. Zharoff
Alaska State Senator

cc: Clarence Pautzke
NPFMC executive director

Mr. Richard Lauber, Chairman
North Pacific Fisheries Management Council

Dear Sir;

The following proposal is an expansion of Item 1.0 of the Kodiak Conservation Management Techniques on agenda item C-6 c. Please also consider this proposal under agenda item D-5 c.

Pot Harvest Plan for management of the Alaska sablefish and Pacific cod fisheries:

- 1). Require all directed fix gear harvest to utilize pots.
- 2). Specify a pot limit of 150 pots per vessel.
- 3). Require buoy and pot tags with replacement requirements similar to Bering Sea crab tags.
- 4). Specify web size on door or one side which will allow juvenile escape.
- 5). Require opening size and triggers that eliminate non-target species.

Assessment of this Pot Fishery Plan

- 1). "Resource Conservation" - Web size will allow escape of juveniles without trauma of hooking. No dead loss will occur from gear that has to be delayed being hauled for weather. Utilization of pots will eliminate the marine mammal conflicts that currently exist with Killer Whales and with Steller Sea Lions in the sablefish and P. cod fisheries using longline gear.
- 2). "Bycatch elimination or reduction" - Halibut mortality will be reduced from the current 750 mt. PSC which has shut down the fishery in the past. This would allow an increase in the directed halibut fishery allocation of 1,600,000 pounds. Shark, skate, and most other bycatch will be reduced to near zero. The logic of the pot selective harvest strategy has already been recognized by NMFS in the October 1991 opening of the Gulf of Alaska for the taking of remaining quota for P. cod with only pots and jigs as legal gear. Longline gear just had too many bycatch problems to be allowed.
- 3). "Fish handling and quality improvement" - The landing rate can be tailored to the handling speed of the vessel to ensure the absolute best quality without loss of unhailed product to predators and parasites.

4). "Market distribution over long period" - Pot harvest with a pot limit will generally produce a slower paced fishery which will occur over a longer period.

5). "Safety of fishermen and vessels" - Fishermen can delay hauling of gear for weather considerations without wasting fish on set hook longlines thus safety may have a greater relative importance. Movement of pots could be a risk factor but since the pot fishery will be slower paced, vessels will not need to move pots in bulk. The fish pot fishery is much more area specific rather than moving gear to chase the stock as characteristic with some crab fisheries. Numerous pot designs are tailored to the size of the vessel.

6). "Socioeconomic continuity for local coastal communities" - A pot limit tailored for each area can allow retention of a historic mix of onshore /offshore - small / large - fleet composition.

7). "Maintain broad base of employment" - The pot fishery will probably maintain approximately the same size fleet and workforce. This is in contrast to the huge reduction of vessels and fishermen anticipated under the Council's IFQ Plan.

8). "Easily implemented" - The pot style fisheries are very familiar in this region. Fishery managers have much experience with pot limits especially now with the introduction of the Bering Sea crab pot limit.

9). "Effective and cost efficient enforcement" - The efficiency and effectiveness of the Bering Sea is a good large area, large fleet example of this type of program. The cost this is drastically less than what would be needed to effectively implement the Council's current IFQ Plan

10). "Low cost of administration" - Very little additional expense to the management of the fishery other than the printing and distribution of the pot tags which could be covered in the price charged for the tags. No additional staff should be necessary in contrast to the huge bureaucracy, paperwork, electronic data equipment, etc. that are required for the Council's IFQ Plan.

11). "Broad Industry Support" - There is overwhelming opposition to the Council's IFQ Plan. A number of groups have indicated that they support a resource conservation - bycatch reduction solution to the management of the fisheries.

General Considerations beyond the Parameters:

Since the pot fishery is slower than longline when P. cod are disbursed at the start of the year, a separation of the fixed and trawl gear cod quota

would be necessary to maintain or establish harvest allocation between fixed and trawl gear.

The Council's IFQ Plan would be a violation of the policies just agreed to by the President of the United States signed June 14 1992 at UNCED at Rio de Janeiro, Brazil, in Agenda 21, protocols ; 17.45, 17.46c, 17.72, 17.75 d, 17.79 e. . Specifically stated: 17.46 (c) "Promote the development and use of selective gear and practices that minimize waste of catch of target species and minimizes bycatch of non-target species." This Pot Plan specifically aligns the Council with the United Nations agreement to which the USA is a signatory.

The IPHC has previously testified that all fisheries should be prosecuted using the most selective available gear.

Sincerely,

Paul K. Seaton
HC-67 Box 1253
Anchor Point, AK 99556
907 235-6342

C-6

Post-It™ brand fax transmittal memo 7671		# of pages > 2
To	Richard Lauber	
From	R. W. Loescher	
Co.	NPFMC	
Dept.		
Fax #		

September 22, 1992

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

Dear Mr. Lauber:

Sealaska Corporation is a Regional corporation created under the 1971 Alaska Native Claims Settlement Act. Sealaska has in excess of 16,000 shareholders, some of whom are commercial fishermen that harvest halibut and black cod. Sealaska previously provided comments to the North Pacific Fishery Management Council and to the Secretary of Commerce regarding the decision to implement IFQs for halibut and black cod. We remain concerned that the IFQs will adverse economic and social consequences to our shareholder fishermen, Alaska commercial fishermen and to Alaska communities.

Sealaska Corporation supports the August 12, 1992 letter from the Alaska Congressional Delegation to Honorable Barbara H. Franklin, Secretary of Commerce. We urge the North Pacific Fishery Management Council not take further action on the IFQs until the studies recommended by the Alaska Congressional Delegation are undertaken.

In the interim, Sealaska urges the NPFMC to put traditional management tools back on the table for use during the 1993 season. Further, we urge the Council to look at other alternatives such as that proposed by the joint Congressional letter. We appreciate your consideration of our letter.

Sincerely,

SEALASKA CORPORATION


 Robert W. Loescher
 Executive Vice President
 Resource Management

RWL/RPH:mt

cc: Leo Barlow
Marlene Johnson
Honorable Ted Stevens
Honorable Frank H. Murkowski
Honorable Don Young
Alaska Federation of Natives
Alaska Native Brotherhood Grand Camp
Alaska Native Sisterhood Grand Camp

JERE T. MURRAY, Ph.D.

P.O. Box 237, Seldovia, Alaska 99663-0237

(907) 234-7646

September 25, 1992

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

Dear Chairman Lauber, members of the Council:

Thank you for another opportunity to appear before you to express my concerns and ideas concerning fishery management.

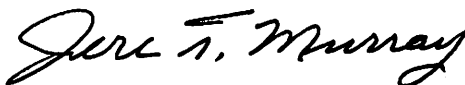
Again the subject of halibut/sablefish IFQs is before your Council. Many times in the past the Council has asked the public to provide input on this subject and the public has responded resoundingly. Literally thousands of citizens and representatives or official bodies of coastal Alaskan communities have testified or otherwise attempted communication on this subject and their voices are clear: In written communications Alaskans by very large margins typically over 90% oppose your IFQ plan while those from other states have supported it at the 70% to 84% level. Thousands of citizens have also communicated with the Office of the Governor of the State of Alaska and, again the message is clear: 98% of Alaskan communicators are opposed while 95% of those from other states support IFQs. The numbers of Alaskans communicating is 30 to over 100 times the number of people from the other states.

Supporters of IFQs have repeatedly asked opponents to provide their concept of an alternative as proponent ingenuity has, apparently, been exhausted. Now you have before you a concrete and detailed proposal for an alternative to IFQs for the management of halibut and sablefish which has been presented by the Kodiak Island Borough and Paul Seaton. This proposal is multifaceted. It is non-permanent, that is it retains the common property nature of the resource. It has none of the legal problems of the IFQ plan. It could be implemented in total or in part if analysis shows some parts to be superfluous. It can be modified easily in order that all goals of management be achieved. The calculational methodology for a major component (trip limits) of this plan already exists and is in regular use by the IPHC. Little additional bureaucracy or government spending is required - certainly much less than the IFQ plan. Support from the industry and coastal Alaskan communities is growing rapidly.

On numerous past occasions requests to implement portions of this plan have been made of you and/or the IPHC. You now owe it to yourselves and the public to seriously address this proposal. It should be analyzed and streamlined to utilize the parts most easily implemented which have the highest probability of efficacy. It should be implemented for a trial during the 1993 season as should a variant of the CDQ portion of the IFQ plan. It should be seriously considered as a replacement for the IFQ plan.

Again, I thank you for listening.

Sincerely,



Jere T. Murray, Ph.D.

RESOLUTION 92-20

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SELDOVIA,
ENDORISING MULTIPLE OPENINGS AS AN ALTERNATIVE TO THE CURRENT
INDIVIDUAL FISHING QUOTA MANAGEMENT PLAN

WHEREAS, the City of Seldovia has a gone on record in the past as being opposed to the IFQ management plan until further studies have been completed, and

WHEREAS, the City of Seldovia has urged the North Pacific Fisheries Management Council to study the impact on Coastal Communities affected by the IFQ plan, and

WHEREAS, the studies have not been done and the IFQ plan is before the Secretary of Commerce awaiting approval.

NOW, THEREFORE, BE IT RESOLVED THAT: The City Council of the City of Seldovia endorses the multiple monthly openings for halibut and sablefish as an alternative to the IFQ plan.

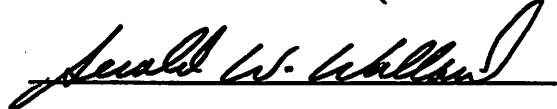
PASSED AND ADOPTED by a duly constituted quorum of the Seldovia City Council this 23rd day of September, 1992.

ATTEST:

APPROVED:



Frances L. Eckoldt, Clerk



Gerald W. Willard, Mayor

SELDOVIANS FOR SANE FISHERIES MANAGEMENT

c/o P.O. Box 237, Seldovia, Alaska 99663-0237

(907) 234-7646

September 17, 1992

North Pacific Fishery Management Council
Box 103136
Anchorage AK 99510

Gentlemen:

The undersigned residents of the Seldovia, Alaska area urge you to give serious consideration to an alternative to the IFQ management plan for sablefish and halibut which incorporates multiple monthly openings each with trip limits. WE understand a proposal for such a plan is to be before the Council during the September meeting and we support this concept over the previously passed IFQ plan. Whether you ultimately choose such a plan or not we urge you to implement an alternative to the current management for the 1993 and subsequent seasons.

Signature Name Address Industry Affiliation

Randy Casarant 2nd MOUNTAIN VIA HOME 99663

Jay Wilson Box 201 Seldovia AK 99663

Jim Hecks Jim Hecks Box 27 Seldovia,

Renee Peterson P.O. Box 178 Seldovia

B.C. Henry POB-161 Seldovia

Ferry Story P.O. Box 274 Seldovia, Ak. 99663

Jerre Murray JERRE MURRAY Box 237 Seldovia AK 99663 Boat Owner

Sandra R. Murray Sandra Murray Box 237 Seldovia AK Boat Owner
99663

Sadi Synt SADI SYNT Box 134 SELDOVIA AK 99663 BOAT OWNER-OPERATOR

Barbara Carlough Box 141 Seldovia, Ak 99663

Mark Hill Box 181 Seldovia Boat Owner

Michael J. Belop Box 22 Seldovia Boat Owner-Fisher

SELDOVIANS FOR SANE FISHERIES MANAGEMENT

c/o P.O. Box 237, Seldovia, Alaska 99663-0237

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September 17, 1992

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Signature	Name	Address	Industry Affiliation
-----------	------	---------	----------------------

<i>Phyllis J. Balogh</i>	Phyllis J. Balogh	Box 22	Fisher
<i>Dan L. Hecks</i>	Dan L. Hecks	Box 215	Fisher
<i>Joe Carls</i>	Joe Carls	Box 241	Fisherman
<i>Robert M. Rafferty</i>	Robert M. Rafferty	Box 277	Fisherman
<i>James Hecks</i>	James Hecks	Box 34	Fisherman
<i>Al Sawoff</i>	Al Sawoff	P.O. Box - 276	//
<i>John Rubin</i>	John Rubin	Drawer 2	"
<i>Eric Ardym</i>	Eric Ardym	Box 212	FISHERMAN
<i>Peggy Cloninger</i>	Peggy Cloninger	Box 121	Charter Boat Captain's wife
<i>George Seville</i>	George Seville	Box 156	Deck Ape
<i>Carl Lindstedt</i>	Carl Lindstedt	Box 71	Fishes
<i>Jim Brown</i>	Jim Brown	Box 77	fisherman

SELDOVIANS FOR SANE FISHERIES MANAGEMENT

c/o P.O. Box 237, Seldovia, Alaska 99663-0237

(907) 234-7646

September 17, 1992

North Pacific Fishery Management Council
 Box 103136
 Anchorage AK 99510

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Signature	Name	Address	Industry Affiliation
<u>Fred H. Elmson</u>	<u>Box 133</u>		<u>Fisherman VESSEL OWNER</u>
<u>Ticky Stewart</u>	<u>Box 32</u>		<u>wife of Deckhand</u>
<u>David S. Bishop</u>	<u>Box 164</u>		<u>Fuel Co. Rep.</u>
<u>Aerial W. Ingham</u>	<u>Box 158 Seldovia</u>		<u>Mayor City of Seldovia</u>
<u>Kurt Hansen</u>	<u>Box 132 Seldovia</u>		<u>Fisherman Vessel owner-operator</u>
<u>James Eckoldt</u>	<u>Box 96 - Seldovia</u>		<u>City Clerk</u>
<u>John M. [unclear]</u>	<u>PO Box 257 Seldovia</u>		
<u>James B. Eckoldt</u>	<u>P.O. Box 75</u>		<u>Winter gear</u>
<u>John Muehle</u>	<u>Box 226</u>	<u>Seldovia</u>	<u>Crewman AK 99663</u>

*New
Version*

Mr. Richard Lauber, Chairman
North Pacific Fisheries Management Council

Rationalization of the halibut fishery could be addressed by utilizing the Trip Limit Conservation Management Technique listed in the Kodiak Island proposal. The following is an expansion and refinement of item 4.0 of that proposal for inclusion and discussion under the September agenda item C 6 c.

Trip Limit Plan for management of the Alaskan Halibut Fishery

- 1). Divide the entire quota for each management area into five (5) equal trips occurring May through September.
- 2). Utilize A - H vessel categories already established by the IPHC for clean-up openings which were developed to reflect the historic catch percentages by vessel size.
- 3). The trip limits openings should remain at 24 hours to maintain the competitiveness of the fishery.
- 4). Any area's fleet overage or underage from one month would be added to the same area's quota for the succeeding month to evenly distribute the harvest throughout the halibut stock's migration.
- 5). Over catch by an individual vessel should be treated as a violation with significant violation receiving stiff penalties.
- 6). No tendering of halibut would be allowed by any vessel licensed to participate in the halibut fishery.
- 7). Any transfer of halibut between vessels would be a violation.

Assessment of this Trip Limit Plan

1 "Resource conservation" - Gear conflict would decrease as the fleet would spread out because good fishermen would be able to achieve their "trip" in many different areas. Less "excess" gear would be set because the premium would be on the flexibility to move to find the fish and harvest at the least cost, instead of on maximizing the hauling rate.

2 "Bycatch elimination or reduction" - With a slower maximum pace vessels could retain and well handle legal bycatch such as Pacific Cod. With reduced volumes going to any individual port at each opening processors would be in a much better position to process the lower value species.

3 "Fish handling and quality improvement" - The size of the monthly trips will ensure that all fishermen will be able to quickly butcher and refrigerate their catch.

4 "Market distribution" - Properly handled halibut have a long shelf life.

4 "Market distribution" - Properly handled halibut have a long shelf life. Since the harvest period is short, processors can be assured that the shelf life has not been "used up" by a vessel on a long trip. Processors can keep fresh fish in the pipeline for almost the entire month until the next "trip". Thus fresh fish will be available from each management area for almost six months.

5 "Safety of fishermen and vessels" - Safety is improved because fishermen could fish protected secondary grounds in case of bad weather. The difference between secondary grounds catch and the trip limit would be much less than the potential difference from an open derby. A fisherman could even skip an exceptionally rough opening without the consequence of drastic economic loss as it would be only one of five openings instead of one half of his season as under current management. Adding any over or under harvest to the next month's trip limit eliminates the potential for an accumulation of underage being saved until October when the small vessel component of the fleet would be at risk from fall weather .

6 "Socioeconomic continuity for coastal communities" - The pattern of delivery to the multitude of coastal towns would be expected to continue unlike the IFQ Plan which projects significant contraction of ports of delivery and an exodus of product from traditional Alaska ports. Vessels could still make economic choices for participation based upon their current economic situation. Diversity of fishery opportunity is maintained for the fleet which helps prevent business failures when one stock cycles down.

7 "Maintain broad base of employment" - The trip limit plan will not result in the loss of 90 % of the fleet and the loss of 12,000 fisherman jobs as identified by the Council's EIS for the IFQ Plan.

8 "Easily implemented" - The Trip Limit Plan for the halibut fishery could be quickly and easily instituted. The vessel category stickers are already on each halibut vessel. The main necessity would be to calculate the estimates of trip limits and participation for each area. This is similar to the exercise that the IPHC undergoes each year for clean up openings. Since any overage or under catch would be added to the next month's trip, the exact numbers are not extremely critical. The current clean-up opening trip is more critical since it could result in over harvest.

9 "Effective and cost efficient enforcement." - The 24 hour openings give enforcement a discrete window for fishing and gear in the water. This is the normal time type fishery enforcement with which all officers are familiar. No tendering and no transfer is the current law for clean up openings. Some additional effort would be nice to better enforce current law but the cost is infinitesimal compared with the massive, elaborate system necessary to be developed to enforce the IFQ Plan.

10 "Low cost of administration" - The administration of the Trip Limit Plan would require a slight addition of computer time for setting the original trip limits. Some additional staff time would be necessary to publish the

amount of added or subtracted poundage before each month's trip. The Trip Limit administrative amount is so slight compared to the huge bureaucracy, forms, electronic data processors, etc. that are mandated by the IFQ Plan that it could be considered no increase in cost at all.

11. "Broad industry support" - Several processors have indicated that the Trip Limit Plan would allow normal fishery business to be continued. The short time intervals will still allow economy of scale production while spreading the fresh sale year. Since the influx of halibut to any port will be less than one fourth of the current level and will be properly handled, processors believe they would be able to handle the deliveries throughout the season along with other species with the exception of a few short periods that generally cannot be identified by specific dates.

Voted or verbal support from:

Homer's independent fleet consensus supporting trip limits was established at the meeting of the Committee Against IFQ's.

South Central Alaskan Longline Enterprises, Nancy Lande, Seward
Small boat fishermen of Unalaska, Dennis Robinson, Unalaska
Anchorage fishermen coalition - Ron Kozak, Anchorage
N. P. Fisheries Protection Assoc., Laura Cooper, Seattle
Sitka Chapter, Alliance against IFQs, Matt Donahoe, Sitka
Seldovia Chapter, Alliance against IFQ's, Jerri Murray, Seldovia

General Consideration beyond the Parameters:

If a several day "window" was given to harvest each trip, smaller limits would result as most vessels would be likely to catch each trip limit. This would stimulate many new entrants into the fleet. Also, a long "window" would allow the same crew time to switch boats and harvest more than one trip limit.

The competitiveness of fishermen is maintained because the better and professional halibut fishermen will consistently make all the trips and will consistently get their "trips". Currently many fishermen do not get the trip limit for which their vessel qualifies and this plan does not attempt to "equalize" fishermen.

Underage is likely to occur because significant portions of the fleet will decide for reasons of economic conflict with other more profitable fisheries to forego some of the trips.

The exact dates for each month's period should be set by the IPHC Advisory panel to take into account tides, holidays, and the other factors currently considered in setting the dates.

Paul K. Seaton
HC-67 Box 1253
Anchor Point, AK 99556
Phone & fax 907 235-6342

ESTIMATED TRIP LIMITS AND PER VESSEL YEARLY TOTALS FOR A FIVE OPENING 1992 SEASON.

Vessel Class	September Trip Limits and Fraction of Remaining Quota			5 Opening Trip Limits & Year Totals								
	Area 2C		Area 3A		Area 3B		Area 2C	Year Total	Area 3A	Year Total	Area 3B	Year Total
00-25 A	700	.0001591	1400	.0001197	1000	.00050	318	1591	637	3183	880	4400
26-30 B	1200	.0002727	1700	.0001453	1200	.00060	545	2727	773	3865	1056	5280
31-36 C	1900	.0004318	6100	.0005214	4400	.00220	864	4318	2774	13868	3872	19360
36-40 D	3000	.0006818	6300	.0005385	4500	.00225	1364	6818	2865	14323	3960	19800
41-45 E	4800	.0010909	9500	.0008120	6800	.00340	2182	10909	4320	21598	5984	29920
46-50 F	6800	.0015455	12600	.0010769	9000	.00450	3091	15455	5729	28646	7920	39600
51-55 G	6800	.0015455	19200	.0016410	13700	.00685	3091	15455	8730	43651	12056	60280
56-> H	10000	.0022727	35000	.0029915	25000	.01250	4545	22727	15915	79573	22000	110000
Remaining Quota:	4400000		11700000		2000000							
Total 1992 Quota:	10000000		26600000		8800000							

Trip limits for 5 openings calculated assuming the fractions used for each vessel class for September 1992 opening would be applicable to harvesting one fifth of the entire 1992 quota in each of five openings. This may not be a good assumption.