SUMMARY OF PUBLIC TESTIMONY ON PROPOSED 1982 REGULATIONS FOR THE KING AND TANNER CRAB FISHERIES

Anchorage, Alaska
March 25, 1982

The North Pacific Fishery Management Council and the Alaska Board of Fisheries conducted a public hearing on proposed 1982 regulations for the king and Tanner crab fisheries off Alaska as part of the March 23-26, 1982 Council/Board meeting held in Anchorage. Synopses of testimony received are given below.

Howard Farley, commercial crabber and salmon fisherman from Nome testifying on behalf of the Norton Sound Fish and Game Advisory Committee, said that the abundance of crab in Norton Sound has diminished considerably since the early days of the fishery, particularly over the last seven years.

Jerry Tilley of Seawest Industries said that floating processors have a definite advantage over small boat fishermen because they do not have to stop fishing to offload. He favored an October 1 king crab season opening date, saying that those extra two weeks would make a significant difference in meat recovery. Mr. Tilley offered to accommodate ADF&G biologists aboard his vessel at no cost to the State so they could close the fishery when it needed to be closed and not before.

George Sherrod of Kawerak, Inc. said that the Norton Sound subsistence fishery for king crab should receive top priority.

Dennis Petersen, member of the Council's Ad Hoc Crab Pot Storage Workgroup, testified in favor of the Workgroup's proposal for a new pot storage area in Bristol Bay (Board proposal 68). He supported the new area because it would eliminate stored pot losses caused by foreign trawlers.

Sig Jaeger, speaking for Richard Goldsmith, executive director of the North Pacific Fishing Vessel Owners Association, opposed Board proposal 87 which would prohibit pot storage around the Pribilofs, and suggested that pots be stored year-round in the Pribilof Islands in 25 fathoms of water or less except from May 1 through September 30. He also suggested that pots be stored year-round in the waters north of 56°41' North latitude, south of 57°20' North latitude, east of 169°30' West longitude, and west of 169° West longitude.

Phil Hansen, speaking on behalf of the Dutch Harbor Fish and Game Advisory Committee, favored the October 1 opening date for the king crab season in Bristol Bay and endorsed establishing a minimum size limit for opilio. He opposed the proposal for a year-round hair crab fishery.

Mel Morris of Alaska Shell and Deep Sea Fisheries, testified in favor of an October 15 to November 1 king crab opening date.

Terry Buholm, owner of the F/V AMERICAN VIKING, preferred a September 10 season opening date. He felt that catcher/processors have caused some of the king crab stock decline because they tend to keep under-sized crab. He opposed area registration; he favored allowing crabbers to trawl for their own bait.

Mick Stevens of Marine Resources Company favored the pot storage area recommended by the Ad Hoc Pot Storage Workgroup.

Lloyd Cannon, president of All Alaskan Seafoods, felt that nothing would be gained by delaying the king crab season opening dates past September 15. He said that an escape mechanism should be developed for crab pots so that small crabs and females could escape, thus reducing handling mortality. Mr. Cannon urged the Council and Board to prevent floating processors from using under-sized crabs by staffing the vessels with observers.

Phil Hansen, speaking on behalf of Rich White, supported later season opening dates in Dutch Harbor, Bristol Bay, and Area Q (the Pribilofs). He felt that an August 1 opening date would be much more appropriate for the Northern District than the present May 1 opening date.

Jeff Stephan, director of the Fisherman's Marketing Association and member of the Council's Advisory Panel, supported some type of regulation over catcher/processors to prevent the harvest of sub-legal crab. He favored leaving the Bristol Bay opening date at September 10, saying that only large vessels would benefit from a later opening. He opposed the Board's proposal prohibiting side loading Tanner crab pots in the Yakutat District.

Richard Goldsmith, executive director of the North Pacific Fishing Vessel Owner's Association, presented written testimony giving the Association's position on each of the Board's proposals. A copy of his written testimony is made a part of this summary as Attachment 1.

North Pacific
Fishing Vessel
Owners' Association

Proposal #18

"Prohibit the use of sideloading king and tanner crab pots in the Yakutat area."

The Association opposes this proposal. It believes the real purpose of this proposal is to keep non-Yakutat fishermen out of the area.

There has been no data to show that there is a high incidental catch of halibut in the Yakutat area that is jeopardizing the stocks. Nor is there data which demonstrate high incidental catches are attributable to the side-entry pots used by the crab fishermen. Even if such data were available, NPFVOA believes there is an obligation to consider less drastic and economically disruptive means of reducing incidental catches, such as the installation of tanner boards, than imposing an outright ban on side-entry pots.

Before the Board of Fisheries adopts this proposal, it must answer the following questions:

(1) Is there a high incidental catch of halibut in the Yakutat area?

(2) Is this catch jeopardizing the halibut stocks?

(3) Is this catch attributable to side-entry crab pots?

(4) What is an acceptable level of incidental catch by side-entry pots?

(5) Can this level be achieved by modification of the side-entry gear?

(6) What would be the financial cost to fishermen (individually and as a group) to modify the side-entry pots?

(7) Are there other methods of reducing incidental catches by side-entry pots?

(8) What are the costs (financial and economic) of these methods?

(9) If side-entry pots are to be prohibited, will this ban affect the productivity

of the tanner crab and king crab fisheries?

(10) Does this loss in productivity and its socioeconomic effects on the local community and fishing industry outweigh the value of preserving the halibut stocks?

To be responsive and responsible to the fishing industry and society, NPFVOA believes that it is necessary for the Board to answer these and other questions posed by a prohibition on side-entry pots in the Yakutat area.

Apparently, the information being used to justify this proposal is a report which compares halibut and crab catches in side-entry and top-entry crab pots, and in side-entry pots with and without tanner boards. The report was prepared by the International Pacific Halibut Commission (IPHC) and the Alaska Department of Fish and Game for the North Pacific Fishery Management Council.[1] As will be pointed out, the Council Report does not back up the claims of the proposal makers. Nor does it respond to most of those questions which NPFVOA posed above.

The Council Study states that the International Pacific Halibut Commission estimates that "1.6 and 2.0 million pounds of halibut were caught in the king and tanner crab fisheries, respectively, in the Gulf of Alaska during the 1979/1980 season."[2] However, the study also notes that "Information on the incidental catch of halibut in the crab fishery is lacking...." (emphasis added).[3] Although the study was conducted in the Yakutat area (see Table 6 of the Appendix for fishing locations), nowhere does it state the extent of the incidental catch of halibut in this area. The Board should also be aware that the Council Study was not conducted to explore the incidental catch of halibut in the Yakutat area by crab gear but was carried out for the following objectives:

(1) Test the hypothesis that top-entry crab pots catch fewer halibut (per unit soak time) than side-entry (rectangular) pots.

(2) Test the effectiveness of the two pot types in catching crab.

(3) Test the hypothesis that "tanner boards" reduce the catch of halibut in side-entry pots.[4]

Furthermore, one of the three tasks of the Council Study was to "[a]nalyze data from the experiment and report their interpretation relative to objectives."[5]

The preparers of the study also recognized that data on incidental catches of halibut were necessary. Recommendation 2 of the study partially declares that "An observer program should be conducted to... establish rates of incidence in the commercial fishery." (emphasis added)[6]

NPFVOA did an analysis of the data gathered during the course of Experiment I of the Council Study, which compared the catch of halibut and crab in side-entry and top-entry pots. The Association came up with the following statistics. (Note: Due to the poor quality of reproduction of NPFVOA's copy of the Council Study, the figures and percentages are based on 195 pots fished, rather then the 198 pots used in the study.)

Pots with no halibut or crab	66 (33.8%)
Pots with no halibut or one or more crab	48 (24.6%)
Total pots catching no halibut	114 (58.4%)
Pots with one or more halibut and no crab	58 (29.7%)
Pots with halibut and crab	23 (11.9%)
Total pots catching halibut	81 (41.6%)

Table 1 of the Appendix also shows that when 15 or more crabs were caught in a pot, either no halibut or at the most two halibut were also caught. Of the 18 pots where there were 15 or more crabs caught, 13 pots (72.2%) had no halibut, 3 pots (16.6%) had only one halibut, and 2 pots (11.2%) had two halibut.

These figures might indicate that where there are large quantities of crab, there are few halibut to be caught. It has been the experience of the Association's members that there is no extensive intermixing between halibut and crab except during migratory periods. We suggest that the Board might wish to conduct further inquiries into the distribution of crab relative to halibut during tanner crab and king crab seasons.

One finding of the study was that tanner boards reduced the catch of halibut in side-entry pots by 63%.[7] "Perhaps more importantly," the study noted, "the use of 'tanner boards' almost eliminated the catch of halibut over 90 cm in length."[8]

Communication between NPFVOA and White Metal Fabricating Inc. of Seattle, Washington has resulted in the following price quotations for tanner boards and 300-500 pound top-entry crab pots (pyramid pots):

$1.70	Wooden Tanner Boards
$9.60	Plastic Tanner Boards
$210.00	Pyramid Pot

If a fishermen who fished 200 side-entry pots were to install tanner boards, his costs would be $340 (wood) or $1920 (plastic). To change to a top-entry pyramid pot would be a $42,000 investment.

The Council Report recognizes the high financial costs that gear changes would entail. One of its recommendations was that "[f]urther gear research should be conducted to determine if side-entry pots can be modified to significantly reduce halibut loss with little cost."[9]

It has been the experience of NPFVOA's members that fishing pyramid pots for king crab has not been very successful. Thus, the Board should consider the socioeconomic impact on the fishing industry if side-entry pots are banned. In prohibiting side-entry pots to reduce or eliminate the incidental catch of halibut, the Board may be adversely affecting those dependent on king crab, a sphere of people much larger than those whose livelihood is tied to the halibut fishery.

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1 "A comparison of halibut and crab catches in: (1) side-entry and top-entry crab pots; and (2) side-entry crab pots with and without tanner boards," Draft Final Report on North Pacific Fishery Management Council Contract No. 81-3, November 20, 1980. Hereinafter called "Council Report" or "Council Study."

2 Council Report page 7

3 Council Report page 7

4 Council Report page 8

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6 Council Report page 2

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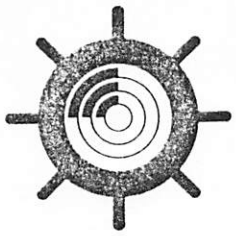
9 Council Report page 2



**North Pacific
Fishing Vessel
Owners' Association**

Proposal #59

"Change the [king crab] season [for Dutch Harbor]."

The Association will support this proposal if the processors are able to produce data which show increased recovery in Bristol Bay by moving the season opening to a later date. (See Proposal #65.)

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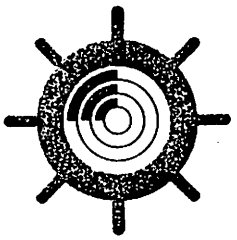

**North Pacific
Fishing Vessel
Owners' Association**

Proposal #60

"Change the Dutch Harbor king crab guideline harvest levels."

The "Joint Statement of Principles" requires the Board to "make readily available in written form...for...at least thirty (30) days [before taking final action], the reports and data received by BOF upon which the proposed regulation is based...." Where are these reports and data?

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North Pacific
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Proposal #61

"Eliminate water storage of crab pots in Dutch Harbor statistical area O."

The makers of this proposal have failed to provide statistics which show the extent of the alleged conflicts. If conflicts are widespread, the Association believes the Board should encourage the affected fishermen to resolve the problem among themselves rather than institute a total ban on storing gear in the water.

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North Pacific
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Proposal #62

"Change the season closing date [for Adak]."

The Association supports this proposal for the following reasons:

(1) A later closure period will allow boats to fish tanner and king crab simultaneously.

(2) It is felt that a better concentration of crab may be found later in the spring in the Adak Area, resulting in lower operating costs for vessels and processors.

(3) Weather conditions would not be any different than those already experienced since the opening date is not proposed to be changed.

(4) This proposed change should not impose any problem with regard to molting conditions. If there were molting problems, the season could be closed by emergency order and then reopened when the condition of the crab improve.

(5) Since the decline of the Adak fishery in the late 1970's, little is known about the red and brown king crab stocks in this statistical area: Adak is not covered by the National Marine Fisheries Service's trawl survey which assesses king crab abundances or by an Alaska Department of Fish and Game research program. Exploratory fishing could take place if the season on male red and brown king crab were extended past the present February 15th closing date, and would result in the collection of much-needed information on the abundance and life cycle of these stocks.

The Association supports the placing of observers aboard harvesting vessels to alleviate enforcement concerns.

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North Pacific
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Proposal #63

"Make the Bristol Bay area a nonexclusive registration area."

The Association supports this proposal.

Last year, the Board and North Pacific Fishery Management Council agreed to the "Joint Statement of Principles" which states that the Bering Sea and Aleutian Islands king crab fisheries are to be managed in accordance with National Standards of the Magnuson Fishery Conservation and Management Act (MFCMA) and the "Bering Sea/Aleutian Island King Crab Fishery Management Framework." The Framework sets out five criteria in determining whether a registration area should be exclusive or non-exclusive:

(1) the desire by the public to protect industrial and community investments;

(2) the ability to properly manage the fishery;

(3) providing fleets a reasonable opportunity to participate in the fishery;

(4) promoting the most efficient utilization of vessels and gear; and

(5) availability of similar management measures which would limit overall fishing effort.

Exclusive areas were designed to protect the local fleets and therefore, are not only an unlawful exercise of a state's police power, but also violations of National Standard 4 of MFCMA (which prohibits discrimination) and National Standard 5 (which mandates that a management measure shall not have economic allocation as its sole purpose).

Providing fleets a reasonable opportunity to participate in the fishery is an indirect way of stating that the designation of an area as "exclusive" is an allocation matter. National Standard 4 of the MFCMA requires allocations be "fair and equitable" and "reasonably calculated to promote conservation." However, setting aside Bristol Bay as an exclusive area in order to protect the Dutch Harbor area from large vessels does not comply with this standard.

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Designating an area as "exclusive" is not the most efficient use of vessels and gear. It protects inefficient vessels from competition and has led to the buildup of large fleets in each exclusive area. Consequently, this management measure violates National Standard 5 of the MFCMA (which requires, where practicable, the promotion of efficiency in the use of fishery resources).

Quotas coupled with size and gear restrictions are adequate management measures which serve the purpose of limiting overall effort. Exclusive areas are not needed to limit overall effort.

The Association does not oppose area registration if it is to be used only to ascertain the number of vessels fishing in an area and to gather information on stocks.

North Pacific
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Proposal #65

"Change the opening date for the Bristol Bay king crab season."

The Association supports a September 15th opening date for red and blue king crab. If the processors can produce data that clearly show that a later season opening will result in increased recovery rates, the Association would support an opening date no later than October 1st. (Such data must span at least five years in order to establish a trend.) An opening date later than October 1st could jeopardize the safety of vessels and crew.

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North Pacific
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Proposal #66

"Change the season [for king crab in Bristol Bay]."

The Association supports Option 2 (which would allow a year-round fishery for brown crab). Little is known about the brown king crab. A year-round fishery would enable fishery managers to acquire more information on the abundance, distribution and life cycle of this specie. The Association supports an observer program aboard harvesting vessels to alleviate enforcement concerns.

For the Association position on Option 1 (an October 1st season opening for red and blue king crab), see its comments on Proposal #65.

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North Pacific
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Proposal #67

"Change the Bristol Bay king crab guideline harvest level."

The Association opposes the proposed harvest guideline level. In setting the upper end of the harvest range, the Board did not follow the procedures set out in the "Bering Sea/Aleutian Island King Crab Fishery Management Framework." If these procedures were followed, a .7 exploitation rate would be used, resulting in an upper limit of 40 million pounds. (See the materials prepared by Dr. Jerry Reeves of the National Marine Fisheries Service.)

The "Joint Statement of Principles" requires the Board to "make readily available in written form...for...at least thirty (30) days [before taking final action], the reports and data received by the BOF upon which the proposed regulation is based...." Where are these reports and data?

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North Pacific
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Proposal #68

"Change the [Bristol Bay king crab] pot storage area or allow random inwater storage of pots."

The Association supports Option 2 (random storage).

In 1981, the Board agreed to manage the Bering Sea and Aleutian Islands king crab fisheries in accordance with the "Bering Sea/Aleutian Island King Crab Fishery Management Framework." This document sets out five criteria for establishing gear storage regulations:

(1) the biological impacts of storing gear at sea;

(2) the enforcement costs of determining whether fishing gear stored at sea is in a non-fishing condition;

(3) the costs borne by the fleet to store gear;

(4) availability of on-land or at-sea storage areas; and

(5) possible gear conflicts.

Scientists have readily admitted that there is no data which demonstrates that at-sea storage of gear in a non-fishing condition has a negative biological impact on crab stocks.

Most fishermen store their gear in a non-fishing condition; therefore, the costs of sending enforcement officers to pull pots probably outweighs the benefits of such activities. In addition, the vessel tank inspection requirement eliminates any incentive to store pots in a fishing condition.

Open storage, as evidenced by a table (copy attached) in the North Pacific Fishery Management Council's King Crab Plan of September 15, 1980, is the least costly of all pot storage options to the fleet. The costs of open (random) storage are estimated at $640,800 while the costs of storage in a designated high seas area are $1,214,388. Storage in less than 25 fathoms costs $1,618,200 and on-land storage costs run $3,477,600. Open storage also is consistent with the national policy of conserving fuel: the Council estimates that this storage option consumes 210,000 gallons of fuel while the other alternatives require 3 to 9 times this amount of fuel. In addition, if the time between the close of tanner crab fisheries and the opening of the king crab fisheries is short, it makes no sense to impose

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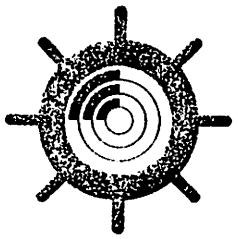
Table 25 A comparison of estimated costs of various types of gear storage for the time period between the end of the Tanner crab fishery and the beginning of the king crab fishery in the southeastern Bering Sea.

	DRY LAND STORAGE	LESS THAN 25 FATHOM	DESIGNATED HIGH SEA STORAGE AREA	RANDOM STORAGE
FUEL - GALLONS	1,944,000 gal	972,000 gal	651,240 gal.	210,000 gal
Cost ($1.20/gal.) (per pot)	$2,332,800 (37)	$1,166,400 (18.50)	$ 781,488 (12.40)	$252,000 (4)
FOOD	$ 126,000	$ 63,000	$ 44,100	0
STORAGE/POT	630,000	0	0	00
TANK INSPECTION	$ 388,800	$ 388,800	$ 388,800	$388,800
TOTAL COST	$3,477,600	$1,618,200	$1,214,388	$640,800
TOTAL COST/POT	$ 55.00	$ 25.70	$ 19.28	$ 10.17

ASSUMPTIONS

75% of 240 boats fish Tanner crab = 180 boats
Average 350 pots each
20 hours running from grounds to shore
10 hours running from grounds to 25F
6.7 hours running from grounds to designated storage area
3 round trips necessary beginning
3 round trips necessary end
1 round trip for tank inspection
fuel $1.20/gallon
45 gallons/hour
Food = $100./day

Source: "Western Alaska King Crab Draft Fishery Management Plan" prepared by the North Pacific Fishery Management Council (September 15, 1980)



**North Pacific
Fishing Vessel
Owners' Association**

Proposal #70

"Change the [king crab] seasons for the Pribilof district."

The Association supports Option 2 (a year-round fishery on brown crab). Due to the lack of information on brown crab, there is no quota on this specie in the Pribilof district. A year-round exploratory fishery would result in the acquisition of much needed information on the distribution, abundance and life cycle of this crab. The Association supports the placement of observers aboard harvesting vessels to alleviate enforcement concerns.

For the Association position on Option 1 (an October 5th opening date for the red king crab fishery), see Proposal #65.

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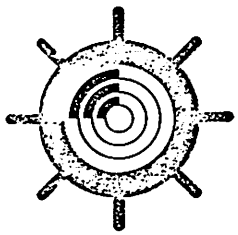

North Pacific
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Proposal #71

"Change the [king crab] season for the Northern District."

The Association supports this proposal for the following reasons:

(1) When male red and blue king crab have been harvested in the Northern district in mid-July (the present opening date) the shell condition has been soft, indicating that molting occurred just prior to the season opening. Opening this fishery on May 1st when the ice is just moving out would enable harvesters to take red and blue crab before molting has occurred.

(2) A May 1st opening date would provide for an exploratory fishery and enable fishery managers to acquire needed information on the abundances and life cycles of these stocks. When data from the fishery show that molting has has begun, the fishery would be closed down and reopened when crab are again in good condition.

(3) An earlier fishery than is presently allowed would also spread out fishing effort by diverting vessels from the tanner crab fisheries.

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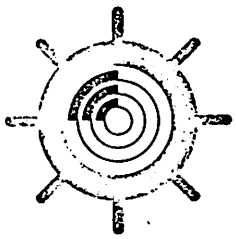

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Proposal #72

"Close the Norton Sound section [to king crab fishing]."

The Association opposes this proposal.

There are no statistics presented which support this proposal.

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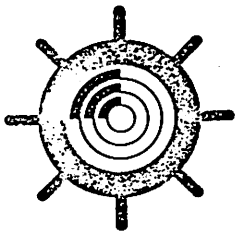

North Pacific
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Proposal #73

"Close the summer [king crab] season
in the Norton Sound section."

The Association opposes this proposal.

Where are the statistics that show a four-year decline in the crab population?

Where is the information to show that recritment is low and it will be two years before "any significant recruitment becomes available"?

Where is the information to substantiate the implied claim that the commercial harvest has led to a "nonexistent" subsistence catch?

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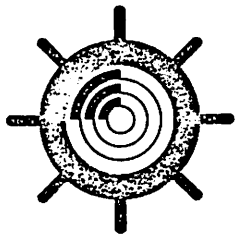

North Pacific
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Proposal #74

"Change the Bering Sea king crab guideline harvest levels."

The "Joint Statement of Principles" requires the Board to "make readily available in written form...for ...at least thirty (30) days [before taking final action], the reports and data received by BOF upon which the proposed regulation is based...." Where are these reports and data?

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North Pacific
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Proposal #76

"Change the size limit of male red and brown [king] crab in the Pribilof district of the Bering Sea, area Q."

The Association opposes this proposal.

Where are the data to substantiate that taking 7-1/2 inch crab is better than 7 inch? Why isn't the size limit just left at 6-1/2 inches? In "An Analysis of Size Limitation for the Alaska Red King Crab" (presented to the Board in 1980), it is concluded that

> "Application of split seasons and different size limits may increase sorting mortality and generate unnecessary fuel costs. Similar yield could be achieved by slight increases in fishing rates at the lower size limits while reducing energy requirements and sorting mortality."

The study also concludes that

> "Greater annual yield stability can be achieved with lower size limits [than presently allowed] by increasing the number of "buffering" year classes involved in the fishery if appropriate fishing rates are applied"

and

> "A size limit of 6.25 inches with a 0.6 fishing rate is proposed for all areas."

In view of this study, why is a second season on 7-1/2 inch or even 7 inch crab considered?

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North Pacific
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Proposal #78

"Establish Chignik as an exclusive registration area [for tanner crab]."

The Association opposes this proposal.

Adoption of this proposal would be in violation of National Standards 4 and 5 of the Magnuson Fishery Conservation and Management Act. (Association's comments on Proposal #63 explain why exclusive area registration violates these standards.)

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Proposal #80

"Open the Western Aleutian district Tanner crab season simultaneous to the Adak king crab season."

The Association supports this proposal. It would cut down on vessel operating costs.

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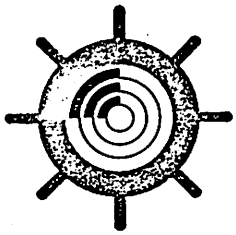

North Pacific
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Proposal #81

"Close the Norton Sound section to the taking of tanner crab."

The Association needs more information on this proposal. Where are the data which show that there is covert fishing on the king crab resources during the tanner crab fishery?

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North Pacific
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Proposal #82

"Change the Southeastern subdistrict [tanner crab] pot storage area or allow random in-water storage of pots."

Please see the Association's comments on Proposal #68.

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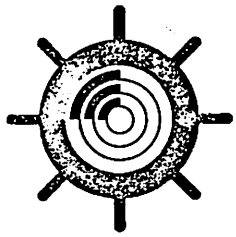

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Proposal #83

"Prohibit storage of [tanner crab] pots
in the water east of 172° W. longitude."

The Association opposes this proposal. The Association suggests that a meeting of the conflicting groups be held to find a solution that is acceptable to all.

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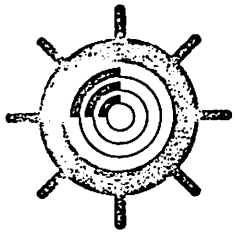

North Pacific
Fishing Vessel
Owners' Association

Proposal #87

"Prohibit inwater storage of crab pots near the Pribilof Islands during the months of June, July and August."

The Association met with the makers of the proposal, crab and halibut fishermen, and representatives from joint venture and Japanese fisheries to find a solution to the storage problem in the Pribilofs. The group came up with the following storage areas:

(1) Pots may be stored year-round in the Pribilof Islands in 25 fathoms of waters or less except from May 1st through September 30th.

(2) Pots may be stored year-round in the waters north of 56°41' North latitude, south of 57°20' North latitude, east of 169°30' West longitude, and west of 169° West longitude.

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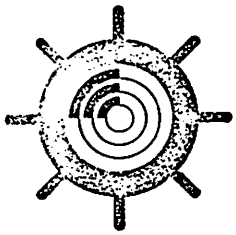

North Pacific
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Owners' Association

Proposal #88

A proposal which requests the Board to "adopt regulations to prevent the harvest and processing of sublegal size king and tanner crab by catcher-processors."

The Association wants more information on this proposal.

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North Pacific
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Proposal #89

"Set a year-round season for [Korean hair crab for the] area west of Cape Kumlik."

The Association supports this proposal.

Last year, ADF&G reopened the Korean hair crab fishery within 3 miles of the Pribilof Islands on August 10th after the fishery had been closed June 30th by emergency order to protect the crab during molting. ADF&G gave the following rationale for the reopening:

> "Since the life history of the Korean hair crab has not been established in respect to the annual molting cycle, the actual period required for these crab to recover from the post-molting condition requires a fishing effort to evaluate the future establishment of the commercial season."

ADF&G also stated that a reopening was warranted in order to maximize the utilization of this resource. Since there was an abundance of crab more than 3 miles beyond the lower tide mark of the Pribilofs, those waters were also reopened.

Conditions have not changed since last year. Data on the abundance, distribution and life cycle of the Korean hair crab are still needed by fishery managers, and a year-round fishery for all areas west of the longitude of Cape Kumlick would enable them to collect this information.

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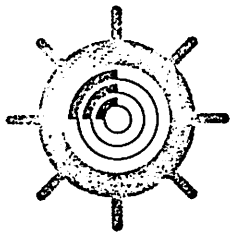

North Pacific
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Proposal #99

"Prohibit [statewide] in-water storage of king crab pots."

The Association opposes this proposal.

Please see Association comments on Proposals 61, 68, 82 and 83.

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North Pacific
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Proposal #106

"Prohibit simultaneous operation of trawls and pots."

The Association opposes this proposal; it would prohibit trawling for bait.

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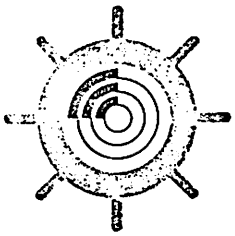

North Pacific
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Proposal #107

"Establish a new category of fishing [personal use] and adopt regulations for the taking of fish under that category."

The Association needs more information on this proposal.

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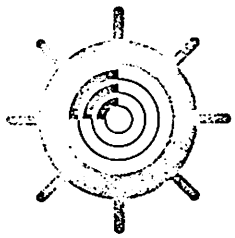

North Pacific
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Proposal #119

"Present management options for the
Southeast bottomfish fishery."

The Association opposes all three options. Although Option 1 is the least onerous of the three alternatives, it still leaves the development of a trawl fishery to the discretion of the Commissioner rather than the initiative of the fishermen. If there are potential conflicts between user groups, wouldn't it be better for the Commissioner to bring the groups together to try to resolve the issues in a manner that is satisfactory to all?

The Association would also like an opportunity to examine the data which are being used to justify restrictions on the trawl fishery. Could it be that incidental catches are increasing due to increased populations of those species?

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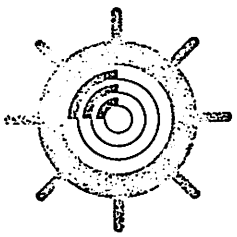

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Proposal #126

A proposal which establishes user group priorities.

The Association opposes this proposal.

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Proposal #127

A proposal that "all shellfish surveys be done by experienced vessels and crew, with no less than 5 years experience in areas affected."

The Association supports this proposal.

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