## Public Testimony on Groundfish Agenda Items

Nick Delaney, Kodiak Longline Vessel Owners Assn (KLVOA). With regard to the sablefish opening date proposal under Amendment 17, their association feels that changing season dates without better supporting data at this time is too radical. If a change is made, they feel that splitting the quota - 50% at April 1, the status quo, and 50% for a later season, would be an option. Later in the fall might be best for a second season because of better quality which brings better prices, and halibut bycatches may be lower at that time. A middle-of-the summer season might cause processing problems because of other fisheries being prosecuted at that time. A season later than September might have weather problems.

Linda Kozak, KLVOA. They had originally supported Alternative 5 (season framework) until NMFS said it was not feasible. They agree with the AP's recommendation that the April 1 and September 1 dates, along with the status quo, be analyzed and addressed by the Council in September. They feel that until biological and socioeconomic data prove that a change in the fishery is needed, they would like to maintain the status quo. If a split opening is chosen, they would recommend that it be on a trial basis with as much observer coverage as possible and that a sunset date be included. Observer coverage should be mandatory.

Bob Trumble, IPHC. The IPHC believes halibut bycatch should be managed on a coastwide basis to whatever degree possible. They have consistently recommended that halibut bycatch limit be set at status quo levels until some objective criteria or procedures are established to determine the best use of halibut, either as bycatch or as a directed fishery. They believe Alternative 3 of the bycatch proposal under Amendment 12 would provide, along with current bycatch limits in the Gulf, an acceptable halibut bycatch rate. With regard to raising the OY cap in the Bering Sea, they are concerned that if the cap is raised there may be some pressure to increase the halibut bycatch caps and they feel the cap should not be increased until the new bycatch regime has been in place for some time and more data becomes available.

Ken Larson, NPFVOA. Mr. Larson summarized written testimony provided to Council members. The NPFVOA favors setting the OY in the Bering Sea annually at a level equal to the sum of the ABCs. They support Alternative 3 of the bycatch proposal, and also support requiring federal permits for all vessels receiving EEZ-caught fish. They support Alternative 2 for the non-retainable groundfish catch limit proposal - provide for non-retainable catch limits that are not within the OY for groundfish species, and removing the July 1 deadline for the RAD. NPFVOA favors maintaining the status quo for the rock sole proposal, with increased enforcement and reporting requirements to generate a more complete data base upon which decisions can be made.

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Cindy Lowry, Greenpeace. They feel the SEIS for the Bering Sea OY proposal is seriously flawed. The status quo provides a safety buffer given the uncertainties and inadequacies of current knowledge about the environment and socioeconomic uncertainties caused by overcapitalization. With regard to the bycatch proposals, they support Alternative 4, establishing numerical bycatch limits for specific zones. For the non-retainable groundfish catch limit proposal, they support Alternative 2, to establish non-retainable groundfish bycatch limits outside the groundfish OY but within each species ABC, allocated to DAP, JVP and TALFF as required. They also support the proposal requiring federal permits for all vessels receiving fish caught in the Alaska EEZ.

Alan Reichman, Greenpeace. Urged the Council to send a letter in support of the agreement between industry and environmental interests on marine mammal issues under the MMPA.

Clint Atkinson, Seattle. Provided the Council with some information on cod prices versus supply. Cannot agree with the conclusions reached in the NRC report on raising the OY in the Bering Sea. The data used for the report were based on an academic model and should not be used as true data. Based upon his research of landing data for the past six years, the price of cod in Japan does not seem to decrease with increased landings.

Barry Collier, PSPA. They feel that the Bering Sea OY should remain at the status quo, 2 million mt, because of unknowns associated with harvest activities in the donut hole and the relationship between those stocks and the American stocks.

Ted Evans, AFTA. If the OY range is going to be increased, the Council needs to proceed cautiously. AFTA presented a proposal for a framework which would allow the OY to be increased annually by up to 10% with an overall limit of 25%. However, the proposal would exclude pollock until there is some resolution of the unregulated harvests in the donut hole.

Bert Larkins, MRCI. He supports Alternative 2, Option A, of the OY proposal setting the cap at the sum of the ABCs with no other restrictions except those the Council may chose to impose on an annual basis. He also favors Alternative 3, Option A, of the bycatch proposal although he supports Option B at this time because he's concerned that the current management system is not capable of setting up and monitoring the complexities of Option A.

Dave Harville, KWT. Mr. Harville told the Council they have suspended their Gulf of Alaska joint venture operations because of a high bycatch of halibut; ProFish/Anyo have also delayed starting their summer venture for the same reason. Regarding the roe rock sole proposal, he hopes the Council will taken into consideration the information Chris Blackburn has gathered. To maximize the value to joint ventures they need the roe rock sole; to delay their season to April 1 will mean no rock sole joint ventures at all.

Chris Blackburn, Alaska Groundfish Data Bank. Based on her research on roe rock sole, she estimates that about 100,000 mt could be taken safely. In 1988 the DAP operations in the Bering Sea took approximately 19,000 mt, the joint ventures took around 5,000 to 6,0000 mt. Eliminating joint ventures on roe rock sole won't have a significant effect on the price in the Japanese market.

John Bruce, Deep Sea Fishermen's Union. Regarding the bycatch proposal, he feels it doesn't make sense to allow a higher bycatch of halibut when they are seeing a decline of the halibut resource.

<u>Linda Kozak</u>, KLVOA. They support the status quo for the OY proposal; there are so many variables to consider, such as the bycatch needs of the fisheries if the OY is raised.

Nick Delaney, KLVOA. Asked the Council to keep any halibut bycatch cap at an absolute maximum of 3,000 mt regardless of what they do with the OY proposal.

Fred Yeck, Oregon. Supports setting the OY cap equal to the sum of the ABCs. The Council will still have the option to set the quotas for each individual species below the cap annually.

<u>Bob Dewly</u>, Oregon. Agreed with the testimony of Fred Yeck. Joint venture fisheries in general are being severely financially disabled because of the current cap.

Mick Stevens, Profish International. Recommended Alternative 3, Option B for the bycatch proposal The status quo for the roe rock sole proposal would be acceptable to them because they are a small operation, but may not be responsible. Alternative 3 may be the most logical way to proceed because it would create a separate TAC for rock sole and allow annual split season apportionments. He also supports Alternative 2, Option A of the OY proposal, sum of the ABCs.

<u>Pete Granger</u>, AHSFA. They support Alternative 3, Option A, of the bycatch proposal, the status quo on the roe rock sole proposal, and Alternative 2, Option A, of the OY proposal, sum of the ABCs.

Craig Larson, Pacific Independent Trawlers Assn. Supports increase in the OY cap to sum of the ABCs.

Steve Hughes, Midwater Trawlers Co-op. Support Alternative 3, Option B, of the bycatch proposal. On the non-retainable groundfish proposal, they have revised their previous support of Alternative 2 because the Regional Director would not have regulatory authority to close down fisheries or impose time/area closures if bycatch limits are reached; therefore, they prefer status quo. They support removing the July 1 deadline for the RAD, Alternative 3 of the rock sole proposal, and Alternative 2, either Option A or B, of the OY proposal.

Tom Casey, Seattle. Against the bycatch proposal because of the number of crabs and halibut that could be taken as bycatch.

Gary Painter, Oregon. Cannot support the bycatch proposal because of the high bycatch numbers; they are not certain that crab survey numbers are correct. Also, the value of the king crab bycatch was not addressed in the EA.

Paul MacGregor, AFTA. In regard to the non-retainable bycatch proposal, the problem can be addressed by regulatory amendment if the Council wishes to provide bycatch of totally DAP species for TALFF fisheries, which was the original purpose of the proposal when it was suggested some time ago. Now, it has evolved to provide a bycatch regime for not only TALFF but also DAP and JVP fisheries. This proposal is much more complicated than necessary and is not needed.

<u>Bill Orr</u>, AFTA. Recommends the Council approve the Bycatch Committee's proposed directed fishing definition. In regard to the roe rock sole proposal, they support the AP recommendation. They are also in support of the Bycatch Committee's bycatch proposal (Alternative 3, Option A).

Joe Plesha, Trident Seafoods. Opposes raising the OY cap because of the uncertainties of the harvests in the donut hole.

<u>Dave Fraser</u>, Cape Flattery Fisheries. Supports Alternative 3, Option A of the bycatch proposal, including all items the committee agreed upon. Option B would only create a "olympic" system for bycatch. For the roe rock sole proposal, he supports Alternative 3, creating a separate TAC and a split season for rock sole. He also favors a cautious approach to raising the OY cap and supports setting the cap to the sum of the ABCs.

Arni Thomson, ACC. They still have problems with the high bycatch levels in the the bycatch proposal; also must have a minimum of 20% observer coverage to make it work. ACC supports maintaining the status quo on the OY cap in light of the transition going on in the DAP groundfish industry and lack of a data collection program at this time. They also favor the status quo for the roe rock sole proposal.

<u>Paul Fuhs</u>, Unalaska. Against raising OY cap. Current data are not reliable; need more information on stocks and harvests in the donut hole.