## Public Testimony on Groundfish Agenda Items

Mark Hutton, explained to the Council his proposal to change the sablefish season in the Gulf to coincide with the halibut fishery in order to reduce the bycatch of halibut.

John Coyne, Deep Sea Longline Fisheries, Inc., said that market prices for ITQ fish are affected by the fish caught by Japanese boats. Hope that the Council will not allocate cod TALFF for the coming year because according to DAP and JVP requests the fisheries will be completely "Americanized" in 1988.

Kit Adams, Golden Age Fisheries. They will be involved in joint ventures with Japanese partners in 1988 and also have two U.S. factor trawlers. It's important to them to have access to all Bering Sea stocks excess to DAP needs. Requests the Council reject the AP recommendation that rock sole joint ventures be limited to bycatch only from January to April; they don't feel there is any biological or socioeconomic justification for the proposal.

Dave Fraser, Cape Flattery Fisheries. He supports raising the OY cap after reviewing the RAD, and attending SSC and plan team meetings. He believes this can be viewed as an emergency action from an economic perspective. He does not agree with the AP request to restrict joint venture rock sole fishing; the ABC is far more than needed for joint venture bycatch in the yellowfin sole fisheries and for the directed rock sole fishery. He does think rock sole should be broken out from the yellowfin sole category but that it should be done through the regular amendment process. The rock sole fishery can also provide much needed bycatch information because there would be 100% observer coverage.

Barry Collier (PSPA), & Joe Plesha (Trident Seafoods). Mr. Collier expressed concern over the new definitions resulting in higher ABCs. They were established without taking catch records into account. Until credible data is available on fish harvested in the donut hole, the TAC should not be raised. Mr. Plesha said Trident processes pollock and cod at their plant in Akutan and they need a stable, long-term supply. He opposes the increased OY in the Bering Sea and removing the safeguard of the 2.0 million mt cap and believes doing so by emergency order is circumventing the public process. He also expressed concern over the new definitions resulting in higher ABCs.

Bob Alverson, Eric Olson, Jack Knutsen, FVOA. They are opposed to the recommendation of a 35,000 mt ABC for sablefish in the Gulf; they believe in a more conservative approach and suggest 27,000 mt. Agree that the percentages should remain the same for the three areas. They opposed the suggestion to delay the sablefish season to May 1; experienced fishermen can minimize bycatch of halibut by fishing shallower. They believe the plan team recommendations for the ABCs in the Bering Sea are too high and that if the stocks are fished too hard all at once they may rapidly decline. They urged the Council to be conservative. They support the AP's recommendation that the Council not take emergency action to raise the OY cap in the Bering Sea and that it go through the complete amendment process.

Jim Hubbard, Arctic Alaska Seafoods. Doesn't think you should change quotas by changing exploitation rates. Thinks the Council has the responsibility to use the available data and that shows declines.

Mick Stevens, Dennis Petersen, Profish Int'l & Pacific Independent Trawlers. If the Council puts restrictions on foreign joint venture permits at this late date there will be economic hardships for their operations. None of their partners have significant enforcement actions and should not be denied permits. Asked that the Council provide for an experimental fishery in the Outside Shelikof area again in 1988. Urged the Council to approve the SSC's recommendations on ABCs as the best scientific information available. The ABCs should not reflect socioeconomic factors. Does not think the Council should raise the OY in the Bering Sea by emergency order but does think it should be considered as it may lessen the time spent by foreign vessels fishing in the donut which would benefit U.S. fishermen and the economy.

<u>Paul Fuhs</u>, City of Unalaska. Both Soviet and Chinese fleets have spent a lot of money in Dutch Harbor and helped their economy. Their two processing plants were built mainly with Japanese money and have been running 24 hours a day which has contributed to their economy. Their concern is about the scientific information available to determine whether or not to raise the OY in the Bering Sea - there are a number of uncertainties about catches in the donut hole area. There have not been enough surveys to accurately gauge the biomass.

Eric Maisonpierre, Alaskan JV Seafoods, said that if the OY is not raised joint ventures will be put out of business in the very near future. Historical figures indicate there would be very little impact on marine mammals. He feels this is an emergency situation for joint ventures.

<u>Cindy Lowry</u>, Greenpeace. Opposes raising the OY. If the Council wishes to do so, complete analyses should be done on population levels and stock origin; an full environmental impact statement should be prepared.

John Jemewouk, Keg Fisheries. Support TALFF for Japan Longline Association.

<u>Mark Snigaroff</u>, Atka Fishermen's Assoc. Requested the Council support continuing allocations of cod for the Japanese longliners in the Bering Sea. They have assisted Atka fishermen in developing the groundfish fisheries around Atka Island.

Harold Sparck, Qaluyiat Fishermen's Assn. Support continuing allocations to Japanese longliners because of the assistance they've received in developing their fisheries. Also asked the Council to approve the Atka request for a halibut allocation for their fishermen.

Ted Evans, Scot Jacobsen, Jim Hubbard, AFTA. They must continue to have high CPUEs in the Bering Sea to maintain their markets and think a lower exploitation rate is the answer. In regard to raising the OY cap, the catches in the donut cannot be ignored. The Council needs to look carefully at this subject before considering raiding the cap.

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Scott Jacobson, Kemp Pacific Fisheries. The Council has the responsibility to find out what is being caught in the donut and take that into account before raising the OY.

Ron Pauley, Ocean Trawl, Inc. Raising the OY in the Bering Sea will have a devastating effect on the CPUE.

Paul MacGregor, North Pacific Longline Association of Japan. Mr. MacGregor reviewed NPL's past efforts in assisting Western Alaska fishermen in developing their fisheries and listed several possible ventures for 1988; However, in order to fulfill these commitments they will need an allocation early in the year.

Steve Smith, Kemp Pacific Fisheries. Reviewed their DAP requests and urged the Council to take an conservative view on raising the OY in the Bering Sea.

<u>Dave Harville</u>, Kodiak Western Trawlers. Thinks rock sole should be treated as a bycatch-only species in the trawl fisheries just as blackcod is. Doesn't think rock sole should be broken out into its own species category because it would result in a lot of waste and unused fish. Does not agree with delaying joint venture catch of rockfish until April.

 $\underline{\text{Rod Armstrong, Hong An}}$ , Korea Fisheries Assn. Reviewed their joint venture requests for 1988 and gave statistics on 1987 imports of American products into Korea.

Ron Peterson, Mr. Janssen, spoke in support of the Icelandic joint venture request.

Steve Brooks, Bill Hayes, Bob Dooley, Jubliee Fisheries. Support raising OY cap using an emergency order. They are interested in the rock sole fishery in the Bering Sea but were closed out of Zone 1 because of the bycatch; urged the Council to hold an allocation open for DAP fisheries when rock sole quota begins to dwindle. Joint venture fishermen have been aware that allocations will dwindle but did not expect it to happen this fast. Major cuts in joint venture allocations will have a significant impact on American fishermen.

<u>Pete Granger</u>, <u>Hugh Reilly</u>, <u>American High Seas Fisheries Assn.</u>, outlined their reasons for requesting an emergency action to raise the OY cap in the Bering Sea. The regular amendment cycle will not be soon enough, the economic damage will be done by the time the amendment could be in place

Steve Hughes, Midwater Trawlers Co-op. DAP figures should be looked at very closely. Allocations should go to DAP first, but unused DAP should be released in a timely manner. In the GOA, the TAC for POP and other rockfish should equal ABC because they are in a rebuilding mode.

Vern Hall, Fred Robinson. They have three trawlers planning to fish JVP in 1988, 90% pollock. Agree with limiting blackcod bycatch and suggest a 20% bycatch rate. The suggested pollock TAC will displace catcher boats and Council must take that into consideration. Have been unable to secure domestic market for their boats; most are smaller plants requiring smaller amounts of product. Urged the Council to raise the cap on pollock which may allow time for markets to develop.

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Einar Pedersen, Joe Wabey, Tim Gerding, F/V American Eagle, F/V Vesteraaten, F/V Alsea. Increased DAP requests will phase out JVs much faster than anticipated; if there is excess, then JVP should have it. Urged the Council to raise the OY cap by emergency order.

Trefon & Ralph Angason, Great Pacific Inc. They participate in a joint venture and can't secure domestic markets. Asked the Council to provide some mechanism for their company and other joint ventures to continue to participate in the fisheries.

<u>Peter Block</u>, NorFish. Supports raising the OY cap and timely release of excess DAP. Does not support the AP recommendation to prohibit joint venture fishing for rock sole until April 1. Also, the participants in the industry bycatch agreement asked the Council to adopt it without amendment, which would allow the fishery to open at the first of the year.

<u>Terry Thomas</u>, Arctic Ventures. Said there will be an economic hardship for joint ventures if the OY is not raised. If the Council does not raise the OY they should lift the 40/60 split for pollock by emergency order to allow take their total quotas at the beginning of the year.

Hae-Joo Park, North Pacific Fishing, Inc. A very substantial amount of income can be lost by a conservative approach to setting quotas. Urged the Council to set the TAC for other rockfish in the Gulf at least at the plan team's recommendation, or higher. Opposed to delaying opening of sablefish season.

Ken Sjong, F/V Margum, F/V Gunmar. If the OY cap is not increased there will be economic hardships for joint ventures. They will be forced to take part in other fisheries which are already overcapitalized. Asked the Council to take emergency action to raise the cap while shoreside markets are being developed.

Steve Johnson, Japan Deep Sea Trawlers/Hokuten Trawlers. Asked the Council to make available any fish excess to DAP needs for foreign fishing. Supports an emergency order to raise the OY in the Bering Sea.

<u>Fred Yeck</u>, Midwater Trawlers & AHSFA. Supports proposal to raise the OY cap by emergency order to increase JVP. TAC should be set equal to ABC for those species.

Phil Chitwood, MRC. Urged the Council to adopt the SSC's recommendation of 250,000 mt TAC for yellowfin sole. Asked the Council to provide for bycatch of other flounders in the yellowfin sole fishery. Also noted that all their fish goes to the USSR for their consumption and does not enter the international market. Urged no TALFF for other flounder species.

Steve Hoag, IPHC. In reference to the proposal to delay the opening of the sablefish season to minimize bycatch of halibut, Mr. Hoag said that data is limited; it's possible there may be some savings if the opening is delayed to May 1. They support a maximum halibut PSC limit of 200 mt in the Gulf. They are beginning to see a slight decline in the halibut resource with a drop-off in recruitment rates.

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Gary Westman, F/V Rosella, Inc. Supports raising the OY in the Bering Sea.

Leroy Cossette, F/V Eskimo Princess. Supports black cod as a bycatch only species; it would be helpful if they could bring in all the fish they catch and also that the fishery would last all year. Urged no TALFF.

<u>Bill Orr</u>, AFTA. Reviewed AFTA's comments on the recommended quotas. In reference to the rock sole proposal, he pointed out that this species is very important to the DAP fisheries. They have been developing it for the past two years and JVs should not be allowed to target on rock sole during the spawning period.

Tim Ward, Yupik Star Fisheries. Supported allocation for Japan Deep Sea Trawlers because of their assistance in helping the Western Alaska communities.

Vic Horgan, Jr., King Crab, Inc. & Ocean Beauty Seafoods. Responded to a previous comment that there isn't enough investment going into shorebased processing. This may be true in the Bering Sea and Aleutians, but not in the Gulf. In regard to raising the OY for the Bering Sea, he feels that if there are fish there they should be allocated; however, if the scientists are just manipulating numbers, then he's not sure what the effects might be on the stocks.

Al Burch, Alaska Draggers Assn. Disagrees with the proposal to prohibit targeting on rock sole during the first part of the year. They have already made their commitments to begin fishing on January 1. Agrees with the proposal to designate blackcod in the Gulf as bycatch only during the beginning of the year. Also agrees with raising the OY cap in the Bering Sea because the Council needs that option in order to manage the fisheries.

Oliver Holm, Kodiak Longline Fishermen's Assn. Agrees with the SSC and AP recommendations for pollock in the Gulf. For sablefish, he agrees with the plan team's recommendation of 35,000 mt for biological reasons, but economically 27,000 to 30,000 mt would be more reasonable. Apportionment of sablefish based on the 400 m depth zone should be continued. They support the sablefish as bycatch proposal to reduce discards and waste. Urged the Council to continue to be conservative on rockfish to allow rebuilding. TACs for flatfish should be held at status quo in the Gulf because of bycatch problems. The Council should not raise the OY cap in the Bering Sea by emergency order as there is no emergency.

Dave Woodruff, Alaska Fresh Seafoods. Suggested that there should be caps set for the taping of roe fish; the pollock they are getting are very small. Also, a size limit and changing the season date from January to April would provide for a more orderly harvest. Kodiak is well on its way in accomplishing what they said they would in the area of shoreside processing. They projected needs for this year is 88,000 mt. Agreed with the AP's recommendation on the OY cap - do not change by emergency order. If the Council wishes to consider it, go through the normal amendment process.

Raymond Campbell, Kodiak. Against limited entry in any form; it stifles development. If limited entry is imposed, there should be a date set for review and to accommodate changes in the fisheries.

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Barry Fisher, Midwater Trawl Cooperative. Supports raising the OY cap in the Bering Sea; feels that both the SSC and plan team's recommendations should be followed. There would be an added benefit of reducing the fishing pressure on donut hole stocks.

Dave Herrnsteen, Kodiak. He has a problem with the make-up of the FOG Committee as each will be representing their own interests and that's not the way to develop management plans. Against the 12/87 cut-off date for entry into the groundfish fisheries. People in Kodiak are still trying to decide how to get into the groundfish fisheries and setting a cut-off date is causing people to rush into decisions without fully considering the consequences. Stability in the fisheries will be taken care of by natural supply and demand forces.