

Public Testimony

Agenda C-3 Domestic Observer Program

Larry Tideman, Pacific Observers. Agrees that government should not mandate level of insurance; however, large variances between contractors are not fair either. Urged caution regarding the total cost to users under the new user fee system..

Greg Baker, Westward Seafoods. There is serious concern within industry about the biological condition of the pollock resource. There is concern that there is a lack of information about discards and the possibility that the product recovery rates used to calculate fishing mortality are inaccurate. Hopes the Council will discuss the product recovery rates.

Doug Gordon, American High Seas Fisheries Assn. Very concerned about the costs of a user fee system. Observer program should be under federal management; he's not happy with independent contractors. Deployment of observers should be done by the government, not industry. Fees should be based on an ex-vessel value. Observers must be tasked to account for total mortality and fees should be based on total fish killed as well as fish lost. Advocates serious study on product recovery rates which vary throughout the season because of the condition of fish; there should be different rates for at-sea and onshore. A board should be set up, with industry representation, to manage the new fee program; they would like to participate.

Agenda C-4 Inshore/Offshore Allocation

John Iani, Pacific Seafood Processors Assn. Support inshore/offshore allocation of groundfish in the North Pacific. Goals of the management plans for the Gulf and BSAI promote fair and equitable allocation of resources.

Daniel Hamblin, Kodiak. Shoreside operations have more than enough capability to process pollock TAC in the GOA; 100% should go to inshore. For Pacific cod, 80% to inshore and 20% to offshore. Shoreside preference is better for local communities and the state.

Paul MacGregor, American Factory Trawlers Assn. They have done the best they can to complete the economic surveys and have been working with Council staff, the analytical team, and the Fishery Planning Committee and will continue to do so. Are concerned that some part of the review process has been abbreviated to a meeting rather than a written analysis to review and respond to.

Agenda C-5 Halibut Management

Charlie Spud/Ed Shavings, Mekoryuk Fishermen. Their community is just getting into the fishery and the quota is already going down. Requested 70% of the halibut quota for Area 4E (Nelson and Nunivak) and 30% for Bristol Bay. Haven't had the proper equipment before but gearing up now to take more fish next summer. The harvest last season was low because they ran out of fuel. Also, finding buyers was difficult. Their herring commercial fishery has declined over the years and so it's hard to have income to pay for loans on fishing boats. Halibut fishery is new to them; some of them don't have longlines, but are preparing to get that gear for next season. Would like to keep the 70,000 lb quota for their area to replace lost income from herring fisheries.

William Nicholson/Tom Haseth, Bristol Bay Longline Gillnet Cooperative. The last few years they have requested 50,000 lbs (half in spring and half in the fall). In 1990, they had a 30,000 lb quota. The experimental halibut fishery supplemented poor income from herring and they appreciated the opportunity. The last opening of only 5,000 lbs did not offer enough economic return to participate. Also, not having a fall fishery precluded gathering necessary data. They are very interested in having their own fishery. They have worked out an arrangement with Nelson Island whereby, after August 1, Bristol Bay fishermen could participate in harvesting 50% of any unharvested Nelson Island quota.

Paul John. Would like to see Nelson Island/Bristol Bay work things out together on the halibut quotas. Nelson Islanders have only halibut for income, not like Bristol Bay residents who have herring and salmon.

David Bill, President, Fisheries Assn, Nelson Island. Over the 3 years they have fished, they have had a low harvest rate because of a lack of buyers and then lack of fuel. Would like to keep 70% of the 4E quota; they would agree to share unharvested quota after August 1.

Jon Zuck, Bering Sea Fishermen's Assn. They have members in both areas. Their choice would have been to create a new area in Bristol Bay for last season; however, IPHC didn't concur. Encouraged the Council and Halibut Commission in future to come to a better understanding of who is responsible for what. Support splitting if there are no other alternatives.

Lyman Hoffman, Alaska State Senator. Newly elected representative for the Nunivak and Nelson Islands. Asked Council to permanently divide the areas and allocations and ask IPHC to increase 4E quotas. They have some of the lowest per capita incomes in Alaska, no commercial salmon fishery, and have lost substantial commercial herring fisheries in past years. The gasoline problem has severely limited their halibut harvest, however they are working to assure supplies for this season. Asked Council to take action now: encourage larger quota for 4E when meeting with the IPHC next month.

Agenda C-6 Sablefish Management

Mark Lundsten. Submitted an alternate plan for sablefish management. Concerned that the issue has been in process for over five years. Urged the Council to make some decision soon.

Agenda C-7 Foreign Permits

Lynn Richardson/Jim Daniels, Mrs Paul's Kitchens. Poland has provided a great deal of information on donut catches and have taken observers and they should receive some consideration. U.S. consumers and secondary processors will be hurt most if Poland is denied access to EEZ for transshipment. About 85% of Mrs. Paul's products is from Alaska. Cost and quality are large factors - it's not feasible or prudent to obtain whole supply from U.S. suppliers so they must continue to buy

from foreign catches from the donut. Council decisions have had a major effect on their business - higher priced products and uncertain supplies.

D-1(a) Vessel Incentive Program

Paul MacGregor, AFTA. AFTA supports vessel incentive programs; however, they are not very pleased with the current proposal; they don't think it's comprehensive enough and does not have enough inseason relief. The "bad" vessels need to be identified and removed from the grounds during the fishery, not six or seven months later. This may be the best they can have for 1991, but encouraged Council and NMFS to begin work on a better program as soon as possible. The volunteer program conducted on yellowfin sole was very successful although legal enforcement wasn't available. Unfortunately, late in the fishery some boats came in and wouldn't comply with the voluntary agreement and shut the fishery down.

Chris Blackburn, Alaska Groundfish Data Bank. Supports AP recommendations. The GOA particularly has had a problem with boats coming in for short periods and causing problems. Locals have worked over the years to learn how to fish the area with low bycatch. They do have problems with the current program because of the data required of vessels. Need to continue to work toward a true incentive program.

Dave Fraser. The current program is the only one available right now and although it's not perfect, it's way ahead of anything else. Flatfish fishery may be a problem area - a refuge for dirty fishermen since it isn't covered.

John Henderschedt, Golden Age Fisheries. Agrees with previous testimony. He participated in the AP workgroup which established the recommended standards for the 1991 fishery.

Steve Hughes, MidWater Trawlers. The goal is to have real-time data and incentive program to reduce bycatch; but for 1991, that's not possible. The best that can be done at this time is what the Council has before them. Midwater Trawlers supports the AP recommended rates for 1991.

D-1(c-e) Pelagic trawl definition/regulatory amendments

Bob Leggate, Gurock Trawls. Urged adoption of some type of individual bycatch avoidance program -- leave the definition of pelagic trawl as broad as possible.

Thorn Smith. Represents freezer longliners who mostly fish cod in the Bering Sea. They have requested the amendment to require pots be fished on single lines because they are concerned about burgeoning pot usage. Favor postponing sablefish opening until whatever date that will minimize bycatch of halibut.

Jeff Stephan, UFMA. Support prohibition on longlining of pots. Had expected this would be in place by January. In favor of exempting octopus pots from the regulation.

Art Hodgins/Jack Knutsen. As individual participants in the fishery they support the AP recommendation for a May 15 opening date for sablefish. Besides helping with bycatch this might also help to make the fishery safer. Also support ban on longlining of pots; there enough gear conflicts as it is without that potential. Regarding bycatch options, if there is a possibility of getting a depth restriction that is enforceable in the sablefish fishery, bycatch would be virtually eliminated.

Linda Kozak/Rob Wurm, KLVOA. Support May 15 opening date for sablefish in the GOA. Also want to discourage prospecting for halibut during sablefish fishery; they plan to lobby for an earlier halibut opening to help clean up the halibut and also avoid the prospecting that takes place in the sablefish fishery.

Kris Norosz, PVOA. Supports May 1 opening date for sablefish; delay of one month will help reduce halibut bycatch rate. Regarding the AP recommendation of a May 15 opening, they question the validity of some of the assumptions. The EA/RIR is based on one year's data only and the Council shouldn't make such a radical change in season based on one year's observer data. Also, perhaps a more comprehensive approach is needed; by opening later the chance to gather information on earlier stocks is lost.

Bud Samuelson, Petersburg. Supports Chris' (Norosz) statements on May 1st sablefish opening. Believes most support for the May 15 opening is based on the assumption that there may be a halibut opening prior to that time. If that happens, near shore boats will have to go to nearest shoreplant to deliver halibut in order to get back on grounds for sablefish, regardless of the price offered.

Doug Gordon, AHSFA. Regarding the pelagic trawl definition, the Council should insist that observers be tasked to observe compliance. A performance-based definition would be OK, as long as the Council is moving toward an IFQ system; however the Council is nowhere near that decision. Support the idea of a gear technical group, but in a broader context of bycatch reduction. Support ban on longlining of pots in the Gulf, Bering Sea and the Aleutian Islands. There are a lot of key areas in Aleutians for pollock. Need clear delineations of the areas.

Gregg Williams, IPHC. Regarding halibut opening dates: There will likely only be two openings in the Gulf next year. With only two openings, IPHC staff prefer one in spring and one in fall. For spring, it would be early May or June because of favorable tidal conditions. However, better weather in June may be a factor in that decision.

Steve Hughes, Midwater Trawlers. Supports a delay of fishery on arrowtooth flounder until May 1, consistent with other groundfish fisheries. It's important that it be included with Greenland turbot--bycatch from arrowtooth fishery is also important. Regarding the pelagic trawl definition, they are frustrated with it like everyone else. They believe it's best left as is for '91, but a detailed description is not the way to go; the problem is best addressed through a good bycatch incentive program. Support ban on longlining of pots, but it is not their intent to interfere with the octopus fishery or the pot longline Pacific cod fishery in the Aleutians.

Paul Clampitt. Favors AP recommendation of a May 15 opening for sablefish for safety reasons, and the later in the year, the more separation of the stocks. Last year's data can be skewed because some boats were prospecting for halibut.

Ed Fuglvog, Petersburg. Thinks May 15 opening date for sablefish may be going too far at this time; still don't know what IPHC may do with halibut opening dates and there are not enough data regarding the depths. Thinks the May 15 date may be an effort to push later openings and force fishermen to choose between fisheries. Recommend May 1 opening.

Thorne Tasker. Have already bought longline pot gear to fish cod. The Council should promote a fishery which has tremendous potential and no bycatch. Doesn't think there is that great a possibility for gear conflicts.

Dave Benson. Supports a delay in the flatfish opening; however, would like to see a 20% bycatch allowed on these species as was the case this year to avoid waste. The pelagic trawl definition has been changed twice in the last six months; not happy about that. A lot of effort to change gear over

in response to Council action and doesn't think the Council's goals are best served by this. The last definition seemed pretty effective in decreasing bycatch with 32" mesh. Most observers are not even trained to know the difference between the mesh sizes.

David Little. The AP recommendation for a May 15 opening date for sablefish is predicated partially on information that bycatch will be reduced by starting after halibut the halibut opening. If halibut opening doesn't appear earlier, then it doesn't make any difference - May 1 or May 15. The Council should send a message to IPHC regarding the May 15 date and the reasons for choosing it. Regarding the pelagic trawl definition, some bycatch is being experienced because of the definition and experimenting with nets.

D-2 GOA Groundfish

Chris Blackburn, Alaska Groundfish Data Bank. Supports AP recommendation for apportionment of pollock and delay of the 2nd quarter pollock season to the opening of the Bering Sea pollock season. Although bottom trawl survey shows stocks have increased, conservatism is still necessary because there are some low year classes coming through the fishery.

Linda Kozak, KLVOA. Supports halibut cap of 1,250 mt for longline fishery in the Gulf for 1991. Suggested apportionment by trimester to spread out the cap: 30/40/30 split. Recommends exemption for pots in the Gulf; there are no mortality data on pots and exclusion devices weren't required until middle of August; data from before then will not be relevant.

Jeff Stephan, UFMA. Recommends that pots for Pacific cod be exempt from halibut PSC limits.

Jack Hill. Agrees with Jeff Stephan's testimony.

Gregg Williams, IPHC. Suggests that in principle a limit be put on bycatch rate for the pot fishery; however feels data are insufficient at this time to impose such a restriction. Recommends a one-year exemption for the pot fishery so 1991 observer data can be used.

Hans Hartmann. Recommendations for an increased pollock TAC should be viewed with caution. He doesn't agree with the method used to determine the biomass. The SAFE document does not take into consideration the interaction between pollock and the sea lion which is a threatened species.

LaMar Cotten, Aleutians East Borough (Sand Point, King Cove, False Pass, Nelson Island, and Akutan). Would like to see the proposed Pacific cod TAC of 25,000 mt for the Western Gulf increased. They proposed that the Gulf allocation for cod be split as follows: approx. 38,000 for the Western Gulf, 38,000 for the Central Gulf, with the remaining quota for the Eastern Gulf.

John Henderschedt/George Anderson. Golden Age/Fishing Co of Alaska. 1991 rockfish ABCs are a disappointment. Research is needed to accurately estimate the size of this stock. Mr. Anderson told the Council that an emergency is arising in the rockfish fishery and stressed the need for an emergency plan. Concerned now about the biomass assessments which came from a trawl survey done only every three years and which do not accurately assess the biomass of rockfish. They are going to have to forego up to \$60 million in revenues for the next three years because of inaccurate data.

John Dolese, Emerald Resource Mgmt. Supports pollock TAC of 133,400 mt for the Gulf, but not delaying season to June 1. Justifications given for this proposal are essentially economic, not biological.

Brad Resnick, Aleutian Dragon. Supports AP recommendations for Gulf TACs. Also supports simultaneous opening of second quarter pollock in GOA with June 1 opening in the Bering Sea. Concerned about making any significant changes in Gulf management areas at this time.

Joe Plesha/Don Rawlinson, Trident Seafoods/Peter Pan Seafoods. Regarding the Pacific cod apportionment among the Western, Central, and Eastern districts of the Gulf of Alaska. The trawl survey indicates that 33% of the total Gulf of Alaska cod biomass was in the Shumagin area, 40% in the Chirikof, 22% in Kodiak and 5% from Yakutat west. The Plan team has recommended that the ABC be distributed 33% to the Eastern district, 62% to the Central district, and 5% to the Eastern district. They are concerned that the bulk of the Central district harvest comes from the Kodiak area and that would mean fishing on a biomass that is not as strong as the allocation would indicate. They suggested a redistribution of the Chirikof quota into the Western District.

Steve Hughes, Midwater Trawlers. Supports ABCs as recommended by the SSC. They have a serious problem with the rockfish assessment in the Gulf. They suggest using a chartered fishing vessel using their gear and methods of operation to gather more relevant data. Prefer same program same as last year for halibut PSCs in the Gulf, and for one more year, an exemption of the cod pot fishery from the halibut cap.

Paul Clampitt, F/V Majestic. Doesn't understand the reduction of the blackcod quotas in the Gulf. This will cause considerable economic loss. Half of the quota was left unharvested in the Western Gulf last year; it doesn't make sense. Apportionment of the PSC will drive both Pacific cod and sablefish fisheries.

Mel Morris, All Alaska Seafood. In favor of June 1st opening for the 2nd quarter pollock fishery in the Gulf.

Doug Gordon, AHSFA. Synchronizing second GOA pollock season with the June 1 Bering Sea non-roe season is consistent with their organization's support of synchronizing the opening of all trawl fisheries.

Ken Allread. Supports Gordon's comments on opening of the 2nd quarter pollock season. Keep halibut PSCs at current levels and splits.

Dan Hamblin/Stoian Iankof, F/V Vanguard. Support the 2,000 mt halibut PSC allocation and a June 1 opening for the 2nd quarter pollock season in the Gulf.

D-3 BSAI Groundfish

Matthew Weber, Gorton's of Gloucester. Underscored the need for careful deliberation of pollock quota. Right now there are few pollock products available because of unprecedented closure of the 1990 pollock fishery. Urged a pollock TAC equal to ABC for all areas for 1991. Also, urged development of disincentive bycatch programs.

Bruce Cotton, Long John Silvers. Stressed the need for a consistent supply of quality pollock and cod products.

Lana Hobbs, Jack Swafford, Bob Bowers, Ocean Trawl. Alaskans are employed on these vessels and that income is spread throughout the state. Decisions made by the Council have a direct effect on employees of the industry and their families.

Hans Hartmann, Kathleen Matthews. Referred to his previous testimony.

Bert Larkins, AFTA. ABCs are conservatively set; existing DAP industry has the capacity to take the entire 2 million mt in the Bering Sea this year. Recommend setting TAC equal to ABC for cod, turbot, perch, rockfish, sablefish, Atka mackerel, etc. This would leave around 1.7 million mt to divide between Eastern Bering Sea/Aleutian Islands pollock and flounders. Pointed out that shifting the pollock season away from the January-March period would reduce fishing efficiency, product recovery rates, and product value. If nothing else, they need the month of February in particular for pollock.

Peter Fox, Specialty Foods Inc. They manufacture dry mixes used in processing fish. Council decisions also have a profound effect on those who service the fishing industry.

Steve Hughes, Midwater Trawlers. Supports AP recommendations for TACs. Does not support seasonal split for Pacific cod. Support quarterly allocation of halibut PSCs: 40/25/15/20. Also can see merit in allocating halibut and king crab PSC for flatfish by quarter.

John Henderschedt, Golden Age Fisheries. Favors AP recommendations for TAC and bycatch allocations.

George Anderson, Fishing Company of Alaska. As in the Gulf, he feels that the BSAI trawl survey does not accurately assess the rockfish on the slope. Industry can live with the SSC recommendation for ABC although all participants know that the slope rockfish assemblages are much higher than shown in the SAFE document. Urged caution regarding the new overfishing definitions; need a better assessment for rockfish in both the Gulf and BSAI. They are prepared to gather information for the Council's next meeting if they wish to put it on the agenda.

Daniel Hamblin, Kodiak. Doesn't fish the Bering Sea but is affected by what goes on there. Supports a January 1 opening for pollock in the Bering Sea with a conservative percentage for the roe fishery. Also urged some kind of research into Davidson Bank or a separate management area excluded from Gulf stocks. Supports smaller management area breakdowns in the GOA.

David Benson, Ocean Enterprise. Need research on several species. Supports TACs proposed by the AP. Concerned about the lack of research for rockfish, turbot, and Atka mackerel; he feels there is a higher abundance than current figures show. In the future more observer data should be used; the Council also needs to look at the whole picture to determine what effect decisions for one fishery may have on other fisheries. Advocated retention of bycatch.

John Iani/Greg Baker. Concerned over the status of pollock stocks in the Bering Sea and support conservative apportionment to roe season--25-30%. Effects of fishing on roe-bearing stocks have not been determined and they don't want to take a chance. Suggested that if the Council is going to change the opening date for pollock in the Bering Sea, then it should also be changed in the Gulf to coincide. Strongly urge a conservative TAC for pollock as advised by AP -- 1.3 million in the Bering Sea for 1991.

Paul Fuhs, Unalaska/Dutch Harbor. Supports AP's recommendations, especially for pollock because of the uncertainties of unreported discards, bycatch, and fishing in the Donut. Favors the proposed split season: 25% during roe-bearing season and 75% during non-roe season. An August start date for second season would be better.

Doug Gordon, AHSFA. Urged conservatism when setting pollock TAC; supports AP recommendations; but would support no greater than 1.3 million mt for pollock; and 229,000 mt for cod. Still concerned that there's not a good handle on commercial fishing mortality. Supports AP recommendation of 40/60 split for roe and non-roe season. With regard to cod proposal--oppose emergency rule for allocation of cod species; also oppose quarterly apportionment of halibut PSC,

but if the Council does apportion, they would support a split of 40/25/15/20. Supports synchronized openings in the Bering Sea for trawl fisheries.

Steve Finley, Emerald Seafoods. Recommended a pollock TAC of 1.5 million and 200,000 mt for yellowfin sole. They do not want any JVP for yellowfin sole. Request as much pollock TAC for first season as possible, and to get them through the first week of March. Supports Bert Larkins' comments on product recovery rates. Also, changing season dates this late can be very difficult for some industry participants.

Jim Beaton, Yukon Queen Fisheries. It's necessary to coordinate the Pacific cod and pollock fisheries. They are freezer longliners and it will be economically difficult if the fisheries are taken in a rapid fashion. Suggested a season split of 30/20/20/30 for cod would have the advantage of spreading the fishery out over year.

Dave Shoemaker, Empire Alaska Seafoods. Concerned for the freezer longline group; they need stocks to keep them surviving throughout the year. If there is excessive trawl effort early in the year the longliners will be put in a very uncomfortable situation. The Council should consider those who have elected to use longline gear because of the long-term effect on targeting Pacific cod.

Mark Antonsen, Elizabeth Hasdorf, Bill Atkinson. Antonsen: represents a major European buyer whose needs are approximately 15-20,000 mt of high quality at-sea codfish per year. They have developed a good market for high quality Pacific cod and would like to see a uniform supply throughout the year. Hasdorf, Icey Bay Seafoods: Supports an apportion for Pacific cod TAC in BSAI between the 1st and 2nd quarters which will allow 35-50% of the TAC available for harvest in the second half of the year. Worldwide shortage has given Alaska an opportunity to develop new cod markets; uniform, year-round supply is absolutely necessary. Atkinson, Alaskan Frontier Co: Favors a split season for Pacific cod in the Bering Sea, 30%/20% to first and second quarters to maintain stability for cod resource in long term and to provide stability in the market place.

Thorn Smith, Freezer Longliners. Supports an emergency rule to apportion Pacific cod TAC and halibut PSC, 35%/25% to first and second quarters and to synchronize openings of all groundfish fisheries. They only fish Pacific cod so they're very concerned over the status of the stocks.

Paul Clampitt, Jack Knutsen, Mark Lundsten. Support quarterly allocations of pollock: 30/20/30/20. Some longliners are considering a directed fishery for turbot in the summer; their gear type has a better bycatch record and it would be at a different time of year. The sablefish fishery in the Aleutians is on the decline, but the recommended TAC is too low; the area is not frequented by very many other fishermen.

Fred Yeck, Oregon. Supports AP recommendations for TACs and quarterly PSCs to help spread out the fishery. Opposes quarterly allocation of cod. Supports a 40%/60% split for the pollock seasons. Opposes a delayed season opening for pollock.

Mick Stevens, Ocean Phoenix. Concerned about the AP recommendation on pollock in light of the increased ABC. They recommend 1.5 million tons for pollock and 206,000 mt for cod. January and February and autumn months are needed for pollock, particularly January and February when roe adds value to the product.

Don Johnson, F/V Margaret Lynn, part owner Ocean Phoenix. When making allocations the Council should keep in mind that they have "Americanized" as Magnuson intended.

Scott Hovik, Ocean Phoenix group. Has fished pollock since joint ventures started. They should not be lumped in with the factory trawlers. If anything, they should be categorized with the shorebased fleet and not constrained by regulations to limit factory trawlers.

Stan Hovik, Ocean Phoenix group. Pollock is his entire fishery - doesn't have the options of crab, herring, etc. They need pollock in early part of the year when economic return is best.

Marvin Stone, Ocean Phoenix group. He's seen fisheries continually go; first limited entry, and then joint ventures phased out; now it's the same thing. Wants to be independent; need a quota and a chance to fish.

Peter Garay, Master/Ocean Phoenix. A lot of people came over to fishing from oil tankers thinking they had a possibility of a long career. Support industries also depend on Council decisions. Urged the Council to consider the long-range planning necessary in the business so that they can plan, and make a living for their families.

Robert Wurm, KLVOA. Urged the Council to pass an emergency rule for seasonal allocation of cod in the Bering Sea. He's concerned that with the new distribution of pollock and yellowfin sole fisheries there will be a shift into Pacific cod, particularly during the spawning period.

Dave Galloway, Profish: Agrees with Pete Garay's testimony. Regarding pollock allocation, they need at least 600,000 mt during the "A" season. Urged the Council to look at the larger picture of moratorium issues, artificial OY cap, etc.

Phil Kneisley, MRC. They are a group of American boats interested in working with joint ventures in a flatfish fishery. They realize the amount to be apportioned is smaller, but request any excess to be apportioned to JVP with bycatch allowances. If that's not possible, asked the Council and Regional Director to consider a timely reallocation of flatfish if it becomes clear that DAP will not harvest it all.

Bob Morgan, AFTA. Reaffirmed their position on a moratorium on fishing in the Donut and urged an aggressive position with the government to close this area to all fishing. They performed a test fishery and found little available and feel it just allows a staging area for illegal fishing in U.S. waters.

Arni Thomson, ACC. Regarding the Amendment 16 revised bycatch program, there are advantages, i.e., the crab fisheries are rebounding. Disagrees with AFTA's claims that groundfish industry lost more than \$140 million in revenues because of closures; he thinks it is more like \$30-\$40 million. Supports Amendment 16.

David Little, Clipper Seafoods. Regarding the emergency rule for quarterly allocation of cod in the Bering Sea, they feel it's important to protect cod during spawning period. Without quarterly allocation, the fishery would probably end within a couple of months and they would move to other fisheries, causing other problems.

Dave Fraser, Cape Flattery Fisheries. Encourage support of AP recommendations.

John Dolese, Swan Fisheries. Recommend a pollock TAC between 1.4-1.5 million mt and only DAP on flatfish. Still question the validity of apportionment between roe and non-roe seasons. These are allocative measures, other measures should be used instead. Continue to advocate measures to maximize full utilization of fisheries resources.

General Comments

Jay Hastings. Per written handout (Secretary did not get a copy for the record).

George Anderson, Fishing Co. of Alaska. It has become clear at this meeting that there is a need for limited access in Alaska. The sablefish IFQ system may not be perfect but it's a start; it's sensitive to protect slope rockfish and sablefish. Industry is ready to fund a rockfish limited access analysis.

Harold Jones. Regarding halibut bycatch, a lot of time is spent determining how to count halibut bycatch, but not enough is spent on education on how to avoid it or get it back into the water alive. Need more effort in designing trawls, research on how to avoid bycatch, and education on how to treat the fish once it's on board.

Paul Fuhs, Dutch Harbor/Unalaska. NMFS presence in Dutch Harbor is important but they are having a problem finding space. GSA invitation to bid was not tenable; asked the Council to write a letter to expedite re-bidding process by GSA.

John Dolese, Emerald Seafoods. Would like Council to base future bycatch programs on proportional value so a low value fishery can't close down a high value fishery.