


MEMORANDUM

TO: Council, SSC and AP Members

FROM: Clarence G. Pautzke  
Executive Director 

DATE: January 3, 1995

SUBJECT: Staff Tasking

ESTIMATED TIME 3 HOURS
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**ACTION REQUIRED**

Review amendment proposals and determine which to process further.

**BACKGROUND**

For reference, Item D-3(a) is a status report on Council projects, including major plan and regulatory amendments in progress.

In December, the Council delayed until this meeting a review of amendment proposals received during the summer and fall months. The Plan Teams reviewed the proposals at their November meeting and the Plan Amendment Advisory Group met to review them during the December Council meeting week. Their reports are re-copied here for reference (Item D-3(b)). Item D-3(c) is a transcript of public comments received at the December meeting on some of the proposals. A few copies of the entire package of amendment proposals are available for reference.

**STATUS OF COUNCIL TASKING**

January 5, 1995

	<b><u>ACTION</u></b>	<b><u>STATUS</u></b>	<b><u>TASKING</u></b>
<b>REPORTS:</b>			
1	Pacific Pelagics Management	Report in April 1995	Region/Council
2	Halibut Charter Cap	Report in January 1995	Council
3	Opilio Bycatch	Report in January 1995	Region
4	Full Utilization/Harvest Priority	Report in April 1995	Region/Council/Center
5.	Observer Program - Qualifications & Training	Report in January 1995	Council, Center, OOC
<b>REGULATORY AMENDMENTS:</b>			
1	1995 Reporting/Recording Requirements	Being developed by NMFS	Region
2	Directed Fishing Standards	Proposed Rule in DC	Region/Council
3	Pollock 'A' Season Start Dates	Final Rule on December 16 Effective January 12, 1995	Council/Region
4	Salmon Bycatch cap in CVOA	Emergency Interim Rule Effective August 15, 1994	Region
5	Seamount Restrictions	Review in January 1995	Region
6	Halibut Grid Sorting	Review in January 1995	Council/IPHC
7	Relax Halibut Fixed Gear PSC	Proposed Rule in DC	Region
8	Omnibus IFQ Reg. Amendment	Proposed Rule in DC	Region

	<u>ACTION</u>	<u>STATUS</u>	<u>TASKING</u>
<b>PLAN AMENDMENTS:</b>			
1	Moratorium	Passed by Council in Dec. New rulemaking in preparation	Council/Region
2	Sablefish/Halibut IFQs	Final Rule on Nov. 9, 1993. Discuss in January 1995	Council/Region
3	NPFR Plan	Final Rule Published Sept. 6, 1994. Fee begins in 1995.	Council/Region/Center
4	Pribilof Closures	Approved December 30. Effective mid-February 1995	ADFG/Region
5	Salmon Retention/Delivery	Proposed Rule in preparation	Region
6	Salmon Bycatch Program (Foundation)	Review in January 1995	Region
7	Chum Salmon Hotspot Authority/Bycatch	Review in January 1995	ADFG/Council
8	Chinook Salmon Hotspot Authority/Bycatch	Review in April 1995	ADFG/Council
9	Comp. Rationalization Plan (a) License Limitation (b) IFQ Program	(a) Final Review in April 1995	Council Council
10	Scallop FMP/Moratorium	Proposed Rule in Preparation Discuss in January 1995	Region/Council
11	Mesh Size Amendment	Action in Sept. 1994/Dec. 1994. Proposed Rule in preparation	Council/Region
12	Total Weight Measurement General Fisheries	Action in Sept. 1994. PR in preparation.	Region
13	Inshore/offshore continuation	Analysis in April 1995	Council
14	CDQ Compensation exemption & one-time transfer	Final Review in January 1995	Council
15	Allow freezing of non-IFQ species/prohibit halibut catcher QS use on FLs	Proposed Rule in preparation	Council/Region

	<b><u>ACTION</u></b>	<b><u>STATUS</u></b>	<b><u>TASKING</u></b>
16	Pollock CDQ rollover	Analysis in April 1995	Council
17	Distribute halibut PSC savings	On hold pending other actions.	Council
<b>OTHER ACTIONS:</b>			
1	April 24, 1994 Scallop Control Date	Published on June 15, 1994	Region
2	Halibut Charter Control Date	Never published in F.R.	Region
3	Bristol Bay Crab Bycatch Control Measures	Emergency Rule in DC. Discuss in January 1995	Region/ADFG/Council
4	1995 Groundfish Specifications	In preparation	Region

Groundfish amendment proposal rankings by Plan Teams						Rankings				
No.	Proposal	Area	Action Required	Staff Time	Priority	Comments				
Block 1	<i>Allocate GOA Pacific cod</i>	GOA	Plan Amendment	H	L	allocations require underlying rationale and data analysis; would increase efficiency				
1	to fixed gear									
7	among gear based on recent historical gear shares					vote: 5L, 3M, 2H				
12	to jig gear									
13	to jig gear, 33 %									
14	to jig gear, 33 %									
20	to trawl (55%), fixed gear (45%), jig (5%)									
Block 2	<i>seasonal apportionment</i>		Regulatory Amendment	M	M	pursue spreading catch over the year				
8	seasonal apportionment					vote: 4L, 5M, 1H				
19	seasonal apportionment									
Block 3	<i>GOA Pacific cod</i>	GOA	Regulatory Amendment	M	M	require interacting with state government - evaluation of crab survey data already ongoing				
2	open state waters from Sept to end of year	(State)				vote 3L, 4M				
11	8,000 mt for western GOA state waters to gig and pot fisheries	(State)								
Block 4	<i>Bering Sea Pacific cod</i>		Regulatory Amendment	L	L	cod model complete; can evaluate allocation alternatives				
15	Allocate between fixed gear (75%) and trawls (25%)	BSAI				vote: 6L, 1M				
Block 5	<i>license limitation</i>		Regulatory Amendment	H	L/M	license limitation requires substantial effort; already being addressed by Council under CRP				
22	license limitation for southeast Alaska DSR	GOA				vote: 3L, 3M				
4	set second class of permits for CRP	BOTH								
Block 6	<i>forage fish</i>		Regulatory Amendment	L	H	limited biol. info., but is already summarized; economic analysis tied to uncertain biol. info.; if collapse of fishery is casually related, there are increased economic implications				
5	prohibit commercial fishing for capelin	BOTH				vote: 2L, 6H				
6	prohibit commercial fishing for capelin, sand lance, and other fish	BOTH				need to look at many years of data for fishing pattern analysis				
Block 7	<i>area registration</i>		Regulatory Amendment	H	L/M	vote: 4L, 4M, 1H				
9	area registration for pollock and Pacific cod (or catcher boat trip limits)	GOA								
10	area registration for pollock and Pacific cod	BOTH								
Block 8	<i>trip limits</i>		Regulatory Amendment	M	L	data available/needs analysis; less intensive analysis than area registration				
17	trip limits for central GOA for Alaska pollock	GOA				vote: 6L, 4M				
Block 9	<i>species TACs</i>		Regulatory Amendment	H	H	complex analysis to include ecosystem concerns; possibly requires evaluation of 2 m lb OY				
16	BSAI jig fishery species TACs	BSAI				vote 1L, 5M, 7H				
21	BSAI species TACs for pollock and other species	BSAI								
Block 10	<i>other</i>		Regulatory Amendment	M	L	requires modelling of alternatives for economic analysis				
3	set base amount of halibut PSC on historical performance	BOTH								
Block 11	<i>pollock B season</i>		Reg./Plan Amendment	M	M	data analysis need to be done for rock sole; done for other species in August 94				
18	move back pollock B season start	BSAI								
24	move back pollock B season start									
23	split rock sole into A and B season									
Block 12	<i>FMP update</i>	BOTH	Plan Amendment	L	L	administrative update of FMPs (tables, figures, revise foreign fishing and JVP discussion)				
25	Fishery Management Plan update					vote: 7L, 3M, 1H				
Block 13	<i>sablefish IFQ</i>	BSAI	Regulatory Amendment	Unrated	Unrated	received after Plan Team meeting				
26	no closure for sablefish in the BSAI during the winter									

**Report of the Plan Amendment Advisory Group  
North Pacific Fishery Management Council  
December 6, 1994**

The Council's Plan Amendment Advisory Group (PAAG) met Thursday, December 6 from 8:00 - 9:30 p.m. to review 28 groundfish amendment proposals. Chairman Mace reviewed the procedure whereby the PAAG was requested by the Council to review the amendment proposals. The Council did not solicit a call for proposals this past summer due to the press of current projects. However, the Council received about 20 groundfish proposals by the September Council meeting. The Council requested that the Gulf of Alaska and Bering Sea Plan Teams rank the proposals and provide recommendations to the Council's Plan Amendment Advisory Group. The Council requested that the PAAG also review and rank the proposals for the Council's consideration at the December Council meeting.

A total of 25 proposals were reviewed and ranked by the Plan Teams. The Teams blocked the 25 proposals into 12 blocks of similar management action. They identified the area affected, whether it would require a plan or regulatory amendment, the relative amount of staff time to prepare the amendment, and its priority relative to current management actions being considered by the Council. The results are listed in the first attached table.

The committee deliberated over the approach in which to evaluate the proposals (including three additional proposals not received by the Plan Teams). The committee identified that most proposals addressed symptoms of current management regimes, and not the problem of over-capitalization. Most proposals were allocative and would likely be addressed under Comprehensive Rationalization Program currently under consideration by the Council (proposal #4 is already being considered under CRP) The committee acknowledged the importance of each proposal to its requestor, and chose to defer ranking of those proposals to the full Council.

The committee, however, did group the blocks identified by the Plan Teams further to simplify the decision-making process. The proposals were divided into allocative and non-allocative issues. The committee ranked the non-allocative proposals on a relative scale:

<b>BLOCK</b>	<b>RANK</b>
6	M
10, broaden to include all fisheries	H
12	L

The allocative issues were further grouped into six categories, but were not ranked:

<b>CATEGORY</b>	<b>BLOCK</b>
<u>Gulf of Alaska</u>	
1. Pacific cod gear allocations	1, 3
2. season extensions	2, 5, 7, 8.
<u>Bering Sea/Aleutian Islands</u>	
3. groundfish OY	9
4. pollock & rock sole A/B season apportionments	11
5. Pacific cod gear allocations	4
6. sablefish IFQs	13

The PAAG discussed the Council's heavy management schedule and the current level of staff tasking. The committee recommends that the Council consider the short-term benefits of the proposals to industry against the long-term benefits of CRP and other comprehensive management alternatives before the Council.

Jay E. Stinson  
PO Box 3845  
Kodiak, Alaska 99615  
(907) 486-6933

Richard B. Lauber, Chairman  
Clarence Pautzke, Executive Director  
North Pacific Fishery Management Council  
PO Box 103136  
Anchorage, Alaska 99501

Re: Regulatory Amendment for Quarterly Apportionment of the Pollock TAC in the Eastern Gulf of Alaska.

Dear Mr. Lauber and Mr. Pautzke,

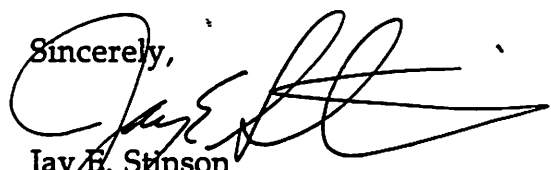
Because of the reduced pollock quota in the eastern gulf of Alaska, controlled management of the fishery will become increasingly difficult without certain measures being taken to safe guard the stock from over exploitation.

Consequent to ocean currents in the gulf, this spawning stock is extremely critical to the continued health and viability of down-current fishing stocks in this area of 630, 620 and eventually 610. By putting the eastern gulf pollock into quarterly apportionment, the risk of over exploitation of the spawning stock is reduced.

Additionally, by spreading fishing effort out over more of the year, there is less potential impact on the marine mammal stocks in the area. Although the sea lion stocks in this area seem to be doing better than in other portions of the state, it is extremely critical to protect and husband any and all of these animals.

In conclusion, quarterly fishing allotments would reduce the potential for over harvesting of this stock, and would reduce the potential for adverse impact on marine mammal stocks in this area.

Sincerely,



Jay E. Stinson  
Owner F/V Alaskan

28  
block 2

Paul Finzer  
PO Box 4363  
Kodiak, Alaska 99615  
(907) 486-6234

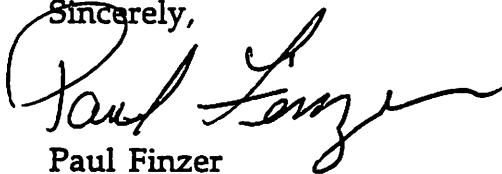
Richard B. Lauber, Chairman  
Clarence Pautzke, Executive Director  
North Pacific Management Council  
PO Box 103136  
Anchorage, Alaska 99501

Re: Trip limits for Pollock in Eastern Gulf of Alaska

Dear Mr. Lauber and Mr. Pautzke,

In order to protect the pollock spawning stocks in the eastern gulf of Alaska, and to better control the rate of harvest to lessen likelihood of over-harvesting, trip limits should be considered as a management tool in this area. Because of the reduced biomass in the gulf, spawning stocks need to be managed with minimal biological impact and maximum control. Maximum economic utilization of the resource needs to occur, particularly for some of the communities of the central and north gulf coast. One hundred ton trip limits would address these concerns.

Sincerely,



Paul Finzer



**GROUND FISH FISHERY MANAGEMENT PLAN AMENDMENT PROPOSAL**  
**North Pacific Fishery Management Council**

**Name of Proposer:** Scientific and Statistical Committee  
**Address:**  
**Telephone:**

**Date:** 12/7/94

**Fishery Management Plan:** GOA/BSAI Groundfish

**Brief Statement of Proposal:**

Reconsider overfishing definition to provide buffer between ABC and OFL and to respond to "Scientific Review of Definitions of Overfishing" prepared for NMFS.

**Objectives of Proposal: (What is the problem?)**

Problems have occurred in the groundfish specification process when ABC and OFL turn out to be the same. Conceptually, ABC should be a "target" and OFL should be a "threshold" level to be avoided, so that there should be a buffer between them.

**Need and Justification for Council Action: (Why can't the problem be resolved through other channels?)**

The OFL process is specified in the plans. The Teams sometimes adjust the ABC downward to provide a buffer. The SSC does not agree with this approach and the desirability of the downward adjustment has not been evaluated. The "Scientific Review" claims that the NPFMC overfishing definition is somewhat ambiguous and may not be conservative in some cases. It recommends an evaluation mechanism based on recruitment falling to 1/2 the pristine level that may not be appropriate. The Council should be proactive in addressing overfishing.

**Foreseeable Impacts of Proposal: (Who wins, who loses?)**

Evaluation of the OFL process is needed to provide credibility for the desired conservatism of the NPFMC TAC's, ABC's, and OFL's. Overfishing is one of the most important issues in fisheries management at the current time, and the Council needs the assurance that its management avoids overfishing.

**Are There Alternative Solutions? If so, what are they and why do you consider your proposal the best way of solving the problem?**

NO

**Supportive Data & Other Information: What data are available and where can they be found?**

"Scientific Review of Definitions of Overfishing in U.S. Fishery Management Plans" by A. Rosenberg, et al. (1994).

**Signature:**

*Thomas J. Z. II, Chair, SSC*

December 11, 1994

Public Testimony on Groundfish Amendment Proposals  
(by those who will not be present at the January meeting)

Agenda D-4      Groundfish Amendment Proposals

Mike Tolva, F/V Ferrara Sea, Homer: We'd like to see you guys make the new no-trawl zone a permanent rule and that it should be closed to all trawling to simplify enforcement for the Coast Guard and then for PSCs we'd like to see them enforced with zero tolerance and then we'd like to know how you would do this because it hasn't been done to date. Then, also we'd like to see the bairdi PSC reduced to 1.5 million crab, and that's all I have.

Kris Wyatt, F/V Diamond Head, Homer: The only thing I have to add to what Mike said is I'd like to see a PSC on king crab lowered to 65,000; I'd like to see a PSC established on opilio at no more than 4 million crab.

Mako Haggerty, North Pacific Fisheries Assn: I'd like to speak to P. cod in the Gulf and allocations. The City of Homer passed a resolution and I think it made it into the record, but basically, "Be it further resolved that the City Council of Homer, Alaska, respectfully requests the North Pacific Fisheries Management Council to allocate the total allowable catch for Pacific cod season in the Gulf of Alaska on a quarterly or trimester basis, whichever best accomplishes the goal of extending this fishery through the year." My association, North Pacific Fisheries Association, we believe that the P. cod quota in the Gulf of Alaska should (1) be divided up into two or more seasons, and (2) be allocated by gear type. Basically, I'll just cut it short, we think something needs. . .we would like the Council to address a different way to allocate P. cod so that it's spread throughout the year and more fishermen have an opportunity to prosecute that fishery at a time when the flesh of the fish is more marketable. And, the way that fishery is prosecuted now in the Gulf, it basically ends in March and we lose market continuity. We'd like to maintain market continuity; we'd also like to bring a better product to the market, and we can do that better if we're allowed to catch that fish later on in the years.

Ken Adams, Cordova. I'd like to enter into the record three resolutions which are offered in support of a proposal, that I submitted to the Council. One resolution is from the City of Cordova, one from the Native Village of Eyak Tribal Council, and a similar letter of endorsement from Cordova District Fishermen United. The intention of my comments concern increasing the opportunity for diversity for small boat fishermen in the Gulf of Alaska. The means I offer to accomplish this is to establish gear type allocations for Pacific cod in the Gulf of Alaska, and to initiate discussion to establish gear type allocations similar to what the Council has already done for the Bering Sea and Aleutian Islands. There is a problem, and I should say ;that although the Council hasn't issued an RFP, the fact that the Council has received a number of proposals which are Pacific cod-related, I think is symptomatic of a problem. The problem from the perspective of small-boat fishermen is the fact that small-boat operators are preempted, preempted by the dragging harvesting component which in the Western and Central Gulf in the last couple of years has harvested approximately 70% of the P. cod, and in effect preempted small-boat fishermen. I've heard you gentlemen deliberate about the need to maintain stability with respect to the CRP eventual implementation. Well, I would offer to you that to establish the CRP without some type of gear type allocation only ensures preemption for the small-boat fishermen. That's the basis of my remarks.

[end of testimony on this subject]

# CITY OF CORDOVA

AGENDA D-3  
JANUARY 1995  
SUPPLEMENTAL



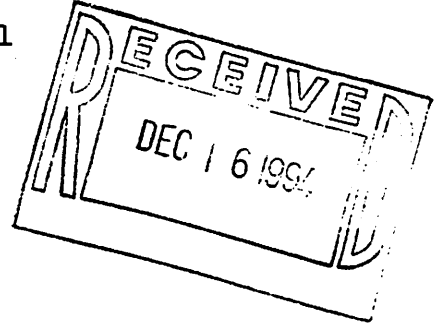
December 12, 1994

To: North Pacific Fishery Management Council  
P.O. Box 103136  
Anchorage, AK 99510

From: Cordova City Council

Attention: Chairman Richard B. Lauber

Re: City of Cordova Resolution 12-94-69



The Cordova City Council at its regular meeting held December 7, 1994 unanimously approved the attached Resolution 12-94-69 in support of Kenneth Adams proposal to the NPFMC to initiate gear type allocations for Pacific Cod in the Gulf of Alaska to create additional fishing opportunities for local fishermen.

Your consideration is appreciated.

Lynda Plant  
City Clerk

CITY OF CORDOVA, ALASKA

RESOLUTION 12-94-69

WHEREAS, Cordova is a community with an economy based largely on fisheries; and

WHEREAS, the spring herring fisheries have failed in Prince William Sound and will likely remain in poor condition for several years; and

WHEREAS, implementation of IFQ's for halibut and sablefish by the Federal Government will reduce the ability of Cordova's and other Alaska coastal communities' fishermen to participate in these fisheries; and

WHEREAS, trawlers fishing in the winter quarter of the calendar year currently harvest approximately 68% of the total allowable catch of Pacific Cod in the Gulf of Alaska and cause an early closure of the fishery; and

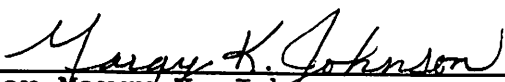
WHEREAS, many small boat fishermen are more dependent upon weather conditions which are more likely to be favorable in the spring and beyond; and

WHEREAS, Pacific Cod appear to be more abundant in local waters in the spring and beyond;

WHEREAS, an extension of fishing time for Pacific Cod, the desired goal of the accompanying proposal, would be of benefit to local fishermen and processors alike;

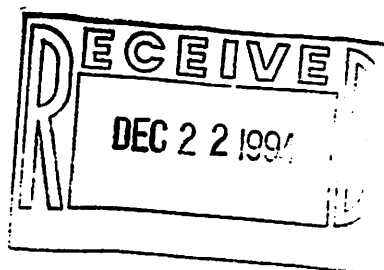
NOW, THEREFORE, BE IT RESOLVED that the City of Cordova, Alaska, supports the proposal of Kenneth Adams to the North Pacific Fisheries Management Council (N.P.F.M.C.) to initiate gear type allocations for Pacific Cod in the Gulf of Alaska to create additional fishing opportunities for local fishermen to diversify their efforts.

PASSED AND APPROVED THIS 7TH DAY OF DECEMBER, 1994.

  
\_\_\_\_\_  
Mayor Margy K. Johnson

  
\_\_\_\_\_  
Lynda Plant, City Clerk

Kenneth M. Adams  
P.O. Box 1855  
Cordova, AK 99574



December 14, 1994.

Dear Council Member,

I'd like to offer the following comments regarding the December Council meeting. I'm aware of the degree of complexity of issues before the council and the thoroughness of discussion and investigation the council exhibits in attempting to resolve these issues. I recognize that the work load before you and staff is extensive, but please let me call your attention to yet another issue.

Recall the council didn't issue a request for but nevertheless received 29 proposals for plan or regulatory amendments this fall. Ten of these were Gulf of Alaska Pacific Cod related. This is symptomatic of a problem. To be specific, fishermen working largely within three miles of shore and often in small boats are being preempted from the P. Cod harvest by trawl vessels which take approximately 70% of the P. Cod T.A.C. in the western and central Gulf. The trawl effort early in the season results in a fishery that closes too soon. I've fished P. Cod with jig gear. I could barely catch a fish until practically the very day the season closed in March of 94. The fish just weren't in shallow enough until then and it's a similar story all along the Gulf shore. Jig fishermen need more time. The jig fishery is realistic only if it begins in the spring.

The Council is concerned with by-catch waste. This is certainly a high profile subject in the media these days. The Council would show good faith by facilitating the development of a clean fishing gear type such as jigging and enhancing opportunities for pot gear.

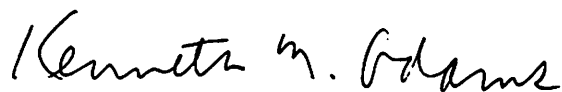
We residents of Prince William Sound and many other locations along the Gulf shore need help. In PWS we suffered through several years of poor salmon and herring returns. On top of that, with IFQ implementation just around the corner, access to those species will be severely reduced. We need to diversify fishing opportunity to survive. A P. Cod fishery opening

in the spring would offer some relief and alleviate the prospect of our financial failure.

I submitted proposal #20 in the array of proposals received by the council this fall and attempted to discuss this proposal at the end of the December meeting. There was not enough time to elaborate, but the issue is clearly one of small boat preemption in state waters by the trawl fleet under the present management regime. Perhaps my proposal which advocated trawl and fixed gear percentages for the GOA is too disruptive and controversial for the council to take up at this time. However, in the interest of fairness, please consider some relief measures for fishermen within state waters. Example: An allocation for clean fishing pot and jig gear for P. Cod in state waters or at least a jig gear opportunity beginning in the spring.

In closing, I have received from ADF&G approval for a bottomfish test fishery to be conducted quarterly in PWS. We will contrast the longline versus jig gear catch of target and by-catch species and will be happy to make the project's results available to the council.

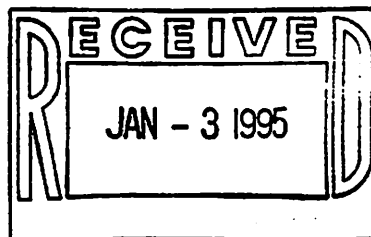
Sincerely,

A handwritten signature in cursive script that reads "Kenneth M. Adams".

Kenneth M. Adams

P6# 1

**DAVID HILLSTRAND  
BOX 1500  
HOMER, ALASKA 99603  
(907) 235-8706**



## **NORTH PACIFIC COUNCIL**

I have written and submitted proposals that need to be looked at. The council is also considering proposals before it. It is imperative that you are careful in affecting those who rely off of the fisheries at our present dates. This is just a summary of my thoughts, please read each proposal.

1. The Protected Species Caps, need to be able to go to zero.
2. Permanent area closures.
  - a. In doing so you will encourage fisheries with cleaner fishing practices. The fish need to still be harvested in these closed areas.
3. Over harvesting, due from to large of quotas, bycatch and waste, or biological factors; such as death and food for other animals. Reduce all of these factors especially bycatch and waste.
4. Tanner crab *Opilio*, and Baridi mesh size in the pots to reduce handling and mortality. Along with an increased size for *Opilio*'s to 3.75 inches.
5. Permanent area closures to protect the female and small crab from being handled by the commercial fleet.
6. Pot limits, for a more accurate CPU and in season management, increased safety, and gear conflicts.
7. Observer coverage increased at the expense of those who operate with bycatch.

*David Hillstrand*

8. Moratorium I would like to see an increase in the jig fisheries. The moratorium basically encourages clean fishing in the cross over; which is really what is needed!

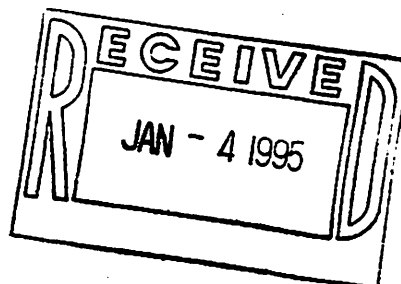
9. Hook stripers, we give them names because of what they do; crucifies! They are needed when a lot of gear is hauled! Eliminate them from Sablefish also, because of the Halibut bycatch.

10. License Limitation, chose the most current dates.

David Hillstrand



OYSTEIN LONE  
811 162ND PL. SOUTH WEST  
LYNNWOOD, WA 98037  
206-745-2778



December 19, 1994

Mr. Steven Pennoyer  
N.P.F.M.C.  
P.O. Box 103136  
Anchorage, Ak. 99510

Dear Mr. Pennoyer:

My name is Oystein Lone and I am a commercial fisherman involved in crabbing, longline, and Bristol Bay Gillnetting. This year I have been watching the development of the jigging fishery out of Dutch Harbor and elsewhere in Alaska. I am currently planning on bringing my boat up there next summner and participating in the jig fishery. But I understand that the fishery might be in danger of being shut down due to loosing its allocation. I hope this doesn't happen. This would be a great small boat fishery that would not over fish the fish stock and would enable us small guys to do something else with our boats except pay moorage. In this day when the crab fishery is dying and longlining is facing limited access I am looking at this fishery to help pay the bills and keep doing what I love to do. So please keep this fishery alive and allocate quota for the small boat fleet.

There have also been numerous other fishermen that have expressed the same concerns as mine and you will find there signatures included in this letter. We are all boat owners and have actively participated in the development of the small boat fishery in Alaska.

Regards,

*Oystein Lone*

Oystein Lone  
F/V Lone Star  
#-NWR1-006635

*Larry Peterson F/V Bandit  
Willy Lee F/V ARCTIC KNIGHT  
Palmer Sig F/V SILVER SEA  
Walter Lee F/V Marie Jensen*

# Cordova District Fishermen United

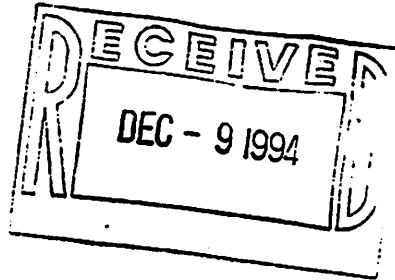


P.O. Box 939  
Cordova, Alaska 99574

(907) 424-3447 FAX (907) 424-3430

December 9, 1994

North Pacific Fisheries Management Council  
P.O. Box 103136  
Anchorage, AK 99510



Dear Council Members:

On behalf of the nearly 300 commercial fishers who comprise Cordova District Fishermen United (CDFU), I am pleased to offer support for regulations and management initiatives which allocate at least 45% of the total groundfish harvest in the Gulf of Alaska to fixed gear fisheries. In the Bering Sea, 45% of the total harvest is allocated to fixed gear and CDFU believes that a similar proposal would be appropriate for the Gulf of Alaska.

If you have any questions or require additional information, please do not hesitate to contact us at the number above. Thank you for your consideration.

Sincerely,  
CORDOVA DISTRICT FISHERMEN UNITED

Board of Directors



# North Pacific Fisheries Association, Inc.

HEADQUARTERS:

BOX 796 • HOMER ALASKA 99603

TO : NORTH PACIFIC FISHERIES MANAGEMENT COUNCIL

DATE : 1/7/95

RE : UNITED FISHERMAN'S MARKETING ASSOCIATION'S FISHERY  
MANAGEMENT PLAN AMENDMENT PROPOSAL

## GROUNDFISH FOR THE GULF OF ALASKA

NPFA would like to express support for this groundfish management plan instituting an apportionment of the pacific cod TAC by a quarterly or trimester harvesting period.

We feel we can comment better to our particular concerns during the analysis by council staff. We feel it very important to implement as soon as possible a scheme which gives the coastal fleet the ability to harvest throughout the year.

REASONS : The fisherman based out of Homer and Seldovia are currently at a disadvantage in the harvest of pacific cod. It is our experience that the main biomass of pacific cod is located offshore during the winter months. When the water temperature warms in late winter early spring, the stocks migrate inshore.

Currently the small boat fleet is at a disadvantage in harvest in the Cook Inlet area. Water temperatures warm sooner on the Alaska Peninsula and around Kodiak Island bringing the cod biomass inshore sooner. With the seasons now so short as to close in early March, the Cook Inlet area is just getting its CPUE up when the TAC is taken.

The problem here is two-fold: first since the small boat fleet starts in January and their CPUE is low, any future ITQ or IFQ catch history will not equate to the catch history of other areas to the south where the stocks amass themselves earlier and the CPUE is higher. Since the NMFS makes their assessment, we assume on one biomass for the Central Gulf, this affects the Cook Inlet region inequitably.

We also have had for four years a developing fresh pacific cod market in Korea. Achieving a steady supply throughout the year to satisfy these markets, product needs to be readily available. Only through a quarterly or trimester system at present will aid in this situation.

We thank the North Pacific Fisheries Management Council for their consideration on this proposal for analysis.

submitted by Drew Scalzi for NPFA