

MEMORANDUM

TO: Council, SSC and AP Members

FROM: Clarence G. Pautzke
Executive Director

DATE: September 15, 1993

SUBJECT: Staff Tasking

ESTIMATED TIME

2 HOURS

ACTION REQUIRED

- (a) Receive report by groundfish PAAG
- (b) Review current tasking and give staff direction

BACKGROUND

(a) PAAG Report

The Council's Plan Amendment Advisory Group (PAAG) met earlier this week to review the groundfish proposals received during this year's solicitation of proposals. They also reviewed proposals relating to management of the King and Tanner crab fisheries. Their report will be available when this agenda item comes before the Council. Copies of the proposals, along with the initial reviews by the Groundfish Plan Teams and the Crab Plan Team are also available at this time.

(b) Staff Tasking

A summary of the current status of plan amendments, regulatory amendments, and other actions in progress is found under Item D-6(b) as well as under B-3, the NMFS management report. These items are in various stages of completion, with several items still backlogged at the Proposed Rulemaking stage. Included in this list are the Moratorium and the Research Plan. Council and Region staff are working to get these and other items through the system. As the Council is aware, the Comprehensive Planning Program will take up a lot of available staff time in the next 12 months, including Council, Region, and Center analysts.

STATUS OF COUNCIL TASKING

September 15, 1993

<u>ACTION</u>	<u>STATUS</u>	<u>TASKING</u>
REPORTS:		
1 Crab Management	Discussion in Sept.	Region/ADFG/ Council/BOF
2 Full Utilization	Report in Sept.	Council
REGULATORY AMENDMENTS:		
1 Insh/Offsh/CDQ Bycatch	Passed by Council	Council/Region
2 Performance Pelagic Trawls	Effective August 19	Region
3 1994 Reptg/Recording Requirements	Being developed by NMFS	Region
4 Observer Requirements 1993	PR in Preparation	Region/Council
5 Require Offloading of PSC Species Caught Beyond EEZ	In Effect	Region/Center
6 Standard PRRs	PR published Comment period ends Sept. 23	Region
7 Pollock Roe-stripping PRR	PR published Comment period ends Sept 23	Region
8 Re-define Roe-stripping	Final Rule pending	Region
9 Gangion-Cutting/Careful Release	Effective May 15	Region
10 Hook & Line Fair Start	Effective May 11	Region
11 Define Legal Gear Types	PR in preparation	Region
12 Directed Fishing Standards	Initial review in Sept	Region/Council
13 1994 Observer Changes	Review in Sept.	Council/Center/Region

	<u>ACTION</u>	<u>STATUS</u>	<u>TASKING</u>
PLAN AMENDMENTS:			
1	Moratorium	PR in preparation	Council/Region
2	Exclusive Registration	Final review in Sept.	Council/Region
3	Sablefish/Halibut IFQs	Final Rule pending	Council/Region
4	NPFR Plan	PR in preparation	Council/Region/Center
5	Gear/Seasonal Allocations of Cod	PR in preparation	Region
6	Pribilof Closures	Initial Review in Sept.	ADFG
7	Salmon Bycatch Program	PR in preparation Discuss in Sept.	Region
8	Salmon VIP	Review in Sept.	Region
9	IFQ Block Proposals	Final Review in Sept.	State/Council
10	Comprehensive Rationalization Plan	Report in Sept.	Council
11	Subdivide Aleutians Mgmt Area	In Effect	Center/Council
12	Establish Atka Mackerel as Separate Species in GOA	PR published Commends due Sept 20	Region
13	Total Weight Measurement for CDQ Fisheries	PR pending	Region
14	Rockfish Rebuilding Amendment	Final review in Sept.	Center/Region/Council
15	Additional Marine Mammal Closures	PR pending	Region/Center
16	Scallop Management	Final review in Sept.	ADFG/Council
17	Release PSC rates by vessel name	PR in preparation	Region

ACTION

STATUS

TASKING

OTHER ACTIONS:

1 June 24, 1992 Control Date

Published June 20

Region

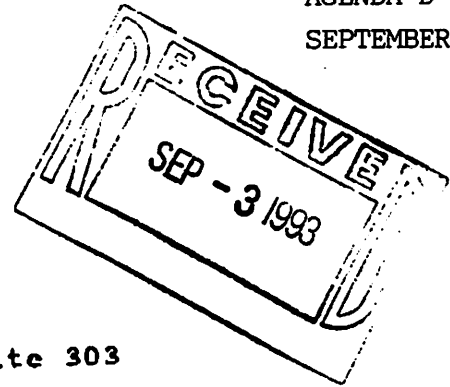
From : PROFISH INT,L

PHONE No. : 6326762

Sep.03 1993 2:53PM F01

AGENDA D-6

SEPTEMBER 1993



Walter T. Pereyra
400 North 34th Street, Suite 303
Seattle, WA 98103

September 3, 1993

Dr. Clarence Pautzke
North Pacific Fishery Management Council
605 West 4th Avenue
Anchorage, Alaska 99501

RE: Adding "C.V.O.A." to the Final Agenda for the September
Council Meeting

Dear Clarence:

Recently, an issue has come up involving the need to impose an emergency closure in the Bering Sea to prevent further incidental catches of P.O.P. These closures have the potential to create economic hardships for the offshore fleet and biological impacts to the pollock resource from possible redeployment of the fleet north into areas with small pollock.

The presence of the C.V.O.A. limits the alternatives available to the R.D. in terms of addressing the P.O.P. problem and preventing economic hardships in the fishery.

I feel we need to have some discussion on the C.V.O.A., its intent and whether or not any changes are warranted in view of recent experiences in the pollock fishery. Thus, I ask that a discussion of the C.V.O.A. be added to the September agenda.

Thank you.

Yours Sincerely,

Walter T. Pereyra

DRAFT
PLAN AMENDMENT ADVISORY GROUP (PAAG) REPORT

September 20, 1993

The Plan Amendment Advisory Group (PAAG) met on Monday, September 20 at the Council office in Anchorage. The purpose of the meeting was to review submitted groundfish plan amendment proposals and provide to the Council recommendations on which proposals should be considered for analysis during the 1994 amendment cycle.

The meeting was called to order at 8:00 am by Chairman Bob Mace. PAAG members in attendance were Wally Pereyra, Ron Hegge, Doug Eggers, Richard Marasco, Al Burch, and John Roos. Also in attendance were Clarence Pautzke, Al Millikan, Dave Fraser, Beth Stewart, and several members of the public and industry.

The PAAG heard a report from the groundfish Plan Teams who reviewed the proposals two weeks earlier. The 23 proposals, along with the Plan Teams review summary are attached. The Teams rated the proposals (High, Medium, Low, or no rating) based on priority of importance. For each proposal, the amount of staff time required to complete an analysis was estimated. Although not estimated, additional staff time would be required for rulemaking and secretarial implementation. The rationale for each priority and required staff time was also provided.

The PAAG reviewed each proposal and grouped them into three categories, with proposals ranked in priority within each of the three categories. The categories are as follows: (1) Housekeeping, (2) CRP related, and (3) Other amendment proposals. The PAAG recommends that top priority continue to be assigned to development of the Comprehensive Rationalization Plan. For the proposals categorized in the housekeeping group, the PAAG's understanding is these are proposals for which the analysis could be done with minimal staff resources from within NMFS. For Housekeeping and CRP related proposals, the PAAG identified the most important proposal, but did not rank the remainder. For the other amendment proposals, the PAAG ranked them in order of priority. These categories, and the numbered proposals as classified were:

CRP related proposals (1, 5, 6, 12, 13, 14, 16, 17, 18, and 19).

Most important: # 1, requiring total weight measurement of groundfish catch in the groundfish fisheries. The PAAG notes that this proposal is currently endorsed by the Council and NMFS staff assigned to the analysis. The PAAG's intention in recommending a high priority ranking for this proposal is to show support for departing from PRR-based catch accounting.

Housekeeping proposals (4, 7, 8, 15, and 22).

Most important: # 8, Defining satellite communication standards. The PAAG notes that this proposal has two parts: defining the standards and requiring use of satellite communication in the groundfish fisheries. The PAAG recommends definition of the standards first before requiring vessels to use satellite communication.

Second most important: # 15, eliminating requirements for net sounding devices (paper recorders). The PAAG felt this regulation is outdated and currently not enforced by NMFS.

Other amendment proposals (2, 9 and 20).

Most important: #2 and #9

Continued research needs: # 3, require a minimum mesh size restriction in the pollock and P. cod trawl fisheries. The PAAG noted the lack of selectivity data and the current research by the AFDF and University of Washington, FRI, to determine selectivity information in the BSAI pollock fisheries. The PAAG noted that this proposal is on the September Agenda as a separate action item.

Several proposals addressed similar issues and were grouped accordingly. Proposals 13, 14, 16, and 17 address salmon bycatch issues. Proposals 5, 12, 18, and 19 address changes in season opening dates for various fisheries. Proposals 2 and 23 address reductions in halibut PSC limits. The PAAG suggested that, if analyzed, these proposals could be grouped together.

For various reasons, the PAAG did not make recommendations for several proposals. The PAAG notes that although data necessary for analysis are not currently available, research on mesh selectivity should be done, as the information will be useful even after implementation of a CRP program. Proposal # 10 was dropped from consideration because NMFS does not have the authority to invalidate federal fishing permits of vessels that are delinquent in their payments for observer coverage. Proposal # 11 apparently was concerned with reinstating the use of pot longlining, but not enough information was provided for the PAAG to evaluate. Proposal # 21 was not rated as it is on the September agenda.

Regarding proposals placed into the CRP category, the PAAG's rationale for placing proposals into this category was that these topics would need to be addressed in the alternatives considered in a CRP analysis.

The PAAG also reviewed a previously submitted proposal from the SSC regarding revision of the overfishing definition for groundfish. After hearing from the SSC representatives on the PAAG, the Committee felt this proposal has merit, and should be considered after a national NMFS working group completes its review on this issue.

Recommendations on Crab FMP Proposals

The majority of proposals submitted address the issue of federal/state authority for crab management. The PAAG wishes to underscore the issues presented in these proposals, but felt that a complete FMP amendment might not be the best manner to address the concerns presented. The PAAG believes that some form of review of the plan is appropriate, perhaps through the development of a memorandum of understanding between the management agencies and/or an annual meeting between the Council and the Board of Fisheries to review actions taken under the FMP. Through these measures, management could then present recommendations of possible changes to the FMP, including additional peer review or clarification of framework-type management measures outlined in the plan.

**Groundfish Plan Teams' Review and Ranking
of 1993 Groundfish Amendment Proposals
September 1993**

Proposal	Priority	Staff Req. ^A	Comments
<p>Gulf of Alaska and Bering Sea/Aleutian Islands FMP:</p> <p>1. Require actual weighing of all harvested groundfish in order to accurately determine harvest levels.</p>	High	Diff: High Time: High	Already ongoing w/ CDQ fisheries. Analysis extensive, NMFS will have in place prior to CRP. Team agrees with accurate measurement. Is an off-cycle analysis, NMFS has the lead.
2. Set base amount of halibut PSC limits for each management plan derived from historical performance and adjust the base amount annually using change in abundance of halibut biomass and of groundfish species.	Medium	Diff: Low Time: 6 mo	Have information, is do-able. IPHC endorses. Difficulty in estimating the standard (baseline).
3. Reactivate the former Highliners proposal to establish a minimum mesh size regulation in the pollock fishery using trawl gear. Implement a mesh size regulation in the directed cod fishery using trawl gear.	Medium	Diff: Med/High Time: 12 mo	AFDF/FRI study will provide information for pollock. Need additional information to determine selectivity of Pacific cod.
4. Require NMFS to publish on the NMFS Bulletin Board the names of the vessels and their skippers that exceed the VIP standards.	No rate		NMFS implementing now, not to be used to enforce the VIP due to un-debriefed data.
5. Review season opening dates for sole fisheries, particularly yellowfin sole in the Bering Sea and deepwater flats in the GOA, with a view toward an earlier opening of yellowfin (and a possible June closure) and a later opening of deepwater flats.	Medium	Diff: Med/High Time: 12 mo	Data may not be available when shifting fishery into new times. Needs to be considered in light of CRP analysis. Combine w/#18 & 19. Dates in GOA can be adj. by PSC spec., BSAI require an FMP amendment, perhaps could framework.
6. Trip limits for the groundfish fishery limited to two trips per week not to exceed 150,000 by 10%.	Low	Diff: High Time: 1+ yr	Very little information available.
7. Make jig gear subject to halibut bycatch restrictions in the GOA. Provide a mechanism for exempting jig gear annually in the BSAI and GOA.	House-keeping No rating	Diff: Low Time: 3 mo	NMFS AKR staff will do analysis. Very little observer information on jig gear. Some work will have to be done for IFQ program (CRP). Is a regulatory amendment.

^A Time is in terms of people months

Proposal	Priority	Staff Req. ^A	Comments
8. Define standards for satellite communication between fishing vessels in groundfish fisheries and the NMFS. Require all or some vessels to carry and use hardware and software meeting those standards.	High	Diff: Low Time: 4 mo	NMFS AKR will conduct analysis. Consider Observer Program requirements. Two parts: 1: define standards, 2: require use.
9. Define April 15 as the start of each fishing year and amend the annual groundfish specification process to eliminate the September recommendation of proposed specifications.	High	Diff: Med/High Time: 1+ yr	Would be time consuming, as is a complex issue. Alternatives should consider other start dates.
10. Allow the NMFS the authority and oversight to invalidate federal fishing permits of vessels that are delinquent in their payments for observer coverage.	No rating	Diff: N/A Time: N/A	NOAA GC advice is that NMFS not have authority to do this. Idea of requiring a bond. Outside Team's review. Is being addressed by the Council.
11. Reinstate the use of pot longlining.	No rating	Diff: N/A Time: N/A	Need clarification.
<p>Gulf of Alaska Only:</p> <p>12. Change the longline opening date of the GOA to April 1, 1994, for the season and until ITQs are implemented.</p>	Low	Diff: Low Time: 6 mo	With advent of IFQs, appears to be inefficient use of staff time. Also appears to be allocative between BS and GOA. Exclusive Reg. issue being addressed currently.
13. Add GOA to BSAI Amendment 29 (Salmon VIP).	Low	Diff: Low Time: 6 mo	Analysis problematic with adequate data, limited observer coverage. Compliance difficult.
14. Close Western Gulf trawling in June and July and redistribute allocations to later portions of the year.	Medium	Diff: Med/High Time: 12 mo	Linked to 16 & 17. Need to take a close look at salmon bycatch.
15. Delete paragraphs 3 and 4, Section 672.24 from regulations and management plan - regulations pertaining to federal trawl closures in the Kodiak area.	Low	Diff: Low Time: 2 mo	Housekeeping issue, easy to do by NMFS AKR.
16. Reapportion Gulf pollock to avoid high "other salmon" bycatch in June and July.	Medium	Diff: High Time: 1+ yr	See # 14.
17. Proposed quarterly pollock apportionment in the GOA.	Medium	Diff: High Time: 1+ yr	See # 14.

^A Time is in terms of people months

Proposal	Priority	Staff Req. ^A	Comments
Bering Sea/Aleutian Islands Only: 18. Open directed fishing for "other flatfish" species in the BSAI management area at the beginning of the fishing year and allocate a halibut bycatch cap to that fishery.	Medium	Diff: Medium Time: 4 mo	See #5.
19. Move opening date for Greenland turbot to middle of June.	Medium	Diff: Medium Time: 2 mo	See #5.
20. Remove the Catcher Vessel Operational Area (CVOA) from the BSAI plan.	Medium	Diff: Low Time: 6 mo	Large fish in large numbers caught outside CVOA this year.
21. Incorporate pelagic trawling under the halibut bycatch limits.	Low	Diff: Med Time: 6 mo	Justification of the exemption: low bycatch rates in the midwater pollock fishery. The new pelagic trawl definition needs to be given a chance.
22. Eliminate two archaic management items: Port Moller Pacific cod fishery exclusion to trawl closures in areas 512 and 516 and the Winter Halibut Savings Area.	Low	Diff: Low Time 1 mo	Analysis would be done by NMFS AKR.
23. Reduce bycatch limits for Pacific halibut by 10% (742 mt).	Low	Diff: Med/Low Time: 6-12 mo	Related to #2 (preferred). Council should decide about the allocative nature of this proposal.

^A Time is in terms of people months

SUMMARY OF BSAI CRAB PLAN TEAM MEETING
Friday, August 27, 1993
Anchorage, Alaska

The Bering Sea Crab Plan Team met in Anchorage on August 27, 1993 to review submitted FMP amendment proposals. Members present included Kim Spitler (NMFS), Rance Morrison (ADF&G), Ken Griffin (ADF&G), Peggy Murphy (ADF&G), Brent Paine (NPFMC) and Bob Otto (NMFS). Bill Nippes (ADF&G) and Jerry Reeves (NMFS) were unable to be in Anchorage but were connected to the meeting by teleconference. Members of the public in attendance included Ron Miller, Eric Fry, Roy Ashentelter, Jon Zuck, Tim McKeeler and Karl Ohls. Ron Berg and Jonathan Pollard (NMFS-AKR) were present via the teleconference.

Overall, on a ranking scale of high, medium and low, the plan team ranked just two proposals as high (#3 and # 9) , one low (#11), and recommended no ranking for the remaining 11 proposals. The team believes that for 90 percent of crab management issues, the framework approach currently present in the crab FMP is appropriate and works well. The team believes that analysis of the proposals ranked high by the team will address concerns raised regarding joint federal-state oversight of Bering Sea crab management. What follows is a summary of the plan team recommendations for individual amendment proposals.

- #1: Manage Pribilof Island blue and red king crab as one district; calculate the biomass of both species as one for harvestable stock in that district.**

The team did not rank this proposal and recommends the Council not endorse it. The team felt this proposal provides no real advantage and could result in overfishing of either stock.

- #2: Authorize experimental fisheries for purposes of obtaining fisheries information; namely a pot survey for the area in conjunction with the traditional trawl survey.**

The team recommended not ranking this proposal, as the State of Alaska currently has the authority to conduct experimental fisheries which could include additional survey work.

- #3 Establish a superexclusive registration area for the Norton Sound king crab fishery.**

The plan team ranked this proposal as high.

The team believes that the FMP can be further clarified in regards to registration designation. This could minimize appeal action. The team also felt this issue should be limited to the Norton Sound king crab fishery. Amount of staff time would vary depending on the scope of the analysis.

- #4 Repeal the BSAI king and Tanner Crab FMP; return all management of crab to State of Alaska.**

The team recommended no ranking of this proposal.

#5 Add legal male Bristol Bay Red king crab to threshold level; review current threshold level for other king and Tanner crab stocks.

The Crab Plan Team recommends that specification of thresholds remain status quo to allow incorporation of the best scientific information as it becomes available.

Thresholds are not quantified in the crab FMP but defined as the minimum size of a stock that allows sufficient recruitment so that the stock can eventually reach a level that produces MSY. The FMP further states thresholds should reflect the best scientific information available. The State of Alaska's (State) Management Plan for Westward Region King Crab Stocks specifically sets thresholds for Bristol Bay and Kodiak red king crabs and the St. Matthew and Pribilof Islands blue king crabs using criteria developed by the Crab Plan Team in the Environmental Assessment (EA) for Amendment 1 to the crab FMP dated Nov. 20, 1990. Currently, no threshold values have been adopted for snow or Tanner crab stocks in the Bering Sea/Aleutian Islands.

The State plan estimates the threshold for Bristol Bay red king crab at 20% of the equilibrium level of female crabs ≥ 89 mm carapace length as estimated from a Ricker stock-recruitment model fit with trawl survey produced by those females. This method indirectly incorporates male abundance through the stock-recruit curve.

Since trawl survey estimates of abundance are more reliable for males than females in St. Matthew and Pribilof Islands areas, thresholds are expressed as numbers of mature males and assume that threshold levels relative to average spawning stock abundance are the same as for Bristol Bay red king crabs.

Recently modeling work on Bristol Bay red king crab has resulted in development of a new stock-recruitment relationship where the spawning biomass is a function of the mature male abundance (i.e., includes legal abundance). This study is undergoing peer review and if endorsed by the scientific community, will be brought before the State for consideration in determining thresholds.

#6 Include accountability by management in the Crab FMP, reintroducing peer review process.

The plan team was sympathetic to the idea of expanded peer review but recognized that a review analogous to that applied in groundfish plans was probably not feasible within current time constraints. Time constraints are conditioned by the following factors:

- 1) short interval between surveys and season openings;
- 2) heavy Council burden relative to the groundfish plans during the fall months; and
- 3) timing of molting in crab populations relative to surveys and decision making.

The team feels that review of a SAFE document might be feasible. This review would have to occur at the September Council meeting since surveys are not completed until mid-August and most major fisheries open before December. Alternatively, a review could be conducted after fisheries have been completed in the Spring.

The Team asks Council guidance as to the form and timing of expanded procedures.

- #7 Move minimum size limits, GHLS, districts, subdistricts, and sections, fishing season, sex restrictions, pot limits, registration areas, and closed waters from Category 2, and Other in Category 3, to Category 1 in FMP.**

The team recommends no ranking of this proposal.

- #8 GHL process should be moved from Category 2 to Category 1 of the Crab FMP. Include all crab, instead of only legal size male Bristol Bay red king crab in the exploitation rate. Factor discard mortality into the GHL. Lower exploitation rate and implement a lower legal size limit. Allow industry to set the size standard. Combine harvesting of species in the same location.**

The team recommends no ranking of this proposal.

The annual development of the Bering Sea preseason guideline harvest levels is a dynamic process dependant on utilizing the most recent information available, and applying this information through analysis and statistical modeling. Scientists from both the NMFS and ADF&G are currently using the most current scientific information available to set GHLS and manage crab stocks.

Due to the timing of the Bering Sea surveys and the openings of the early fall fisheries, only a limited time presently exists to analyze, discuss, amend and release the GHLS to the public in a timely fashion. Placing the GHL process into Category 1 of the FMP would only mean that this process would be considerably lengthened. This added layer of review by the Council would slow development of the GHLS. To release the preseason harvest guidelines under the proposal, the current season opening dates for the fall fisheries would have to be delayed and/or rescheduled, or the previous years' survey information would have to be used to set GHLS in the current year. In addition, the Council would have to schedule a special meeting or allow time during the September meeting to address crab management after the survey information became available.

Concerning the bycatch issue, the Alaska Board of Fisheries has recently implemented new regulations addressing this issue. Information on crab bycatch in the crab fisheries is being collected and may be useful in determining future GHLS.

- #9 Review and clarify framework-type management measures outlined in Category 2 of the crab FMP, i.e., pot limits and registration areas. Review and clarify the discretionary management measure in Category 3 listed as "other."**

The plan team ranked this proposal as one of high priority.

Some type of protocol is necessary for dealing with Category 2 management measures (those that can be frameworked in the FMP). Two specific areas, pot limits and registration areas, have already been challenged due to the ambiguous nature of the guidelines. The plan team felt that other areas in this category could be similarly challenged and therefore may also warrant clarification.

The "other" area in Category 3 (discretion of the State) was identified as one which potentially may be challenged. Possible alternatives for amending this section of the FMP include deleting the "other" area in Category 3, retain it with additional clarification, or remain as currently written. Team members recognized that the management measures identified in the FMP do not necessarily

represent the only measures possible therefore request Council clarification of what issues are included in the "other" area.

The plan team felt these issues can be resolved with clarification of the intent of the Council and also consultation and input from the Board of Fisheries in regards to its role in the management of the BSAI crab fisheries.

#10 Allocative measures in Category 2, pot limits, exclusive and superexclusive area designations and "other" measures to Category 1, specifically, trip limits and vessel length restrictions.

The Team recommended no ranking of this proposal.

#11 Bring the Bering Sea/Aleutian Islands hair crab fisheries and snail fisheries under the framework jurisdiction of the crab FMP.

The team gave this proposal a low ranking.

The team felt that until state management of these fisheries was shown to be inadequate, that management of these fisheries should remain with the State of Alaska.

#12 Revise the process for developing the GHLS for crab fisheries, by placing GHLS in Category 1, and specifically requiring scientific peer review by the Crab Plan Team and NPFMC SSC and AP.

The team recommended not ranking this proposal, thus supporting the status quo.

Guideline harvest levels (GHLs) are estimated through a cooperative review of current and historic survey and catch data by Alaska Department of Fish and Game and National Marine Fisheries Service staff and in accordance with the harvest rate policy of the Board of Fisheries (Board) and Section 8.2.2 of the crab FMP. GHLs are calculated annually using the most recent survey estimates of abundance. Typically, the survey is completed by mid-August. Estimates of abundance are generally available by late August at which time king crab GHLs are computed and released to the public. The first major king crab fisheries in the Bering Sea begin September 15.

The plan team felt placement of the GHL management measure in category 1 would risk rational management of crab fisheries in the BSAI. The crab plan team agreed insufficient time was available from the time GHLs are calculated until the first crab fisheries of a season to allow annual review of GHLs in the Council process such as provided for TACs in the Groundfish FMP. With the exception of the crab plan team coordinator and Dr. Shirley of the University of Alaska, the crab plan team has participated in the review process establishing annual GHLs in recent years.

The crab plan team felt the methods used to calculate GHLs receive regular peer review through the Board process. Specific methods are outlined in the State's Management Plan for Westward Region King Crab Stocks and the EA for Amendment 1 to the Crab FMP.

Team comments on Proposal #6 also apply to the second part of this proposal.

#13 Revise the federal appeal process in the FMP to insure that appeals are completed in a timely fashion, prior to the opening of crab seasons that will be affected by new regulations.

The plan team did not rank this proposal.

The team was sympathetic to revision to the appeals process, but felt that an appeal process is difficult to complete in a timely fashion, regardless of how it is constructed.

#14 Change State of Alaska crab observer program to become a federal observer program, but maintain existing levels of coverage.

The team did not rank this proposal.

The team felt that due to the imminent implementation of the Research Plan, this issue should be deferred until evidence indicates that the Research Plan does not address the issues presented in this proposal.