

Public Testimony

Agenda Item C-5, Data Gathering & Observer Program

Carl Ellis, University of Alaska. They are interested in developing observer training programs and setting up the administration for the observer program in Anchorage. Asked for Council support in designing a model observer program through Sea Grant.

Chris Blackburn/Ken Allread, Kodiak. Logistics for shorebased observers is difficult. Sometimes a operation does not know a week in advance whether they will fish. Pointed out that observers cannot do their paperwork on the smaller vessels and must spend extra time onshore after the trip. The program has been well received in Kodiak although there are some areas which need attention. Regarding reporting requirements, onshore operations are having to comply with requirements suited to offshore operations. They also feel that using product recovery rates can result in erroneous figures; shorebased operations use round weight. Mr. Allread suggested that observers have some type of identification; they are exposed to confidential information and should have to identify themselves before that access is granted. Also, he feels observers are spending too much time on paperwork. The emphasis should be on biological data gathering. Filling out the various forms is also taking more of the processor's time than NMFS indicated.

Michael Lake, Alaskan Observers. The observer program is oversized which has led to higher costs. There is no scientific basis for requiring such broad coverage. Because of the number of observers needed, some are hired who may not be as well suited for the job as others. One problem he sees is that industry can choose their contractor which can lead to conflict of interest and other problems. Suggested a smaller group of higher qualified biologists be used and that coverage of 25%-30% would be adequate. Also in favor of a cost-recovery type program.

John Dolese, Emerald Seafoods. The effectiveness of this program may be undercut because observers are not required on the greater proportion of the industry. There is a need for more observers on the shorebased fleet.

Mandy Merklein/Debbie Hicks, Saltwater Inc. There is a definite need for accuracy in the data gathered. There is increasing pressure to relax qualifications for observers, but in actuality they should be increased. There should be increased training for onshore observers and increased safety training for all observers. Observers do not have the appropriate equipment to gather reliable data.

Roger Woods, Data Contractors, Inc. Because there are no definitive guidelines for this new program there are many problems left to the contractor and vessel to solve. Have also recently seen some vessels back away from their commitment to carry an observer. Would like to see debriefing done in Alaska, especially in Anchorage, because of transportation costs. Also feels there is an inequitable distribution of observers in the 30% class.

Doug Gordon, AHSFA. Supports a cost-recovery program for observers. There is a duplication of effort between 100% class vessels and shorebased because the catch sampling is done twice; this raises costs. There is a shortage of observers which may prevent vessels from fishing.

Paul MacGregor, AFTA. AFTA continues to support the observer program and hope that once data are available the coverage can be distributed more realistically. The third-party contractor program has a lot of problems; there's too much risk for conflict of interest. Need government oversight with a fee to users.

Ted Smits, NPFVOA. NPFVOA initiated a safety training program five years ago; it's available and contractors can call for training classes. It's time for the Council and NMFS to pull all the data gathering programs together into one comprehensive program not limited to species or vessels. Also, funding should be more evenly distributed throughout the industry. Duplication of coverage between at-sea and onshore operations should be resolved.

Agenda Item C-6, Sablefish Management

Jerry Nelson, Courageous Fisheries. A mechanism must be devised to transfer and sell IFQs in an equitable manner. Also suggested allowing sellers of quotas in one area to buy corresponding quotas in other areas.

Jeff Stephan, UFMA. Favors open access (status quo). They do not favor IFQs or any limited access approach for the sablefish fishery. Suggested the Council delay final decision past June, preferably after January 1991.

Linda Kozak, KLVOA. They have several concerns with the draft document. The positive aspects of an open access system should also be analyzed. Bycatch should be the Council's first priority.

David Little, Clipper Seafoods. Personally favors an IFQ system; feels that the Council is on the right track and that the system so far looks good. With regard to the analysis, there may be some perceived errors but that's what public comment is for. The document should go out for public comment.

Jude Henzler, Bering Sea Fishermen's Assn. Favors the community development quota concept. It is the only way coastal communities can have access to a share quota system. He is working with seven villages interesting in having some commercial groundfish activity.

Agenda Item C-7, Future Management Planning

Dennis Reynolds, Cascade Fisheries. His client favors a moratorium on the fleet itself to prevent more capitalization. January 19, 1990 is an appropriate date. Perhaps there could be an exemption for small vessels and an economic community program for depressed communities. The Council should allow for cross-over fishing. The moratorium should be the Council's highest priority except for bycatch issue. Thinks the Council should establish a possible sunset date for the moratorium with the understanding that it could be revisited sooner.

Jim Wexler, Swan Fisheries. Expecting delivery of a new vessel which they initiated because of the MFCMA invitation to develop the pollock resource. Their groups would support a moratorium for all species under Council jurisdiction as long as it applies to all segments - inshore and offshore, harvesting and processing. They would favor an exemption for small vessels in connection with a program for economically disadvantaged communities. If the Council cannot regulate shoreside processing, then they recommend indirect control as much as possible. They have no objection to

the January 19, 1990 date for having a keel laid and the July 1, 1991 date for completion of projects. Favor a 1- or 2-year sunset provision and then a review of the program.

John Dolese, Emerald Seafoods. Support a moratorium extended to onshore processing and all vessels with the exception of those under 40 ft.

Bert Larkins, AFTA. Cited their letter of February 15 for the record. The letter cited the recommendation of noted economists for an immediate moratorium. They support a moratorium for all groundfish harvesting and processing, with a sunset in 3 or 4 years. Considering a moratorium should be first priority in order to deal with overcapitalization which is causing so many other problems.

Elizabeth Coyne, Arctic Vessel Mgmt. Anticipate construction of a freezer/longliner vessel for Pacific cod, an underutilized species. Asked the Council to consider that this fishery would be concentrated in the Bering Sea and that halibut bycatch is minimal. The Pacific cod TAC has not been fully utilized.

Doug Gordon, AHSFA. They have vessels in the 50' to 185' category; they want a healthy resource, long-term stable relationship and the maximum freedom to sell in the market of their choice. If the Council allocates, high priority should be given to true American ownership. The first step in allocation is a moratorium on new effort as a precursor to license limitation, IFQs, or onshore/offshore systems.

Wally Pereyra, ProFish Intl. Supports a moratorium. The effort in fisheries is still increasing and he doesn't expect it to decrease; the overcapacity and growth has a definite impact on the management efforts of the Council.

George Anderson, Fishing Co. of Alaska. Growth is causing chaos in the fisheries for managers and the resource itself. Urged the Council not to become stagnate; if industry can arrive at a consensus, the Council should proceed with a moratorium. He doesn't see an industry consensus on the IFQ issue and thinks the Council shouldn't waste more time on it. Suggested a test IFQ fishery on rockfish. It is fully utilized and could provide landmark data for Council use. The rockfish industry is ready to move forward and urged the Council to implement an immediate moratorium and implement an IFQ system. The overcapitalization of the fishery will be brought under control; fishing strategies will change which will stop olympic-type fishing, gear conflicts will be brought under control; safety will improve, and data will be generated for research and management. Other species will also benefit, including 19 species of rockfish, sablefish and halibut. He recommended a sunset on the moratorium.

Steve Hughes, Midwater Trawlers Co-op. Their association is one of the those who helped draft the straw-man moratorium proposal; it has broad industry support. He and Wally Pereyra asked for a moratorium two years ago; now the fishery problems are amplified. A moratorium should be linked with considerations of inshore/offshore allocation. Fishermen who qualify under the moratorium should be allowed the right to move between fisheries to maximize their efficiency. A 3-5 year time frame for the moratorium is acceptable to them; it will help for better planning for long-term management measures.

Ted Smits, NPFVOA. Supports a moratorium. There is great concern about what might happen to the fisheries if limited entry is dealt with on a fishery-by fishery basis. A moratorium will give the Council time to do a serious study of an appropriate limited entry system. Fishermen should be able

to move from fishery to fishery; a 3-5 year moratorium with an annual review of its effects is desirable. At the end of the moratorium the Council can implement limited entry, go back to open access, or if still unsure, extend the moratorium with the same proviso for a sunset.

Gary Painter, Oregon. Does not support a moratorium. Does not think this is a resource consideration, but an economic consideration. The Council can use quotas and data from observers, as well as other traditional tools to avoid a conservation problem. He has always been against limited entry, BUT a limited moratorium would be more favorable than a piece-meal approach to limited entry.

Fred Yeck, Oregon. Opposes a moratorium; there are still many JV boats without adequate markets. A moratorium will inhibit free trade and make it difficult for small boat owners to get fair prices. A moratorium on processing will prevent small Alaskan communities from developing; it's not a conservation issue. If the Council decides to implement a moratorium on harvesting, he urged they proceed with care and only if they intend to follow-up with a definitive management program. Suggested the Council spend limited management dollars on bycatch and inshore/offshore issues rather than a moratorium.

Eric Silberstein, Emerald Seafoods. Favors a moratorium, but it is essential to include shorebased processing, at least in the pollock industry. He doesn't think inshore/offshore allocation is necessarily linked to a moratorium. The process should include a new Council policy that requires a super majority vote on an allocation issue.

Jeff Stephan, UFMA. They don't want the Council to issue a moratorium. Regarding work on a moratorium, it should take a secondary priority to bycatch, inshore/offshore allocation, refinement of the observer program, and plan amendments that have been put off.

Dan Winn, Homer. Doesn't agree with limiting access; thinks some interests are trying to lock the resource in for their own interests.

Ted Dickson, MARCO. They have entered into a contract for a new vessel in the \$5 million class and are quite far into the project. They are concerned about moratorium and how it will affect them.

Agenda Item C-8, Inshore/Offshore

Dennis Reynolds, Cascade Fisheries. His client believes that limiting the economic survey of industry may provide a legal basis for challenging any final Council decision. Because of controversial nature of the issue, a comprehensive survey approved by OMB should be undertaken.

Jim Wexler, Swan Fisheries. Opposes any type of indirect onshore/offshore allocation. Council should focus on creating a record and adequate discussion as to whether proposals meet the National Standards. Alaskan inshore operations have no more legal right than offshore operations. Any allocation between inshore and offshore will be challenged.

Doug Gordon, AHSFA. Would like to see in the analysis the idea of an inshore/offshore split; the idea of the JVP catches should be looked at as an entity by themselves; 70-30 and 80-20 split of the traditional JVP catch history would be reasonable. The Council needs to provide maximum freedom to sell fish into market of choice. Personally believes the free market in and of itself is not quite enough.

Paul Fuhs, Dutch Harbor/Unalaska. Moratorium is not a replacement for the inshore/offshore analysis. The Council should look into the various sectors of the fleet and overcapitalization to determine the effects an allocation might have. He wants both shoreside and factory trawler industries to be healthy. An area closure around Dutch Harbor and Akutan for pollock and Pacific cod, and an equal split of the pollock and cod quotas between shore plants and factory trawlers are two options suggested by his City Council. Also thinks there should be a 50-50 split for bycatch, too. One more element should be added to the moratorium - don't allow boats that go bankrupt back into the fishery to attack the economic health of the industry.

Bill Atkinson/Elizabeth Coyne, Alaska Frontier Co./Arctic Vessel Management. Suggested the Council treat harvest of fixed gear industry to proportions given; allocate pollock to Pacific cod in GOA and pollock only in the BSAI. Feels analysis will show the fixed gear segment is not causing problems now being encountered.

John Sevier/Ken Allread, Kodiak. They want action as soon as practicable. The overcapacity problem should be looked at separately from inshore/offshore analysis. Urged the Council to continue economic survey and analysis as it relates to all communities off Alaska. Supports moratorium and inshore/offshore allocation. Overcapitalization is a threat to conservation. Urged the Council to continue the inshore/offshore study as scheduled with action by 12/90. This issue is the most important facing their industry today; it's not an allocation problem.

Chris Blackburn, Alaska Groundfish Data Bank. Strongly supports continuation of inshore/offshore analysis. It's a continuation of the process already begun under Amendment 14. A moratorium will not necessarily hurt or harm Kodiak - they are not overcapitalized.

Reed Wasson, Eagle Fisheries. Thinks flatfish should be included in the inshore/offshore analysis because it is a rapidly developing fishery.

John Iani, PSPA. Supports AP priorities with regard to the inshore/offshore analysis, moratorium and bycatch. Asked that their report, "The In-Shore/Off-Shore Dispute: Impact of Factory Trawlers on Fisheries in the North Pacific and Proposals to Regulate the Fleet," be entered into the official record. They have participated with the Fishery Planning Committee and staff to help develop the economic data sheets; those who are expressing concern with them now were present at the FPC meetings and did not raise any such concerns at that time.

John Dolese, Emerald Seafoods. Do not support onshore preference. The EEZ is a federal, not Alaska, zone. The domestic industry has only recently evolved; all participants made investment decisions based on knowledge that both sectors were being encouraged to participate. The industry has become extremely competitive based on the concept of competition and free enterprise; the Council should not short-circuit that system by giving preference to one segment of the industry.

Bob Jettner, (Sand Point Administrator) Al Osterback (Sand Point), Gary Hennigh (King Cove Administrator). Sand Point supports inshore/offshore allocation. They are concerned with the moratorium and how it will affect their communities and hope those concerns will be clarified through the analysis process.

Meredith Sandler, Southwest Municipal Conference. Supports analysis that is being done for inshore/offshore, but has some major concerns about the economic analysis being taken. Long-term deferred costs are not being adequately covered; need to examine cost and feasibility to develop alternatives to the bottomfish industry, a major industry in their communities. Suggested that

additional economic questionnaires be revised to reflect these concerns and be distributed to the communities she represents.

Joe Plesha, Trident Seafoods. Believes OMB approval of the economic survey is not necessary; current surveys developed will provide the Council with better information than any OMB-approved form.

Brad Resnick, Aleutian Dragon Fisheries. Supports Alternative #3 for the inshore/offshore definition. The analysis doesn't necessarily have to be tied to a moratorium, but a moratorium is very important in the near future.

Steve Hughes, Midwater Trawlers. If allocations are determined necessary, they support inshore/offshore allocations to the seafood industry at the harvesting segment level. Harvesting vessels have been caught between the two giants - PSPA and AFTA. Support using catch histories based on a 1986-89 average as basis for allocation. The Council needs to plan ahead for the flatfish fisheries and other species; they should be included in this allocation process. Developers of the flatfish fisheries support PSPA's position; they want the opportunity to sell to markets that will buy if there's a surplus. This process needs to be directly linked to a moratorium as soon as possible.

Harold Jones, MARCY J. The groundfish fisheries were developed by vessels that have been in the business a long time and were able to displace foreign fleets. When factory trawlers came along many of those traditional vessels were left without a market. Shorebased facilities couldn't accommodate the vessels as quickly as they were displaced in the joint venture fishery. Supports the concept of inshore/offshore allocation.

Dave Fraser, Muir Milach. The goal of proponents of this issue is to get as much fish to process as they want, and the fish harvested by catcher-processors are not available to them. Suggested various methods of allocation.

Bert Larkins, AFTA. Their organization is against this allocation procedure. If there is going to be an allocation, they support addition of the team's definition as an alternative for analysis. With regard to joint venture allocations being used as a basis for analysis, he is concerned because primary basis for allocation used up to this time has been DAP. In terms of allocating, maybe a ratio of investment in fisheries should be used rather than the 50-50 split now being considered. Offshore investment much higher. Regarding the industry economic survey, he is concerned that the data won't be considered confidential. General Counsel has indicated that the data would be public. Should go through the OMB process; they will cooperate and will urge OMB to expedite.

Agenda C-9, Pollock Roe-Stripping Amendment

Herb Holley, Seafood Cold Storage Assn. Regarding pollock roe-stripping, seasonal apportionment of the quotas is desirable.

Dennis Reynolds, Cascade Seafoods. Much of the information needed to make such decisions is not available. A comprehensive survey of industry may provide that information. Research does not indicate adverse impacts of the status quo. Biological staff say it's a non-issue; economists say it doesn't warrant a change from the status quo. If it's an allocation issue, then it should be dealt with in that manner and analyzed that way providing adequate opportunity for comment. Delay any action until sufficient information is available to analyze it as an allocation issue.

Jim Wexler, Swan fisheries. Supports implementation as long as recovery rates reflect existing domestic fleet's recovery rates. Supports Alternative 2. One concern is that the Secretary failed to act aggressively to have its regulations implemented at the same time the State of Alaska's went into effect. Need timely cooperation in an emergency situation.

Cindy Lowry/Hans Hartmann, Greenpeace. Supports Alternative 3, 4, and 6 for inclusion in the amendment package. Concerned that the rapid decline of the Steller sea lion population indicates that the Gulf of Alaska and Bering Sea ecosystems are facing significant environmental stresses. With the overcapitalization of the domestic trawl fishery it is critical that the Council take action to address the pollock roe-stripping issue through adoption of these three alternatives.

John Dolese, Emerald Seafoods. Supports Alternative. 2 applied on shore directly or through the State of Alaska. Oppose other alternatives as allocative in nature.

Bob Trumble, IPHC. Although they do not have comments on a selection of a specific alternative, they are concerned that several of the alternatives may cause greater problems with increased bycatch rates.

Chris Blackburn, Alaska Groundfish Data Bank. Support Option 5, both the ban on roe-stripping and quarterly allocations, at least for the Gulf. Disagrees with many of the statements and conclusions in the analysis. They feel a quarterly apportionment is a safeguard for the stocks; this is a biological and conservation issue, not allocational.

Agenda D-3, Groundfish

Howard Amos, Nunivak & Nelson Island; Kokechik Fishermen's Assn. Mr. Amos was accompanied by Dave Bill, Joe Paniyak (Pres. Kokechik Fishermen's Assn.), Victor Paniyak Sr., James Smith, and several herring fishermen from his village. They continue to be very concerned about herring bycatch and the impact on their subsistence fisheries and recommended that the Council stop trawling north of the Alaska Peninsula and northwest of the Pribilofs when herring are present and place a cap on bycatch of herring. They are also interested in the community development quota; if given an opportunity they may be able to fish cod and would be willing to invest in larger vessels to do so.

Paul John, Tooksok Bay. He is concerned about the future of his grandchildren and their lifestyle because of the threat to herring stocks. There is a great deal of anxiety about the possibility of not having a commercial herring season this year; their community stores herring for use throughout the whole year. (Mr. John testified twice on this subject.)

Steve Joner, Fisheries Dept., Makah Tribe, Washington State. The Tribe has traditional fishing waters off the coast of Washington and east of Port Angeles. They have conducted halibut fisheries for hundreds of years and had developed a lucrative economy on the sale of halibut and other marine species, which continued until early 1900s when the fisheries declined and they were regulated out. Since about mid-1970 they have urged the Halibut commission to provide a quota for the tribe to re-establish their halibut fishery. In 1986 they received their first commercial quota, but declining TACs have reduced their tribal quota. This fishery is very important to the Makah fleet and they are very concerned about the increased trend in bycatch and the impact on their fishery and encouraged the Council to reduce bycatch.

Bob Trumble, IPHC. The IPHC has two bycatch goals they've been working toward - an overall reduced bycatch level for halibut, and to maximize the groundfish harvest available for that bycatch. Encouraged the ad hoc bycatch committee to continue working toward a long-term solution to bycatch. Regarding short-term solutions proposed by the bycatch committee, they feel the measures proposed, and the Advisory Panel modifications, would be acceptable. Recommended that the committee's idea for a test incentive package for the joint venture fishery be maintained in the analysis, not just the disincentive program as proposed by the AP. They would give a high priority to the analyses of the incentive programs as proposed for the second amendment.

Shari Gross, HANA. Their main concern is protecting halibut stocks, with an emphasis on reduction of halibut bycatch. Oppose any attempt to raise halibut caps beyond the current level. Would like to see caps lowered to the levels experienced by foreign fleets in later years in the Bering Sea/Aleutians. Support any effort to lower halibut mortality rates.

Paul MacGregor, AFTA. Costs on the trawl fleet of Amendment 12a have been quite significant. They don't have the "tools" to respond to these caps. They need to have some kind of benchmark by which to determine whether an operation is clean or dirty; they don't know what any of the other vessels are doing because of confidentiality restrictions. There are no sanctions; even if they did know a vessel was fishing dirty, they couldn't do anything about it. As a consequence the bycatch rates have been such that it looks like there will be a Bering sea-wide closure by summer which could leave about \$2 million worth of target species on the grounds. This is the fatal flaw. A review is needed of the caps; looks like halibut and crab stocks may have improved since Amendment 12a was implemented. Also, need some sort of incentive program; without it, it may be difficult to have any different performance than this year. Scheduling of fisheries may help - the yellowfin sole joint ventures may be willing to delay their opening; also turbot fishery delay may help. They are working with IPHC to develop techniques to avoid halibut and improve survival rates of the ones that are caught.

Fisheries Conservation Action Group: "A coalition of fishery organizations and businesses committed to the effective conservation of the fishery resources of the Bering sea and Gulf of Alaska." Submitted a written statement for the record. Opposed a proposed 450 ton increase in halibut cap in the Bering Sea for 1990; endorsed extension of Amendment 12a with the addition of an incentive program to minimize bycatch of prohibited species while attempting to more fully utilize the total allowable catch of other species. Requested the Council clarify the halibut bycatch mortality rate which is based on an assumed mortality of 4,000 mt; and requested the Council take action to implement necessary conservation measures to address herring bycatch issues in the trawl fisheries of the Bering Sea.

Steve Hughes, Midwater Trawlers. Continuing Amendment 12a without an individual incentive program will be a severe disservice to the industry. Bycatch caps should be reevaluated. Caps should be a percentage of biomass determined annually. Flounder fisheries should be open no earlier than May 15 for all areas for 1991.

Doug Gordon, AHSFA. Urged incentives at individual vessel level. The bycatch committee recommendation that joint ventures begin May 15 won't help DAP operators at all; prefer AP recommendation.

Thor Olsen. He fishes cod and is interested in catching as much fish with as little bycatch as possible. Described changes to his mesh gear to eliminate or drastically reduce his bycatch of other species. Also suggested the need to study the effect of predation on crab to fully understand the relationship.

Halibut bycatch is a problem; cannot do much to reduce it. Noted that night trawling is when bycatch is higher that perhaps the Council should prohibit night fishing.

Frank Kelty, Alyeska Seafoods. Council should consider separate area closures; separate bycatch quota for shorebased fleet; and ban on night trawling. With the observer program NMFS should have information on who's buying the majority of halibut and fleet shouldn't be shut down by the few who are abusing the resource. Supported changing date on turbot fishery.

Harold Jones, Kodiak. His vessels fish several different species; they want to protect all species and keep bycatch low and Council should consider prohibiting night fishing for any bottomfish. Thinks observer program will show that night fishing is a problem. Starting fishing later in year would be better. Need an incentive for clean fishing. Thinks escapement panels in gear would eliminate all the problems with herring bycatch.

Bill Orr, Golden Age Fisheries. Amendment 12a is flawed; hundreds of thousands of tons of groundfish will be left on the grounds this year. Bycatch caps should be indexed to biomass level; monitoring and management should be done on a fishery-specific basis and vessel-by-vessel. Supports incentive or reward system, but it would only will be valid if the allowances given fishermen are reasonable.

Fred Yeck, F/V SEA DAWN. He spent a lot of money converting a joint venture vessel for DAP operations and now they find they will be shut down almost immediately. The codfish could be a year-round fishery if the Council moves to solve these problems. Approves of the AP's suggestion for an individual level incentive program. Also supports a ban on night towing.

Dr. Bruce Leaman, Canadian Dept. of Fisheries and Oceans. Canada feels the bycatch issue in Alaska is a very serious issue because halibut are migratory. They are encouraged by the efforts being taken but discouraged by the timing - halibut are on a downswing and bycatch is having a significant effect on their stocks. Urged the Council to implement some incentive program to reduce the incidental catch of halibut.

Ted Smits, NPFVOA. Leaning more toward the recommendations of the AP than those of the bycatch committee. Stressed the need for additional gear research to prevent bycatch as much as possible. Should move toward being able to keep everything they catch instead of discarding. Perhaps it could be turned over to government for funding observer program and research.

Bud Hodson, Chairman, Alaska Board of Fish. The Board has formed its own bycatch committee and plan to interact more with the Council. The herring fishery may not open this year, even for subsistence; encouraged the Council to take emergency action on herring bycatch and then address it on the regular plan amendment cycle.

Jon Zuck, Bering Sea Fishermen's Assn. Supports AP proposal for herring bycatch for 1990 with some changes in the suggested zones. Also recommended bycatch cap for herring in the entire Bering Sea be set at 1 or 2%.

Harold Sparck, Yukon Kuskokwim Task Force. The herring bycatch problem is caused by the trawl fisheries offshore. Need emergency action now to benefit herring this summer. The Council can consider a winter savings area and other longer-term measures later. Recommended a 1% bycatch cap during summer period.

Dick Pace, UniSea, Dutch Harbor. If the Council adopts the AP's suggestion for herring bycatch and the cap is reached, it's going to have a grave impact on the pollock fishery in Unimak and Yakutat and on their economy. Would support the AP proposal with one significant exception: cap should be divided between inshore and offshore components.

Phil Kneisly, MRC. Regarding the yellowfin sole joint venture fishery, asked that it be reopened. They are willing to agree to a voluntary PSC cap - 150 tons of herring with daily bycatch monitoring.

Sinclair Wilt, Alyeska Seafoods. Concerned about the health of herring stocks but nervous about closures in Areas 514, 511. Dick Pace addressed his concerns. Closures could put shoreside plants out of business while allowing at-sea operations to move to another area. Cap should be equally divided between the onshore and offshore segments.

Steve Hughes, Midwater Trawlers. Regarding the yellowfin sole Togiak fishery, he thinks they can fish to avoid high bycatch. There are 88,000 tons yellowfin sole left. They have already agreed to pool bycatch allowances and implement incentive programs.

Ken Westman. Fishes yellowfin sole; 2 out of 5 years he's fished in Togiak district on the proposed date - May 15; the later you wait the more bycatch you'll encounter.

Gary Westman. Joint venture fisherman. Urged the Council to allow them to take more of the yellowfin sole quota.

Bob Trumble, IPHC. Support sending out groundfish amendment Chapters 7 & 8 for public review.

Chris Blackburn, Alaska Groundfish Data Bank. Supports extending current emergency regulation on quarterly allocation for another 90 days. Support pots being excluded from cap in the Gulf. If there is no incentive on a vessel level, wants separation of cap for inshore and offshore.

Reed Wasson, Eagle Fisheries. Agrees with Chris Blackburn's testimony. Concerned that trawlers will use up their quota and come inshore to put Kodiak out of business for the rest of the year. Shorebased groups shouldn't be penalized by offshore "dirty" fishermen.

Al Burch, Alaska Dragger's Assn. Favors an individual vessel incentive program with bycatch cap apportioned to individual boat although he realizes that's probably not possible. Supports continuation of yellowfin sole fishery. Regarding the herring bycatch problem, urged the Council to initiate a sampling program to collect data.

Steve Drage, F/V COHO. Supports some method of accountability on the bycatch of halibut in the Gulf, although that may not be possible. Need incentives for clean fishing.

Jon Zuck, on behalf of Bristol Bay Longline Gillnet Cooperative. They are very concerned about the opening up of yellowfin sole fishery just when they are opening up their test halibut fishery in the area.