

PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: DZ BSAI Cod Allocation

		Check the boxes below if you will have a PowerPoint or Handout	
NAME (Please Print)	TESTIFYING ON BEHALF OF:	Handout	PPT
1	Dustin Dickerson	/	
2	BERRY MERZIGAN		X
3	Paul Gronholdt		
4	Garrett Alon Flyord		
5	Garrett Kavanaugh		
6	Pat Davis		
7	Julie Kavanaugh		
8	Hannah Hembach		
9	CHRIS WOODLEY		X
10	Todd Hoppe		
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NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person "to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act.

UNFA's comments to the Council regarding Am.85

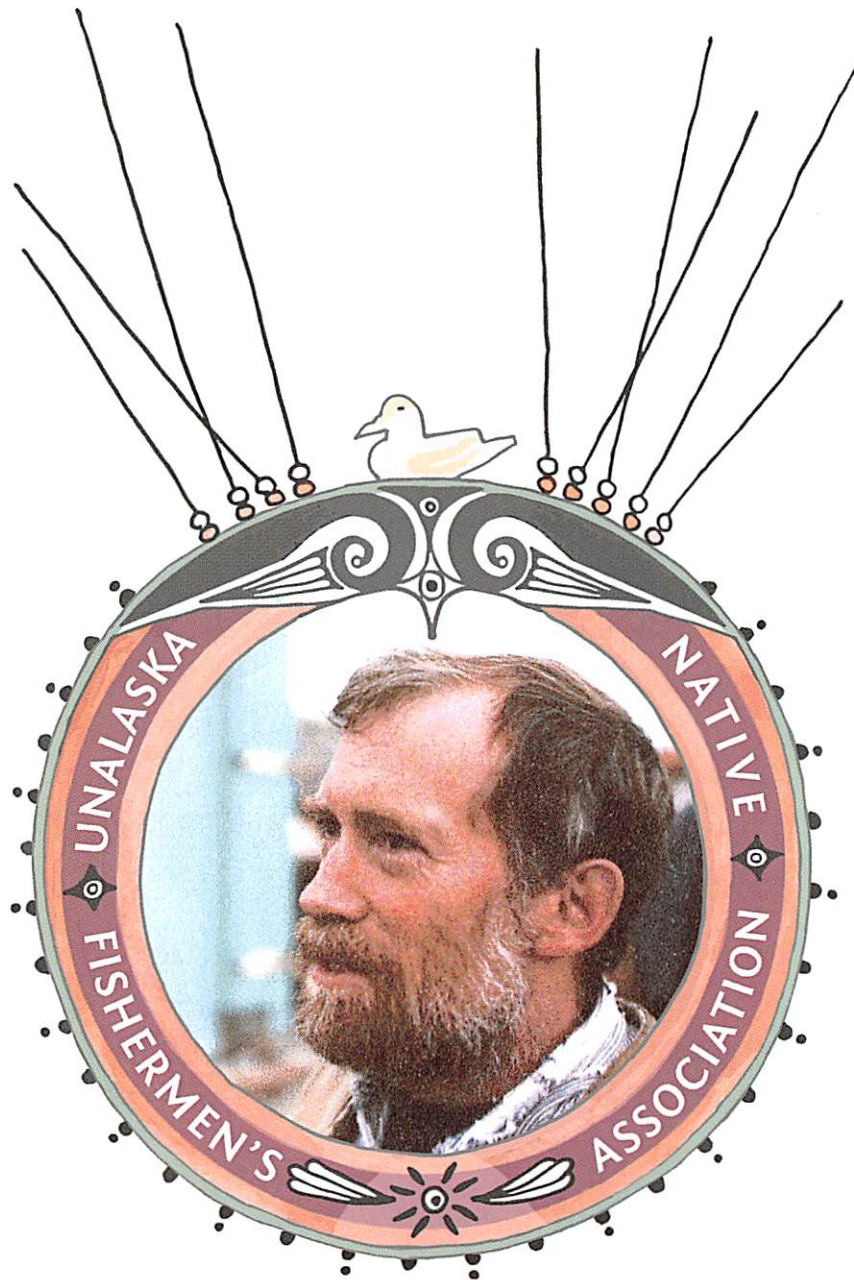
Thank you Chairman Kinneen and members of the Council. My name is Dustan Dickerson and I am the VP of the Unalaska Native Fishermen's Association.

From where we stand Amendment 85 has not met it's objectives. We represent the smaller boats of the Under 60' sector and the one's who's work it was that created this sector. We are the local boats of this region. Referencing the second objective that would "consider catch history, socioeconomic and community factors to include allocations to the small boat sectors to expand entry-level and local opportunities", it was admitted in the summary data "this objective has had mixed success".

And speaking to the third objective that would "provide stability among sectors". I think it should be noted, that like the cv trawl season of 2018, this years Under 60' A season, lasted just 12 days also. I don't feel "stable" at all.

Ever since Amendment 85 declared that the cod resource in the Bering Sea was "fully utilized", I have seen our local opportunities about terminated. And the gate is still open to new entrants. My feelings are, it is just ridiculous that the small boats of the Under 60' sector must compete in a fishery with boats five times bigger than us. Unless something is done it is a virtual guarantee that the most vulnerable boats of the sector will be extinct in the next couple of years.

In order to establish true local and entry-level opportunities for the communities of Unalaska and Akutan, we must have a regional allocation. We would like the concept of a regional allocation being attached to or inserted into one of the cod discussion papers at the next meeting.



**UNFA Tribute to
Bobby Storrs, 1948-2005
Capt. F/U Flying Oosik**



“you ain’t been around if you ain’t been aground”

UNFA's additional comments to the Council regarding Amendment 85

Prior to am. 85, the allocation to the under 60' sector was just 1.4% and our season lasted into april, 100 days plus.... and that was without any rollovers or a State-water season.... After am. 85, the allocation was 2%, and again, this last A season was just 12 days. So, in the case of the Under 60' sector vs. the cv trawl sector, there is actually a far larger discrepancy in the number of days fished from 2008 until now, almost double the discrepancy, I think the Under 60' sector has a better case for rationalization than the trawl cv's. Especially considering the door is still wide open for new boats to enter the fishery. This is a very un-sustainable fishery if you are one of the smaller boats of the Under 60' sector, which speaks directly to why we need a regional allocation.



**D-2: BSAI P-cod Allocation Review
NPFMC, June 2019 NPFMC**

Fisheries Allocation Review Policy (NMFS 01-119-01)

- Allocation review: originated from allocations (primarily sport/commercial) in other regions where management was static and not ongoing (i.e. not adaptive).
- NPFMC: BSAI p-cod management not static: Two recent actions and four ongoing actions in BSAI p-cod.
- NPFMC BSAI p-cod sector allocation amendments: 24/46/64/77/85
- P. 2: “Allocation review mechanisms should provide transparent processes for adequate reviews of allocations to ensure that U.S. fisheries are managed to achieve National Standard 1.” [OY]
- On average (2005-2018), EBS ITAC is **96.4%** caught (Table 8-44, p. 84)

A. 85 Problem Statement and Objectives

- BSAI p-cod is fully utilized
- Participants have significant investments and long term dependence
- Allocations should better reflect historic use and dependency
- Provide stability among sectors
- Reduce the need for inseason re-allocations (rollovers)
- *“Allocation to the sector level is a necessary step on the path towards comprehensive rationalization.”*
- Allocations based on catch history and/or other considerations

2019 Review: BSAI p-cod Dependency by Sector: Average proportion of sector's total gross revenues from BSAI P-cod (2005 -2017).

However P-cod is an important part of each sector and there can be higher dependency for p-cod for specific vessels within a sector.

- **CP H&L: 67%**
- **Pot CP: 41%**
- **A. 80: 21%**
- **CV fixed gear <60 16%**
- **Pot CV >60 12%**
- **CV trawl 8%**
- **Jig 2%**
- **AFA CP 1%**
- **CV H&L >60 0%**

A. 85 objectives are largely being met.

- “If the Council, utilizing all the information in the BSAI p-cod allocation review, determines that the objectives of A85 and the appropriate groundfish FMP objectives are still being met, then the allocation review is complete, and the 10-year time trigger for the BSAI Pacific cod allocation review is reset.”
- “In general, it is likely an extremely challenging endeavor to design a BSAI p-cod allocation program that would guarantee a fully harvested TAC each year due to the dynamic nature of the fishery and the intended goals of A85.”

EBS p-cod ITAC is on average 96.4% caught; rollovers are still a necessary mgmt tool

- **Rollovers** are still necessary to provide management flexibility to achieve OY in response to interannual variability in fisheries.
- **Cod aggregation:** If cod are more aggregated, sectors are more likely to catch 100% of allocation; when cod are less aggregated (particularly in B season), some sectors are less likely to catch full allocation.
- **Ice edge:** The timing and southern extent of the ice edge can influence the prosecution of cod fisheries.
- **PSC use:** Can be a limiting factor for a sector to achieve full allocation.
- Proportionately less rollovers when ITAC is lower (Figure 1-2)

SSC Minutes

- *“The SSC finds that this document fulfills the requirements of the periodic Pacific cod allocation review.”*
- *“It provides the information necessary to characterize how each fleet uses Pacific cod to advance the objectives of A. 85 and the broader FMP.”*
- *“It is sufficient to draw a conclusion about whether this review should trigger any allocative adjustments that would not otherwise arise through the normal Council action and amendment process.”*
- **No public testimony at SSC (i.e. no call to trigger allocative adjustments)**

AP motion

- Review is complete. Unanimous vote.
- No public testimony requesting a further triggering of the allocative review process.
- Some testimony regarding “uncertainty” regarding allocation and rollovers

The major cause of uncertainty in BSAI federal p-cod fisheries is the increasing reallocation to the DHS GHL.

- **EBS p-cod ABC:** Declining ABC affects all sectors proportionately – except <60 sector due to large increases in DHS GHL (<58' pot only).
- **2006-2013:** Total catch inside 3 miles in the BS = **0.67%** of BSAI ABC
- **2013:** BOF establishes DHS GHL at **3%** of BSAI ABC for <58 CV pot only.
- **2016:** GHL increased by BOF to **6.4%** of EBS p-cod ABC
- **2018:** GHL increased by BOF to **8%** (for 2019) with stairstep to **15%**
- Increased GHL results in a lower ITAC for federal sectors ----which could result in lower magnitude of rollovers.

Allocation Review Complete: Provides a snapshot view of status of the sector allocations

- Accurate presentation of sector profiles.
- One small issue is that the ownership information does not appear to clearly identify CDQ ownership in vessels in the sectors participating in the non-CDQ BSAI cod fisheries
- BSAI p-cod is an important fishery for CDQ –both within the CDQ allocation and within the non-CDQ allocations
- Freezer-Longline Coalition: 13 vessels with 33% to 100% CDQ ownership.

Table 2-2 CDQ Ownership in Vessels Active in Federal Groundfish and Crab Fisheries

ADFG	Vessel Name	CDQ Group(s)	CDQ ownership	ADFG	Vessel Name	CDQ Group(s)	CDQ ownership
77470	Arctic Prowler	APICDA	25%	59687	Forum Star	CBSFA	9.9%
63333	Bering Prowler	APICDA	25%	55301	Katie Ann	CBSFA	9.9%
47952	Exceller	APICDA	100%	56618	Northern Eagle	CBSFA	9.9%
62424	Farwest Leader	APICDA	70%	60202	Northern Jaeger	CBSFA	9.9%
35687	Golden Dawn	APICDA	25%	56987	Ocean Rover	CBSFA	9.9%
39369	Gulf Prowler	APICDA	25%	75473	Saint Paul	CBSFA	100%
69625	Konrad	APICDA	100%	76769	Saint Peter	CBSFA	100%
43570	Ocean Prowler	APICDA	25%	34931	Starlite	CBSFA	75%
40920	Prowler	APICDA	25%	39197	Starward	CBSFA	75%
57621	Starbound	APICDA	20%	33696	Arctic Sea	CVRF	100%
8522	US Liberator	APICDA	20%	56016	Deep Pacific	CVRF	100%
44971	Barbara J	APICDA	50%	63484	Lilli Ann	CVRF	100%
41312	Alaska Defender	BBEDC	50%	59376	North Cape	CVRF	100%
62437	Alaskan Leader	BBEDC	50%	36047	North Sea	CVRF	100%
35844	Aleutian Mariner	BBEDC	40%	60795	Northern Hawk	CVRF	100%
57450	Arctic Fjord	BBEDC	40%	8225	Sea Venture	CVRF	100%
31792	Arctic Mariner	BBEDC	50%	38989	Alaska Rose	CVRF, NSEDC	37.5%, 37.5%
51672	Bering Defender	BBEDC	50%	40638	Bering Rose	CVRF, NSEDC	37.5%, 37.5%
74669	Bering Leader	BBEDC	50%	60655	Destination	CVRF, NSEDC	37.5%, 37.5%
70435	Bristol Leader	BBEDC	50%	37660	Great Pacific	CVRF, NSEDC	37.5%, 37.5%
8411	Bristol Mariner	BBEDC	45%	35957	Sea Wolf	CVRF, NSEDC	37.5%, 37.5%
64	Cascade Mariner	BBEDC	50%	60407	Alaska Ocean	NSEDC	38%
56676	Defender	BBEDC	50%	5992	Aleutian No. 1	NSEDC	100%
38431	Morning Star	BBEDC	50%	57228	Arica	NSEDC	9%
32858	Neahkahmie	BBEDC	40%	55921	Cape Horn	NSEDC	9%
222	Nordic Mariner	BBEDC	45%	34905	Glacier Bay	NSEDC	100%
77393	Northern Leader	BBEDC	50%	48075	Northern Glacier	NSEDC	38%
7	Pacific Mariner	BBEDC	40%	56991	Pacific Glacier	NSEDC	38%
963	Western Mariner	BBEDC	50%	35767	Patricia Lee	NSEDC	100%
965	Adventure	CBSFA	100%	51873	Rebecca Irene	NSEDC	9%
50570	Aleutian Challenger	CBSFA	9.9%	57211	Unimak	NSEDC	9%
62152	American Challenger	CBSFA	9.9%	24255	American Beauty	YDFDA	75%
59378	American Dynasty	CBSFA	9.9%	34855	Baranof	YDFDA	41%
60660	American Triumph	CBSFA	9.9%	35833	Courageous	YDFDA	90%
103	Early Dawn	CBSFA	50%	52929	Golden Alaska	YDFDA	30%

Other approaches

- “The policy decision to initiate an FMP amendment for new sector allocations is not the only approach to address the changing BSAI Pacific cod fishery.”
- “These Council actions and taskings indicates there are numerous approaches for addressing the changing BSAI p-cod fishery **without** changing A85 sector allocations.”

Council management of BSAI p-cod has not been static: Recent Council actions on BSAI p-cod, p. 62

- A. 113: Aleutian Island cod set-aside (ongoing)
- A. 119: CPs acting as motherships (completed)
- Limit access in the parallel cod fishery for federal participants (after respective sector closes)
- BSAI CV trawl p-cod management (potential rationalization)
- BSAI CV pot >60 cod management (potential rationalization)
- BSAI CP pot cod management (potential license limitation)
- Reduction of “stranded” uncaught cod

Recommendation

- Review is complete.

Other slides

SSC

- *“The SSC recommends minimizing the discussion of changes in conditions whose effects are not yet known.”*

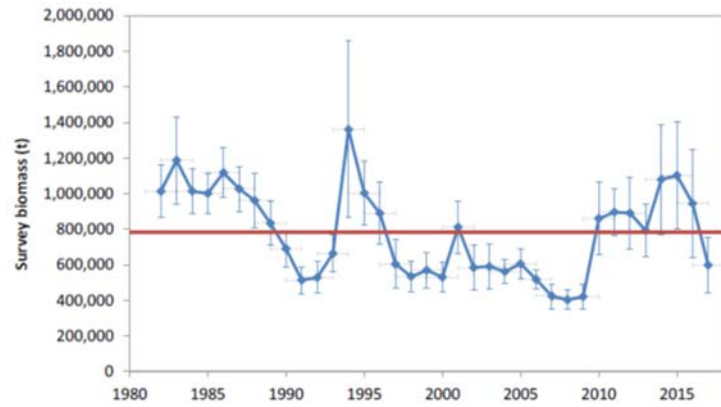


Figure 2.5—EBS trawl survey biomass estimates with 95% confidence intervals (standard area). Red line = long-term average.

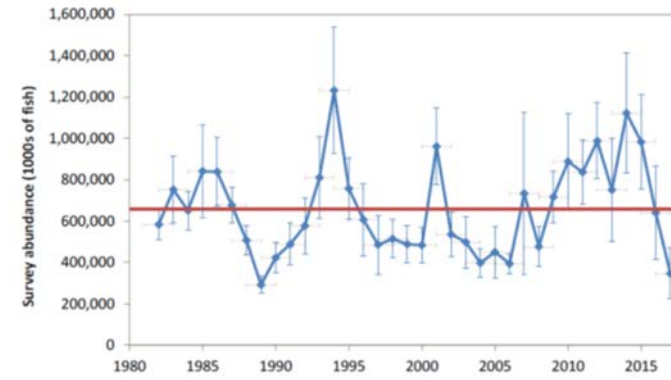


Figure 2.2—EBS trawl survey numerical abundance estimates with 95% confidence intervals (standard area). Red line = long-term average.

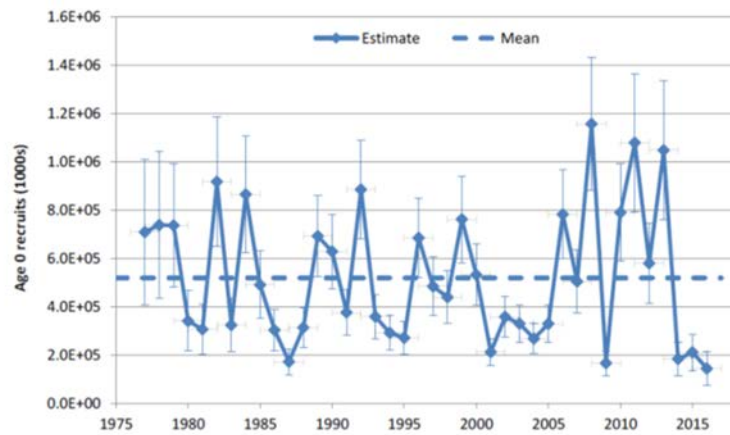
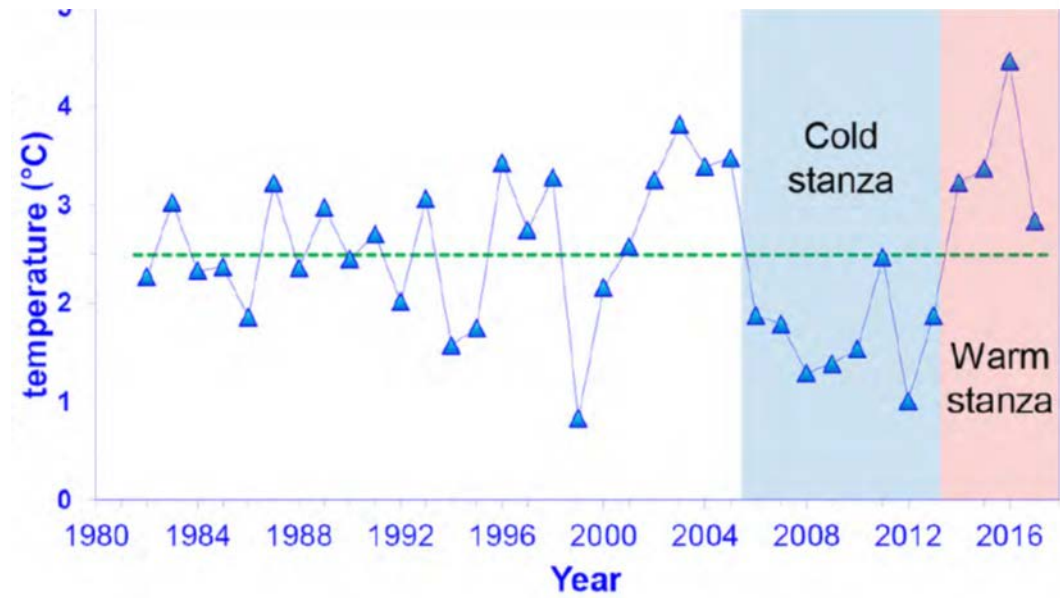


Figure 2.32—Time series of recruitment at age 0 as estimated Model 17.2.



Crab Bycatch in the <60 sector, Table 8-17 (p. 72)

- 2018 federal fishery = 75,500 RKC and 85,461 C. bairdi
- Total federal <60 p-cod catch = 8579 mt
- Rate = 8.74 RKC/mt and 9.96 C. bairdi/mt
- 2018 GHL = 13,180 mt (with no observer coverage)
- At the same rate in the GHL: 115,193 RKC and 131,273 C. bairdi
- Total 2018 crab bycatch (federal plus GHL):
- **RKC = 190,693 crab**
- **C. bairdi = 216,734 crab**

Pacific Cod Allocation Amendment Review (A85)

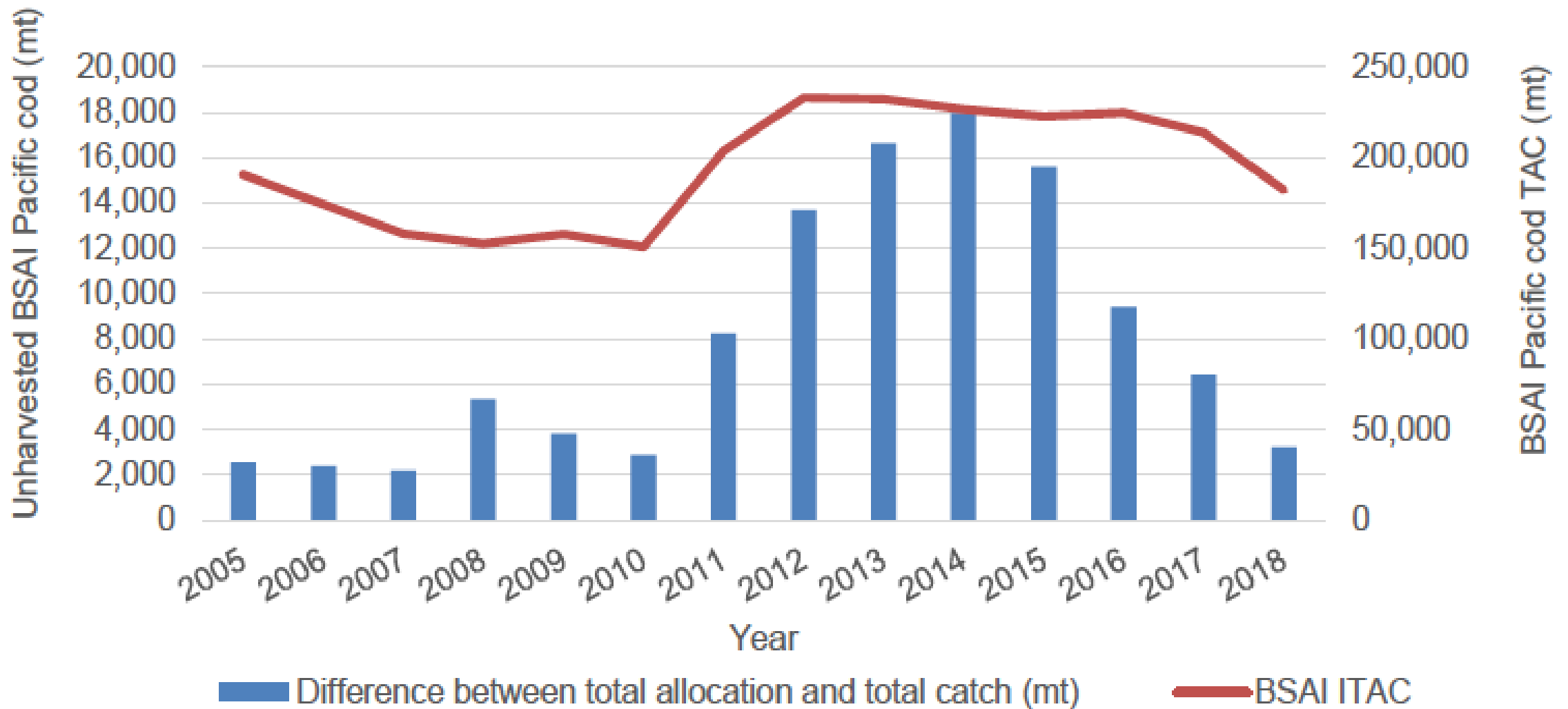
Groundfish Forum

June 2019

Agenda Item D-2

“THE DOCUMENT FULFILLS THE REQUIREMENTS OF THE PERIODIC PACIFIC COD ALLOCATION REVIEW” AND AS SUCH THIS REVIEW SHOULD BE FOUND TO BE “COMPLETE” AND THE 10-YEAR REVIEW INTERVAL BE RESET.

Stranded BSAI Pacific Cod



Bering Sea A80 Cod and Groundfish Weekly Harvest

