

C-3(c) BSAI Cod Split/Community Protections

The Problem:

The American Fisheries Act, BSAI crab rationalization program, and BSAI Amendment 80 program each provide benefits to processing vessels that were intended to protect investments in and dependence on the respective fishery resource. Each of these rationalization programs has afforded opportunities for consolidation, thus freeing some processing capacity to target the non-rationalized BSAI Pacific cod fishery at the expense of other industry and community investments.

The original problems statement (above) remains valid, but is compounded by the interaction the impact of the TAC split and its default option of accounting sector allocations at the aggregate BSAI level.

Under the TAC split other rationalized harvesting sectors can also impact the amount of cod available to AI communities.

With the TAC split, the DFA for 541/542 for 2014 as projected in SSL EIS table 8-95 would be about 8500 tons.

From 2002 to 2007, the Adak processing facility processed an average of 8000 tons/year from the federal cod fishery. The facility has the capacity to process 8000 tons in a one month period..

Trawl cod fishing gets started about 4 or 5 weeks later in the AI than in the BS. As the race for fish has intensified in the BS CV trawl fishery the average catch per week in the 1st 5 weeks has reached 6000 tons/week in BS. This means that the CV sector in the BS can harvest the full aggregate sector allocation before fishing gets underway in the AI, leaving the AI shoreplants with a one or two week season in the primary AI fishery.

The CP sectors of the cod fishery are rationalized. The freezer longliner fleet has a 4000 ton per week capacity. If a significant portion of that fleet chose to start January 1st in the AI, they could easily take the DFA before the end of February.

Prior to rationalization the freezer longliners took only a small percent of their AI cod in the A season. Using recent post-rationalization years to calculate sideboards rewards changes in behaviour relative to the AI cod fishery that rationalization made possible.

Increasing the state GHIL to 4.5% is a sub-optimal response that may result in PR looking for offsetting restrictions in other AI federal fisheries. The Council can provide a better solution to this problem.

Adak and Atka can't weigh anchor and make up catch in another fishery or another area. Waiting is not the answer unless the desired outcome is to extinguish processing in the AI communities.

The Solution:

The only real solution is to explicitly allocated an amount of cod outside the aggregate BSAI sector splits aside for CVs delivering to AI shoreplants.

We ask that the Council move forward an analysis of community protection measures in the Aleutian Island Pacific cod fishery to mitigate the combined impact of the re-direction of excess processing capacity by rationalized sectors into the AI cod fishery and impacts of the BSAI cod split in the context of the SSL protection measures in the AI cod fishery.

The analysis should include an option that would allocate the Directed Fishing Allocation (after CDQ and ICA) for areas 541 and 542 to CVs with a regionalized delivery requirement to shoreplants in the Aleutian Island management area. In the event that no shoreplant is operating in AI area, or insufficient processing capacity is available the regional shorebased delivery requirement would be waived.

This option would maintain the current P. Cod sector allocation percentages in the Bering Sea only. Area 541/542 would be a CV only allocation. (Area 543 would be CP or MS only.)

If the 541/542 DFA exceeds 10,000 tons, CPs would be allowed to harvest up to 50% of any additional DFA tonnage after April 30th.

If any of the AI CV cod allocation is unharvested by April 30th, it would be made available to CPs after that date.

PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: C-3 (a,b,c) Steller Sea Lion EIS/B.O.P./BS+AI

AI
Pcod
ABC
Split

	NAME (PLEASE PRINT)	TESTIFYING ON BEHALF OF:
1	Dave Wood	US Seafoods
2	Sam Wrenschule / Mike Levine	Oceana
3	Dave Fraser	ACDC
4	Larry Cotter	APICDA
5	Todd Loomis	Ocean Peace, Inc.
6	Clem Tillion	Alut Corp.
7	Frank Kelly	City of UTA Alaska
8	Linda Kozak	Kodiak Vessel Owners
9	John Gawwin	Alaska Seafood Cooperative
10	Shaden	At-Sea Processors
11	Chad See	Freezer Longline Coalition
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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.