

Steven Taufen

AMERICANS FOR EQUAL ACCESS

- Working to ensure equal public access to America's natural resource

September 30, 2013

North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501

RE: GOA Trawl Bycatch Management--updated discussion paper

Dear Chairman Olson and members of the Council:

I am following up with you based on our conversation and meeting last week by providing you with supplemental information to be considered by your staff for inclusion and analysis in the next iteration of the Gulf of Alaska (GOA) trawl bycatch management discussion paper, specifically regarding the concept of non-monetary Total Allowable Catch (TAC) allocations of target species, in addition to PSC and MRAs. This idea is that TAC would be analyzed in a "pool-able," collective, "bank-style approach, to insure that eligible participants would be able to have access to these public resources. Of course, one would also be required to have the necessary LLPs and FFPs to qualify for entry into this publicly owned and public-steward style of approach to management of the Gulf groundfish fisheries.

On behalf of the group Americans For Equal Access (AFEA)¹, we ask that you include the addition of the total allowable catch (TAC) quota, to be analyzed with IBQs and PSC quotas in a "pool-able" and "bankable" style, in order to maintain public ownership of resource. We asked you in June to do this, and during staff tasking as well. We have written directly to Deputy Director Dave Witherell and held conversations with both Mr. Witherell and staff analyst Sam Cunningham about including this element in the staff catch share analysis. We yet again ask that this be included in AFEA's approach to the Gulf trawl bycatch problem.

With quotas for pollack and other species on the rise in the Gulf, there is no need for consolidation that follows all privatized fisheries where flatfish quotas are never reached. If quota is divided up by history--in the flatfish fishery especially--it will be rewarding the dirty fisherman and excluding future fishermen who may be able to do it more cleanly. In addition, privatized fisheries make it very hard for new entries into the fisheries because only corporations can afford to buy up quota and vessels. In the upcoming meetings, AFEA will be participating at a greater level--God willing--and thank you for your consideration of this proposal, which deals with bycatch management and keeps the resource publicly owned.

To that end, the following comments are on behalf of myself and AFEA and pertain to the September Council meeting Agenda Item C-5(a), the updated Council staff discussion paper on GOA trawl sector bycatch management. We have reviewed the current and past Gulf trawl groundfish management papers, and have been communicating and participating with the Kodiak City Council and Borough Assembly. The comments below are designed to provide input to the Council on the development of a catch share program for groundfish fisheries in the Gulf.

We believe that the Council's statement of purpose and need as currently drafted can accommodate a variety of different elements in any bycatch-reduction management or catch share program for the Gulf

¹ AFEA is a trade and community association of like-minded people who share the common goal of equal access for the public to public fisheries resources.

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groundfish fisheries. AFEA's main policy goal in this process is to ensure access to these important Gulf fisheries for all interested participants at a reasonable expense, and to ensure that Captains and crew will have the opportunity to move into vessel ownership.

As stated in our testimony at the June Council meeting for Agenda Item C-5(a), we have asked the Council at every past opportunity for public comment and testimony that any catch share program in the Gulf trawl fisheries be limited in its aspects of private, exclusive ownership. This could be included with the analysis of individual PSC and MRAs quotas, which we have also been asking the Council to consider, or it could stand as its own pool with a separate but concurrent staff analysis. Though our members would favor a separate analysis approach, we would also welcome the combination of PSC, MRAs, and TAC as "pool-able" and "bank-able" so as not to lose sight of our larger goal,

AFEA also believes this approach to bycatch management could fit into a community-based quota plan, as well, though a community catch share program would need to be 3 tiered, at least, at the community, regional, and state and federal levels, to insure both entry-level and historical opportunities.

Finally, AFEA has started the process of moving towards the goal of having the State of Alaska take over management of its fisheries within the three mile jurisdictional boundary regarding both gear types and all target species. This will ensure continued access to the next generation of fishing men and women whose dream and goal is to become an owner/operator in our public resource fisheries.

We hope to expound on some of the proposals coming up before the state Board of Fisheries this October--one being scallops and the management plan put forward in that state fishery to address the end of exclusive and unconstitutional vessel-based permitting, and in the Pacific cod and pollock Kodiak fisheries--and try to move these into statewide management. We may try to do this as a statewide ballot question, if not able to move through the Board.

AFEA thanks the Council for its dedication to our nation's resources here in Alaska. Though we may not always agree with the Council's actions, we do recognize the job you have been appointed to is perhaps one of the toughest in the nation. Perhaps the only job tougher is if you are trying to sway the direction of fisheries management away from privatization back towards publicly owned and managed.

We often feel like the proverbial Little Dutch Boy, with his finger in the hole of the dike. We pray people come help us quickly!

Sincerely,
(signed)
George Hutchings
Commercial Fisherman

President
Americans for Equal Access
P.O. Box 8242
Kodiak, AK 99615

Encl.

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AFEA PROPOSAL

The asset value of catch shares must be limited to the extent practically possible, to limit the amount of windfall awarded to initial issues and to limit the potential cost of new entry.

The most important aspect of any catch share program in the Gulf should be non-monetary quotas that are nontransferable, but "pool-able" for the purposes of cooperative structures within the groundfish trawl fleet to voluntarily report, monitor, and divide allocations, as individual bycatch quotas (IBQ) or prohibited species catch (PSC or MRA) quotas. To keep Kodiak and the other coastal communities in the Gulf economically viable, the initial allocation boon must be limited to protect smaller participants and ensure entry-level opportunities.

In addition, if target species allocations are incorporated into a catch share program, the target species Total Allowable Catch (TAC) should be analyzed in a "pool-able," collective, bank-style approach, to insure that eligible participants would be able to have access to these public resources.

Renewal or re-issuance of catch shares must be tied to performance standards, such as reduced bycatch or a high level of active participation.

Such an approach to catch shares on the Gulf will absolutely bring individual responsibility into the management process as a performance standard. It is my goal to one day see any discard of a resource illegal, and that will not happen unless we begin down a path of individual responsibility for bycatch. I support requiring active participation in the fishery by vessel and permit owners, and any entities that receive or purchase bycatch or target species allocations. Public fish should not be turned into an exclusive private property right for those lucky enough to receive allocations. We also do not want to reward the most gluttonous fishermen who, though they may have the largest historical participation, are likely responsible for the most bycatch, by grandfathering them in for the largest share of future fish. Catch share allocations should be a privilege and not a right granted in perpetuity to so-called "armchair" fishermen.

Any catch share program in the Gulf must be limited to bycatch species only allocations—IBOs or PSCs.

There is absolutely no need for a target species allotment-based catch share program here because the problem in the Gulf is excessive bycatch in the trawl fleet. This bycatch problem can be solved through sensible management of bycatch with individual bycatch (IBQ) or PSC (or MRA) quotas for other trawl-caught bycatch.

My idea is a bycatch or PSC quota "bank" of sorts, from which to draw individual bycatch or PSC allotments, by vessels per fishery or per trip. Each target species in the Gulf groundfish fisheries would be separated into an individual species-fishery, with a percentage of PSC divided and assigned to each species-fishery. The goal is to make every fish count and promote more efficient and cleaner fishing through incentives to avoid bycatch and PSC species, utilize allocations more efficiently, and gradually reduce the amount of bycatch or PSC allotments available, to overall reduce bycatch and required discards by groundfish trawl vessels.

Every participant in the fishery would need to have their vessel in the Gulf and ready to fish, to acquire any quota from the bank. Vessels would report in weekly. Upon reaching 85% of the quote, that vessel

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would be required to return to port and off-load. If a vessel fishes cleanly, they can keep fishing until the TAC is reached. If a vessel goes over their quota, perhaps 5% increments, the repercussions would gradually worsen until that vessel could no longer fish.

All bycatch and PSC would be required to come to the dock unless discarded—alive—and counted under the direct supervision of an observer. Halibut can be returned alive, and crab and salmon. For example, all caught crab would be counted and if still alive, returned to sea; if dead, the crab could be sectioned-off and iced, to be consumed. 100% observer coverage would be required – the fleet's bycatch or PSC would be sold to offset these costs

Bottom line: if fish can be returned alive and counted, it must be; if not, it must come back to the dock to be processed and consumed.

Theresa Petersen

We, the undersigned residents of Gulf of Alaska coastal communities, support a Community Fishery Association (CFA) which is allocated 100% of the quota in a Gulf of Alaska trawl bycatch management program.

We urge the North Pacific Fishery Management Council (the Council) to utilize a CFA as a primary component of any Individual Fishing Quota (IFQ) or catch share program the Council develops. In providing the trawl fleet with "tools" to reduce bycatch, it is critical that we do not create a system which repeats the negative impacts of past catch share programs. We encourage the Council to be innovative and design a management program which creates a better fishing future.

Allocating quota directly to the community via a CFA would provide assurances that fishing rights would be anchored in the community. Fishery participants would play a central role within the CFA, and would receive all of the benefits that come with slowing down the race for fish. However, by setting performance standards and contractual obligations, the CFA could ensure that community needs – such as stable crew jobs, active participation in the fishery and a diverse fishing fleet – are met.

We support the Alaska Marine Conservation Council's (AMCC) and Gulf of Alaska Coastal Communities Coalition's (GOACCC) proposal for a CFA which is allocated 100% of the quota.

	FIRST	LAST	ADDRESS	CITY	STATE	ZIP	INDUSTRY/INTEREST
1	Don	Dumm	PO Box 1723	Kodiak	AK	99615	Commercial fishermen
2	Susan	Paine	PO Box 1723	Kodiak	AK	99615	Commercial fishermen
3	Frank	Miles	PO Box 2744	Kodiak	AK	99615	Commercial fishermen
4	Peter	Allan	PO Box 2160	Kodiak	AK	99615	Commercial fishermen
5	Mary Ann	Hickey	PO Box 2160	Kodiak	AK	99615	Coastal resident
6	Leigh	Thomet	PO Box 3258	Kodiak	AK	99615	Commercial fishermen
7	Cache	Seel	515 Carolyn	Kodiak	AK	99615	Coastal resident
8	Mike	Trussell	1298 Sawmill	Kodiak	AK	99615	Coastal resident
9	Pete	Wedin	PO Box 3353	Homer	AK	99603	Charter, coastal resident
10	Claudia	Anderson	PO Box 310	Kodiak	AK	99615	Commercial fisher, coastal resident
11	Terry	Haines	724 Hillside Dr.	Kodiak	AK	99615	Commercial fishermen
12	Dave	Kubiak	PO Box 193	Kodiak	AK	99615	Commercial fishermen
13	Robert	Heinrich	PO Box 1388	Kodiak	AK	99615	
14	Rob	Sanderson	PO Box 5484	Ketchikan	AK	99901	commercial fishermen
15	Herman	Squartsoff	PO Box 189	Ouzinkie	AK	99644	GOAL3 board member
16	Theresa	Peterson	1850 Three Sisters Way	Kodiak	AK	99615	Commercial fisher, coastal resident
17	Charlie	Peterson	1850 Three Sisters Way	Kodiak	AK	99615	Commercial fisher, coastal resident
18	Theodore	Panamarioff	810 Hillside	Kodiak	AK	99615	Coastal resident, consumer, subsistence
19	James	Skonberg	PO Box 70	Ouzinkie	AK	99644	Commercial fishermen
20	Alice	Lewis	PO Box 671141	Chugiak	AK	99567	Resident
21	Gene	Anderson	PO Box 47	Ouzinkie	AK	99644	Fishermen
22	Dauren	Muller	3447 E. 67th Ave.	Anchorage	AK	99507	Fishermen
23	Adrian	Rhoades	2661 Turner Lane	Kodiak	AK	99615	Coastal resident
24	Brigid	Dodge	11754 S. Russian Cir. Rd.	Kodiak	AK	99615	Ecotourism, sport fishing, coastal resident
25	Stosh	Anderson	PO Box 310	Kodiak	AK	99615	Commercial fishermen
26	Pete	Hannah	PO Box 1803	Kodiak	AK	99615	Commercial fishermen
27	Alexus	Kwachka	326 Cope St.	Kodiak	AK	99615	Commercial fishermen
28	Eva	Holm	PO Box 8749	Kodiak	AK	99615	Commercial fishermen
29	Oliver	Holm	PO Box 8750	Kodiak	AK	99615	Commercial fishermen
30	Christopher	Johnson	PO Box 151	Kodiak	AK	99615	Commercial fishermen
31	Danielle	Ringer	PO Box 151	Kodiak	AK	99615	Commercial fishermen
32	Darren	Platt	3331 Balaka Lane	Kodiak	AK	99615	Commercial fishermen

33	Wendy	Beck	PO Box 2790	Kodiak	AK	99615	Commercial fishermen
34	Andy	Mezirow	PO Box 2794	Seward	AK	99664	Commercial fishermen, charter
35	Jane	Eisemann	1885 Pruitt Lane	Kodiak	AK	99615	Commercial fishermen, marine education
36	Switgard	Duesterloh	PO Box 2787	Kodiak	AK	99615	Coastal resident
37	Gary	Rozelle Sr.	PO Box 5033	Akhiok	AK	99615	Commercial fishermen
38	Kip	Thomet	PO Box 3258	Kodiak	AK	99615	Commercial fishermen
39	Harvey	Goodell	PO Box 3108	Kodiak	AK	99615	Commercial fishermen
40	Darius	Kasprzak	807 Jackson Ln.	Kodiak	AK	99615	Commercial fishermen
41	Stan	VanMatre	3199 Penninsula Rd.	Kodiak	AK	99615	Commercial fishermen
42	Ann	Spaeth	PO Box 8814	Kodiak	AK	99615	Coastal resident
43	Neil	Rickman	PO Box 2872	Kodiak	AK	99615	Vessel owner
44	Ian	MacIntosh	910 Steelerway	Kodiak	AK	99615	Vessel owner
45	Gary	Rabideau	PO Box 8882	Kodiak	AK	99615	Coastal resident
46	Margaret	Bosworth	PO Box 1803	Kodiak	AK	99615	Coastal resident, salmon permit holder
47	Stacy	Studebaker	PO Box 970	Kodiak	AK	99615	Coastal resident, sport fishing
48	Steve	Mathieu	1721 Mission Rd.	Kodiak	AK	99615	Commercial fishermen, coastal resident
49	Julie	Miller	614 Hillside	Kodiak	AK	99615	Commercial fishermen, coastal resident
50	Marvin	Agnot	PO Box 503	Akhiok	AK	99615	Commercial fishermen, coastal resident
51	Fred	Christiansen	PO Box 6	Old Harbor	AK	99643	Subsistence fisher
52	Diann	VanMatre	3199 Penninsula	Kodiak	AK	99615	Commercial fishermen, coastal resident
53	Steve	Branson	PO Box 451	Kodiak	AK	99615	Commercial fishermen
54	Kaysia	Hildebrand	3731 Gull Kodiak	Kodiak	AK	99615	Retail
55	Richard	Blackwell	1820 Larch St. E4	Kodiak	AK	99615	Builder
56	Todd	Musgrove	1327 Mylark Ln Kodiak	Kodiak	AK	99615	Technician
57	Stephanie	Mangini	313 Murphy Way	Kodiak	AK	99615	Commercial fishermen
58	Mike	Milligan	12056 Gara Dr.	Kodiak	AK	99615	Coastal resident
59	Theron	Haines	724 Hillside Dr.	Kodiak	AK	99615	Coastal resident
60	Ben	Watkins	PO Box 1430	Kodiak	AK	99615	Fishermen
61	Chris	O'Callahan		Kodiak	AK	99615	Fishermen
62	Robert J.	Clark	PO Box 1207	Kodiak	AK	99615	Fishermen