



Alaska Longline

FISHERMEN'S ASSOCIATION

Post Office Box 1229 / Sitka, Alaska 99835 907.747.3400 / FAX 907.747.3462

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

November 28, 2014

Dear Chairman Hull and Members of the Council,

On behalf of the Alaska Longline Fishermen's Association (ALFA), I am submitting these comments in Agenda Item C-7 Vessel IFQ. ALFA opposes increasing vessel caps in the Gulf of Alaska for halibut or sablefish. Our rationale is explained below.

As the Council is aware, vessel caps are in place to control consolidation of quota. Consolidation of quota onto fewer boats eliminates deckhand jobs and entry level opportunities. Quota consolidation onto fewer boats harms the support industries and the communities that depend on the commercial halibut and sablefish fleets. As industry support sectors falter, services become unavailable in small communities, further reducing the viability of local fishing fleets and the communities they support.

The Council that built the halibut/sablefish IFQ program recognized the negative socioeconomic impacts of fleet consolidation and carefully included "excessive share" limits on both QS ownership and vessel operations. As the Discussion Draft notes, the Council sought to retain the character and distribution of the fishing fleet and to protect small producers and entry level opportunities. While these provisions have proven essential, they have not stopped the size of the fleet in each fishery from being reduced to **one third** of pre-IFQ levels, a dramatic reduction not captured in the discussion paper provided to date on this issue. Halibut quota was initially fished from 3,452 vessels and sablefish quota from 1166 vessels; in 2014, 936 vessels participated in the halibut fishery and 350 participated in the sablefish fishery.

The impacts of QS consolidation on small boats and coastal communities is now a well recognized and often criticized aspect of catch share programs, a concern that led to National Standard 8 in the last reauthorization of the Magnuson-Stevens Act. National Standard 8 directs regional councils to: "take into account the importance of fishery resources to fishing communities in order to (A) provide for the sustained participation of such communities, and (B) to the extent practicable, minimize adverse economic impacts on such communities." Allowing already well positioned boats to harvest more quota while other vessel owners lose access undermines National Standard 8. The Council's goal should be to allow a reasonable number of fishermen and fishing boats to earn a healthy living in the highly valuable

sablefish and halibut fisheries. The dramatic reduction in vessel participation in these fisheries should clearly flag for the Council that additional consolidation violates goals and objectives of this program and of Congress.

During these times of low abundance all fishermen need to get by with less. Redistributing quota so some vessels can harvest more disrupts historic harvesting and delivery relationships. Because all quotas have been reduced proportionally, historic relationships are maintained until caps are raised, not by raising the caps.

The original Clipper Seafoods proposal addressed only sablefish caps in the Bering Sea/Aleutian Islands, claiming higher caps would allow full prosecution of these fisheries. Subsequent proponents of raising the caps have claimed the same rationale for raising sablefish AND halibut caps in all areas west of Southeast. The tables on pages 4 and 5 of the Discussion Paper identify that Gulf quotas for halibut and sablefish are 90-100% harvested, with most areas harvested at over 97%. Bering Sea halibut harvests are 85% and higher. Only the Bering Sea/Aleutian Island sablefish fisheries are leaving quota unharvested (57% landed). This data clarifies that there is no defensible rationale for raising vessel caps in GOA area and really very little rationale for raising vessel caps in the halibut fishery in any areas.

In sum, the Council should recognize that the original Clipper Seafood proposal to raise vessel caps in the BSAI sablefish fishery addressed a specific issue, namely challenges to fully prosecuting the fishery in these areas, but has become a Christmas tree for highly capitalized operations feeling confined by low quotas and consequently low caps in all other areas. While ALFA members understand the challenges IFQ fishermen face, raising caps to allow additional consolidation is incompatible with Council policy for these fisheries and with Congressional objectives to provide for the sustained participation of community based fishing fleets in limited access fisheries. Sablefish and halibut TACs are fully harvested in all Gulf areas, halibut quota is substantially harvested in BSAI areas, and while sablefish TAC is not fully harvested in BSAI areas, other factors, such as price and stock productivity, may also be at play. The current low abundance levels are hard on the fleet, the support industries and fishery dependent communities; allowing additional fleet consolidation will further marginalize small operations that are vitally important to Alaska's coastal communities. ALFA opposes increasing Gulf of Alaska vessel caps in the halibut and sablefish fisheries.

Thank you for the opportunity to comment.

Sincerely,



Linda Behnken
(Executive Director, ALFA)