

North Pacific Fishery Management Council (NPFMC)
February Plenary Session — For the Record by Fax to 907-271-2817
February 3-11, 2014 Renaissance Hotel Seattle, Washington
Public Comment by Stephen Taufen, Groundswell Fisheries Movement

Groundswell is an advocate for public rights and accountability and transparency in USA fisheries.

Re Community Fishing Association (CFA) Workshop

Feb. 10, 2014 from 1:00 to 6:00 pm. (5 hours)

Secretary Pritzker, Chairman Olson, Council Members and CFA Panelists:

First, some questions for Chris Oliver's quiver:

1. Please ask the panelists to discuss Bycatch Mitigation Tools – not only in terms of program or management scheme assisted, but in terms of tools that work directly in the ocean to reduce bycatch as TAC and multispecies ecosystem changes occur in the future, upwards and downwards adjustments.
2. Please ask the panelists how full Accountability and Transparency will happen, who will do it, and how will the public get unrestricted access to all the fisheries data as well as non-profit entity revenues and disbursements on a timely basis.
3. Please ask the panelists to discuss whether or not the best way to provide for communities is to award shares to that communities resident fishermen, if such an approach is legal etc.

Second, the process underway at the Council is another example of why the GAO found that “the fishery management council it reviewed lack key elements of an effective stakeholder participation framework and therefore might be missing opportunities for all stakeholders to participate in ... [the] program development process.”

Groundswell believes that:

The current CFA Workshop once again isolates the Council members themselves from full responsibility, and this will no more successfully serve our communities than the former crab crew workshop served the interests of crewmen. Rather, it failed miserably.

Likewise, this panel is comprised of many individuals who have their own motives and demonstrated tendencies to mischaracterize their community programs.

A key individual who would have made a topnotch panelist is Lacey Berns who was doing her Masters at Humboldt State University in California on Community Fisheries, re Salmon.

Her report is the nose that should be part of the horse, so to speak – while at least the Council recognized the CFA proposal already submitted was a cart before the horse. A cart a commoner might say is carrying a lot of pro-catch share manure.

We hope Ms. Berns submits a public comment, as well. You'd benefit for a review of her work.

Masters Program, Humboldt State University — Excerpts from thesis: "Alaska's Changing Coastal Communities: A Case Study of Kodiak; Implications of Low Salmon Prices and Sustainability."

Berns' draft thesis outlined the:

- What is a fishing-dependent community?
 - Variables that help identify community dependence on a fishery.
- The power of Culture: shared history, occupation and identity.
- Cultural Capital: the importance of "Legacy"
- The types of Capital in Alaskan fishing communities
 - Human, Cultural, Social, Financial, Natural
- Assessing Community Dynamics: Conceptual Frameworks
- What is a Dying Fishing Community?
- Corporate Political Capital: Controlling the outcomes of critical fisheries management decisions.
- Who's Accountable?

Lacey Berns' paper headlines:

"Fisheries are a human phenomenon. fisheries are places where human activities are linked with marine ecosystems and renewable resources. Human fishing activity is the defining attribute of a fishery. [and] if fisheries management is to be more successful in the future it must integrate social and cultural concerns with the management of natural resources and ultimately the level of its success will rest upon how well it promotes the well-being of people living in fishing communities." — The Food and Agriculture Organization of the United Nations: Understanding the Cultures of Fishing Communities: A Key to Fisheries Management and Food Security, 2001.

Third, some important reminders:

- The issue is Bycatch Reduction – for Sustainability and Conservation needs – not allocations, gifts of the national Commonwealth. The bycatch reduction toolbox already has tools available, especially when considering new technology, and the restrictions of TAC setting, of course.
- 50 CFR § 600/325 NS#8—Communities: states ***"This standard does not constitute a basis for allocating resources to a specific fishing community nor for providing preferential treatment based on residence in a fishing community."*** It does not get any clearer than that.
- Allocations – even to Communities – are not bycatch reduction tools, and cannot provide for meaningful reductions in the bycatch of halibut, king salmon, and other species. 50 CFR § 600.345 NS#8—Communities: provides for sustained participation ... but ***"This standard requires that an FMP take into account the importance of fishery resources to fishing communities. This consideration, however, is within the context of the conservation requirements of the Magnuson-Stevens Act."***
- Community allocations are a poor substitute for direct allocations to those who fish – the captains and crew (historically 35-40%) & local boat owners (historically 60-65% of adjusted gross revenues): i.e those who spend in the community.
- Tying a catch share to a community would be better achieved by setting an amount of quota that can only be awarded to historical participants who agree to continue living in that community.
- Referring to a 20 year history in Alaska with IFQs simply demonstrates the deliberate march, species by species, to privatize a national resource without paying for it. It does not demonstrate a means of bycatch reduction, nor a tool.

- No Community Association approach can be successful until the CDQ program is properly, fully assessed and its lessons learned. The CFA proposal in play outlines Boards that will inevitably prove to fail Kodiak. That entire proposal is a cart before a horse with no nose, and reflects improper public process.

Conclusion:

Groundswell notes:

- Concern that the panel will have an inordinate amount of subjective self-praising about the NE Cooperatives and Morro Bay arrangements, not scientifically objective review of whether or not the programs work, or what elements within them are of authentic use to Alaska.
- **Bycatch species are already being commercially fished – by trawlers.** That simple statement is an important perspective to keep foremost in mind, especially with multispecies management standards and multiple user groups with fishing privileges.

Respectfully,

Stephen R. Taufen, Groundswell Fisheries Movement



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What is a Fishing Community?

A Framework of Analysis: The Human, Social, and Cultural Dimensions within a Natural Resource Community



Lacey J. Berns

Excerpts from research for a
Masters Thesis entitled:

**Alaska's Changing Coastal Communities:
A Case Study of the Kodiak Island Salmon Fishery;
The Impact of Low Salmon Prices and Sustainability**

Introduction

This research is submitted as comment to the NPFMC regarding the importance of social, cultural, and human impact studies of fishing communities and the needs of these communities, associated with external events, i.e. policy and management regime changes

- **This research examines the Kodiak Island salmon fishery following a ten year decline in prices, along with the introduction of IFQs. Both created a drastic reduction in the salmon fleet, impacts on families, fishermen, and their way of life. These critical events for the salmon fleet threatened the sustainability of the fishery, as over 250 seiners fell out of the fishery.**
- **In a natural resource community, the impacts of externalities have a profound impact on the networks of relationships of dependence. This is depicted on (Chart I)**
- **Using a theoretical framework with types of capital, human, social, economic, natural, cultural, the research defines the aspects of capital, and reveal the interaction, connections, within a fishing community under stress. I developed a flow chart depicting the flow of capital within a fishing community, identifying the “assets” of each type. (Chart II)**
- **Because there were no other studies about the salmon fishery in these contexts, I explored place-based and resource-based communities, such as logging and farming for the same themes.**

Regional Ecosystem Approach

Natural Resource Community-Networks of Relationships of Dependence

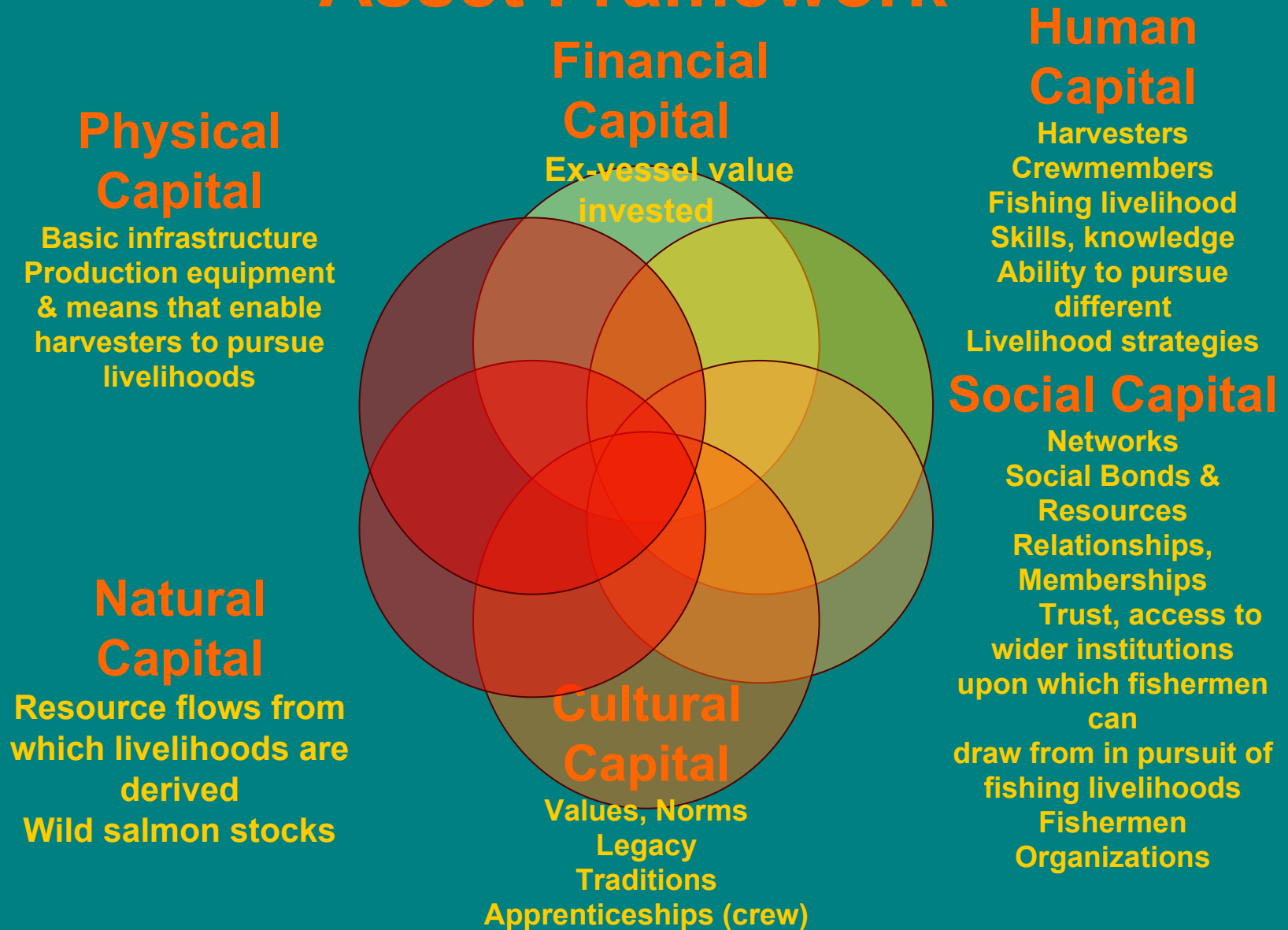
Impacts of Externalities (Chart 1)



- In-depth, personal interviews with Kodiak salmon fishermen reveal, even at the lowest point in the price decline, their attachment to their way of life, the camaraderie among fellow fishermen, their sense of place, demonstrating a deep attachment to all aspects of fishing around Kodiak Island, despite the price disaster. Their responses are deeply personal and poignant. Because I am a salmon fishermen, the respondents were more open to explore their feelings. The response rate was 40%. Can be applied to any fishery or fisherman.
- The well-being of natural resource-based communities depends on the level of policy development that meets the needs of the impacted group.
- Using MITs research identifying a “dying fishing community”, conclusions are made regarding the status of the fleet in 2005.
- The final Chart III reveals the impacts of the salmon disaster on the fishermen and community. The decline of all forms of capital are visually depicted, involving the assets such as skills lost, the blocking of legacy, and social connections, way of life, and loss of place. Criteria, such as the loss of plurality, or the ability to advocate for their gear type are shown. Kodiak salmon fishermen lost five advocacy groups between 1997 and 2003.
- The research conducted and diagrams to describe this complex event were designed by myself. This study is a unique, first time perspective and in-depth examination of a fishing community in Alaska—utilizing personal accounts and stories from local Kodiak fishermen.

Forms of Capital in a Fishing Community

Asset Framework



(Chart II)

“Alaska’s Changing Coastal Communities”

- **Define fishing communities & dynamics**
- **Social, cultural, and human aspects of fishing communities**
- **Introduce a theoretical framework involving forms of capital or “community assets”**
- **Results of Kodiak salmon fishermen surveys (quotes and photographs)**

Assumptions

That many of Alaska's coastal communities have been affected by "critical events," such as the implementation of IFQs, Quota share systems, and low salmon prices (1991-2004).

That it is difficult to assess the overall impact of these events and to quantify their total value to your community

Based on the lack of social, cultural, and human research about the Alaskan fishing communities, policy development has not been successful in terms of rebuilding fleets and communities, following critical events

Policy decisions, community strategic planning and economic development can benefit from understanding a capital-based framework

What we need to know: What is a fishing community?

- “A set of households that have traditionally depended on a communal fishing resource for a large share of their livelihood (Isham).”
- *Occupational communities-fleets, gear types, groups of harvesters*
- *Resource-based*
- *Place-based*

Natural capital is the marine life, healthy fisheries resources, the millions of pounds of fish caught and processed in coastal communities



“Fisheries are a human phenomenon”

- “Fisheries are human activities linked with marine ecosystems.”
- “If fisheries management and policy are to be successful they must integrate human, social and cultural concerns.”

“The level of its (policy) success will rest upon how well it promotes the well-being of people living in fishing communities.”



Human Capital

- Human capital involves a set of skills, abilities usually accrued over a large amount of time on the ocean, on vessels, and includes intimate knowledge of fishing areas and fish-catching abilities.
- It also includes the ability to pursue different livelihood strategies, or the ability to diversify into different fisheries.
- Includes the skills of marine-related trades and specialized businesses (welding, electric)
- Tendermen, and cannery workers



Human attributes of a fishing livelihood: Occupational Well-Being

Job Satisfaction

Independence
Freedom
Pride in Skills
Hard Work

Strong Identity

Being identified in a
a unique
category of workers

Friendship Patterns

Camaraderie
Strong social bonds
Patterns of fishing
heighten this

Shared Reality

Dangerous
Occupation
Being involved in
the
the same work

**“I only feel connected to myself and life
when I am in the natural world”**



Fishermen pass on expertise and intimate knowledge of place, of working in the surrounding environment, to their children. Fishing as a way of life engenders a deep connection with the surrounding environment.

Fishermen are passionate about their way of life

- “The thought of working 9 to 5 until your retire is somewhere along the level with being sentenced to jail for that amount of time. I want to believe that I can wake up in the morning and invent my day.”



Social Capital



- Relationships, networks, norms of social behavior, mutual trust which all contribute to a sense of common identity and shared future.
- Bridging and bonding capital are important for community prosperity through fisheries organizations, gear types, fleets.
- Involves interaction and behavior on the fishing grounds, camaraderie, shared history, traditions, and a way of life.



Camaraderie or “Friendship Patterns”

“There is a bond between fishermen unlike any other that I have seen in other occupations. It is difficult to explain, but I think it comes from facing the same challenges, and persevering in the face of adversity.”



Kodiak salmon fishermen, 2005

Salmon fishermen form life long relationships Social interactions are the essence of the place-based work they share

“It’s something only fishermen can understand.”

“I fish next to one guy and his family, he is my best friend, aside from my wife, and is a person I trust with everything.”



“Being part of a fishing family means you have friends that know how you are affected by the joy and stress of the profession. We are part of a community with common interests and problems.”



“Social Impact Assessment”

Has there been a socio-cultural impact study completed?

- “The cultural attitudes, beliefs, and values of fishermen, fishery-related workers, other stakeholders and their communities;
- The effects of the proposed action (or “event”) on social structure and organization, the ability (of the affected fishing community) to provide necessary social support to families and communities;
- The non-economic social aspects of the proposed action (or event) which includes lifestyle issues, health, and safety;
- The historical dependence and participation in the fishery by fishermen and communities, reflected in the structure of fishing practices;

(Community and Social Data Update: 2003 SAFE Report, / NOAA Fisheries guidelines for Social Impact Assessments).”

Powerful Identity Formation Promotes Social Capital

- **Fishermen are “members” of a unique group**
- **Work in the same environment, sharing the same occupation. The occupation defines the “self.”**
- **Social interactions are the essence of the place-based work they share.**
- **Fisheries are made up of a complex web of relationships, when people work together, they tend to share and reinforce their social identities, validating their self-image through social interaction.**
- **Fishermen share many skills, work on the ocean, which creates a “distinctive social reality.”**

Cultural Capital



- “The fishermen in our area are like family, a fishing day is a day of grace.”
- “We’re all part of a special club”
- Being part of a fishing family means you have friends that know how you are affected by the joy and the stress of the profession. We are part of a community with common interests.”

Kodiak salmon survey, 2005



A CRUCIAL ASPECT OF CULTURAL CAPITAL IS THE TRANSMISSION OF “LEGACY” TO THE NEXT GENERATION

Legacy depends on current economic opportunities.

Most fishermen have tried try to “weather” the price declines and “rationalization.”

The loss of an industry can mean the loss of all three “Legacy Goals”



Legacy and Uncertainty



“To ensure sustained communities you have to have something for the younger generation to look forward to. They have nothing.”



When that legacy is blocked, as it was for farming families in the 1980s, the loss to a community can be devastating”

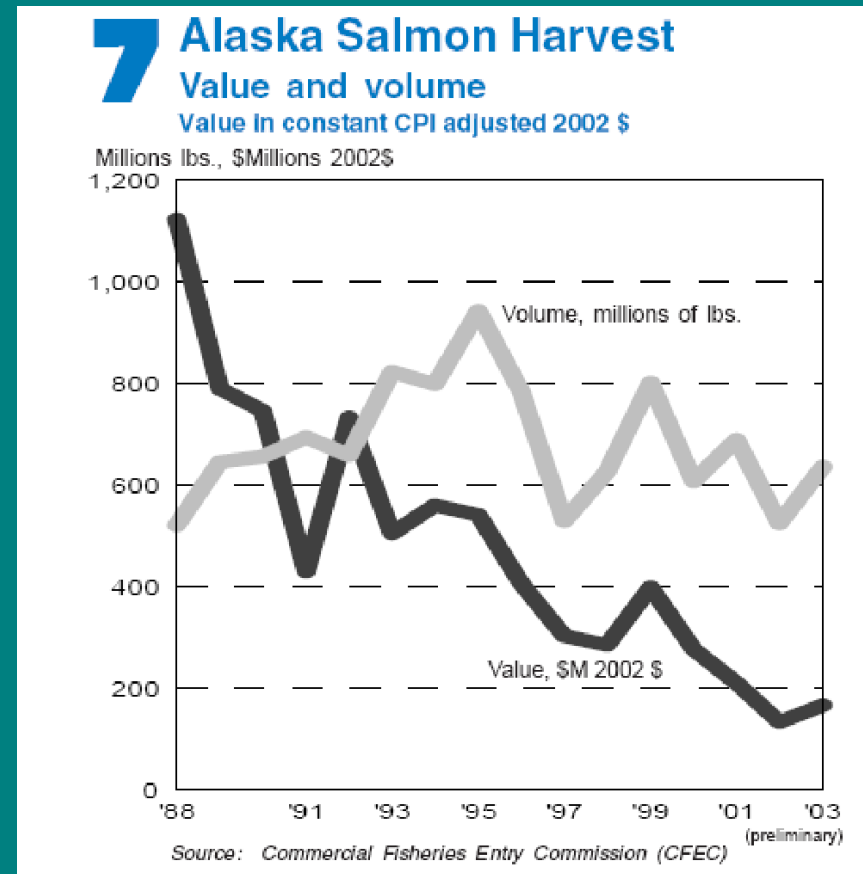
Kodiak salmon fisherman, 2005

The Power of Social and Cultural Capital: Shared History, Occupation, and Identity Makes Strong Communities

- **Social interaction creates camaraderie**
- **Shared meaning is created through occupational identity**
- **A shared system of beliefs, attitudes, activities, and commitments**
- **Fishermen are connected by bonds that establish a common purpose**
- **Share a sense of belonging, place, and “rootedness” on the ocean**
- **Mutual help and cooperation, sharing, support and trust**
- **Community emerges through a shared, collective sense of history**
- **“The bonds of community are strongest when they are fashioned from strands of shared history and culture.”**

Human capital consists of the skills and abilities of fishermen within a community including the ability to pursue different livelihood strategies

- “In the mid-90s there a dramatic social and economic decline occurred “that cut the heart out of the small boat fleet in Alaska:
- Dramatic Decline of salmon and herring prices
- IFQs
- The Americanization of the BSAI ground fish industry which transformed the harvesting sector.”



CONCLUSIONS FROM RESEARCH

Fishing communities are dynamic and have complicated networks of social, cultural beliefs and values.

Resource, occupational, place-based communities create “intense bonds within a community of common interests, a shared sense of identity, function as a distinct social grouping.

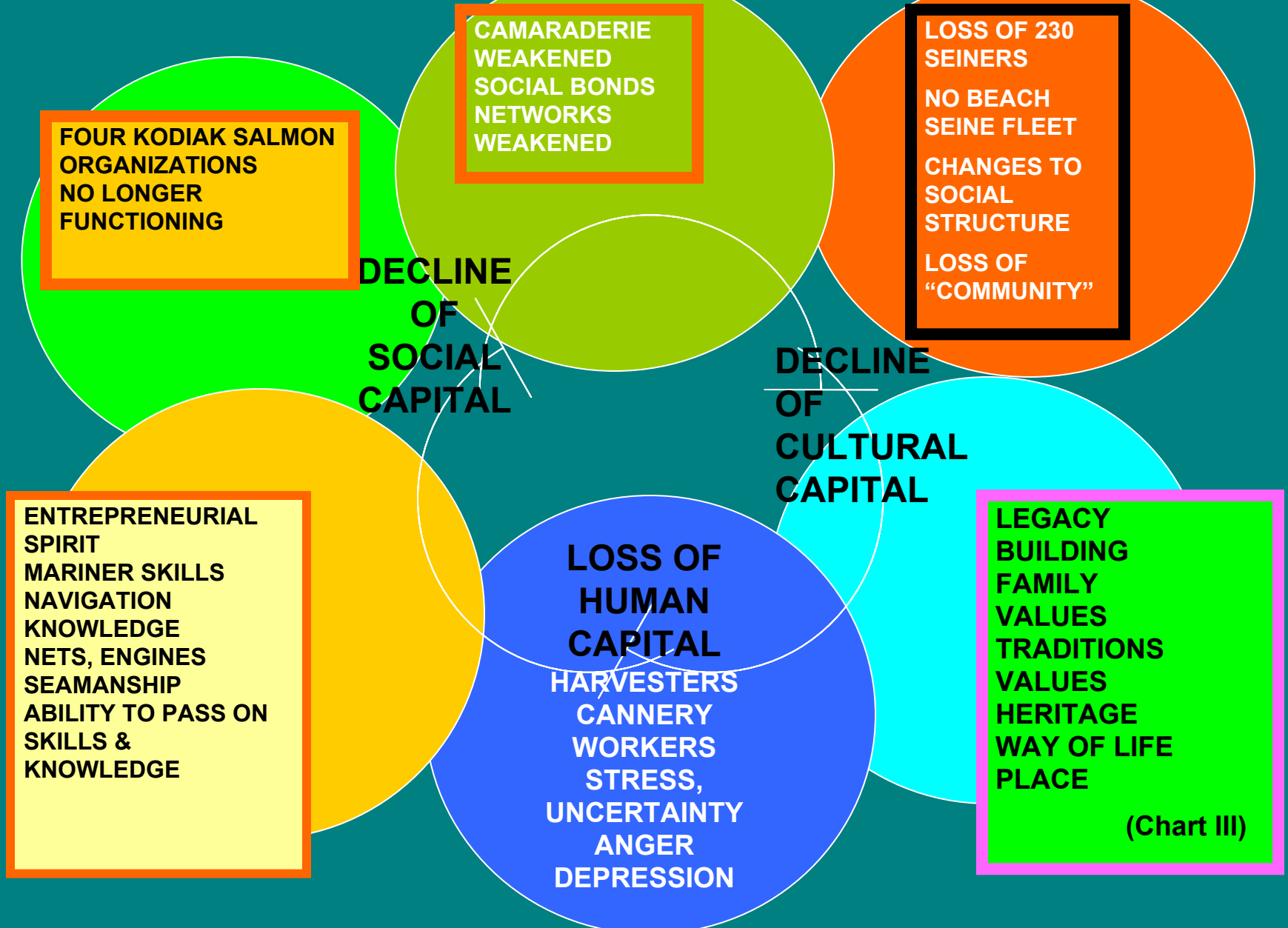
The ocean surrounding their community creates a strong, shared sense of place.

There is tight-knit social interaction between fishermen, fleets, and their relationships in the community.

“If fisheries management and policy are to be successful they must integrate human, social and cultural concerns.”

- Fishing communities are spatially separate, remote and therefore have isolated economies making it difficult for life long fishermen to retrain or to adapt to a new job. The jobs typically aren't available.
- When critical events occur, a fishing community must be ready with support services, a “safety net” for those who cannot easily change into another profession.
- Fishing communities should invest in their productive base, harvesters, fisheries are the foundation of community prosperity
- Fishermen unusually attached to their profession with a high degree of “job satisfaction”
- Their identities are very strong
- Fishermen do not want to be “retrained”
- To continue to fish, they develop a set of coping mechanisms to deal with the stress and uncertainty of the salmon fishery
- Make adjustments to their fishing operations by cutting expenses such as maintenance, gear and equipment.
- The inability to diversify has led to the extreme rate of attrition out of the salmon fishery

“The level of policy success will rest upon how well it promotes the well-being of people living in fishing communities.”



(Chart III)

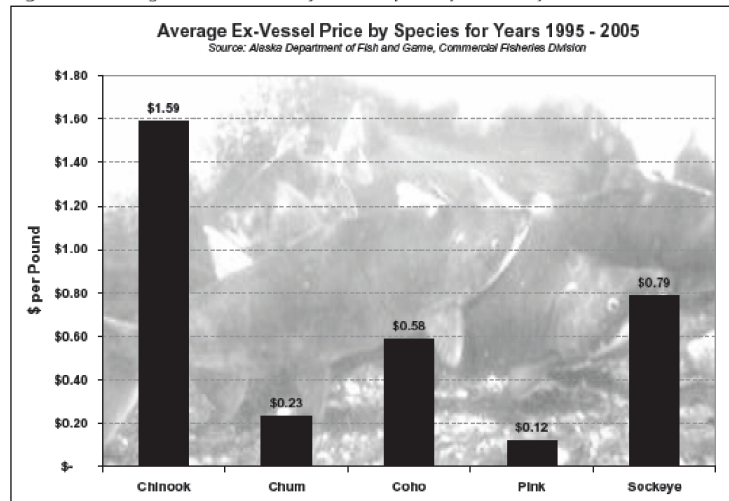
What is a “dying fishing community”?

Alaskan fishing communities are at a critical juncture



- “Abandonment of a natural region
- Decay of a socio-cultural system
- Extinction of a particular form of association—the totality of the interdependent relationships (or total capital that define a community.”

Figure 37 - Average Ex-Vessel Price of Salmon Species per Pound for Years 1995 - 2005.



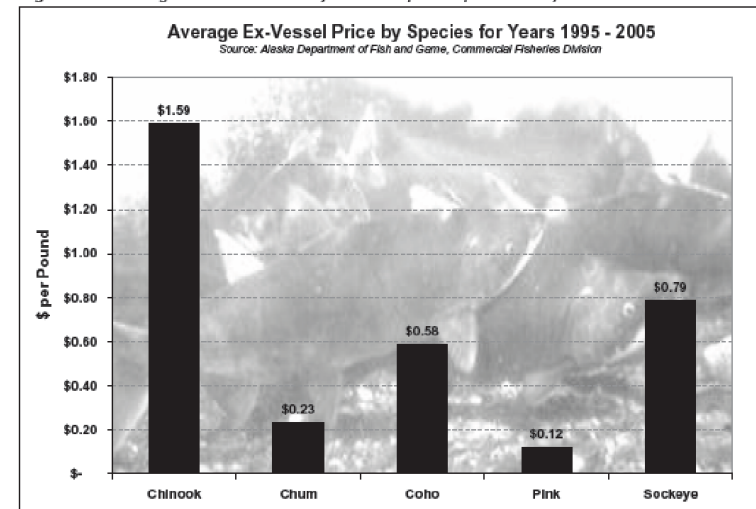
What is a sustainable fishing livelihood?

“A sustainable livelihood is comprised of the capabilities, assets and activities required for a means of living. A fishing livelihood is sustainable when it can cope with and recover from stresses and shocks and maintain or enhance its capabilities and assets both now and in the future, while not undermining the natural resources base.”



FAO Fisheries Report No. 639 entitled
“Poverty in Coastal Fishing Communities”

Figure 37 - Average Ex-Vessel Price of Salmon Species per Pound for Years 1995 - 2005.



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- **Alaska Marine Conservation Council**
- **Kodiak Island Convention and Visitors Bureau**
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Note: All research and diagrams in this presentation are original in nature and developed in the course of writing a master’s thesis, Lacey Berns (2014)

Gulf of Alaska Community Fishing Associations—Lessons from the Western Alaska Community Development Quota Program

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January 28, 2014

Introduction

Community Fishing Quotas have been proposed as a component of Gulf of Alaska rationalization. CFAs are similar to the Western Alaska Community Development Quota program authorized in the MSA to promote fisheries related economic development in 65 eligible Bering Sea coastal communities and to provide residents of those communities with a stake in the federally managed commercial groundfish fisheries occurring in the seas adjacent to their communities. The CDQ program addresses National Standard 8.¹

During the 22 years since the CDQ program was created, like Indian Gaming, it has proven to be a remarkably good way for generating revenue outside of normal federal funding mechanisms. The CDQ program costs the taxpayers very little while producing more than a billion dollars during the past 22 years potentially available to further the badly needed economic development and social welfare goals of the program.

Also like Indian Gaming, administering the CDQ program fairly and effectively has presented unique and unforeseen problems for the intended beneficiaries of the program which the government has either ignored or not dealt with very well.

Compared to other catch share programs, how the CDQ program functions in reality has received very little attention or objective quantitative analysis. About the only data available upon which to evaluate the effectiveness of the CDQ program is self-reported by the CDQ industry itself which has obvious economic and political incentives for portraying the CDQ program as a resounding success.

Preliminary to developing CFAs, it is imperative that the council initiate, for the first time, an impartial and detailed economic and social scientific investigation of the impact of the CDQ program on residents of the communities it was intended to benefit and on the other sectors also affected by the program such as the geographically ineligible rural Alaska communities and the

¹ 50 CFR § 600.345 National Standard 8—Communities.

other participants in the fishing industry. The CDQ program has matured to the point that it is ripe for this analysis and the results are needed not only for guiding the development of CFAs but for identifying needed amendments to the structure of the existing CDQ program to make it more effective at addressing the needs for which it was created.

Background

The first real attempt to examine CDQ program performance was by a committee of the National Academy of Sciences specified in the 1996 MSA reauthorization. The committee's findings were published in 1999.²

One of the committee's key findings was the following: "Perhaps the greatest weakness of the CDQ program as implemented is a lack of open consistent communication between the CDQ groups and the communities they represent, particularly a lack of mechanisms for substantial input from the communities into the governance structures. There has also been a lack of outreach by the state to the communities to help ensure that the communities are aware of the program and how to participate. For the CDQ program to be effective there must be a clear, well-established governance structure that fosters exchange of information among the group's decision makers, the communities they represent, and the state and federal personnel involved in program oversight."

The committee complained that it was hampered in its ability to quantify the impact of the CDQ program by the lack of access to data, "In general, some of the quantifiable factors can be evaluated by comparing conditions before the CDQ program and changes since the program's implementation. However, in some cases the data are not available to adequately measure such changes. Data about the CDQ program that precisely details the benefits received by the CDQ communities can be difficult to obtain. One of these difficulties is due to the newness of the program and the inability to draw clear conclusions from the limited data that are available. A second difficulty is a State of Alaska law...that certain financial and catch data can be maintained as confidential. These conditions make it difficult to provide detailed analysis of the benefits received by the CDQ program."

In May 2005, Alaska Governor Murkowski appointed a Blue Ribbon Committee to evaluate all aspects of the CDQ program and develop recommendations.³ This committee also reported difficulty obtaining financial and other quantitative data and several of the committee members

² The Community Development Quota Program in Alaska Committee to Review the Community Development Quota Program, National Research Council ISBN: 0-309-52410-5, 228 pages, 6 x 9, (1999)
http://www.nap.edu/catalog.php?record_id=6114

³ Blue Ribbon Committee on the Western Alaska CDQ Program, Report to the Governor State of Alaska, August 2005

went to work as CDQ industry lobbyists soon after their findings were published putting the committee's objectivity into question.

In 2012 the state of Alaska conducted a pro forma decennial review of the six CDQ groups required by the 2006 MSA reauthorization.⁴ The state complained that it did not have funding or legal authority to conduct the review and the results were self-reported by the CDQ groups themselves which can hardly be considered an objective analysis.⁵

In summary, very little meaningful information is available upon which to judge the effectiveness and fairness of the CDQ program as implemented and it would be imprudent to proceed with developing a similar program, CFAs, in the Gulf of Alaska without conducting that analysis. The results would be useful not only for avoiding the problems experienced by the CDQ program but for identifying needed changes in the MSA and CFR for regulating the CDQ program.

Specific problems with CDQ program governance that should be addressed in CFA development.

- The enabling legislation and subsequent state and federal regulations contain insufficient provisions detailing the requirements for CDQ group governance. The individuals who initially controlled CDQ group organization naturally set them up with governance structures that allow those in control to maintain control and limit community resident participation.
- The 2006 MSA reauthorization removed nearly all state and federal CDQ group oversight authority and replaced it with nothing.
- CDQ groups are nonprofit corporations. In most nonprofit corporations, members provide the primary oversight for management. Nonprofit corporation members have codified rights contained in the Alaska Nonprofit Corporations Act. The members of CDQ corporations are undefined villages which have no means of obtaining the right to see books and records, attend meetings or chose management, for examples. That essential component of good corporate governance is missing. Residents of CDQ eligible communities have no codified rights in the CDQ program which gives the persons in control of those corporations nearly unlimited discretion over the corporation's resources and programs.
- CDQ corporation boards of directors are generally composed of individuals lacking the education and experience necessary for managing multi-million dollar corporations. This places too much control in the hands of hired executives whose interests are not necessarily aligned with the intended beneficiaries of the CDQ program.

⁴ 16 U.S.C. 1855(i)(J)(H)(i)

⁵ <http://alaskafisheries.noaa.gov/cdq/dreview.htm>

- The MSA, CFR and State of Alaska CDQ program regulations contain no provision for selecting members of CDQ group boards of directors in fair and open processes leading to abuse in determining who sits on these boards.
- Most CDQ community residents can't participate effectively in the council process because only the individuals selected by those in control of the corporation can use the resources of the CDQ corporation to finance their participation. In reality, the council hears mostly from spokespersons hired by the CDQ industry and CDQ community residents don't have any viable way to influence what these spokespeople tell the council so their concerns go unheard.
- Large amounts of CDQ program funds and resources have been and are being moved into privately owned for-profit business entities that remove even the loose oversight, transparency and accountability afforded community residents in the CDQ corporations. This creates unhealthy opportunities for misapplication of funds and improper private inurement.
- CDQ groups are exempt from the provisions of the Sarbanes-Oxley Act which was enacted to protect the interests of corporate shareholders in the wake of the Enron scandal. CDQ groups should be required by statute and regulation to have independent audit committees, record retention and transparency requirements and other provisions for good corporate governance found in Sarbanes-Oxley.
- CDQ groups with their large financial resources have the power to act as abusive monopolies and interfere with the business activities of anyone they view as competitors or political opponents. This would be a problem anywhere but in the simple, low value economies found in western Alaska, this presents an impossible barrier to anyone targeted by the CDQ groups.
- There are no mechanisms in place for resolving grievances resulting from CDQ group actions or failures to act. Because they are not corporate members, community residents do not necessarily have standing to sue a CDQ group in state or federal court and even if they did, the asymmetry in financial power between impoverished rural residents and those who control the CDQ groups' wealth put the courts out of reach. There needs to be an impartial mechanism for arbitrating grievances that is accessible to residents of the CDQ communities.