

Beth Stewart

## Peninsula Fishermen's Coalition

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Eric Olson, Chairman

April 9, 2014

North Pacific Fishery Management Council

605 West 4<sup>th</sup> Avenue

Anchorage, Alaska 99501

In Re: Agenda Item C2: GOA Trawl Bycatch Management

Dear Chairman Olson:

The Peninsula Fishermen's Coalition would like to thank the Council for providing a framework that will guide Gulf of Alaska fishing interests in building suggested elements and options for improving fishing under new bycatch restraints for the pollock and Pacific cod fisheries.

The AP motion included two proposals—the CFA proposal that was introduced at an earlier meeting, and a new proposal submitted by Alaska Groundfish Data Bank, Alaska Whitefish Trawlers Association, Groundfish Forum, Pacific Seafood Processors Association, and Midwater Trawlers Cooperative. This latter proposal was developed by a committee that has been meeting for a couple of years. This group was able to work out a very complete package. This group's meetings were private and did not include input from our sector.

Peninsula Fishermen's Association prefers that the Council remain focused on GOA pollock and P. cod cooperative management plans. We are concerned that once rockfish and flat fish are put into the mix, any chance for moving forward in a timely manner will be lost.

We believe that many of the elements and options that we have presented to you as early as the January, 2013 meeting fit well within the coop structure as expressed in the C2 Discussion Paper presented at this meeting.

Our proposal includes only WGOA pollock and WGOA P. cod trawl coops for vessels <60', with the exception of the area 620 landings made by this fleet. We understand that the Council would have to take separate action to modify or change the boundary line between that

section of the Central Gulf and the Western Gulf. Comments submitted by PFC member Jody Cook speak to that issue. PFC supports Mr. Cook's comments.

While our comments are focused on the <60' trawl pollock and P. cod vessels, we know that the larger catcher vessels have the same stake in these fisheries that we do. Nothing in our proposals is intended to sever our relationships with the larger trawlers. We look forward to working with them to refine these proposals over time.

WGOA <60' P.cod and Pollock Trawl Sector: The Council's Discussion Paper identifies two sectors, Catcher Vessels (CVs) and Catcher Processors (CPs). We are asking, that for the Western Gulf pollock and Pacific cod trawl fisheries, the Council identify a <60' catcher vessel sector.

Just as identifying separate sectors for CVs and CPs minimizes allocation disputes between these sectors, we believe identifying a WGOA <60' P. cod and pollock trawl sector will allow vessels with very different fishing patterns to form coops that will enable all concerned to develop management measures that will be most appropriate for each group.

PFC's vessels share many characteristics and histories and have strong ties to the communities of Sand Point and King Cove. Many of the vessel owners are long time residents. Providing stability for this sector contributes to sustaining a healthy and vibrant waterfront, including good jobs for crewmen and skippers.

Our fleet does not participate in rockfish or flat fish trawl fisheries, and therefore would not bring the same set of issues to a coop that more diversified fleets would need too. We believe that our coop could function much more smoothly if our vessels were identified as a separate sector.

Development of Cooperatives: Voluntary coops offer an excellent opportunity for similarly situated vessels to work with their processor to develop management and monitoring programs that conserve halibut and salmon while maximizing both the quantity and quality of pollock and P. cod deliveries.

Duration of Shares: Our coalition has some concerns about how this portion of the Council's motion would work. We will be meeting in late May to explore this issue, and plan to provide more informed comment for the next meeting when this agenda item comes before the Council.

Community Protections: PFC kept community protections in focus when developing our previously submitted elements and options. We believe that by treating the WGOA <60' trawl vessels as a sector, the Council will have taken an important step towards that goal. Preserving this fleet, and adopting measures that prevent consolidation in this sector, insures that local employment and crew opportunities are preserved.

We have some concerns about inserting local government participation in coop formation. It is unlikely that the negotiations between fishermen and processors will be enhanced by such participation. This fleet delivers either to Trident Seafoods in Sand Point, or to Peter Pan Seafoods in King Cove. The cities of King Cove and Sand Point collect raw fish tax as does the Aleutians East Borough. The fleets are stable and the vessel owners have long term relationships with these community processors.

CFAs: We are adamantly opposed to creating CFAs. Setting up a group, that we would have to pay for, that would then pass out quota, that we would pay for doesn't make any sense. We already pay city, borough, and state raw fish taxes, and we will be paying for 100% observer coverage. The margins in P. cod and pollock are thin. Adding the cost of paying for a CFA so that people not involved in the fishery can have a paycheck will cost crew jobs and may force consolidation.

Gear Conversion: We believe that the Council should clarify that this element would allow P. cod trawl vessels to harvest cod with pot gear. Longline gear has its own share of halibut bycatch problems, so the clarification seems necessary.

Entry Level Opportunities: To date this sector has not participated in the directed trawl fisheries for rockfish or flat fish in the Western Gulf. The two local processors have not been able to provide markets. In order maintain healthy communities, local boats have a long tradition of participating in every fishery for which there is a market.

IF the Council does go forward with a cooperative management plan for trawl rockfish and flat fish fisheries in the GOA, then we would ask that the council set aside a portion of the WGOA rockfish and flat fish TACs for development when markets become available, would insure that these small vessels can remain viable.

## **PFC WGOA <60' Pollock Trawl Coop Requirements**

Purpose and Needs: The Peninsula Fishermen's Coalition submits the following plan to develop a cooperative program that will allow the fleet to obtain pollock TACs while minimizing impacts to Chinook salmon. It is our purpose to maintain local economies, continue to provide maximum employment, recognize skipper participation, and provide a viable means of entry to young fishermen.

**Participation Criteria:** Coop allocations will granted based on this sector's history of trawl caught pollock in the directed Western Gulf pollock fishery between 2000 – 2012. Eligible vessels must have made at least 10 deliveries of trawl caught pollock in the directed WGOA pollock fishery between 2000 and 2013. Upon formation of a coop, vessels will have quota share issued based on landings in the directed pollock fishery between 2000 – 2012.

Option 1: Drop 0 years

Option 3: Drop 2 years

Option 2: Drop 1 year

Option 4: Drop 3 yea

**Transfer of This Sector's Catch Histories:** This sector's shares may not be transferred outside this sector. A portion of this sector's shares will be set aside and made available to qualified skippers.

*This provision provides for community stability and maintains the fleets based in Sand Point and King Cove.*

**Ownership Caps:** No vessel may control more than:

- Option 1: 5%
- Option 2: 8%
- Option 3: 10%

of the pollock quota. Grandfather Clause: Any vessel whose initial history exceeds the cap may fish all shares for which it has history, but may not acquire additional shares.

**Skipper Shares (S Shares):** The purpose of this section is to recognize the role of hired skippers in this fishery and to provide a means of entry for new skippers. Skippers, as verified by *contracts with vessel owners or by fish tickets*, shall receive:

- Option 1: 10%
- Option 2: 15%
- Option 3: 25%

of the quota share issued to qualified vessels. The total skipper share allowance for each vessel shall be divided between eligible skippers based on landings accrued by each skipper.

Skipper eligibility will be based on participation between 2008 – 2012.

Such shares are subject to all other transfer restrictions; Skipper shares may only be transferred to a person who does not own other sector shares; and holders of Skipper shares must be on board when their shares are harvested and landed.

We have not suggested a crew share provision because trawling is not an entry level fishery. It takes several years of experience before a crewman is ready to take over the wheel. It is when a crewman rises to the level of skipper that access to fishing shares can lead to vessel ownership and continued participation in this important fishery.

**Community Protection Landing Requirements:**

All trawl caught pollock must be processed in King Cove, Sand Point, Akutan, or Dutch Harbor in proportion to the average of landings in a community between:

- Option 1: 2005 – 2012
- Option 2: 2010 – 2012.

Trawl caught pollock taken in 620, which has been traditionally processed in King Cove and Sand Point must still be landed in those ports.

This provision keeps processing within the current communities, thereby protecting the existing plants without granting them processing rights, thus avoiding the need to set up ROFRs.

## PFC WGOA Pacific Cod Trawl Catch Share Plan

**Purpose and Needs:** The Peninsula Fishermen's Coalition submits the following plan to develop a cooperative program that will allow the fleet to obtain P. cod TACs while minimizing impacts to Chinook salmon. It is our purpose to maintain local economies, continue to provide maximum employment, recognize skipper participation, and provide a viable means of entry to young fishermen.

**Participation Criteria:** Coop allocations will be granted based on this sector's history of trawl caught P. cod in the directed Western Gulf P. cod fishery between 2000 – 2012. Eligible vessels must have made at least 10 deliveries of trawl caught P. cod in the directed WGOA P. cod fishery between 2000 and 2013. Upon formation of a coop, vessels will have quota share issued based on landings in the directed P. cod fishery between 2000 – 2012.

Quota share will be based on the eligible vessels landings in its highest years within the qualifying period.

Option 1:	Drop 0 years	Option 2:	Drop 1 year
Option 3:	Drop 2 years	Option 4:	Drop 3 years

*This provision provides for community stability and maintains the fleets based in Sand Point and King Cove.*

**Transfer of this Sector's Catch Histories:** This sector's shares may not be transferred outside this sector. A portion of this sector's shares will be set aside and made available to qualified skippers.

*This provision provides for community stability and maintains the fleets based in Sand Point and King Cove.*

**Ownership Caps:** No vessel may control more than:

Option 1:	2%	Option 5%
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of the P. cod quota. Grandfather Clause: Any vessel whose initial allocation exceeds the cap may fish all shares issued, but may not acquire additional shares.

**Skipper Shares (S Shares):** The purpose of this section is to recognize the role of hired skippers in this fishery and to provide a means of entry for new skippers. Skippers, as verified by *contracts with vessel owners or by fish tickets*, shall receive:

Option 1:	10%
Option 2:	15%
Option 3:	25%

of the quota share issued to qualified vessels in a coop. The total skipper share allowance for each vessel shall be divided between eligible skippers based on landings accrued by each skipper.

Skipper eligibility will be based on participation between 2008 – 2012.

Such shares are subject to all other transfer restrictions; Skipper shares may only be transferred to a person who does not own other sector shares; and holders of Skipper shares must be on board when their shares are harvested and landed.

We have not suggested a crew share provision because trawling is not an entry level fishery. It takes several years of experience before a crewman is ready to take over the wheel. It is when a crewman rises to the level of skipper that access to fishing shares can lead to vessel ownership and continued participation in this important fishery.

**Community Protection Landing Requirements:**

All trawl caught P. cod must be processed in King Cove, Sand Point, Akutan, or Dutch Harbor in proportion to the average of landings in a community between:

Option 1:           2005 – 2012

Option 2:           2010 – 2012.

Trawl caught P. cod caught in 620, which has traditionally landed in Sand Point or King Cove, must still be landed in those ports.

This provision keeps processing within the current communities, thereby protecting the existing plants without granting them processing rights, thus avoiding the need to set up ROFRs.

