

Deep Sea Fishermen's Union of the Pacific

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Established 1912

November 6, 2014

Mr. Dan Hull
Chairman
North Pacific Fishery Management Council
605 West 4th Street, Suite 306
Anchorage, AK. 99501-2252

RE: December, 2014 NPFMC Meeting Agenda Item "Vessel IFQ Caps"

Dear Chairman Hull:

As per our phone conversation on November, 5th, the Deep Sea Fishermen's Union (DSFU) kindly requests the NPFMC join the DSFU in supporting the attached proposal of Mr. Adam Westfall as an alternative or compromise to the suggested direction of Vessel IFQ Caps by the Council for the following reasons:

- The Council staff was directed by the Council to develop a scoping report on vessel harvest caps for the Halibut QS program and Class A Sablefish. The DSFU finds the proposed scoping exercise to be very discriminatory toward our members who predominately own Class B and C sablefish in the fact that Class B and C sablefish are excluded by the scoping exercise. Class A sablefish QS holders are not the only ones feeling the pinch of decreasing TACs. The DSFU firmly believes that the deep pockets of Class A QS holders are much more capable of weathering the TAC downturns than Class B and C QS holders.
- Vessel Cap limits have followed the TAC downturns to the point where many boats are finding their operations are no longer economically sustainable, the halibut cap is currently 79,000 pounds. These actions have forced individually held QS to relocate to vessels who have managed a way to efficiently cover expenses and provide attractive crew shares. The end result has led to further fleet consolidation and even the stranding of QS by our members who hold such small amounts of QS as not to be economically viable for either party.

- The DSFU does not believe the Council has done enough to promote second generation fishermen from strictly selling their labor to a point of becoming industry stakeholders. Even the CQE program after deducting a community lease fee of say 40%, a boat lease fee of say 40% and expenses of say 5% leaves second generation fishermen with so little income as to be permanent laborers rather than industry stakeholders. The outcome has come to be known by many fishermen and the media alike as “the graying of the fleet”.

The DSFU firmly believes that Mr. Westfall’s proposal is fair and equitable by encompassing all vessel classes and second generation fishermen of all states. Thus, National Standards four and eight of the MSA are met without undoing efforts of the Council to sunset first generation fishermen hired skipper privileges. Furthermore, Mr. Westfall addresses a ceiling cap in times of hardship, believing that when our fisheries begin to prosper that we can revert back to a vessel cap status quo.

In closing, the DSFU cannot think of any proposal which promotes second generation fishermen regardless of race, sex, creed, religion or state of residence with such fairness as Mr. Westfall’s proposal does while at the same time promoting conservation mindedness over the unfair practices of short sighted economic bullying. The DSFU vehemently asks the Council to address Mr. Westfall’s proposal at the December, 2014 meeting in Anchorage as a fair compromise or amendment to what is currently being proposed in regards to Vessel IFQ Caps. The DSFU also asks that Mr. Westfall’s proposal be given full priority at the next IFQ Implementation Committee meeting.

Sincerely,



Shawn McManus
Vice President
Deep Sea Fishermen’s Union