

Unalaska Native Fishermen's Association
PO Box 921408
Dutch Harbor, Alaska 99692

Chairman Simon Kinneen
North Pacific Fishery Management Council
605 W. 4th Avenue
Anchorage, Alaska 99501

September 27, 2019

Dear Chairman Kinneen,

The Unalaska Native Fishermen's Association (UNFA) was established more than two decades ago to represent Unalaska's small boat longline and pot vessels. Since its inception, UNFA has consistently worked within the Council process to ensure viable fishing opportunity for current and future generations of Unalaska's community-based fishermen. UNFA spearheaded the creation of the jig sector allocation (Amendment 24) to provide for growth of entry-level opportunity in Bering Sea Pacific cod fisheries. UNFA also pioneered the <60 sector through Amendment 64 in 1999. The Council's intent in both of these actions was to provide stability and opportunity for the small boat sectors. In the past decade, this opportunity has shifted away from small boat participants and communities that have historically depended on Bering Sea Pacific cod fisheries.

The changing nature of the <60 sector is threatening the survival of Unalaska's small boat fleet and diminishes past Council actions taken to protect community access and participation in Bering Sea Pacific cod fisheries. At the time of Amendment 64, the <60 sector was a primarily local, small boat fleet. For example, in 2003, the <60 sector was comprised of seven vessels. In 2018, 26 vessels participated in the <60 sector, the highest number of vessels to date.¹ In addition to increased participation, the rise of 'Super 8s' within the <60 vessel class contributes to growing disparities and unfair competition within the <60 vessel class size. These disparities are rooted in non-traditional efficiency improvements within the Super 8 fleet (e.g., power, capacity, vessel width, etc.), and have detrimental effects on long-term participants and communities dependent on fixed gear Pacific cod fisheries.

In short, local vessels within the <60 sector are being outpaced and outcompeted in Bering Sea Pacific cod fisheries today. In 2008, the Federal BSAI cod season for the <60 sector lasted more than 100 days. In 2018, the bulk of the sector allocation was harvested in the first 11 days of the season. As noted in the October 2019 BSAI Pacific Cod Scoping Paper for Trawl and Pot CV LAPPs, "prior to 2006, the sector did not have its first closure before April. Between 2006-2014,

¹ See NPFMC 2019. D2 Discussion Paper: Bering Sea/Aleutian Islands Pacific Cod Limited Access Privilege Program Scoping Paper for the Trawl Catcher Vessel Sector and Pot Catcher Vessels \geq 60 feet. p. 66

the sector's first closure occurred in March. Since 2014, the sector's first closure is early February" (p. 66). For local boats highly dependent on cod, the season has become too short to make a living. Efficiency improvements within the <60 sector have come largely at the expense of local vessels and demonstrate the need for the Council to consider alternative measures to provide opportunity, stability and protection for small fixed gear vessels.

We understand that the Council is currently considering a number of actions related to Pacific cod fisheries. It is unclear how these actions will impact the <60 sector. For example, the <60 sector is highly dependent on rollovers from other sectors, including the trawl CV and jig sector. In the last five years, the <60 sector has received between 5,000-7,500 mt. in rollovers from other sectors.² Management changes currently under consideration for other gear sectors harvesting Pacific cod may affect rollovers to the <60 sector and potentially exacerbate adverse impacts already felt by local vessels. These changes represent the potential foreclosure of any future opportunity for our small boat fleet to realize opportunity, sustain ourselves or effectively address the growing inequities within our sector. It is within the Council's purview to develop measures it deems necessary to protect other fisheries from the adverse impacts of potential management changes within the trawl CV and pot CV >60 sectors.

There is a clear and urgent need to enhance and preserve small boat access in Pacific cod fisheries given the changing nature of the <60 sector and potential management changes in the trawl CV and pot CV >60 sectors. UNFA has considered a number of options to address the challenges and impacts on our community fleet and achieve the goals of 1) providing stability and security for our small boat fleet, 2) ensuring entry-level opportunity, and 3) minimizing unfair competition and growing disparities within the <60 vessel class size.

We feel strongly that a community allocation is the best tool to preserve local participation in Bering Sea Pacific cod fisheries for the long-term. A community allocation provides the security for our small boats that was intended through the <60 sector allocation created 20 years ago. (The 1.4% allocation to the <60 sector in 1999 was essentially a community set-aside meant for the people of this region to supplement our season). That said, there remains too much uncertainty and too little guidance on how to provide community protections through a community allocation at this time.

Other options that we have considered that can also meet the needs of our local fleet and community include a subsector split within the <60 sector. This would effectively carve out some space for small boats currently competing against Super 8s. One of the ways that this could be done would be to reallocate the jig allocation as a 'small boat sector' allocation inclusive of jig, longline and pot gear types. The jig sector has not harvested its entire allocation since established in 1994. For a variety of reasons, the program is not meeting its goals and objectives. There are currently no local jig vessels operating out of Unalaska or Akutan. The bulk of the jig allocation currently rolls over to the <60 sector. The primary beneficiaries of this

² NPFMC 2019. D2 Discussion Paper: Bering Sea/Aleutian Islands Pacific Cod Limited Access Privilege Program Scoping Paper for the Trawl Catcher Vessel Sector and Pot Catcher Vessels ≥ 60 feet. p. 66.

rollover are Super 8s. We feel that a small boat sector allocation ranging between 1.4-2% of the total non-CDQ Pacific cod Total Allowable Catch (TAC) is not unreasonable or unprecedented. Reclassifying the jig sector allocation as a 'small boat sector' allocation with specific provisions described below would allow the jig allocation to better meet its goals and objectives. Given that the Bering Sea Pacific cod TAC is declining, allocating a percentage (e.g., 1.4-2%) and a minimum amount (e.g., no less than 3500 mt) to small boats is essential to ensuring our long-term viability.

The small boat sector could be defined by certain criteria including owner-onboard provisions, gear type, and vessel length (e.g., under 57 feet), potentially in combination with other criteria such as vessel tonnage (e.g., under 50 mt) or vessel width. Alternatively, the small boat sector could be defined by a combination of owner-onboard provisions, vessel length and trip limits (or pot) limits.

For more than a century, Unalaska's small boat fleet has depended on viable access to Bering Sea Pacific cod fisheries for economic livelihood and cultural survival. Preserving local cod fishing opportunity is preserving our cultural heritage. We thank the Council for their continued effort in preserving access for the small boat fishermen that live, work and rely on the Bering Sea.

Sincerely,

A handwritten signature in dark ink, appearing to read "Dustan Dickerson".

Dustan Dickerson
Vice President
Unalaska Native Fishermen's Association