



WESTERN ALASKA COMMUNITY
DEVELOPMENT ASSOCIATION

May 27, 2014

via Electronic Submission

Eric Olson, Chairman
North Pacific Fishery Management Council
605 W. 4th Avenue, Suite 306
Anchorage, Alaska 99501

Re: Agenda Item D-2, Sector Reports on BSAI Halibut PSC

Dear Chairman Olson,

At its February meeting, the North Pacific Fishery Management Council (Council) requested each of the sectors that participate in the Bering Sea Aleutian Islands groundfish fisheries to provide a report on voluntary measures in its cooperative and inter-cooperative agreements to minimize halibut prohibited species catch (PSC), including development of effective and verifiable measures for halibut avoidance and individual accountability and use of incentives to reduce PSC.

The Western Alaska Community Development Association (WACDA) serves as the CDQ Program Panel (16 U.S.C. 1855(i)(1)(G)). On behalf of the six Community Development Quota (CDQ) groups, the 65 eligible CDQ communities, and over 27,700 citizens who reside along the Bering Sea/Aleutian Islands coast, we are writing to report on the measures taken by the CDQ sector to minimize halibut PSC in the BSAI.

Through its internal rule making process, WACDA requires that each CDQ entity annually maintain a Community Development Plan (CDP) (defined at 16 U.S.C. 1855(i)(1)(J)) that includes the following information for each CDQ target fishery: 1) the types of gear that will be used for harvest, 2) the general time period of such harvest, and 3) its bycatch avoidance plans with respect to the harvest of its share of the fishery resources.¹

Though CDP language regarding bycatch avoidance varies among the six entities, in general the following is incorporated in each respective entity's CDP: catch will be monitored daily; all CDQ harvesters and harvesting partners use clean fishing practices and avoid high bycatch periods and fishing areas; and a CDP may define and establish reasonable bycatch rate triggers. If these triggers are reached, adjustments are made such as moving fishing operations, adjusting gear deployments, or other measures. Further, the CDQ quota manager (quota manager) has the authority to, if necessary, give a "Stop Fishing Order" that would cease CDQ fishing operations for any vessel harvesting CDQ quota.

¹CDQ Panel Rule 2012-04 Community Development Plans ([http://www.wacda.org/media/pdf/Final_CDQ_Rule_2012-04_CDPlans_\(signed\).pdf](http://www.wacda.org/media/pdf/Final_CDQ_Rule_2012-04_CDPlans_(signed).pdf))

AKUTAN	CHEVAK	EKUK	GOLOVIN	KONGIGANAK	MEKORYUK	NEWTOK	PILOT POINT	SCAMMON BAY	STEBBINS	TWIN HILLS
ALAKANUK	CLARKS POINT	EKWOK	GOODNEWS BAY	KOTLIK	MOUNTAIN VILLAGE	NIGHTMUTE	PLATINUM	SHAKTOOLIK	TELLER	UGASHIK
ALEKNAGIK	DILLINGHAM	ELIM	GRAYLING	KOYUK	NAKNEK	NIKOLSKI	PORT HEIDEN	SOUTH NAKNEK	TOGIAK	UNALAKLEET
ATKA	DIOMEDE	EMMONAK	HOOVER BAY	KWIGILLINGOK	NAPAKIAK	NOME	PORTAGE CREEK	ST. GEORGE	TOKSOOK BAY	WALES
BREVIG MISSION	EK	FALSE PASS	KING SALMON	LEVELOCK	NAPASKIAK	NUNAM IQUA	QUINHAGAK	ST. MICHAEL	TUNTUTULIAK	WHITE MOUNTAIN
CHEFORNAK	EGEGIK	GAMBELL	KIPNUK	MANOKOTAK	NELSON LAGOON	OSCARVILLE	SAVOONGA	ST. PAUL ISLAND	TUNUNAK	

These bycatch avoidance plan provisions are incorporated into harvest agreements with CDQ harvesting partners. CDQ agreements allocate prohibited species quota (PSQ) for each of the target fisheries identified. Quota managers may set PSQ allocations conservatively and assign PSQ to the harvester in phases throughout the year as deemed necessary to optimize the harvest of quota and to encourage the vessel operator to minimize bycatch. If the PSQ allocation to the harvester is exceeded, the agreement may allow for the CDQ entity to charge supplemental royalties for additional PSC to further encourage clean fishing. If a violation does occur, the harvesting partner is responsible for the associated penalty or fine. In addition, CDQ harvesting agreements generally require harvesting partners to pay the CDQ entity a royalty whether the harvester harvests all of the target allocation or not; hence the CDQ partners have a vested economic interest in minimizing bycatch.

In season, CDQ quota managers/pool managers and harvesting partners actively discuss and negotiate what is occurring on the fishing grounds. Bycatch is monitored with SeaState, a daily catch monitoring system, and cross-referenced with National Marine Fisheries Service Landing Reports on a regular basis. Quota managers have the ability to hold back larger PSQ reserves or buffers to ensure that harvesting partners are not exceeding bycatch allocations or if bycatch is high, to issue a Stop Fishing Order if necessary. In times of low halibut abundance, quota managers may manage more conservatively by increasing PSQ reserves.

In the development of this report, we have recognized that there is no standard approach taken by individual CDQ entities when determining acceptable levels of PSQ reserves or buffers. Accordingly, we are discussing the possibility of implementing standardized bycatch rates CDQ program-wide. The CDQ groups, through WACDA, would determine acceptable rates over which the quota managers would have the harvester move to different fishing grounds or stop fishing altogether. Individual quota managers would of course then have the discretion to set a group's rates more conservatively than the program-wide standard. This potential bycatch reduction tool is currently being discussed and vetted within WACDA.

The CDQ sector is complex in that the CDQ entities manage PSQ over not only multiple species, but multiple gear types as well. For other species, the six CDQ entities and industry sector groups have developed and implemented cooperative bycatch reduction and minimization programs, which incorporate closure areas and other incentives along with significant fines, levied in the event a CDQ harvesting partner does not comply with the incentive components of the program. Similarly, if a cooperative, multi-sector bycatch reduction program were developed for halibut in the BSAI, the CDQ groups would participate in that program as well.

All of the above measures are taken by the CDQ sector in addition to the measures taken by other sectors of the BSAI, including CDQ harvesting partners, to reduce halibut PSC. As shown by the following chart, over the past ten years the CDQ groups have consistently managed CDQ halibut bycatch well below our current PSQ allocations, effectively "saving" 3.6 million pounds of halibut as a result of the aforementioned mitigation measures. On average during this time period, the CDQ program collectively used less than 55% of the halibut PSC allocated to the CDQ sector.

CDQ Sector Halibut PSQ 2004 to 2013 (metric tons)

Year	Bycatch	Cap	Remaining	% Used
2013	266	393	127	67.7%
2012	273	393	120	69.5%
2011	242	393	151	61.6%
2010	159	393	234	40.5%
2009	152	343	191	44.3%
2008	214	342	128	62.6%
2007	239	342	103	69.9%
2006	157	342	185	45.9%
2005	127	342	215	37.1%
2004	153	343	190	44.6%
Total	1982	3626	1644	54.7%
Average	198	363	164	54.7%

With the goal of developing a multi-sector bycatch management reduction program, the CDQ groups respectfully request the Council organize an industry advisory committee or workgroup to address halibut bycatch management in the BSAI. This proposed committee, consisting of representatives from each sector, would work together to develop and identify a suite of proposed tools to mitigate halibut PSC in the Bering Sea similar to the Bering Sea Salmon Bycatch workgroup appointed by the Council in 2007.

The reduction of halibut bycatch in the BSAI groundfish fisheries is very important to the CDQ groups. We continue to manage our quota with conservative PSQ buffers and work with our harvesting partners to minimize bycatch to the greatest commercially reasonable extent. The CDQ groups depend on halibut both as direct users and for bycatch in other target fisheries. WACDA continues to engage with industry in the potential development of additional bycatch mitigation measures and will participate in any new programs that are established.

Thank you for the opportunity to provide the Council with this report on the BSAI halibut PSC mitigation measures taken by the CDQ sector. Please contact us with any questions or comments.

Sincerely,

WESTERN ALASKA COMMUNITY DEVELOPMENT ASSOCIATION



Aggie M. Fouts, Executive Director