REQUEST

YDFDA requests that the Board either take "no action" in regards to Proposals 12, 13 and 14. Or an alternative hold the CDQ Groups harmless from the consequences of a reduction in Bering Sea P. Cod TAC would impose on the CDQ program. Our position is that these proposals would:

1) materially frustrate the express purpose of the CDQ program as set out in federal and state law, and
2) be inconsistent with the State Constitutional requirements for this Board to maximize the benefits of the fisheries to the people of the State of Alaska.
Consultation Obligations

In addition, we feel that these proposed actions directly affects our Alaska Native member communities which implicate this Board’s tribal consultation obligations.

The Board should delay action on these proposals until Advisory Committee meetings about these issues are held in Western and Southwest Region Advisory Committee Regions.

The CDQ Program Represents
65 CDQ Communities – Population 29,005 (2016)

<table>
<thead>
<tr>
<th>Akutan</th>
<th>Ekwok</th>
<th>Koyuk</th>
<th>Nome</th>
<th>St. Michael</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alakanuk</td>
<td>Elm</td>
<td>Kwagillingok</td>
<td>Nunam Iqua</td>
<td>St. Paul Island</td>
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<tr>
<td>Aleknagik</td>
<td>Emmonak</td>
<td>Levelock</td>
<td>Oscarville</td>
<td>Stebbins</td>
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<tr>
<td>Atka</td>
<td>False Pass</td>
<td>Manokotak</td>
<td>Pilot Point</td>
<td>Teller</td>
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<tr>
<td>Brevig Mission</td>
<td>Gambell</td>
<td>Mekoryuk</td>
<td>Platinum</td>
<td>Togiak</td>
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<tr>
<td>Cheforak</td>
<td>Golovin</td>
<td>Mountain Village</td>
<td>Port Heiden</td>
<td>Toksok Bay</td>
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<tr>
<td>Chevak</td>
<td>Goodnews Bay</td>
<td>Naknek</td>
<td>Portage Creek</td>
<td>Tuntutuliak</td>
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<tr>
<td>Clark’s Point</td>
<td>Grayling</td>
<td>Napakiak</td>
<td>Quinhagak</td>
<td>Tununak</td>
</tr>
<tr>
<td>Dillingham</td>
<td>Hooper Bay</td>
<td>Napaskiak</td>
<td>Savoonga</td>
<td>Twin Hills</td>
</tr>
<tr>
<td>Diomede</td>
<td>King Salmon</td>
<td>Nelson Lagoon</td>
<td>Scammon Bay</td>
<td>Ugashik</td>
</tr>
<tr>
<td>Eek</td>
<td>Kipnuk</td>
<td>Newtonk</td>
<td>Shaktotlik</td>
<td>Unalakleet</td>
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<tr>
<td>Egegik</td>
<td>Kongiganak</td>
<td>Nightmute</td>
<td>South Naknek</td>
<td>Wales</td>
</tr>
<tr>
<td>Ekuk</td>
<td>Kotlik</td>
<td>Nikolski</td>
<td>St. George</td>
<td>White Mountains</td>
</tr>
</tbody>
</table>
Governed by Six CDQ Entities

Aleutian Pribilof Island Community Development Association (APICDA)

Bristol Bay Economic Development Corporation (BBEDC)

Central Bering Sea Fishermen's Association (CBSFA)

Coastal Villages Region Fund (CVRF)

Norton Sound Economic Development Corporation (NSEDC)

Yukon Delta Fisheries Development Association (YDFDA)
State CDQ Program Purposes

For “providing persons residing in western Alaska communities a fair and reasonable opportunity to participate in the Bering Sea/Aleutian Islands fisheries, and to promote the economic well being of local coastal communities in relation to the Bering Sea fishery resources.”

6 AAC 93.010

Federal CDQ Program Purposes

Magnuson-Stevens Fishery Conservation and Management Act:
- to provide eligible western Alaska villages with the opportunity to participate and invest in fisheries in the Bering Sea and Aleutian Islands Management Area;
- to support economic development in western Alaska;
- to alleviate poverty and provide economic and social benefits for residents of western Alaska; and
- to achieve sustainable and diversified local economies in western Alaska.

16 USC 1855(l)
We Were Required To Invest In Bering Sea Fisheries

The CDQ entities were required by state and federal law to invest in BSAI fisheries, pollock, crab, Pacific Cod, in order to retain their CDQ allocations.

See 6 AAC 93.040
and 50 CFR 679.30

Our Participation in the Bering Sea Pacific Cod Fisheries

We participate in the Bering Sea Pacific Cod fishery in three ways:

1) Most importantly, we use our 10% CDQ allocation of Bering Sea P. Cod TAC to help us prosecute our pollock, groundfish and halibut fisheries. We also use the remainder to stack on our FLC vessels in which we have an ownership interest;

2) We have an effective ownership percentage of 25.7% of the directed FLC quota; and

3) We own 75% of two AFA catcher vessels which have a directed cod fishery allowance pursuant to the provisions of the AFA.
What Do We Do With This Participation?

1) Use the revenues to support economic development in Western Alaska – in 2015 the Program had annual revenues of $339 million and total expenditures of $319 million; and
2) Use our CDQ allocations and fishing vessel ownership positions to provide our residents at-sea jobs in the Bering Sea fisheries.

What We Face

• Western Alaska has some of the worst poverty metrics in U.S.
• 93.2% Alaska Native
• Only 6.9% of those over age 25 have college degree
• Per capita income $11,476 (36% of State average)
• Median HHI $39,583 (57% of State median)
• Poverty level 30% (3X State average)

Source: 2010 Census - YDFDA Metrics
Our Region’s 2017 CDQ Impacts

- Bering Sea Offshore Fisheries – 41 people, $533,381 wages
- In-Region Employment – 1,336 people, $9,574,726 in wages
- Scholarships – 61 students, $313,649 expenditures
- Total 2017 Employment and Scholarships - 1,438
- Total 2017 In-Region Direct Wages and Scholarships - $10,421,756

Conclusion

- The CDQ Program is one of Alaska’s most successful and innovative fishery-related program. We are the primary way that the benefits of the Bering Sea fisheries flow back to the State of Alaska, not go south with the fleet after the season.
- We hope that this Board would look at the benefits the CDQ program provides to more than 29,000 Alaskans compared to any action that would decrease its effectiveness.