

# PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: B - REPORTS

*Check the boxes below if you will have a PowerPoint or Handout*

	NAME <i>(Please Print)</i>	TESTIFYING ON BEHALF OF:	Handout	PPT
1	Linda Behnken	ALFA	X	
2	Melissa Heflin	Benny Sea Eiders Group	X	
3	Amy Doughty	ATA		
4	CLAY MERRILLAN	SELF		
5	Chris Woodley - Anne Fug/vog	GFF & NSFC		
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NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person "to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act.

January 29, 2020

North Pacific Fishery Management Council  
1007 West 3<sup>rd</sup> Avenue, Suite 400  
Anchorage, AK 99501

RE: Future Presentation to B Reports

Dear Chairman Kinneen and Council members:

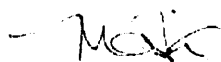
Bering Sea Elders Group (BSEG), as you may know, is an association of Elders from nearly 40 participating tribes from Kuskokwim Bay to the Bering Strait of Alaska. Our mission is to protect our traditional ways of life, the ocean web of life that supports the resources we rely on, and our children's future.

We are writing today to request that you schedule a presentation from our organization and other tribal organizations on our observations on the current state of the Bering Sea during B reports at a future Council meeting, as well as at the next Ecosystem Committee meeting.

As you are well aware, the Bering Sea is one of the most productive ecosystems in the world, giving life to countless species of seabirds, marine mammals, and fish, as well as numerous communities and Indigenous Peoples. The Federally-recognized Tribes in our region have lived with the abundance of the Bering Sea since time immemorial, providing food security and supporting the cultures, economies and spiritual and physical well-being of our peoples across Western Alaska. This rich ecosystem is now facing dramatic change as a result of climate change. Indicator species such as plankton, seabirds, and marine mammals are showing signs of distress and population decline under warmer and increasingly ice-free ocean conditions. We have further concern with the potential of ocean acidification and other sources of pollution. Our Tribal members, including our Elders and Indigenous Knowledge holders, who live in the region year-round, are observing unprecedented changes. We believe this information can provide an important perspective to help the North Pacific Fishery Management Council (the Council) in its working managing the commercial fisheries of the Bering Sea.

A presentation would complement the reports you hear from agency scientists and industry members. To this end, we respectfully request time on a future agenda to provide such a presentation to the Council, preferably during the B reports. We also request that our presentation is also on the Ecosystem Committee agenda for a meeting in the future as well.

Quyanaq,



Mellisa Johnson Heflin  
Executive Director  
Bering Sea Elders Group



# Alaska Longline

## FISHERMEN'S ASSOCIATION

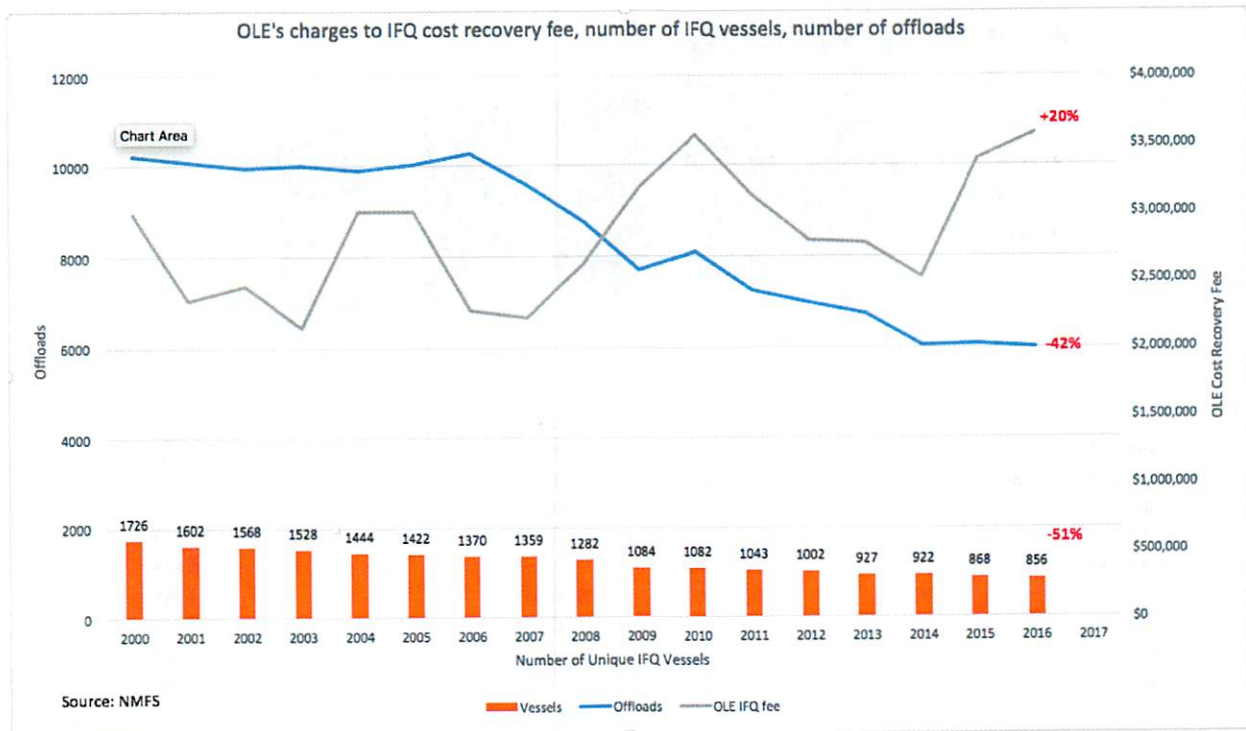
Post Office Box 1229 / Sitka, Alaska 99835 907.747.3400 / FAX 907.747.3462

January 28, 2020

### B2- Halibut/Sablefish IFQ Cost Recovery reports

Chairman Kinneen and Council Members,

I apologize for the late comments on this issue, but please note that the Cost Recovery reports were just published on Friday. I am writing to bring to your attention a disconcerting trend in billings to the IFQ Cost recovery program. Over the course of the IFQ program, fleet consolidation trends occur in every aspect of the program (number of vessels, number of participants and number of landings) yet billings to the IFQ program in proportion to the consolidation trends continue to climb in some departments and divisions. I brought this alarming trend to the attention of the Council during an October 2017 IFQ committee meeting noting the most significant trend at the time:



Although not updated to 2019, the above graphic demonstrates consolidation by two metrics 1) the downward trend in IFQ landings of -42% and 2) the decline in participation in the number of vessels by -51%.

It was noted in that IFQ committee meeting minutes that:

*Will Ellis (NOAA OLE) informed the Committee of efforts to fine tune the apportionment of enforcement costs across cost recovery programs. This initiative was, in part, spurred because of the new collections have been recently implemented. Mr. Ellis noted that the workload of enforcement agents in ports with high IFQ participation had evolved over time to include additional duties, but that cost apportionment had not changed. The attribution of overhead and personnel costs to new cost recovery programs could reduce the “demand signal” in the IFQ fishery. Mr. Ellis noted that a recent surge in enforcement-related cost recovery fees reflected a wave of hiring staff to fill vacancies and to set up new posts in locations with mainly IFQ activity (e.g., Seward and Homer); those costs were apportioned across the smaller number of programs that were subject to cost recovery at the time. OLE expects those hirings to be cost saving, as OLE is recalibrating its staff mix from special agents toward officers. The Committee expressed its encouragement that OLE is seeking to refine how cost recovery fees are charged to different programs. NMFS staff noted that the public can track this progress through reports that the agency produces annually for each program subject to cost recovery.*

As a result, it appears that OLE is working to address this issue as you can see in the 2019 Halibut/Sablefish IFQ Cost Recovery report:

Figure 4. IFQ Direct program costs for NMFS operating units, IPHC, and ADF&G during fiscal years 2015 through 2019.



However, the above figure also points out another discerning trend in billings to the IFQ Cost Recovery which illustrates that RAMs billings to the IFQ fishery have increased by \$3M in the last three years, a 49% surge in billings since 2017.

These costs seem quite excessive in relation to the proportion of continued consolidation in the Halibut/Sablefish IFQ fisheries. I ask that you seek an explanation for these excessive costs and direct the various departments and divisions to seek cost efficiencies that reduce billings to IFQ fleet without driving further consolidation in the IFQ fishery.

Sincerely,  
Jeff Farvour  
ALFA Board