



Central Bering Sea Fishermen's Association

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September 29, 2023

Mr. Bill Tweit
Vice-Chair
North Pacific Fishery Management Council

Submitted electronically

Re: Agenda Item D-2: BSAI Crab Program Review

Dear Vice-Chair Tweit and Council members:

The Central Bering Sea Fishermen's Association (CBSFA) is the Community Development Quota (CDQ) group for Saint Paul Island in the Pribilofs. Due in part to Saint Paul's proximity to the Bering Sea's crab resources, CBSFA is allocated quota for Bristol Bay Red King Crab (BBRKC), Eastern Aleutians Golden King Crab and Bairdi, as well as 20% of the total Bering Sea snow crab set aside for the CDQ Program. In addition, CBSFA has made considerable investments in crab assets, both processing and harvesting quota, and harvests the majority of its crab quota on two partner crab vessels. CBSFA manages its CDQ allocations and quota assets to promote social and economic development in Saint Paul, to fulfill the mandates of the CDQ program.

We appreciate the initiation of the review of the Crab Rationalization Program (CRP). This is the third Council review of the CRP and is especially significant in light of the current status of the BSAI crab stocks and the recent fishery disaster declarations in the Bristol Bay Red King Crab and Bering Sea Snow Crab fisheries. Both fisheries were the mainstays of the crab industry and dependent communities, and both are now at all-time low abundance and will be so for the foreseeable future.

We believe this review needs to recognize this low abundance in the two premier crab fisheries and examine the CRP in that light. CBSFA and the community of Saint Paul are dependent on the continuing harvest and processing of healthy crab stocks. The dramatic drop in the snow crab total allowable catch followed by complete closure of the fishery and the closure of the red king crab fishery have severely impacted CBSFA's revenues. This will begin to impact its ability to fulfill CDQ program objectives for Saint Paul Island, including funding many of the community infrastructure, educational, research, and social programs CBSFA supports.

A related disaster is the total cessation of crab processing at the Saint Paul Island plant. The City of Saint Paul in 2023 is dealing with a 100% cut in landing tax revenues, resulting in major budget cuts for critical services the City provides to the community. Depending on the duration

of the snow crab and red king crab downturns, communities such as Saint Paul that depend on processing operations are likely to shrink and could literally disappear.

One of the objectives of the crab management program is to address the social and economic concerns of communities. With that in mind, and in light of the drastic losses in crab-dependent communities, we suggest that Section 11 of the review, Social and Economic Community Impacts, be especially robust. To quote the outline, the 5-year review included a detailed Social Impact Assessment (SIA) that was an appendix to the analysis. Community Profiles were included for Unalaska/ Dutch Harbor, Saint Paul, King Cove, and Kodiak. A SIA was included in the crab 10-year review, but the community profiles were not updated.

This 17-year review will not include an SIA but will include updated information from recent community profiles. Information, in addition to the catch and value data by community that can be provided within confidentiality rules will focus on information provided in the most recent Annual Community Engagement and Participation Overview (ACEPO) report, community profiles (including those recently updated), and stakeholder input.

In the case of Saint Paul, confidentiality requirements are such that detailed economic data may not be available. Perhaps a special effort could be made to provide qualitative information that reflects the economic and social conditions.

The snow crab and Bristol Bay red king crab failures are the first rationalized fisheries in the country to suffer this magnitude of fishery collapse and correlated economic harm. Hundreds of millions of dollars in losses to harvesters, processors and communities have been devastating to the entire crab industry, and Alaska's economy.

We look forward to working with the Council during the review of the CRP.

Best regards,

A handwritten signature in black ink, appearing to read 'P. Lestenkof', with a stylized, cursive flourish extending from the end.

Phillip Lestenkof, President
Central Bering Sea Fishermen's Association