



# Central Bering Sea Fishermen's Association

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June 2, 2022

Simon Kinneen, Chairman  
David Witherell, Executive Director  
North Pacific Fishery Management Council  
1007 West Third St, Suite 400  
Anchorage, Alaska 99501

Dear Chairman Kinneen:

The Central Bering Sea Fishermen's Association (CBSFA) is the management organization for Saint Paul Island, Alaska, under the Western Alaska Community Development Quota (CDQ) Program. Since the program was created in 1992, the federal government has been awarding various species of fish (CDQ allocations) from the Bering Sea and Aleutian Islands (BSAI) commercial fisheries to CBSFA. In turn, CBSFA manages these allocations, including halibut, to promote social and economic development at Saint Paul Island.

We request that the Council undertake analysis of an action to modify the Vessel IFQ Cap regulations under 50 CFR Section 679.42(h)(1) for halibut in IPHC Regulatory Area 4. The Council's IFQ Committee met on May 26 and agreed to support this request.

The vessel halibut IFQ cap (vessel cap) is currently specified annually for all halibut management areas (except 2C) as .5% of the Alaska coastwide halibut IFQ TAC. The discussion paper on vessel cap issues prepared by Council staff in December 2014 includes halibut IFQ harvest levels in all areas, a tally of participating vessels and their proximity to vessel caps up through 2013. Data collected since 2013 indicates a further drop in available vessels, and varying inability to fully harvest halibut IFQ in parts of Area 4. The IFQ Report to the Fleet under April 2022 Council B reports includes updated numbers. The material provided with this agenda item in the IFQ Committee meeting includes Figure 3, a tally of vessel harvest in relation to caps from 2014 to 2021.

Data indicates a recent inability to fully harvest halibut quotas in Areas 4A and 4B, and a continuing drop in the number of available harvesting vessels. In Area 4, the cap needs to be more closely aligned to the number of available vessels of a size that can safely navigate the Bering Sea.

The proposed analysis would explore changing the vessel cap regulations in halibut management Area 4 (4A, 4B, 4C, 4D) to set the vessel halibut IFQ cap annually as:

Option 1, a percentage (4, 5 or 6%) of the combined Area 4 halibut IFQ TACs, or

Option 2, 50% more than the Alaska coastwide vessel cap.

In the case of a vessel fishing in halibut management areas outside Area 4, the Alaska coastwide vessel cap would continue to apply to poundage harvested in management areas outside Area 4 (except 2C). Under revised regulations the Area 4 vessel cap is expected to be higher than the coastwide vessel cap. Those vessels fishing in Area 4 would be permitted to take up to the Area 4 vessel cap only while fishing in Area 4. Vessels harvesting in Area 4 AND outside Area 4 cannot catch more than the coastwide vessel cap outside Area 4.

We recommend that the action be reviewed five years after implementation to determine whether the conditions that necessitated the action continue to exist.

### Background

The annual cap is driven by coastwide halibut availability. From 2000 to 2010, when halibut abundance was high, the vessel cap for halibut ranged from 201,000 to 295,000 pounds. In more recent years with lower halibut abundance, and lower allowable catches, the vessel cap was much smaller.

Several conditions affect the availability of appropriate halibut harvesting vessels in the Bering Sea.

One is the continuing and worsening problem of whales taking fish off longline hooks in the Bering Sea fisheries, and the need to travel to more remote fishing grounds instead of the shelf edge to efficiently harvest halibut. To safely make those lengthier trips to the viable fishing grounds and then to deliver the catch to processing plants, harvesters need larger vessels. Small boats in the Bering Sea are in danger from frequent storms, with only a short good-weather window in June and July.

Second, the steep decline in halibut availability starting in 2011 has meant that some smaller-scale halibut fishing operations have ceased to operate. The cost of gearing up to harvest halibut has been high in comparison to the expected return at low halibut TACs, and with a Bering Sea ex-vessel price significantly lower than the prices in the Gulf of Alaska and Southeast Alaska.

Third, the COVID pandemic caused further reductions in harvesting capacity, the number of vessels that are willing and able to participate in the Bering Sea halibut fisheries.

These three factors have decreased both the availability of the larger longline vessels and the availability of smaller vessels. The local small-boat fleet in St. Paul, for example, has declined by 25% in the last ten years.

In addition, halibut processing capacity in parts of the Bering Sea and Aleutian Islands has been and remains problematic, forcing vessels to travel long distances to and from processing locations.

It has become clear that Area 4 needs a vessel cap that more closely aligns with the available Area 4 quota AND harvesting capacity – available vessels of a size that can safely navigate the Bering Sea. The current vessel cap in Area 4 – which is the coastwide vessel cap – is 101,490 pounds. Area 4 IFQ for 2022 is 3,888,000 pounds, so the current vessel cap (coastwide vessel cap) is 2.6% of Area 4 IFQ.

If the regulations were revised as suggested, and the Area 4 vessel cap was 4%, for example of the Area 4 IFQ TACs, the Area 4 vessel cap would be 155,520 pounds (see the data below).

Specific to 4C and 4D, in 2022, CBSFA members hold a total of 152,000 pounds of 4C/D halibut IFQ. All that IFQ halibut plus CDQ halibut allocated to CBSFA would normally be harvested on small local vessels in a day-boat fishery.

Because of the COVID-19 epidemic and its associated logistical, safety, processing and cost issues, CBSFA members faced multiple problems harvesting their IFQ (and CDQ) halibut in 2020 and 2021, and will face those issues again in 2022.

In 2020 and 2021, the Council recommended and NMFS implemented an expedited rule to waive vessel caps so the halibut could be safely caught on fewer and larger vessels. As a result of this waiver (and an emergency waiver of IFQ transfer rules) nearly 99% of the quota was harvested in 2020 and 2021 in 4C and 4D, with the benefits flowing to the community.

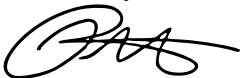
Stakeholders have again made a request for expedited action waiving vessel caps to apply to the 2022 halibut fishery, and the request is being acted upon. This expedited action could be extended through 2023 to apply to Area 4 until the implementation of a more permanent action. This request is for a more permanent action.

It is essential to the Bering Sea fishermen and communities that the full quota of halibut be harvested, but the approach of seeking temporary regulations is not viable under the emergency action criteria.

The fishermen of Saint Paul and area 4CD appreciate the Council's and NMFS' consideration of this proposed change to the IFQ regulations. In an era of rapidly evolving developments in fisheries-management resulting from climate change, stock migration, pandemics, and war, localized stakeholder-driven approaches such as the above, are an example of how fisheries regulatory bodies can work together with stakeholders to respond to the local effects of these larger, even global, developments.

Thank you for your consideration.

Sincerely,



Phillip Lestenkof, President  
Central Bering Sea Fishermen's Association

**Data**

<b>Area 4 Vessel Cap</b>	<b>Pounds</b>
4%	155,520
5%	194,400
6%	233,280