



Central Bering Sea Fishermen's Association

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June 3, 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 to promote social and economic development at Saint Paul Island.

Due in part to Saint Paul's proximity to the Bering Sea's crab resources, CBSFA is allocated 20% of the total Bering Sea snow crab (snow crab) that is set aside for the CDQ Program. In addition to its CDQ allocation, CBSFA has made considerable investments in crab assets, both processing and harvesting quota, as well as harvesting capacity. As a result of the 87% drop in the snow crab total allowable catch (TAC) from 45 million pounds to 5.6 million pounds announced in October 2021, CBSFA is expecting a 65% drop in its total revenues.

This dramatic drop in CBSFA's revenues will impact its ability to fulfill CDQ program objectives for Saint Paul Island, including funding many of the educational, research, and social programs it supports. This situation has been compounded by the closure of the Bristol Bay Red King crab (BBRKC) fishery. At such low overall levels, there is insufficient crab poundage to keep existing crab harvesting and processing capacity in various locations engaged. Depending on the duration of the snow crab downturn, this could be devastating to communities such as Saint Paul Island that host such operations.

This is not the first time the snow crab fishery has experienced such a dramatic decline. From 1999 to 2000 the snow crab resource collapsed from a TAC of approximately 192 million pounds in 1999 to a TAC of 28.5 million pounds in the year 2000. In response to this disaster, both the North Pacific Fishery Management Council (NPFMC or Council) and the National Marine Fisheries Service (NMFS) responded with bold action to: i) initiate the Crab Rationalization Program; ii) secure a Section 312 fishery failure determination which provided funds to affected stakeholders and communities, including Saint Paul; and, iii) establish a vessel buy-back program to reduce excess harvesting capacity.

At this time, and pursuant to Magnuson-Stevens Act (MSA) requirements for the rebuilding of overfished fisheries such as snow crab, we request that the Council undertake bold action and select a comprehensive set of alternatives for the Snow Crab Rebuilding Analysis. These alternatives should include:

- Selection of a range of action alternatives that would allow for a directed fishery and is responsive to the “needs of fishing communities” such as Saint Paul and allocates “both overfishing restrictions and recovery benefits fairly and equitably among sectors of the fishery” pursuant to MSA Section 304(e);
- Selection of alternative rebuilding timeframes (Tmin, Tmax) that use different stock assessment models and use different scenarios for recruitment and natural mortality given the uncertainty around those parameters for snow crab; and,
- Comprehensive and meaningful rebuilding measures such as bycatch control measures and habitat protections.


Regarding bycatch control measures, the analysis should consider alternatives that protect molting and mating crab from fishing impacts; adjust the PSC limit floor at low snow crab abundance; estimate unobserved fishing mortality using best available information; and create incentives to further reduce bycatch with a rate-based per vessel bycatch limit.

Regarding the directed crab fishery, the analysis should consider measures to increase mesh size, require longer soak times, report on hotspots, and retain smaller crab sizes.

In addition, given the dire situation of the snow crab resource, voluntary measures by all sectors to reduce impacts on it should be encouraged.

Finally, concerning snow crab habitat, the analysis’ alternatives should consider protections for their key habitats and Essential Fish Habitat (EFH) during the various life stages of this species, taking into account changes in the Bering Sea ecosystem resulting from climate change and the potential need for more dynamic and responsive protected habitat areas.

Sincerely,



Phillip Lestenkof, President
Central Bering Sea Fishermen’s Association