

March 29, 2019

Simon Kinneen, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, Alaska 99501-2252

Dear Mr. Kinneen and Council Members,

We are writing on behalf of five Western Alaska Community Development Quota Program (CDQ) Groups to request that the National Marine Fisheries Service (NMFS) review regulations specifying when the operator of a trawl catcher/processor must designate whether a haul is assigned to the CDQ Program and a specific CDQ group, or to another management program such as AFA or Amendment 80. The current regulations are unclear. These regulations are found in § 679.5(c)(4)(ii)(B) with the time limits for recording information in the trawl catcher/processor logbook. Specifically,

- § 679.5(c)(4)(ii)(B)(1) requires that “[m]anagement program, except CDQ Program, . . .” must be recorded in the logbook “within 2 hours after completion of gear retrieval.”
- § 679.5(c)(4)(ii)(B)(2) requires that the “CDQ group number” must be recorded in the logbook “within 2 hours after completion of weighing all catch in the haul.”

The first paragraph specifically excludes the CDQ Program from the requirement to record management program within two hours after completion of *gear retrieval*. The second paragraph allows recording of the CDQ group number associated with a haul within two hours after completion of *weighing all catch in the haul*. However, the requirement in the first paragraph to record the management program, except CDQ Program, within two hours after completion of *gear retrieval* also could be interpreted to mean that, if the management program field is left blank for more than two hours after gear retrieval, by default, the haul is assigned to the CDQ Program.

We request the Council recommend that NMFS revise its regulations to clearly state that, on trawl catcher/processors, the vessel operator has until **two (2) hours after completion of weighing all catch in the haul** to designate a haul to a management program and, if designated to the CDQ Program, to which CDQ group the haul will be assigned. This clarification would provide consistent reporting requirements for CDQ and non-CDQ tows and afford the vessel operators time to assess the species composition of a haul before assigning it to a particular management program or CDQ group.

Thank you for your consideration.

Sincerely,

Luke Fanning, *Chief Executive Officer*
Aleutian Pribilof Island Community Development
Association

Norman Van Vector, *Chief Executive Officer*
Bristol Bay Economic Development Corporation

Phillip Lestenkof, *President*
Central Bering Sea Fishermen’s Association

Janis Ivanoff, *President & Chief Executive Officer*
Norton Sound Economic Development Corporation

Ragnar Alstrom, *Executive Director*
Yukon Delta Fisheries Development Association