



# Central Bering Sea Fishermen's Association

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April 1, 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.

CBSFA is requesting the support of the North Pacific Fishery Management Council for initiating an action to modify the Vessel Cap regulations under 50 CFR Section 679.42(h)(1) for halibut in IPHC Regulatory Areas 4C and 4D.

Refer to the discussion paper on vessel cap issues (attached) prepared by Council staff in December 2014 for information regarding halibut IFQ harvest levels in all areas, and for a tally of participating vessels and their proximity to vessel caps up through 2013. Data since 2013 indicates a further drop in available vessels, and varying inability to fully harvest halibut IFQ in some parts of Area 4. Refer to the IFQ Report to the Fleet under B reports on this agenda for updated numbers.

The vessel IFQ cap (also referred to as "vessel cap") restricts the amount of IFQ of each IFQ species that can be harvested on one vessel during a season. The vessel IFQ cap is specified as .5% of all Alaska halibut IFQ TAC, so the number of pounds changes annually, and 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 catches, the vessel cap was much smaller. For example, the vessel cap in 4CD in 2022 is 101,490 pounds.

The Saint Paul local small boat fleet consists of 14 vessels and employs up to 20% of its residents. Commercial halibut fishing is the lifeblood of Saint Paul and is the main economic engine in a community that has few small boat fishing opportunities. In 2022, CBSFA members hold a total of 152,000 pounds of 4C/D halibut IFQ. All the IFQ halibut plus CDQ halibut would normally be harvested on small local vessels in a day-boat fishery.

Because of the COVID-19 epidemic and its associated logistical, safety 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 rules to waive vessel caps (and emergency IFQ transfer rules) so the halibut could be safely caught on fewer and larger vessels. 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 on vessel caps to apply to the 2022 halibut fishery.

It is essential to the Bering Sea fishermen and communities that the full quota of halibut be harvested. However, the approach of recommending temporary regulations that only apply in the current fishing year limits public input and does not contemplate the potential long-term impacts. CBSFA is now asking for initiation of a Council action to change the vessel cap regulations in Area 4CD to a percentage of the 4CD TAC that more closely aligns the cap to the available vessels of a size that can safely navigate the Bering Sea.

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.

The COVID pandemic has 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 has declined by 25% in the last ten years. The capacity is simply not there, and will need to be rebuilt as halibut quotas stabilize and increase.

Higher vessel use caps would allow for the combining of quota, so the available halibut allocations in the BSAI region may be fully harvested in accordance with the principle of optimum yield.

A Council discussion paper could investigate revisions to the vessel cap regulation that more closely matches the available cap to the available vessels. A revision could separate the management areas: instead of the vessel cap being a percentage of the total halibut IFQ TAC over all areas, the vessel cap in Area 4CD could be a percentage of the total halibut IFQ TAC in Area 4CD.

A discussion paper could take a preliminary look at a range of vessel cap percentages – for example, 1.5%, 2.5% and 3.5% of the halibut IFQ TAC in Area 4C and 4D – and how those levels align with vessel availability at various likely levels of halibut TACs. The discussion paper could include the potential use of adaptive management to, for example, periodically review the availability of viable vessels with a goal of determining halibut availability and harvesting capacity at regular intervals, with a trigger mechanism to change the percentage of TAC that would act as the vessel cap.

Understanding that the full development of Council actions and their implementation into regulations can be a lengthy process, and knowing that the conditions in Area 4CD affecting the fishery are likely to persist in 2023 and beyond, we are hopeful that the Council's previous and positive experience with the temporary vessel cap measure of 2020-2022 will provide valuable information to staff assigned to analyze the matter, as well as allow for expedited consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Lestenkof', written in a cursive style.

Phillip Lestenkof, President  
Central Bering Sea Fishermen's Association