



Central Bering Sea Fishermen's Association

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Simon Kinneen, Chairman
David Witherell, Executive Director
North Pacific Fishery Management Council
Anchorage, Alaska

Delivered by email to:
<simon@nsedc.com>
<david.witherell@noaa.gov>

Dear Mr. Kinneen and Mr. Witherell:

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 are writing today on behalf of CBSFA's local small boat halibut fishermen who fish both Individual Fishing Quota (IFQ) and Community Development Quota (CDQ) halibut managed by CBSFA. CBSFA is a signer of an emergency request to the North Pacific Council to allow quota transfers in the halibut and sablefish fisheries during the COVID-19 pandemic – allowing these fisheries to be prosecuted with the least risk to the health of IFQ holders, vessel owners, crewmembers, and Alaska's coastal communities.

The ability to transfer IFQ to a hired master will help hundreds of quota holders land their allocations in this time of crisis, while minimizing health risks to all fishery participants and communities. However, this potential emergency rule will only partially fix the problem for halibut fishery participants in the Bering Sea and Aleutian Islands.

CBSFA is seeking a temporary exemption from the NPFMC's Vessel Cap regulations under 50 CFR Section 679.42(h)(1) for halibut in the BSAI region, specifically IPHC Regulatory Areas 4B, 4C, 4D and 4E.

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 a percent of the annual TAC, so the number of pounds changes annually. From 2000 to 2010, when halibut abundance was high, the vessel cap for halibut ranged from 201,000 to 295,000 pounds. The vessel cap in 2020 is 80,396 pounds (.5% of all halibut IFQ TAC).

CBSFA members would normally be harvesting 325,550 pounds of CDQ halibut out of St. Paul. In addition, CBSFA members hold a total of 126,806 pounds of 4C halibut IFQ in 2020. The St. Paul local small boat fleet consists of 15 vessels and employs up to 20% of its residents. Commercial halibut fishing is the lifeblood of St. Paul and is the main economic engine in a community that has few small boat fishing opportunities. In 2019, CBSFA's member fishermen earned \$1.89 million in gross fishing proceeds, short of the long-term average of \$2.5 million.

The problem CBSFA fishermen may face in 2020 is a lack of harvesting capacity. If the small boat fishery out of St. Paul does not operate in 2020, due to the extremely high risk of spreading COVID-19 in our remote community, and lack of medical facilities to deal with such a crisis, CBSFA and the IFQ holders would need to make use of an emergency rule to allow quota transfer in order for the CDQ and IFQ halibut to be landed.

Even if the IFQ transfer provisions are loosened, local CDQ and IFQ fishers, as well as numerous IFQ holders who reside elsewhere, risk leaving a significant amount of fish in the water due to the low vessel cap. Substantially fewer vessels have been participating in the BSAI halibut fishery over the last couple of years, and there simply may not be enough to harvest all the fish.

CBSFA fishermen who have historically harvested IFQ on their own small boats would need to find vessels that are willing, and have vessel cap availability. More than 126,000 pounds of halibut IFQ would need to be harvested through quota transfers to larger vessels that can travel to the distant fishing grounds and Dutch Harbor.

CBSFA owns the 58-foot F/V Saint Peter, a halibut and sablefish longline vessel that has fished IFQ and CDQ for many years. Because CBSFA members, for the most part, have fished their IFQ aboard local small boats, the Saint Peter has fulfilled its vessel cap with quota from other IFQ holders. Prior to the COVID-19 pandemic, the Saint Peter committed to catching 75,000 pounds of IFQ from quota shareholders in 2020.

Even if the Saint Peter dismissed all of its contractual obligations – leaving 75,000 pounds of quota without a home – it would still not be allowed under the vessel cap to harvest all 126,000 pounds of locally held IFQ. In fact, two boats would not even have the ability to harvest the current obligations of 75,000 pounds plus the 126,000 pounds of member quota, given the vessel cap restraints.

Factors that are contributing to a reduced number of vessels available to harvest IFQ in the BSAI region include low ex-vessel pricing (currently \$3.25 & \$3.50 per pound in Dutch Harbor), the very low vessel cap, whale depredation on longline gear, and the extreme nature of operating hundreds of miles from Dutch Harbor where halibut markets are currently available.

For protection of the remote community of St. Paul, and to provide IFQ holders and vessel owners the best opportunity to harvest halibut allocations in these unprecedented times, a vessel cap exemption for the Bering Sea 2020 halibut fishing season is needed. IFQ holders from St. Paul and elsewhere need this exemption to survive financially. There is no cost to the nation, and it is unlikely that waiving the vessel cap regulation in the BSAI for 2020 will have negative impacts on the fishery or its historical participants. Thank you for your consideration of our request.

Sincerely,



Phillip Lestenkof, President
Central Bering Sea Fishermen's Association

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