



ALASKA

Bering Sea Crabbers

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D1 Public
Comment

North Pacific Fishery Management Council
605 W. 4th Avenue, Suite 306
Anchorage, AK 99501

February 5, 2016

Dear Chairman Hull and members of the North Pacific Fishery Management Council:

RE: Agenda Item D1 Snow Crab Bycatch

The Alaska Bering Sea Crabbers (ABSC) is a 501c(5) non-profit seafood industry trade association representing approximately 70% of the crab harvesters in the Rationalized Bering Sea/Aleutian Islands crab fisheries. As long-time participants in the king and tanner crab fisheries, our members have a significant stake in the long-term health of Bering Sea crab stocks and their supporting ecosystem and are actively concerned with future access to the important crab resources upon which they depend. As such, we would like to take this opportunity to comment on Agenda Item D1, the discussion paper on Eastern Bering Sea snow crab bycatch. **ABSC recommends that the Council initiate an analysis to revise or implement prohibited species catch limits and other management measures to minimize EBS snow crab prohibited species catch (PSC) in the directed groundfish fisheries.**

Based upon the Council's motion from its February 2014 meeting (Agenda item C6 BSAI Crab PSC Limits), the current discussion paper presents the necessary information requested to now support consideration of a revision to EBS snow crab PSC management. Specifically, the discussion paper provides preliminary data on: 1) COBLZ coverage area in relation to the survey distribution of snow crab; 2) the occurrence of snow crab PSC outside of the COBLZ area; 3) the occurrence of snow crab PSC taken by non-trawl gear; and 4) the size and sex composition of snow crab PSC taken in groundfish fisheries. This data indicates that the current COBLZ management measures may not be protecting the snow crab stock (and its associated directed fishery) to the fullest extent. While the discussion paper states that actual trawl bycatch mortality for snow crab ranges from 0.2% to 1.1% as a proportion of the snow crab ABC for 2012/2013, it is important to keep in mind that for 2013 to 2016, established snow crab PSC limits (the maximum amount allowed to be taken) were approximately 9.75%, 9.01%, 10.03%, and 5.1% of the ABC in each year, respectively. Further, established snow crab PSC limits were approximately 19.76%, 25.9%, 20.24%, and 17.4% of the established Total Allowable Catch (TAC) for each year from 2013 to 2016.

Through the development of an analysis, the Council be able to fully answer the question of whether or not current PSC management measures are beneficial (to the greatest extent practicable) in protecting the EBS snow crab stock while also minimizing any potential disruption(s) to the directed groundfish fisheries. As such, **ABSC recommends the Council initiate an analysis with the following Purpose and Need Statement and Alternatives for consideration:**

Purpose and Need Statement

Prohibited species, including halibut, salmon, and crab, are identified as such because they are integral to the health of Alaskan marine ecosystems and to State and Federal economies. Prohibited species catch (PSC) limits and management areas for crab have been established in recognition of the fact that crab are particularly impacted by bycatch during biologically-sensitive time periods and in specific locations; however, PSC limits for Bering Sea snow crab (*C. opilio*) have not been examined in nearly 20 years. Since that time, both the biology and management of directed groundfish and crab fisheries has changed significantly. This, in conjunction with the fact that there are no methods available within the Bering Sea-Aleutian Islands Groundfish Fishery Management Plan to restrict fisheries based on bycatch of crab when the total catch from all sources may not

exceed annual catch limits (ACLs) for crab, indicates that a more precautionary approach to PSC management may be warranted. As such, a reexamination of current Bering Sea snow crab PSC management is necessary. Such a reexamination will allow the Council to minimize snow crab PSC mortality to the extent practicable while achieving optimum yield in the directed groundfish fisheries. Such efforts work to maintain a healthy marine ecosystem; ensure long-term conservation and abundance of crab; provide maximum benefit to fishermen and communities that depend on crab and groundfish resources, as well as U.S. consumers; and comply with the Magnuson-Stevens Act and other applicable State and Federal law.

Alternatives

Alternative 1: Status quo Bering Sea snow crab PSC management [maintain current COBLZ (both area designation and limit amounts) and Northern Bering Sea Research Area]

Alternative 2: Revise the trigger limit percentage for *C. opilio* PSC to [0.05%; 0.075%; 0.10%] of the annual NMFS total survey abundance for snow crab

Option: Apply trigger limit percentage to total snow crab abundance based on the model-estimated population

Alternative 3: Eliminate the minimum *C. opilio* PSC cap and revise the current *C. opilio* maximum cap downward [10%; 20%; 50%]

Both the Purpose and Need Statement and Alternatives presented above are intended to be responsive to recommendations made by the Crab Plan Team at their January 2016 meeting as well as to issues and concerns raised in previous discussion papers related to this agenda item. Additionally, while including an expansion upon much of the information presented in the discussion paper, an analysis would benefit from inclusion of a discussion on each of the following points: 1) the methodology employed to apportion the snow crab PSC limit amongst sectors; 2) what years the snow crab PSC limit was based on results from the NMFS trawl survey and what years the limit was based on assessment model results and the rationale for why these different metrics were used; 3) details on the considerations and assumptions employed by ADF&G regarding snow crab bycatch during the TAC-setting process; 4) the methodology used by groundfish observers to account for snow crab PSC; and 5) the effects of including and not including total allowable (maximum permissible) PSC mortality has upon model population estimates for snow crab.

Finally, in order to move towards addressing other species of crab PSC, **ABSC recommends the Council initiate a discussion paper to outline the steps and information needed to consider the appropriateness of revising or implementing PSC limits or other management measures to minimize Bristol Bay Red King Crab PSC in directed groundfish fisheries.**

Thank you for your time and consideration of this important issue.

Sincerely,

Ruth Christiansen

Ruth Christiansen, Science Advisor/Policy Analyst
Alaska Bering Sea Crabbers