



ALASKA Bering Sea Crabbers

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Dear Dr. Wallace and SSC members,

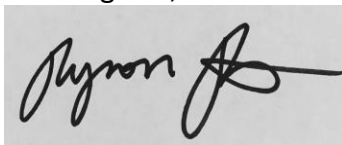
Thank you for providing us with the opportunity to comment on agenda item C8, the 2017 Amendment 80 Exempted Fisheries Permit (EFP) proposal before the SSC. The Alaska Bering Sea Crabbers (ABSC) is a non-profit membership organization committed to the vigilant stewardship of our crab resources and the environment upon which they depend.

The Alaska Bering Sea Crabbers concurs with the findings and comments provided by the Bering Sea Fisheries Research Foundation. More information and consideration is needed before we can support an EFP that would allow for some flatfish fishing inside the Red King Crab Savings Area (RKCSA). The concerns we have are primarily due to these concerns: 1) the recent abundance estimates of the three major Bering Sea Crab stocks have declined for the current fishing season; 2) recently available annual maps created from an analysis of daily fishing logs in the Bristol Bay red king crab fishery shows the relevance of the RKCSA during the time of the targeted crab fishery, especially in warm water years like we are currently experiencing; and 3) significant levels of red king crab bycatch taken during the directed flatfish fishery could negatively impact the health of the stock and resulting economics of the red king crab fishery.

The Alaska Bering Sea Crabbers wishes to continue working with Amendment 80 stakeholders to update and accurately specify bycatch measures for crab in the Bering Sea. We agree with the BSFRF that “a more comprehensive and cooperative approach that could be funded in part by the crab industry as well as A80 and other sectors would align more closely with the Council’s objectives and renewed approach to address crab bycatch. We understand and share the interest to conduct cleaner, lower impact, and sustainable fisheries – across all sectors, and believe at this time that more specific efforts toward a collaborative flatfish/crab/habitat survey are warranted for the area of interest.”

Thank you for accepting our perspective on this issue. Please do not hesitate to contact us for more information on this going forward.

Best Regards,



Tyson Fick
Executive Director
Alaska Bering Sea Crabbers