



North Pacific Fishery Management Council
1007 West Third, Suite 400
Anchorage, AK 99501-2252

Re: Bristol Bay Red King Crab Discussion Paper

Dear Members of the Council,

The Alaska Marine Conservation Council (AMCC) is dedicated to protecting the long-term health of Alaska's oceans and sustaining the working waterfronts of our coastal communities. Our members include fishermen, subsistence harvesters, marine scientists, small business owners, and families. Our ways of life, livelihoods and local economies depend on sustainable fishing practices and productive oceans. Our input in this comment will be focused on the Bristol Bay Red King Crab (BBRKC) Information Discussion Paper, and includes citations from several additional papers including council documents.

The BBRKC stocks are at a level of serious conservation concern and need immediate support to recover. The NMFS east Bering Sea bottom trawl survey showed decreasing BBRKC biomass¹ to levels of abundance that fell below the established State of Alaska threshold to allow a directed fishery in Registration Area T, which resulted in a closure for the 2021/2022 season². The topic of BBRKC abundance came before the council twice in 2021. The abundance of this stock has now reached a critical level that requires action.

Molting and mating crab need protection through restrictions of all gear types except longline during times that crab stocks are critically low. Additionally, it is important to reduce negative impacts to essential crab habitat by fishing activity, particularly at critical stock levels. In shallow waters, young-of-the-year crab rely on relief and protection from local habitat features including coarse substrate such as boulders, cobble shell hash, and living substrates making habitat protection of the utmost importance. The discussion paper author stated that between the age of two and four, crab have a tendency to form pods consisting of thousands of crab³. Mating season primarily occurs from January to March for primiparous and April to June for multiparous RKC. The discussion paper also discussed RKC's additional vulnerability during mating season with overlapped timing of molting times. It takes 75 days for the carapace to reach 90% of hardness which extends the time period of risk from contact with fishing gear³. To protect crab at this vulnerable time, a focus on trawl gear rather than fixed gear is practical, as crab are not actively feeding and therefore not entering baited pots³. We urge the Council to close NMFS Area 509 to trawling from March 15-June 15 to protect molting and mating crab.



We appreciate the Council's request to further identify where and how often pelagic gear is contacting the seafloor in the Bering Sea, and what impacts pelagic gear contacting the seafloor has on BBRKC through both gear on the bottom and bycatch (observed *and* unobserved). The analyst conclusion was that although trawl gear in general directly and indirectly are not the only factor in the decline of BBRKC, it is "assuredly one of the factors that challenge the BBRKC stock³." Ecosystem health was identified an additional factor in the abundance decline⁴. With this, we urge for immediate action taking a strong conservation step to eliminate harmful gear interaction with BBRKC EFH by limiting midwater trawl bottom time to no more than 10% of the time in ADFG Registration Area T. The Bristol Bay Red King Crab discussion paper reflects an assumption that pelagic gear is on the bottom at least 70% of the time (A Season = 0.7 to 0.9, B Season = 0.8 to 1.0)³. These actions are important steps needed to decrease unobserved mortality and allow for the habitat to rebound and support a thriving ecosystem.

Improvements and ongoing examination of the effects of fishing on Essential Fish Habitat (EFH) is needed, in order to determine whether 10 percent or more of the core EFH area is impacted by commercial fishing activities⁵. Moving towards defining stock specific EFH areas would increase the Council's ability to recognize habitat and stock declines at an early stage and in turn mitigate problems more quickly, preventing additional closures.

We appreciate the opportunity to contribute to the Council's ongoing dialogue of the current status of Bristol Bay Red King Crab's critical abundance levels. We thank you for reviewing the above noted themes in the context of your current and future discussions, and support the Council's ability to conserve and manage North Pacific ecosystems sustainably. Thank you for considering our comments.

Respectfully,

A handwritten signature in black ink that reads "Marissa Wilson". The signature is fluid and cursive, with a long horizontal line extending to the right.

Marissa Wilson

Executive Director



References

- ¹Zacher, L., Richar, J., and M. Litzow. 2021. The 2021 Eastern Bering Sea Continental Shelf Trawl Survey. NOAA Technical Memorandum NMFS-AFSC. Available at:
https://apps-afsc.fisheries.noaa.gov/Documents/Temp-for-NOAA-IR/2021_EBS_Crab_SurveyTech_Memo_approved_draft.pdf
- ²Zheng, J., Siddeek, M.S.M., and K.J. Palof. 2021. Bristol Bay Red King Crab Stock Assessment in Fall 2021 (Crab SAFE). Alaska Department of Fish and Game, Division of Commercial Fisheries, Report. Available at:
<https://meetings.npfmc.org/CommentReview/DownloadFile?p=3ada484b-7d8c-42f0-9360-abc1560aa669.pdf&fileName=2%20Bristol%20Bay%20Red%20King%20Crab%20SAFE.pdf>
- ³Bristol Bay Red King Crab Information Paper April 2022
- ⁴Fedewa, E.J., Garber-Yonts, B., and Shotwell, K. 2020. Ecosystem and Socioeconomic Profile of the Bristol Bay Red King Crab Stock. Stock Assessment and Fishery Evaluation Report for BSAI crab stocks. 2020 Crab SAFE. North Pacific Fishery Management Council, Anchorage, AK
<https://meetings.npfmc.org/CommentReview/DownloadFile?p=ea0403bc-6544-4241-bf8c-b9c7a8ebf17d.pdf&fileName=App E BBRKC ESP 2020.pdf>
- ⁵Olson, JV, TS Smeltz, and S Lewis. 2022. Discussion Paper on the Assessment of the Effect of Fishing on Essential Fish Habitat in Alaska for the 2022 5-year Review.
<https://meetings.npfmc.org/CommentReview/DownloadFile?p=ec574180-9e2c-4cf6-bd08-9b8bd96309d0.pdf&fileName=D5%20Fishing%20Effects%20on%20EFH%20Discussion%20Paper.pdf>