



February 2, 2024

North Pacific Fishery Management Council  
Angel Drobnica, Chair  
1007 West 3<sup>rd</sup> Ave., Suite 400  
Anchorage, AK 99501

RE: C2 Groundfish Area Closures within the BBRKC Stock Assessment Area-Initial Review

Dear Chairwoman Drobnica and members of the Council,

The At-sea Processors Association (APA) represents five companies that own and operate 15 U.S. flag catcher processor vessels that primarily participate in the Eastern Bering Sea pollock fishery. APA members would be affected by any action taken under Alternative 2. These comments address the Initial Review Draft

We would like to acknowledge and thank the Council and staff for addressing many of the concerns we highlighted last June in the first Initial Review Draft. Specifically, there is now comprehensive information for the Council to consider the potential trade-offs in terms of impacts on bycatch of other key species in Appendix 2- PSC Analysis. The enhanced data demonstrates the complex tradeoffs and clear impacts to fisheries if prohibited from fishing in the BBRKCSA.

One of the strongest criticisms of the previous Initial Review draft as well as the three discussion papers that preceded that document was the ongoing lack of scientific evidence to understand the relative importance of the RKCSA to the BBRKC stock. This document does present new information on stock distribution relative to the RKCSA, however the analysis acknowledges that Figure ES-2 and Table ES-3 highlights the substantial uncertainties and unknown potential effects of the proposed action on red king crab, and the red king crab habitat.

Further, there remains a large knowledge gap relative to the basic life history characteristics of BBRKC that could lead to better understanding of the effectiveness of the blunt management tools considered within this Initial Review draft. The Council's SSC highlighted some of these uncertainties and lack of information in its June 2023 review of a similar action. Since then, no new science is available on:

- Location and timing of mating and molting crab.
- Unobserved mortality on BBRKC by gear type.
- Relative benefits to the stock given a closure of the RKCSA to all fishing gears.

However, the analysis does highlight two key factors that do not support additional action in the RKCSA at this time.

- Predominant movement of BBRKC to the North and East, outside of the RKCSA.
- Fishing Effects Model and results showing minimal and temporary impacts to Red King Crab Essential Fish Habitat.

New information is coming that could potentially address the many uncertain and unknown impacts of this proposed action, and should be available for consideration by the Council when considering additional management measures for BBRKC in this proposed action. This additional information:

- Ongoing work to better characterize unobserved mortality on all fishing gears through a Council working group and workplan
- Pelagic trawl gear research by all pollock fishery participants
- Pot cod rationalization program and consideration of bycatch management and monitoring provisions under that proposed action.
- Bering Sea Fisheries Research Foundation winter pot and trawl survey-2024 (may provide information on female as well as molting crab distributions)
- Additional research of RKC recruitment and distribution.

In summary, we do not believe that there is sound science that supports any measurable benefits to the BBRKC stock by removing pelagic trawl gear from the RKCSA. However there is extensive information highlighting likely and known adverse impacts on other species, including Chinook salmon, chum salmon, and herring (at a minimum). There is also extensive research in progress that may provide the Council a better roadmap to more effective management actions than those currently being considered.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Stephanie D. Madsen". The signature is written in a cursive, flowing style.

Stephanie Madsen  
Executive Director