



September 27, 2024

Mrs. Angel Drobnica, Chair
North Pacific Fishery Management Council
1007 West Third, Suite 400
Anchorage, AK 99501

RE: Comment on Agenda Item C1 - BSAI Crab Specifications

Dear Chair Drobnica and Council Members:

The Alaska Bering Sea Crabbers (ABSC) is a trade association representing the majority of independent crab harvesters who commercially fish for king, snow (opilio), and Tanner (bairdi) crab with pot gear in the Bering Sea and Aleutian Islands (BSAI) Crab Rationalization Program. We appreciate the opportunity to comment on Agenda item C1 – BSAI Crab Specifications.

ABSC appreciates all the work by the Crab Plan Team (CPT) and stock authors and the work they've done to produce the models and assessments for Bering Sea crab stocks. There has been an incredible amount of uncertainty these past few years, proving to be very difficult for crab fishermen, but also for stock assessment authors, fishery managers, and the CPT as well. We appreciate the CPT's attention, dedication, and thorough work during these trying times.

We were pleased to see the positive signals for crab that came from the summer bottom trawl survey. Particularly with what appeared to be an increase in abundance estimates across the crab stocks. Tanner crab, especially in the Western district, had a strong signal. As did Bristol Bay red king crab (BBRKC), where in the past, we have been concerned with low levels of female abundance. We are pleased to see that both stocks (BBRKC and Tanner crab) appear to be stable enough to support a directed fishery. The trawl survey results for snow crab also appeared to carry some optimism for the stock with a signal that it may be rebuilding faster than expected. Here, abundance estimates for snow crab had increased for nearly all of the size/sex classes. What remains troubling, however, is that the snow crab model does not appear to share the same optimism that the survey results showed. We understand the intricacies of stock assessment and modeling, and at times the model may not always track with the survey data, but the CPT's recommended model, with a very low OFL, is worrisome after seeing positive trends in survey results the past few years since the collapse. The CPT has recently been discussing changing the currency of management, while that may be a necessary path forward, at this time it's troubling to us due to the lack of available information regarding mating dynamics that would inform this new metric. If this is necessary to do amidst a changing climate, perhaps there is a more gradual approach to be had rather than the more abrupt transition that results in such drastically different outcomes for crab. We are encouraged by the efforts of the CPT to think outside the box and support the continued exploration of alternative indices that match current stock dynamics.

Switching gears, something we have brought up in the past and feel important to continue flagging for the Council's consideration; we would still like to see the CPT spend more allocated time at their meetings to focus on strategies to help protect crab stocks, protect essential habitat, and facilitate healthy rebuilding. No doubt modeling is an important component of stock assessments and CPT air time. However, with numerous recent closures of the big three Bering Sea crab stocks, and not to mention the six crab stocks that haven't seen a directed fishery in years, crab could benefit from the expertise on the CPT putting their minds together and brainstorming potential steps to benefit crab and crab habitat across the state. We believe that more attention is warranted to find proactive ways to help these stocks and provide the Scientific and Statistical Committee (SSC) and Council with guidance from the crab experts. Areas for consideration could include a CPT directed discussion regarding important crab habitat based on the recent research results that have become available, some of which have been presented to the CPT this past year.

Finally, we would like to commend all the hard work by authors of the Ecosystem Status Reports and the Ecosystem and Socioeconomic Profiles (ESP). ABSC has been happy to work with the active crab fleet to provide ESP authors with the skipper survey results after each open fishery. Incorporating fishermen knowledge and on the grounds observations is important and we appreciate the development of the ESP's and being able to contribute to them. We would like to see this expanded to the Tanner crab fishery and will be happy to continue working with the authors to provide our fleet's skipper observations for this too.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gabriel Prout', written in a cursive style.

Gabriel Prout
President
Alaska Bering Sea Crabbers