



September 30, 2022

Mr. Simon Kinneen, Chairman
North Pacific Fishery Management Council
1007 West Third,
Suite 400 Anchorage, AK 99501

RE: Comment on Agenda Item D8 Essential Fish Habitat

Dear Chairman Kinneen, Council Members, and SSC:

The Alaska Bering Sea Crabbers (ABSC) is a trade association representing 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. As crab industry stakeholders, we support the ongoing work that the Bering Sea Fisheries Research Foundation (BSFRF) is leading, with state and federal crab researchers, on a variety of projects related to crab movement and essential fish habitat (EFH). We know crab EFH issues are complicated, blending research, fishery data and best available science to improve knowledge and resolution of critical habitat to improve management measures – but now more than ever, increased attention to crab is needed. We appreciate the opportunity to comment on Agenda Item D8 – Essential Fish Habitat (EFH) – Review of preliminary components of 5-year review. The comments in this letter build from [ABSC's comment letter in April 2021](#) on EFH review planning which are herein incorporated by reference.

We appreciate the work that has been put into the fishing effects (FE) model and the continued efforts to update maps of EFH and species distribution across the Bering Sea for many of Alaska's fish and invertebrate stocks. It's evident that an impressive amount of time and energy was put into this discussion paper, including the supplemental material which includes folders containing the species-specific FE model maps, FE model output time series figures, EFH maps, and comparative maps of 50% core EFH areas (CEA) from 2017 and 2022 for EBS crab stocks. We're happy to see specific updates for the red king crab (RKC) EFH maps, particularly the inclusion of the Bristol Bay red king crab (BBRKC) EFH and FE model maps. It remains important to understand the impacts of fishing efforts across the species range, while also evaluating the fishing effects by stock management area. Additionally, we appreciate the effort to provide these same FE maps for adult crab. We continue to ask for inclusion of FE maps for all crab across all life stages.

We are concerned that FE maps have not yet been provided for juvenile crab, and we therefore continue to ask for inclusion of FE maps for all crab across all life stages. We also note that during the February 2015 5-year EFH review, the Scientific and Statistical Committee (SSC) made recommendations to update all species across **all life stages** and suggested incorporating seasonal distributions, including additional sources of data. Similarly, the Crab Plan Team (CPT) identified **RKC habitat concerns** during the April 2010 EFH review, and the Council had reviewed a discussion paper on the issue in February, 2013, but ultimately no action was taken. We support the CPT's suggestion at their Sep 2022 meeting that this process may warrant reconsideration. The lack of recent EFH-related management actions for crab (Appendix A) given their level of conservation concern and overfished status and based on previously identified and up-to-date information requires immediate attention. The Council was alerted

in October 2021 that snow crab is overfished and BBRKC is at a level of conservation concern with female abundance below thresholds. Tanner crab stocks have been depressed for over a decade as well. Given that and given the EFH work since 2010 that flagged several concerns and protections for Eastern Bering (EBS) crab stocks that have not yet been addressed through management action, **we continue to recommend that the Council prioritize EFH considerations for snow, Tanner, and BBRKC** (see [ABSC EFH comment letter Feb, 2022](#)). It's imperative to update information that has become available through research since the 2017 EFH Review, and to incorporate new sources of available information or potential partnerships for outside data collection, including updates on the recommendations from the 2012 discussion paper on BBRKC EFH and on the importance of fishing impacts in localized areas as flagged in the FE model work. We are aware of some parts of this through BSFRF and other research efforts we are attentive to, but Council efforts to focus this in a meaningful way for crab stocks in the EFH update are critical.

We continue to recommend that future FE models and EFH description efforts incorporate crab maturity data collected via EBS summer bottom trawl surveys, observer data, and any potential maturity data to come from additional (winter or other) surveys, and to run separate individual models for both immature and mature life stages of Alaska's crab stocks. This should be made a priority given the status of EBS crab stocks. The next EFH 5-year review should apply these crab maturity data, regularly collected on bottom trawl surveys and include other sources, to inform life stage species-specific distribution models for the BSAI king and Tanner crabs fishery management plans. Additionally, these efforts should include collaboration with scientists from the Bering Sea Fisheries Research Foundation, Alaska Fisheries Science Center, Alaska Department of Fish and Game and the directed fishing fleet, all of whom have crab size measurements and maturity data. These data could be used to spatially and temporally map crab catches and observations of mature and immature life stages in the EBS. Thus, providing maturity dependent spatio-temporal descriptions and maps of crab-specific critical habitat.

In addition to collecting the afore mentioned maturity data by species, we support the CPT's recommendations (see [May 2022 CPT minutes](#)) for identifying habitat areas of particular concern (HAPC) and consideration of these areas for the various life stages of crab, in addition to those identified in the stock assessment author's review, as well as noting that further consideration of habitat protections is a matter of urgency given the depressed condition of most crab stocks. The EFH authors and CPT noted that future efforts need to assess the importance of smaller local habitat scales on overall stock health especially when there remains localized areas showing greater than 50% habitat reduction from fishing effects, even though the overall habitat reduction average is less than 10% (i.e., Southwest Bristol Bay). Additionally, these EFH descriptions would benefit greatly if the impacts of fishing activities were analyzed at a higher resolution - by fishing gear type, which could then inform meaningful management actions to ensure the protection of those critical crab habitats.

In closing, ABSC continues to ask the Council and the SSC be proactive to help slow the decline of Alaska's commercially important crab stocks. We recommend that the highest priority actions for BSAI crab stocks in the Council arena focus on spatio-temporal management across all life stages for crab and higher resolution of spatial and fishery-specific impacts on crab EFH. Additionally, the consideration of habitat protections and identification of (HAPC) for all life stages of crab is the highest matter of urgency given the depressed condition of Alaska's crab stocks. The designation of a HAPC does not require an area be closed to fishing, it is simply a recognition of important habitat that can add value to management considerations. The Council should be leading to build more resilient crab stocks in the face of climate change and ongoing fishing impacts. We have enough information to act now and start helping Alaska's crab stocks. Let's help this commercially and culturally important iconic species for

Alaska rebound using the tools and information we have and continue to find ways to collect and incorporate additional data.

Thank you for your consideration.

Sincerely,



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Appendix A – Timeline of inaction for EFH

