



Central Bering Sea Fishermen's Association

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September 30, 2022

Mr. Simon Kinneen, Chairman
Drs. Sherri Dressel and Franz Mueter, Co-Chairs Scientific and Statistical Committee
North Pacific Fishery Management Council
1007 West Third, Suite 400
Anchorage, AK 99501

Transmitted electronically

Re: Agenda item C1, BSAI Crab specifications

Dear Chairman Kinneen and Council members; Dr. Dressel, Dr. Mueter and SSC members:

The Central Bering Sea Fishermen's Association (CBSFA) is the Community Development Quota (CDQ) group for Saint Paul Island in the Pribilofs. Due in part to Saint Paul's proximity to the Bering Sea's crab resources, CBSFA is allocated 20% of the total Bering Sea snow crab that is set aside for the CDQ Program.

Background

In addition to harvesting its CDQ allocation on wholly-owned and partner crab vessels, CBSFA has made considerable investments in crab assets, both processing and harvesting quota. Much of that investment is in snow crab, but CBSFA also owns Eastern Aleutians Golden King Crab, Bristol Bay Red King Crab and Bairdi quota. CBSFA manages its CDQ allocations and the additional quota assets to promote social and economic development in Saint Paul.

As a result of the 87% drop in the snow crab total allowable catch (TAC) from 45 million pounds to 5.6 million pounds announced in October 2021, CBSFA experienced a 65% drop in its total revenues. Based on the 2022 NOAA Fisheries summer bottom trawl survey, the historic decline in snow crab continues, and is expected to persist for some time. The BBRKC 2022 survey numbers also remain low, compounding the disaster.

The dramatic drop in CBSFA's revenues, continuing into 2022/23, will begin to impact its ability to fulfill CDQ program objectives for Saint Paul Island, including funding many of the community infrastructure, educational, research, and social programs CBSFA supports. In addition, the City of Saint Paul saw an 85% cut in revenue last year from lost landing taxes, trickling down to budget cuts for critical services the City provides to the community.

A related concern is that, at such low overall levels, there may be insufficient crab poundage to keep existing crab processing capacity in various locations engaged. Depending on the duration of the snow crab and red king crab downturns, this could be devastating to communities such as Saint Paul Island that host processing operations.

As processing costs and availability in Saint Paul are affected, it also affects the processing availability for halibut, the other major fishery that takes place around Saint Paul – and has a cascading effect on that fishery and on the community residents that participate in it.

These snow crab and Bristol Bay red king crab fisheries are part of the Bering Sea and Aleutian Islands (BSAI) Crab Rationalization Program, created in 2005 and intended to create economic stability and improve safety. This is the first rationalized fishery in the country to suffer this magnitude of fishery collapse and correlated economic harm. On a larger scale, with over a \$200M loss in crab ex-vessel value last year alone, the effects are devastating to the entire crab fleet and ripple through Alaska’s communities, processors, support businesses, and even schools, affecting thousands of people.

Crab fisheries needed in 2022/23

We support the request made by the Alaska Bering Sea Crabbers (ABSC) for urgent help at the state and federal levels, to create some flexibility in the system to adjust to the desperate situation using the best available science, and moving crab stocks towards more sustainability, while also balancing the needs of fishing communities consistent with the Magnuson-Stevens Fishery Conservation and Management Act (MSA). MSA National Standards 4 and 8 are applicable, as well as Section 304(e) of the MSA which requires consideration of the “needs of fishing communities” and allocations of “both overfishing restrictions and recovery benefits fairly and equitably among sectors of the fishery” while action is considered and taken to rebuild the affected crab fisheries.

We believe the uncertainties in current status, stock estimates, and management leave some room to consider allowing for a small, directed crab fishery to balance the needs of fishermen and the associated fishing communities.

Across Alaska, the directed crab fleet is struggling to keep businesses alive, sustain work for its crews, and maintain market share. Directed crab fisheries for bairdi, Bristol Bay red king crab, and snow crab – however small – are critical, if scientists and managers believe that is appropriate. Maintaining a directed fishery at times of low abundance, small as it may be, provides an opportunity to continue gathering essential data that only a pot fishery can collect. Information like catch per unit of effort (CPUE), size and sex composition, and shell condition are a few of the data collected that are extremely informative to scientists, managers, and stock assessment authors. It is especially crucial because this data is collected at a different time of year than the NMFS summer bottom trawl survey, and with a gear more targeted to catching crab.

These fisheries are among the most dangerous in the world, fishing in difficult conditions in the middle of winter. Experienced crew understand how to operate safely in these conditions and look

out for the greener crew. If our fleet loses those experienced crew, it increases the risk of safety issues. In addition, given the deep economic hit our industry has faced and with BSAI crab stocks collapses persisting, vessels will have to make choices about deferring vessel maintenance, also increasing safety concerns. And the effects go well beyond our fishermen and vessels. Support businesses like welders, fabricators, gear manufacturers, and others are hurting from the lack of business the crab industry regularly provided. Communities like Saint Paul, Unalaska and Kodiak are seeing the impacts.

For Bering Sea snow crab, we and other crab stakeholders ask that there be flexibility to set at least some level of harvest for the upcoming 2022/2023 season. Given the uncertainty in the Bering Sea snow crab stock assessment, paired with the unaccounted-for portion of the same stock in the Northern Bering Sea and hybrid populations, we ask for some level of harvest even if we are approaching harvest control rules, noting that collective fishing impacts have not come close to exceeding snow crab acceptable biological catch levels.

At a minimum, if other sectors are allowed up to 4.35 million animals in bycatch through prohibited species catch limits while the snow crab stock is at low levels, then the direct crab fishery should be allowed at least that same amount, in line with the Magnuson-Stevens Act requirement to allocate fairly and equitably among sectors and to consider the needs of fishing communities.

For Bristol Bay red king crab, we note that the 8.4 million animal female threshold is a hard number, and the stock may be within the margins of error for that threshold. We ask that we have flexibility to have a small fishery this season while also protecting the signal of recruitment for the snow crab seen in the 2022 summer trawl survey.

Crab recovery strategy needed

While the crab industry struggles to maintain viability, we are eager to hear the recommendations of the Council's SSC, ADFG and NMFS on how to best help crab stocks recover. We believe that we must protect the centers of crab abundance for the recruitment signal, so we support comprehensive and meaningful rebuilding measures such as bycatch control measures and habitat protections. The SSC and the Council should consider alternatives that protect molting and mating crab from fishing impacts, adjust the PSC limit floor at low snow crab abundance, and estimate unobserved fishing mortality using best available information.

Concerning crab habitat, alternatives should consider protections for their key habitats and Essential Fish Habitat (EFH) during the various life stages, taking into account changes in the Bering Sea ecosystem resulting from climate change and the potential need for more responsive protected habitat areas. Certainly, we are interested in potential methods of responding more dynamically to changing snow crab and king crab centers of population and/or mating. More responsive management in times of change is a national conversation, and one that is of great interest to NOAA/NMFS. This Council is faced with several major species and fisheries in flux – mostly attributed to changes in climate – and it seems advisable for the Council to begin considering

framework management actions that can more easily be adapted annually to respond to changes in abundance, timing and location.

To summarize, the impacts of the crab declines have already deeply affected the Bering Sea crab fleet and associated communities, processors, and support businesses. Another closure will result in further loss of new entrants and small, independent, family businesses and further devastate crab-dependent communities, counter to the goals of catch share programs as outlined in NOAA's national policy.¹ We appreciate your willingness to employ flexibility in crab science and management as we work together to rebuild crab stocks.

Crab research recommendations (Agenda item D2)

In response to the Council's three-part request for information for the October meeting, the Bering Sea Fisheries Research Foundation (BSFRF) provided a comprehensive summary of immediate crab research needs. CBSFA holds a Board seat on the BSFRF and supports the Foundation's research recommendations.

The Bering Sea Fisheries Research Foundation (BSFRF) is a non-profit research foundation formed in 2003 by voluntary participants within the Bering Sea crab industry, to conduct or support collaborative research to improve scientific understanding and management of Bering Sea crab stocks. The Foundation comments on research priorities related to the Request for Information specifically highlight research ideas that will reduce crab bycatch and fishing impacts on crab.

Climate change and the changing environment in the Bering Sea are clearly impacting the ecosystem overall and adding heightened uncertainty to crab management. While we agree that fishing impacts on the stocks are likely not the primary driver in their current stock dynamics, we also agree that sources of mortality that are currently unaddressed or unaccounted for could be constraining stock recovery.

We encourage the SSC to consider supporting and advocating for the research priorities and focus presented by the Foundation.

Thank you for your consideration.

Sincerely,



Phillip Lestenkof, President
Central Bering Sea Fishermen's Association

¹ NOAA Catch Share Policy (p.1) states, "The purpose of this policy is to encourage well-designed catch share programs to help rebuild fisheries and sustain fishermen, communities and vibrant working waterfronts, including the cultural and resource access traditions that have been part of this country since its founding."