



Coastal Villages Region Fund

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December 2, 2022

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

Re: Comment Letter Regarding Agenda Item C1 – Red King Crab Savings Area Emergency Rule Request Review

Dear Mr. Witherell and Council,

Coastal Villages Region Fund (CVRF) is a Community Development Quota (CDQ) group working for 20 communities along the central coast of western Alaska, most of which are on the mainland of the Yukon-Kuskokwim delta. We receive CDQ allocations in both crab and pollock, have significant investments in non-CDQ portions of both fisheries, and most of our revenue comes from these two sectors. While there are substantial concerns with the long-term viability of the Bristol Bay Red King Crab fishery, we are concerned that the evidence presented in various recent Council documents (including the December 2022 Red King Crab Savings Area Analysis) does not clearly show that removing the pollock fishery from the Red King Crab Savings Area (RKCSA) will present a benefit to the Red King Crab biomass. Nevertheless, eliminating the pollock fishery from the RKCSA will negatively affect CVRF's ability to profitably prosecute the A-season pollock fishery, and thus affect our ability to deliver programs to our region's residents.

As an active participant in the Alaska crab industry, CVRF is empathetic to the rest of the industry and is similarly affected by TAC reductions and fishery closures. Over the years, CVRF has made significant investments in Red King Crab (RKC) harvesting and processing shares. Additionally, CVRF receives allocations of CDQ, including RKC when that fishery is open. Overall, our operations in the BSAI crab rationalization fisheries account for a large portion of our annual revenue stream, funds that are directly utilized for our many programs.

In addition to crab, CVRF is also an active owner in the offshore and inshore pollock fisheries, which are also considerable sources of revenue for our programs funding. We have 100% control of the fishing operations of the catcher processor Northern Hawk, which catches our CDQ and AFA C/P sector pollock. The Northern Hawk is subject to numerous bycatch restrictions, including hard caps on allocated CDQ species and chinook salmon, and fleetwide limits on halibut, herring, and crab. We are party to industry agreements to limit catch of these species. CVRF is doing everything it can, with the operations we control, to minimize our impact on salmon in particular, but also other non-target species, and our fishing decisions are based on a balance of these priorities.



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Over the past several years, our pollock operation, similar to much of the rest of the fleet, has spent part of A-season fishing in the RKCSA, and a big incentive for fishing in this area has been high abundances of quality pollock combined with lowered bycatch encounters. Bycatch of chinook salmon is highest in A-season, and our vessels are instructed to move to a different area when bycatch rates are too high. We prioritize avoidance of chinook salmon due to the annual hard cap, but we also move based on occurrences of other species.

In the recent RKCSA paper, there are several conclusions that are considered to be evidence for bottom contact by the pollock fishery, which would then result in likely impacts to crab and crab habitat. However, several of these discussions do not seem to consider other explanations:

- The EFH Fishing Effects model analysis is based on a voluntary estimation of historical fishing practices by the pollock fleet, data which may not be representative of individual vessels, or of recent activity during A-season within the RKCSA.
- The paper also explores using observer haul performance codes related to a “crab pot in the haul” to infer bottom contact and habitat impacts.
 - Example photos in the paper are of pots that are clearly bent and damaged, and the analysis does not explore the possibilities that a caught pot was resting atop a pile of two or more pots, or was snagged. Either of these scenarios allows for the possibility that a net fished just off the bottom could catch a pot while not actually contacting the bottom.
 - Gear performance codes indicating a pot in the haul only state that the fishing was affected by a pot in the net but does not indicate the location of the pot in the net. It is possible that a pot was scooped into the net by the footrope going under it, but also possible that it was entangled in the wing or other portion of the net. The paper assumes the pots were likely caught by footrope scooping, but the data is incomplete, and this cannot be verified historically.
- The actual incidence of RKC bycatch in the pollock fishery is very low. There is a discussion of unobserved mortality that focuses on the large mesh sizes in pollock nets and how crab may be falling out and not reaching the codend, but there is not clear research on this.

CVRF appreciates the complexities of this decision and thanks the council, ADF&G, and NOAA staff for their hard work on the past and recent documents associated with this decision. However, removing the pollock fleet from the RKCSA will reduce our flexibility in bycatch avoidance and may well lead to increased encounters with other bycatch species, and we do not support the Emergency Rule Request as written.

Thank you for considering these comments.