

December 2nd, 2022

Chairman Simon Kinneen and Executive Director Dave Witherell
NPFMC Council Members
North Pacific Fishery Management Council
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cc: Science and Statistical Committee Members; Advisory Panel Members

Re: C2: Snow Crab Rebuilding Analysis

Dear Chairman Kinneen and Council Members:

The Aleut Community of Saint Paul Island (ACSPI), a federally recognized tribe located on the Pribilof Islands, submits the following comments in response to agenda item **C2: Snow Crab Rebuilding Analysis**. As outlined in the analysis document, the community of St. Paul is facing devastating economic impacts due to the 2022/2023 Bering Sea Snow Crab season closure. The Bering Sea snow crab fishery is the lifeblood of our community and by far the most economically important fishery overall. As noted in the analysis crab represents 94% of landed revenue (halibut accounting for 6%). The Aleut Community of St. Paul Tribal Government estimated a roughly \$670,000 loss from last year's snow crab harvest reduction and expects losses closer to \$1 million this coming year.

Our partner and local city government, the City of Saint Paul; community fishing association, Central Bering Sea Fishmen's Association (CBSFA); and Native village corporation, Tanadgusix (TDX), are expected to take major reductions in revenue. The ripple effects of the shutdowns in the next few years are expected to have decreased funding to the local school as families consider leaving island, loss of public safety services, reductions in hours of local employment, the lack of seasonal workers to St. Paul will have losses in indirect revenue for the community, and a rise in various island wide taxes.

The closure of the crab fishery will also directly impact food security to the Island. While snow crab is not a historical major food source for Unangan (or Aleut) of the Pribilof Islands, it is a traditional food and there are historical subsistence records of snow and blue king crab through harvest in intertidal areas and were consumed when they were found in the stomachs of other animals (fish and marine mammals) (ADFG 1987). Today snow crab is consumed as a valuable, healthier, and fresh subsistence resource for our community members, where alternative protein sources are costly such as chicken or beef due to the high cost of shipping of groceries. For over 10 years CBSFA created and manages the Elder and Community Subsistence Donations Program to disburse Bering Sea seafood to community Elders throughout the year. Seafood products are also donated to various community events and to the local food bank and provide critical access to subsistence foods to contribute to individual and community well-being. Donations are obtained through directed fishery catches, so it's critical we maintain this food source to our Elders.

Regarding Section 3.6.2.2 Local and Traditional Knowledge and Subsistence specific to Bering Sea snow crab, skippers of the Pribilof Island communities have recorded similar observations consistent with the results of the Alaska Bering Sea Crabbers (ABSC) 2022 skipper survey noted in the section. Since 1992 with the allocation of Community Development Quota (CDQ) to the Pribilof Island communities, St. Paul and St. George have directly participated in the Bering Sea crab fisheries and experienced the impacts of the Pribilof Island blue king crab and snow crab fisheries closures throughout the late 1980s and early 2000s. Multiple interviewees who were and are skippers have noted low abundance or disappearance of crab species in fishing grounds near the Islands that

typically were once abundant and a notable decrease in crab sizes (Goldman et al. 2020). As one St. George Island resident put it:

“We used to have the blue crab right here, right out here off this pier [NE garden cove], we used to just go out half a mile throw homemade crab pot over there and get like 23 of them pulled up...When they had the opiolo season up here when the harbor was functional [pre-2000]. We saw right in front of our very eyes that the quota is going up, but the crab were getting smaller. We noticed that and when we would go to the processors and looked and watched through the window. We watched these critters [snow crab] come through and thought ‘Look at how small they are now. We’re not going to have any pretty soon.’ That’s when they shut down the fisheries here.”

While not a comprehensive survey of the changes in crab stocks around the Pribilof Islands, it touches upon local knowledge of community members, the lack of crab recovery in management, and decline in ecosystem health for decades.

In order to alleviate the socio-economic and cultural impacts towards our community **we support Alternative 2, Option 2** to maintain the flexibility to have a directed crab fishery during rebuilding if permitted under the state harvest strategy and federal thresholds. Given the Magnuson-Stevens Act requirements to consider the “needs of fishing communities” and to “allocate both overfishing restrictions and recovery benefits fairly and equitably among sectors of the fishery”, closing the directed snow crab fishery should not be required while rebuilding the stock. Closing directed crab fisheries results in loss of new entrants and small family businesses and devastates crab-dependent communities, counter to the goals of catch share programs and unprecedented in a mature rationalized fishery. In addition, the analysis shows that whether or not there is a directed crab fishery during rebuilding does not change the time to rebuild.

The rebuilding plan should include comprehensive and meaningful rebuilding measures such as bycatch control measures and habitat protections, especially while the stock is at such critical low levels and to protect the recent small signal of recruitment.

For bycatch control measures, we ask the Council to consider:

- Protecting the female center of abundance and key areas for juveniles from fishing impacts (this could be done with a dynamic closed area based on the summer survey data). Should protect the small signal of recruitment from the DRAFT 2022 survey given increasing uncertainty with environmental changes and potential changes in stock productivity, and because projections for next 5 years and the future directed fishery relies on it.
- Protecting molting and mating crab from fishing impacts by restricting fishing, including midwater trawl given their time on bottom (40% on average for CVs, 85% for CPs), in areas with crab especially at times when crab stocks are critically low. Could limit midwater trawl gear to no more than 10% time-on bottom to align with GOA regulatory requirements for midwater gear.
- Removing the PSC limit floor which is not appropriate for stocks at low abundance (for details see ABSC Jun 2022 comment p.5 and ABSC Feb 2022 comment p.2).
- Counting bycatch throughout the stock’s range toward PSC limits (i.e. inside and outside COBLZ) and create an incentive to further reduce bycatch with a rate based per vessel bycatch limit for A80.
- Estimating unobserved fishing mortality using the best information already available (which we know is not zero).
- Encouraging voluntary measures by all sectors to reduce BSS impacts. For the crab directed fishery, that includes increased mesh size, longer soak time, hotspot reporting, and retention of smaller sizes (this will require working with processors & ADFG).

For habitat protections, we ask the Council to consider:

- protecting key habitats and EFH for various life stages of crab to help rebuild the stock. Based on information on habitat disturbance and core EFH, paired with time on bottom and area swept by pelagic and bottom trawl gears, Council should consider habitat protections around the Pribilofs and parts of the shelf, at least until stocks show strong recovery and reach more sustainable levels.
- aligning the Pribilof Island Habitat Conservation Zone (PIHCZ) with ADFG's Homeplate closure. Both closed areas are to protect crab and crab habitat and should be consistent. ADFG's Homeplate closure is a type of dynamic closure evaluated every year based on survey data to provide maximum protections for [king] crab and crab habitat in the area. This area also provides some protections for snow crab and habitat.

Thank you for the opportunity to submit these comments and we look forward to continuing to engage on these issues.

Sincerely,



Amos T. Philemonoff, Sr.
President, Aleut Community of St. Paul Island

References:

Alaska Department of Fish and Game (ADFG). 1987. Subsistence in Alaska: Arctic, Interior, Southcentral, Southwest, and Western Regional Summaries (Technical Paper No. 150). R. F Schroeder, D. B Andersen, R. Bosworth, J. M Morris, J. M Wright.

Goldman, M, S., L. M. Divine, E. J. Knightm V. M. Padula, and D. P. Huffman. 2020. Marine Ecological Atlas of the Pribilof Islands. Alaska Audubon, Anchorage, AK.