



ALASKA

Bering Sea Crabbers

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Sep 27, 2019

North Pacific Fishery Management Council
Mr. Simon Kinneen, Chairman
605 W 4th Avenue, Ste 306
Anchorage, AK 99501

RE: Comment on Agenda Item C4 (BSAI Crab Specifications)

Dear Chairman Kinneen and Council Members:

The Alaska Bering Sea Crabbers (ABSC) appreciates the opportunity to comment on Agenda Item C4 – Bering Sea and Aleutian Islands Crab Specifications. ABSC is a trade association representing independent crab harvesters in the Bering Sea and Aleutian Islands. Our members commercially fish for king, snow (opilio), and Tanner (bairdi) crab with pot gear and hold approximately 70% of the quota in the Bering Sea and Aleutian Islands Crab Rationalization Program.

ABSC is deeply concerned as most of our crab stocks are at historic lows with little or no signs of recruitment. Layered with this, the Bering Sea water temperatures are showing a warming trend and, for the second consecutive year, no cold pool (bottom temperatures <2°C). In addition to the physical changes in the Bering Sea, we heard from scientists and managers at the recent Crab Plan Team meeting about bycatch of crab in other fisheries and potential ecosystem effects such as recent increases in groundfish (a predator of crab). ABSC continues to look for ways to help our crab stocks rebound where we can.

ABSC appreciates the Council's work on **snow crab prohibited species catch (PSC)** limits earlier this year to review bycatch management for crab caught in trawl gear. ABSC has been gathering additional data and mapping snow crab bycatch over the summer to help further inform this issue. Per the Council's motion last April, ABSC will work with other industry sectors to discuss the available information and plan to come back to the Council soon. As snow crab PSC wraps up, it will ideally create a framework that can be used to review **Bristol Bay red king crab PSC**, a stock that has become of more immediate concern.

Another effort underway to help crab stocks rebound is **pot gear design work for Pacific halibut and cod fisheries to reduce crab bycatch**. At the October 2018 Council meeting, the Council adopted pot gear for the halibut fishery in the Bering Sea. As part of that action, the Council directed halibut and crab fishermen to work together on gear designs to preemptively reduce crab bycatch and report back to the Council. During conversations with gear manufacturers and fishermen, the cod fishery was also included in the gear design work to reduce crab bycatch. The Bering Sea Fisheries Research Foundation (BSFRF), ABSC, and Natural Resource Consultants applied for and were recently awarded a NOAA Bycatch Reduction Engineering Program (BREP) grant for this work. To kick-off this stakeholder-led project, we held a workshop in Seattle on September 16 to refine the gear designs to be tested (flyer attached). Thank you for the support from the Council, NOAA Fisheries, Alaska Department of Fish and Game, and several fishing industry organizations; we are excited to see this industry-led project unfold with work starting this fall in the Kodiak lab.

ABSC looks forward to working with the Council and scientists on these and other ways we can help our crab stocks rebound.

Sincerely,

Jamie Goen
Executive Director
Alaska Bering Sea Crabbers

ATTACHMENT: pot gear design workshop flyer



Testing Pot Gear Modifications to Reduce Crab Bycatch in Cod and Halibut Fisheries

With Bering Sea crab stocks at historic lows, bycatch of crab is a growing concern. The North Pacific Fishery Management Council and NOAA Fisheries plan to allow Pacific halibut fishermen in the Bering Sea and Aleutian Islands, who traditionally fish with longline gear, the use of pot gear as an option to help them avoid whale depredation. Additionally, the pot cod fishery in the Bering Sea is exploring ways to reduce crab bycatch in their fishery.

The Alaska Bering Sea Crabbers (ABSC), Bering Sea Fisheries Research Foundation (BSFRF), and Natural Resources Consultants (NRC), with the support of several partners (listed below), were granted an award from the NOAA Fisheries Bycatch Reduction Engineering Program (BREP) to conduct lab and field experiments to develop and test the effectiveness of crab bycatch reduction in a variety of pot gear modifications. **This project will test pot gear modifications by working with fishermen from the halibut, cod, and crab fisheries, as well as gear manufacturers, to utilize their knowledge and experience when coming up with the design and then applying a scientific protocol to rigorously test its effectiveness.**

To start this project, an industry gear committee meeting will be held (details below) where project partners and industry representatives will discuss gear modifications and determine which will be tested during lab experiments. Some initial ideas for pot gear modifications have been developed by industry representatives and are available on the backside of this flyer as a starting point for discussion.

Industry Gear Committee Meeting

September 16, 2019 6:00pm

Ivar's Salmon House

401 NE Northlake Way, Seattle, WA 98105

Once gear designs for testing have been selected, red king and opilio crab will be collected. Trials will be performed at the Kodiak lab, where tanks will be bisected by panels equipped with the pot modifications to be tested. The effectiveness of bycatch reduction will be calculated by the number of crab that successfully pass through the entry tunnel of each pot modification. The modifications identified as the most effective in reducing crab bycatch during lab experiments will then be tested by participating vessels during the following cod and halibut pot fishing seasons alongside un-modified pots. Crab bycatch rates and CPUE of target species (cod and halibut) will be compared between modified and un-modified pots. Findings from this project will be disseminated through written reports and presentations, with the goal of incorporating a new pot gear design that reduces the amount of crab bycatch in cod and halibut pot fisheries in Alaska.

For more information contact:

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Bering Sea
Pot Cod
Cooperative



Some initial ideas for pot gear modifications to reduce crab bycatch

