



Seward Peninsula Subsistence
Regional Advisory Council

Louis Green Jr. Chair

c/o Office of Subsistence Management
1011 E. Tudor Rd. MS121, Anchorage, AK 99503-6199



SP RAC 20024.KD

NOV 10 2020

David Witherell
Executive Director
North Pacific Fishery Management Council
1007 West Third, Suite 400
Anchorage, Alaska 99501

Dear Mr. Witherell,

The Seward Peninsula Subsistence Regional Advisory Council (Council) is writing regarding management of the Red King Crab fishery in Norton Sound. The commercial fishery was closed during the latter part of the 2020 season due to concerns over the lack of mature male crabs and lower than expected harvests. Subsistence users experienced one of the worst Red King Crab harvests on record. The Council is requesting that the North Pacific Fishery Management Council (NPFMC) recommend continued closure of the commercial fishery during the 2021 season for the reasons explained below.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters of the Seward Peninsula. The Councils were established by authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA), and chartered under the Federal Advisory Committee Act. Section 805 of ANILCA established the Council's authority to initiate, review, and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside its region that may affect subsistence resources critical to communities served by the Council. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

At its fall meeting held October 27-28, 2020 via teleconference, the Council heard from multiple government and private individuals regarding updated biological data for Red King Crab in Norton Sound. A recent trawl survey conducted by the Alaska Department of Fish and Game (ADF&G) showed that the estimated numbers comprising the female cohort and their average clutch size were larger and closer to normal than those observed in the past few years. ADF&G believes that many male Red King Crab increased in biological size this past year and were able to successfully mate with mature females. Charlie Lean, Chair of the Northern Norton Sound Fish and Game Advisory Committee, however, stated that the survey only observed three-quarters of the legal-sized males compared to the previous year. Mr. Lean also stated there is still concern that approximately one-third of mature males are failing to molt and grow because they are spending physical resources breeding. There continues to be a significant lack of mature males to mate with females. This discrepancy, combined with last season's reduced rate of egg fertilization and the market demand for larger than legal size crabs, will likely result in limited commercial fishing opportunities in the near future. Mr. Lean also shared that while some recruitment will occur this year, the majority of legal size crab readiness will occur in 2022 and thereafter. ADF&G

representatives indicated that although the population of legal size male crabs are currently at a low point, some younger crabs will molt or are molting, and expected to grow to legal size this coming year.

The current Red King Crab commercial fishery closure will sunset in December, 2020. ADF&G indicated that a commercial harvest quota for next season is already in place, beginning through the ice in February and continuing through the summer. The Council was informed that the Crab Planning Team's recommendations to the NPFMC will be an Allowable Biological Catch of close to 400,000 Red King Crabs, up nearly 200,000 from last year. The Guideline Harvest Level (GHL) for legal-sized Red King Crab may go up 100,000 pounds from last year's GHL of 170,000. The Council is deeply concerned with the increased GHL recommendation, particularly given that commercial crabbers were only able to harvest 80,000 pounds of the 170,000 Red King Crab GHL in 2020.

The Council believes that allowing both a winter and summer commercial fishery at these levels could harvest most legal-sized crabs, and result in the mortality of many of the sublegal and below market sized crabs during sorting. Handling mortality during winter months is particularly high since frost injury is likely to occur before undersized crab are returned to the water. Additionally, the market for Norton Sound Red King Crab requires crabs to be 5 inches across the carapace rather than the legal requirement of 4.75, meaning half of legal recruitment could be subject to handling mortality. Both the subsistence and commercial users of this resource are opposed to this marginal fishery because the vast majority of crabs being handled are sublegal or are unmarketable.

ADF&G reported that subsistence harvest of Norton Sound Red King Crabs peaked this past decade. Sizable decreases in harvest began in 2017 and 2018, with only 4,000 Red King Crabs harvested by Norton Sound subsistence users in 2019. In 2020, there was a subsistence take of just 1,200 Red King Crabs in Norton Sound, representing the lowest subsistence harvest in twenty years. Effort was also low, either because some users thought the season was closed to subsistence harvest or users were not interested in small crabs and throwback females. Only 80 permits for subsistence crab fishing were issued by ADF&G in 2020. This is a result of limited harvest opportunity.

Council members and other subsistence users are extremely frustrated with the inability to harvest this important traditional subsistence resource, despite the fact that the subsistence crab fishery is open 365 days a year with no size or catch limit. Users reported either a complete absence of crabs altogether, or that any good size crabs were extremely difficult to locate. One subsistence crabber noted he only caught 20-30 crabs when 200 was the customary harvest needed to feed his family.

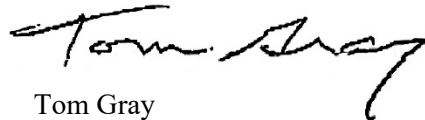
The Council is also very disturbed that ADF&G and others are only "speculating" that the current population of sub-legal crabs will molt this year and become legal during the upcoming fishing season. This was considered by the Council to be a high risk gamble for a currently depleted resource, and should not be the driving factor behind opening up the crab fishery in 2021 to commercial use. The Council highly recommends that managers review available crab survey data collected in 2021, and based upon that review, recommend whether or not to open the commercial fishery in 2022. The Council is convinced that years of overharvest have resulted in the collapse of this fishery, and strong conservation measures are necessary to ensure its viability in the future. If commercial harvest is allowed to continue, it could result in the loss of a robust Norton Sound Red King Crab population for many years to come. Furthermore, last year's observed reduced reproduction will likely contribute to poor recruitment within the next seven or eight years. The Council believes there may also be environmental impacts to the crab population from warming ocean temperatures and contamination. In addition to acquiring reliable 2021

Norton Sound Red King Crab population data, the Council is requesting that research be conducted to further understand how changes to the ocean environment may be adversely affecting the resource.

In conclusion, the Council is strongly opposed to opening the Norton Sound Red King Crab commercial fishery in 2021. The Council requests that the NPFMC work with ADF&G, the Board of Fish (BOF), and others to close the Red King Crab fishery in Norton Sound, while encouraging continued research and monitoring for the recovery of this population before opening to any further commercial uses. The Council believes that commercial fishing for Red King Crab in Norton Sound should only be open when there is scientific evidence that the male legal-sized portions of the crab population have reached sustainable levels. Most importantly, successful subsistence harvest based on historic use and needs should unequivocally be considered as an indicator of when commercial fishing can resume. Otherwise, failure by ADF&G and the BOF to provide adequate subsistence opportunities for Red King Crab is contrary to management for a subsistence priority for this resource in both State and Federal law.

Any questions regarding this letter can be addressed to me through our Council Coordinator, Karen Deatherage at (907) 786-3564 or karen_deatherage@fws.gov.

Respectfully,



Tom Gray
Acting Chair

cc: Federal Subsistence Board

Seward Peninsula Subsistence Regional Advisory Council

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Thomas Kron, Acting Council Coordination Supervisor, Office of Subsistence Management

George Pappas, ADF&G Liaison, Office of Subsistence Management

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Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game

Jim Menard, Norton Sound Area Commercial Fisheries Management Biologist,

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Charlie Lean, Chair, Northern Norton Sound Fish and Game Advisory Committee

Brandon Ahmasuk, Vice-President of Natural Resources, Kawerak, Inc.

Scott Kent, Quota & Acquisitions Analyst, Norton Sound Economic Development Corporation

Interagency Staff Committee

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