

September 29, 2021

Chairman Simon Kinneen and Executive Director Dave Witherell
NPFMC Council Members
North Pacific Fishery Management Council
605 W. 4th Avenue, Suite 306
Anchorage, AK 99501
npfmc.comments@noaa.gov

cc: Science and Statistical Committee Members; Advisory Panel Members

Re: C1: BSAI Crab – SAFE, ABC/OFL for stocks, Plan Team report

Dear Chairman Kinneen and Council Members:

The Aleut Community of Saint Paul Island (ACSPI), a federally recognized Alaska Native tribe located on the Pribilof Islands, submits the following comments in consideration of Agenda Item **C1: BSAI Crab – SAFE, ABC/OFL for stocks, Plan Team report**. We are quite alarmed with the compounding catastrophic news concerning multiple crab stocks in our waters recently. The closure of the Bristol Bay red king crab fishery for the first time in 25 years and a snow crab fishery that is expected to be cut by 80% or more and declared overfished, is simply devastating. We are part of the communities, fishermen, processors, supply chains, and support businesses that are all reeling from these events.

It is time to better scrutinize the western science that has led us to this point. We fully support the comments submitted by affected industry and other communities and organizations that are as alarmed as we are at the status of crab stocks in the Bering Sea.

In particular, we request the following:

1. **The snow crab stock assessment be moved to General Model for Alaska Crab Stocks (GMACS) immediately;**
2. **Additional deeper survey stations be added for the 2022 summer survey using shelf survey gear.** This will help us better understand if snow crab are present in the deeper water at the time of the survey and moving deeper, more in line with where fishing occurred during the 2020/21 season;
3. **That the Council and other sectors also look for ways to reduce their bycatch of crab through hotspot reporting and moving out of areas with crab**, if encountered. We recognize that our snow crab TAC will be significantly reduced in accordance with the state harvest strategy and the federal ABC control rule. In order to support our fishermen, our communities, and our markets, we want to make sure there is at least a small snow crab fishery if at all possible within the defined management process and science inputs.

Thank you for the opportunity to submit these comments on C1.

Sincerely,


Amos T. Philemonoff, Sr.

President, Aleut Community of St. Paul Island