

Bristol Bay Economic Development Corporation

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November 30, 2021

Mr. Simon Kinneen, Chairman
North Pacific Fishery Management Council
1007 West Third, Suite 400
Anchorage, AK 99501

RE: Emergency Action to expand Red King crab savings area

Dear Chairman Kinneen and Council Members:

Bristol Bay Economic Development Corporation (BBEDC) is one of six groups in the Community Development Quota (CDQ) program. The CDQ program was established to provide meaningful participation and investment opportunity in the Bering Sea and Aleutian Island fisheries to support economic development in western Alaska and to alleviate poverty by providing economic and social benefits through the creation of sustainable and diversified local economies. The CDQ program has generated critically important and sustainable economic opportunities to 65 coastal communities for over 25 years and helped leverage private sector dollars through partnerships and investments. As an organization with diverse interest across multiple sectors BBEDC recognizes the importance of sustainable management and the need to balance opportunity for all resource users. In partnership with 17 member communities BBEDC has established a significant interest in Bering Sea crab harvesting in addition to the CDQ quota allocation. BBEDC investment in the Mariner fleet continues to fulfill the mission of the CDQ program by expanding community participation in direct vessel and quota ownership and diversification of the quota portfolio.

Due to the precipitous decline in the abundance of female red king crab in the Eastern Bering Sea (EBS) trawl survey which warranted the closure of the directed red king crab fishery, BBEDC is asking the Council to consider a limited expansion of the Red King Crab Savings Area by emergency action as authorized by 16 U.S.C. § 1855(c). Through this short-term, limited action it is believed that there will be immediate conservation benefits to the stock and future closures will be less probable.

Based on data provided in the EBS survey the female abundance is estimated to have declined by 25% from 2019. Furthermore, a significant density of female crabs extends past the current northern boundary of the savings area. By expanding the closure area by half a degree of latitude to the north the area of high abundance of female crab would be protected from fishing pressure. This expanded area would be closed to bottom trawling consistent with current regulations of the existing savings area.

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Similar to the 1994 emergency action to establish the initial Red King Crab Savings Area, emergency action is justified to avoid substantial damage or loss to a living marine resource, habitat, fishery, industry participants or communities as required by the emergency rule making guidelines. The closure of the directed fishery will cause over \$30 million in direct economic losses and community impacts. Combined with other voluntary efforts by other fleets this action will allow the Council the time to examine long-term actions to improve conservation and management of all the Bering Sea crab stocks.

Thank you for your consideration. The dramatic decline in Bering Sea crab biomass is troubling and all efforts should be made to ensure that the measures within managements control are exercised for the preservation of the stocks. This limited short-term action will ensure all sectors share in conservation measures for the long-term benefit of the resource.

Regards,

A handwritten signature in black ink, appearing to read "Robin Samuelsen".

Robin Samuelsen
BBEDC, Chairman