



# Central Bering Sea Fishermen's Association

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September 30, 2022

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

Transmitted electronically

Re: Agenda item D2: BBRKC expanded discussion paper; Council-requested sector information

Dear Chairman Kinneen and Council members:

The Central Bering Sea Fishermen's Association (CBSFA) is the Community Development Quota (CDQ) group for Saint Paul Island in the Pribilofs. Due in part to Saint Paul's proximity to the Bering Sea's crab resources, CBSFA is allocated 20% of the total Bering Sea snow crab that is set aside for the CDQ Program.

## Background

In addition to harvesting its CDQ allocation on its two crab vessels, CBSFA has made considerable investments in crab assets, both processing and harvesting quota. Much of that investment is in snow crab, but CBSFA also owns Eastern Aleutians Golden King Crab, Bristol Bay Red King Crab and Bairdi quota. CBSFA manages its CDQ allocations and the additional quota assets to promote social and economic development in Saint Paul.

As a result of the 87% drop in the snow crab total allowable catch (TAC) from 45 million pounds to 5.6 million pounds announced in October 2021, CBSFA experienced a 65% drop in its total revenues. Based on the 2022 NOAA Fisheries summer bottom trawl survey, the historic decline in snow crab continues, and is expected to persist for some time. The BBRKC 2022 survey numbers also remain low, compounding the disaster.

The dramatic drop in CBSFA's revenues, continuing into 2022/23, will begin to impact its ability to fulfill CDQ program objectives for Saint Paul Island, including funding many of the community infrastructure, educational, research, and social programs CBSFA supports. In addition, the City of Saint Paul saw an 85% cut in revenue last year from lost landing taxes, trickling down to budget cuts for critical services the City provides to the community.

A related concern is that, at such low overall levels, there may be insufficient crab poundage to keep existing crab processing capacity in various locations engaged. Depending on the duration of the snow crab and red king crab downturns, this could be devastating to communities such as Saint Paul Island that host processing operations.

As processing costs and availability in Saint Paul are affected, it also affects the processing availability for halibut, the other major fishery that takes place around Saint Paul – and has a cascading effect on that fishery and on the community residents that participate in it.

These snow crab and Bristol Bay red king crab fisheries are part of the Bering Sea and Aleutian Islands (BSAI) Crab Rationalization Program, created in 2005 and intended to create economic stability and improve safety. This is the first rationalized fishery in the country to suffer this magnitude of fishery collapse and correlated economic harm. On a larger scale, with over a \$200M loss in crab ex-vessel value last year alone, the effects are devastating to the entire crab fleet and ripple through Alaska’s communities, processors, support businesses, and even schools, affecting thousands of people.

#### Crab protection and recovery strategy

With CBSFA and Saint Paul and the rest of the crab industry and crab-dependent communities struggling to maintain viability, we are asking for the Council to consider actions to help crab stocks stabilize and recover. Given the level of conservation concern, crab should be higher among the priority species for bycatch and other management in the Council.

We very much appreciate the voluntary measures undertaken by the pot cod sector to avoid BBRKC for the past two years. We anticipate additional measures that could be taken by other sectors on a voluntary basis. Voluntary changes in fishing behavior and location must, however, address the real and long-identified issues that could compromise recovery of BBRKC and snow crab stocks

We believe that we must identify and protect the centers of crab abundance, and support comprehensive and meaningful rebuilding measures such as bycatch control measures and habitat protections. We advocate for Council consideration of alternatives that specifically protect molting and mating crab from fishing impacts, adjust the PSC limit floor at low snow crab abundance, and estimate unobserved fishing mortality using best available information.

Concerning crab habitat, alternatives should consider protections for their key habitats and Essential Fish Habitat (EFH) during the various life stages, taking into account changes in the Bering Sea ecosystem resulting from climate change, and the potential need for more responsive protected habitat areas. Certainly, we are interested in potential methods of responding more dynamically to changing snow crab and king crab centers of population and/or mating. More responsive management in times of change is a national conversation, and one that is of great interest to NOAA/NMFS. This Council is faced with several major species and fisheries in flux – mostly attributed to changes in climate – and it seems advisable

for the Council to begin considering framework management actions that can more easily be adapted annually to respond to changes in abundance, timing and location.

The April 2022 BBRKC Discussion Paper and the D2 BBRKC Expanded Information paper at this meeting provide useful information that could be expanded upon to analyze the impacts of precautionary action.

For example, the Red King Crab Savings Area has long been identified as important habitat for red king crab, and the paper indicates that trawl fishing effort in that area is substantial. To address the crisis at hand, the Council could consider looking further at the impacts of closing that area to all trawl effort to address habitat and bycatch concerns, particularly given the much-discussed fact that current mid-water trawl gear actually fishes on the bottom much of the time. Consideration could also be given to dynamic closed areas that protect areas with repeated high bycatch rates that are not currently in the RKCSA.

It also makes sense to consider aligning bycatch management in Zone 1 to management of the BBRKC stock in Area T. All bycatch in Area T should count towards PSC limits to make it consistent with Magnuson-Stevens Act National Standard 3 (managing a stock throughout its range).

#### Crab research recommendations

In response to the Council's three-part request for information for the October meeting, the Bering Sea Fisheries Research Foundation (BSFRF) provided a comprehensive summary of immediate crab research needs. CBSFA holds a Board seat on the BSFRF and supports the Foundation's research recommendations.

The Bering Sea Fisheries Research Foundation (BSFRF) is a non-profit research foundation formed in 2003 by voluntary participants within the Bering Sea crab industry, to conduct or support collaborative research to improve scientific understanding and management of Bering Sea crab stocks. The Foundation comments on research priorities related to the Request for Information specifically highlight research ideas that will reduce crab bycatch and fishing impacts on crab.

Climate change and the changing environment in the Bering Sea are clearly impacting the ecosystem overall and adding heightened uncertainty to crab management. While we agree that fishing impacts on the stocks are likely not the primary driver in their current stock dynamics, we also agree that sources of mortality that are currently unaddressed or unaccounted for could be constraining stock recovery.

To summarize, the impacts of the crab declines have already deeply affected the Bering Sea crab fleet and associated communities, processors, and support businesses. We appreciate your willingness to employ the best available crab science and appropriate and protective

management as we work together to understand and address the unprecedented crab conservation issue facing the Bering Sea.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Lestenkof', written in a cursive style.

Phillip Lestenkof, President  
Central Bering Sea Fishermen's Association