



ALASKA

Bering Sea Crabbers

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North Pacific Fishery Management Council
605 W. 4th Avenue, Suite 306
Anchorage, AK 99501

January 26, 2016

Dear Chairman Hull and members of the North Pacific Fishery Management Council:

RE: Agenda Item D2 Western Aleutian Islands Red King Crab

The Alaska Bering Sea Crabbers (ABSC) is a 501c(5) non-profit seafood industry trade association representing approximately 70% of the crab harvesters in the Rationalized Bering Sea/Aleutian Islands crab fisheries. As long-time participants in the king and tanner crab fisheries, our members have a significant stake in the long-term health of Bering Sea crab stocks and their supporting ecosystem and are actively concerned with future access to the important crab resources upon which they depend. As such, we would like to take this opportunity to comment on Agenda Item D2, the discussion paper on the proposal to remove Adak Management District Red King Crab from the BSAI King and Tanner Crab Fishery Management Plan. **For the multiple reasons detailed below, ABSC recommends that the Council take no further action on this issue at this time.**

First, as presented in the discussion paper, there is a significant lack of scientific and stock assessment information for Western Aleutian Islands Red King Crab. This is a Tier 5 management stock for which there is no assessment model developed (reflecting the greatest deal of scientific uncertainty) and standardized stock surveys have been too limited in geographic scope and too infrequent to provide a reliable index of abundance for the red king crab population west of 171 degrees west longitude. No overfished determination (a stock size estimate relative to an established minimum stock size threshold) is possible for this stock given the lack of biomass information and the current overfishing limit is established based only upon catch history in the area during a limited number of years (which is the unfortunate reality of not having adequate scientific and stock information). Additionally, at no point has it been clearly established whether red king crab in the western Aleutian Islands is comprised of a single population or multiple biologically distinct populations. It is only in recent years that the original 75% buffer between OFL and ABC (established to accommodate the paucity of scientific information) was decreased to 40% to accommodate an exploratory fishery at the request of interested stakeholders. As such, under current federal management, the single OFL for Western Aleutian Islands red king crab is the best management measure available for protection of red king crab throughout their geographic range and removing a portion of this area would significantly diminish such protection. Under this proposal, harvest of Adak District red king crab would cease to be monitored by NMFS, Council action would not be required if harvest levels were to result in overfishing, and federal requirements for accountability measures would be eliminated. This point is further emphasized when considering how WAI red king crab prohibited species catch mortality in the directed groundfish fisheries would be handled. Were an Adak District red king crab fishery to be established independent of the federal FMP, bycatch of this species in the Adak subarea would no longer be monitored by NMFS or the CPT, nor would it be used in the OFL/ABC specification process. The extremely deficient biological and stock information currently available indicates that this species cannot afford removal of the limited protections and federal management measures presently available.

Second, in spite of the lack of biological and stock assessment information available, the SOA Board of Fisheries took action during their March 2014 meeting to establish the conditions for an Adak District red king crab commercial fishery. Under these conditions, as long as a specified red king crab biomass threshold is met, a small boat (and small pot limit) fishery is possible in both State and federal waters. As such, it is not necessary to remove the Adak Management District from the federal FMP in order to facilitate and accommodate a commercial fishery. And were a fishery to be opened under the conditions set forth by the Board of Fisheries, it is possible that such a fishery would be targeting only one portion of a population whole such that localized depletion could occur.

Finally, the discussion paper points out that scenarios of potential commercial fishery responses to an abundant western Aleutian Islands red king crab stock, either with or without the Adak Management District in the federal FMP, are fairly speculative. Given the speculation surrounding a future commercial fishery that stems from this proposal, it is important for the Council to keep in mind that under the BSAI Crab Rationalization Program, there are 36 individual western Aleutian Islands red king crab quota share holding entities holding approximately 21.39 million quota share units that have the potential to be affected by the proposed action, especially if western Aleutian Islands red king crab is a single stock. However, as stated in the discussion paper, if and when an abundant population of western Aleutian Islands red king crab were to return throughout its geographic range and the Adak District were to remain under the federal FMP, the rationalized portion of the commercial fishery would have exclusive access to the Petrel Bank District as well as access to federal waters in the Adak District although the likelihood of this is highly limited given the pot limit in federal waters established by the Board of Fisheries. Additionally, as already mentioned, the small boat commercial fleet would have access to both State and federal waters.

In summary, ABSC again recommends that the Council take no further action on this agenda item at this time. Per the discussion paper, the proposed action to remove the Adak Management District from the BSAI King and Tanner Crab FMP may result in greater flexibility under State-only management for earlier or more responsive development of a fishery in Adak. However, such potential gains are unclear and extremely speculative and should not come at the biological expense of the stock or the economic expense of the rationalized fishery. Prior to any further consideration of this proposal, it would be most appropriate for the Council, the State of Alaska, and affected stakeholders to reevaluate both the economic need for further gains and efficiencies and the biological status of the species after a viable commercial Adak Management District red king crab fishery has occurred under State management. And to further fill in questions on genetic diversity, it would also be most appropriate to wait for additional genetic information to be collected (and analyzed along with samples collected from the Adak District) from the proposed continuation of the cooperative reconnaissance survey in 2016 of the Petrel Bank area.

Thank you for your time and consideration.

Sincerely,

Ruth Christianson

Ruth Christiansen, Science Advisor/Policy Analyst
Alaska Bering Sea Crabbers

