



North Pacific Fishery Management Council

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Bycatch Reduction Engineering Program
Office of Sustainable Fisheries
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910

To whom it may concern:

On behalf of the North Pacific Fishery Management Council (Council), I am providing this letter in support of the research proposals submitted to the NOAA Bycatch Reduction Engineering Program by Alaska Bering Sea Crabbers, the Bering Sea Fishery Research Foundation, and the Natural Resources Consultants to refine and test gear modifications in order to reduce crab bycatch in pot fisheries. Specifically, these proposals seek to 1) refine gear modifications to reduce red king and snow crab bycatch in Bering Sea Pacific cod and halibut pot fisheries, and 2) test gear modifications to reduce bycatch of sub-legal and sub-preferred size male snow crab in directed Bering Sea snow crab pot fisheries.

The Council is very supportive of cooperative research to develop escapement mechanisms or specific pot designs to minimize the bycatch of crabs. Initial research from lab testing of cod and halibut pot designs has shown great promise, and field tests on the fishing grounds are planned in 2020. The current grant proposal seeks to expand this research and refine the gear to be tested with three additional gear designs developed based on the previous lab tests. This grant proposal, as an industry-led initiative at bycatch reduction, in partnership with NOAA's National Marine Fisheries Service and the Alaska Department of Fish and Game, aligns with the Council's direction to industry to work together to develop an effective pot design that reduces crab bycatch in groundfish pot fisheries.

The Council also supports the proposal to test pot gear modifications in the Bering Sea snow crab fishery to reduce incidental catch of small snow crab. This proposal would test a "reach barrier" of slick material making it harder for small crab to get a foot hold to climb into the pot. Small crabs are not marketable and not retained, and in years of good recruitment with abundant small crab just below market-preferred size, discard rates can be substantial. While handling mortality for pot gear fisheries is presumed to be low (meaning that most discarded crab survive), bycatch remains a management concern. National Standard 9 of the Magnuson-Stevens Act requires that conservation and management measures shall, to the extent practicable, minimize bycatch and minimize the mortality of such bycatch. If pot gear can be designed to select for the larger crab, bycatch can be significantly reduced.

In sum, the Council fully supports these proposals to identify pot design opportunities to minimize crab bycatch in the Pacific halibut and cod pot fisheries and in the Bering Sea snow crab fishery. We greatly appreciate your consideration.

Sincerely,

David Witherell, Executive Director

cc: Simon Kinneen
Jamie Goen, ABSC