



Seward Peninsula Subsistence
Regional Advisory Council

Louis Green Jr. Chair

c/o Office of Subsistence Management
1011 E. Tudor Rd. MS121, Anchorage, AK 99503-6199



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JUL 08 2020

David Witherell
Executive Director
North Pacific Fishery Management Council (NPFMC)
1007 West Third, Suite 400
Anchorage, AK 99501

Dear Mr. Witherell,

The Seward Peninsula Subsistence Regional Advisory Council (Council) is writing regarding current management of the Red King Crab fishery in Norton Sound. Recent biological and harvest data show that the mature male Red King Crab population has declined significantly, and that the commercial fishery is not sustainable until the population recovers. Furthermore, there is a very limited number of crab suitable for subsistence harvest. Most importantly, the Council wishes to inform the NPFMC that current management needs to be re-assessed as subsistence needs for Red King Crab in Norton Sound are not being met.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters of the Seward Peninsula. The Councils were established by authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA), and chartered under the Federal Advisory Committee Act. Section 805 of ANILCA established the Council's authority to initiate, review, and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside its region that may affect subsistence resources critical to communities served by the Council. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

Red King Crab Population Concerns

At its winter meeting held March 11-12, 2020 in Nome, the Council heard from multiple individuals regarding biological concerns for the Red King Crab fishery in Norton Sound. Commercial fishermen reported markedly smaller male crabs, and an abundance of mature female crabs. Charlie Lean, a biologist and Chair of the Northern Norton Sound Fish and Game Advisory Committee, shared observations of mature female crabs with unfertilized eggs. Fertilized eggs generate a sticky substance that cause them to stick to the underside of females until they mature eleven months later. Unfertilized eggs, however, simply wash off. This past season, there were reports of seeing female crabs with half of the eggs unfertilized. Mr. Lean believes this is a result of a low number of mature male crabs, particularly males a few years beyond maturity. When older males are not present, barely mature males do not fully fertilize the egg clutches of the mature females and the young males expend so much energy in reproduction that they tend to skip the next growth molt, thereby remaining at a less desirable size for harvest. Small males are genetically selected by this situation. Mr. Lean also believes that the mature

male population of Red King Crab is the lowest on record and male crabs are shrinking in physical size at maturity.

Mr. Lean also shared concerns regarding the high rate of pot loss and handling mortality. Non-legal crab can be mishandled or sustain frostbite during the winter commercial season, resulting in mortal injury when returned to the water. Intense selective fishing for large male crabs also compounds the genetic selection, and can result in a smaller individual size overall.

Current Management

In February, and again in March, representatives from the Northern Norton Sound Fish and Game Advisory Committee, Kawerak, Inc., the Norton Sound Economic Development Corporation (NSEDC), and local subsistence users requested that the Alaska Board of Fish (BOF) close the 2020 commercial Red King Crab fishery in Norton Sound due to low harvest rates and population concerns. Reports of few legal size crabs precipitated this united call to the BOF to take immediate measures to protect the sustainability of the crab fishery. The BOF did respond by closing the Red King Crab fishery for the remainder of 2020, though winter commercial crabbing continued to the end of April.

On March 12, Norton Sound Area Management Biologist Jim Menard of the Alaska Department of Fish and Game (ADF&G) gave a presentation to the Council on the Norton Sound Red King Crab fishery with information on both historical, as well as current management. The Red King Crab fishery is managed by ADF&G using a model derived from trawl surveys and analysis of multiple statistics. Trawling surveys have not occurred since 2017, however, though one is planned for 2020. ADF&G establishes a Guided Fishing Limit (GHL), which sets a projected quota for the season. Mr. Menard reported that a GHL was set considerably below the Allowable Biological Catch of 201,000 pounds due to an anticipated decline in catch during 2019. Mr. Menard noted, however, that only 75,000 pounds of the 150,000-pound Red King Crab GHL was achieved in 2019. He stated that although ADF&G's model had predicted a low GHL compared to previous years, they were extremely surprised that only half of the GHL was achieved.

Mr. Menard also shared with the Council that subsistence users are permitted to harvest Red King Crab all year long with unlimited pots in the ice. During summer months, however, the number of pots dispatched from a boat are by permit only and limited to five pots per person.

Based on the reports and testimony, however, the Council agrees with Mr. Lean that the current ADF&G Red King Crab management model is flawed. The Council was encouraged to hear that a new model was being considered for future management, and strongly recommends that any new model encompass data from the female cohort of the population, where there appears to be both a lack of data and significant issues with recruitment. The Council also recommends that ADF&G consider any recommendations and analysis from the third party contractor being secured by NSEDC to examine the current Red King Crab issue and provide management critique and recommendations for improvement. The Council believes that both of these initiatives will aid in addressing a very serious crisis with Red King Crab populations in Norton Sound.

Protection of Subsistence

Multiple Council members reported that very few Red King Crab were caught by subsistence users this past winter, and crabs of legal size were nearly absent. While subsistence users recognize that subsistence Red King Crab fishing is open all year, reports from community members are that the crabs simply are not there to catch. Those that are caught are generally less than 4" across the back and provide little meat. For subsistence users who strictly fish for sustenance, a lot of work is being put into catching smaller crab for less food. Subsistence users are extremely frustrated and concerned for the future of this traditional food in the region. ADF&G's presentation shows a history of 4,000-27,000 pounds of Red King Crab for subsistence over the last 20-30 years. Today, there is a very poor take of good-sized crab and the number

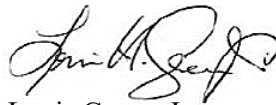
of crabs to bring home. One Council member remarked it would be fortunate if subsistence crabbers reached 500 pounds of crab during this past winter season.

The Council is requesting that the NPFMC work with the BOF to shut down commercial Red King Crab fishing until subsistence needs are met. While the Council is appreciative and encouraged by the BOF decision to shut down the fishery this year, the Council believes there needs to be a sustainable population of legal size Red King Crab before commercial use is re-opened. Mr. Lean reported that it is unlikely there will be much increase in legal size crabs this year. He anticipates there could be a number of crabs that will grow to just under legal size, then a few reaching legal size in 2021. Mr. Lean is hopeful that enough recruitment will occur over the next couple of years to reopen the commercial fishery in 2023. In the meantime, all stakeholders can work together to ensure trawl surveys are being conducted to assess populations, the Red King Crab management model is re-examined to provide overall population and recruitment considerations, and the proposed critique and positive recommendations provided by an NSEDC third-party contractor are all taken into account for the overall fishery.

The Council believes it is critical to look at the biomass of Red King Crab in Norton Sound and what is necessary to meet subsistence needs before the resource is open to commercial use. Failure by ADF&G and the BOF to provide adequate subsistence opportunities for Red King Crab is contrary to management for a subsistence priority for this resource.

Any questions regarding this letter can be addressed to me through our Council Coordinator, Karen Deatherage at (907) 786-3564 or karen_deatherage@fws.gov.

Respectfully,



Louis Green, Jr.
Chair

cc: Federal Subsistence Board
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Jim Menard, Alaska Department of Fish and Game
Charlie Lean, Chair, Northern Norton Sound Fish and Game Advisory Committee
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Administrative Record