

Testimony on Crab Agenda Items

December 2022

A. Snow Crab Rebuilding:

My name is Mateo Paz-Soldan. I am testifying on behalf of the City of Saint Paul Island, Alaska. The City's written comments are posted in the E-Agenda.

First of all, I wanted to thank Jon McKraken and Sara Rheinsmith for pulling this Snow Crab Rebuilding Analysis on relatively short notice and for their outreach in collecting information.

I also wanted to thank Council and SSC members for their frank and sobering discussion about what the future of the crab stocks and fisheries might look like. During yesterday afternoon's at times gloomy exchanges, I was reminded of Dante's Alighieri's admonition to those entering the Underworld: "Abandon Hope All Ye Who Enter Here."

I don't like to think in those terms, and I am actually hopeful that with the Council leading the way, the Snow Crab fishery and dependent stakeholders are entering some form of Purgatory, where, after a lot penance, punishment, and hard work -- albeit unevenly distributed -- there will be a light at the end of tunnel.

Of the Alternatives before the Council, Alt2, Option 2, is hopefully that light. The analysis indicates that neither Alternative will make a big difference in rebuilding time of the snow crab stock. However, clearly, adoption of Alt 2, Option 2, could make a big difference for crab dependent communities such as St Paul and other stakeholders. As some of the tables in the Analysis show, depending on market conditions, small TAC snow crab fisheries can produce significant revenues and associated taxes, perhaps even sufficient to keep crab dependent communities afloat.

Having a fishery is of course important because it is directly responsive to MSA Section 304 which governs rebuilding plans and points out the need to keep community dependence into account. This leads me to the Analysis itself. The City believes the analysis, the Council, and the public would benefit from additional information on the following:

- 1) In Section 1, regarding the recitation of relevant laws for this action, the document would benefit from guidance regarding equity and environmental justice considerations concerning underserved communities and Alaska Native populations that are involved in the action, as well as guidance on NS 4 and 8. From St Paul's and I believe the national perspective, what is really at stake is the survival of a historically and culturally unique Alaska Native community.

St Paul has been one of the few examples of a Native community engaging with the Council successfully and contributing to the development of forward looking and innovative fisheries management programs. This role is in jeopardy.

- 2) Section 3.2.2 (On page 37) of the Analysis discusses implementation of the snow crab rebuilding plan implemented in 2000 in response to the first snow crab collapse, which included: 1) harvest strategy, 2) bycatch control measures, and 3) habitat protection measures. This rebuilding plan was partially successful by 2011.

We think the Analysis, the Council and the public would benefit from more information on what these measures were in 2000. The point of this, is that Actions that may seem controversial today may have been successfully faced and implemented by prior councils. Although the circumstances surrounding the current collapse and the impacts of climate change are different today, we could still learn lessons from 21 years ago.

- 3) Section 3.6.3.2 the community section, (page 92 and onwards) the City agrees with the SSC minutes and also believes the analysis would benefit from standardization, for lack of a better term, in the presentation of community information to allow the Council to make a better comparison and evaluation of the levels of community dependence on the snow crab resource.

And to the extent that confidentiality issues do not trump further disclosure of information, it would be important for the Council and the Public to be able to compare in the Analysis crab dependence versus overall fisheries dependence for each community, and get a more accurate picture of actual snow crab dependence by each community. For example, some communities have wholesale gross revenues and associated values of crab fishery included in the analysis. Saint Paul's section does not. Some communities have mixed resource portfolios for lack of a better term, others are entirely dependent on a single resource.

Assessing a community's level of dependence will be important to determine the responses by the Council that are most aligned with the National Standards and other relevant guidance.

Going forward the rebuilding plan should consider comprehensive and meaningful rebuilding measures such as bycatch control measures and habitat protections, especially while the stock is at such critical low levels and to protect the recent small signal of recruitment. On bycatch for example, it ought to be counted toward PSC limits throughout the stock's range, (both inside and outside COBLZ as the analysis shows that a significant portion of the snow crab range is outside the COBLZ).

The Council should consider protections around the Pribilof Islands and parts of the shelf, at least until stocks show strong recovery and reach more sustainable levels, It should also align the Pribilof Island Habitat Conservation Zone (PIHCZ) with ADF&G's Homeplate closure to be consistent.

B. BBRKC:

I wanted to first of all thank staff for the quick turnaround in this analysis and for laying the information and the decisions before the Council so clearly.

Saint Paul is a mostly Unangan-Aleut community of approximately 400 residents. Saint Paul's economy and its fisheries-related infrastructure is largely dependent on the revenues, businesses, services, and taxes associated with snow/opilio crab -- and to a lesser extent Bristol Bay Red King Crab/BBRKC and bairdi/tanner crab -- landings in the harbor and the processing of these resources at the Trident Seafoods plant.

As I have testified before, traditionally the RKC processing takes place on St Paul in October. It thus plays an important role in keeping the processing plant's operations and the community's economy active throughout various points of the year, which include the summer halibut fishery and the snow crab fishery in the winter months.

Given its overwhelming dependence on crab, the City therefore agrees with the Emergency Rule request to close the Red King Crab Savings Area (RKCSA) and Red King Crab Savings Subarea (RKCSS) to all fishing gears from January 1, 2023 to June 30, 2023 to protect this stock during their molting/mating period, and to protect their habitat at a time of historically low abundance. The analysis for this action noted that minimizing bottom contact in the RKCSA would have a positive effect on habitat, and would thus likely contribute to the protection and recovery of the red king crab stock.

While we agree that fishing impacts on the stock are likely not the primary driver in current health of the stock, we also believe that the Council must take all possible steps to protect this resource and the dependent fishery. The way Saint Paul sees it the questions to be answered are: 1) is there a problem, to which the answer is clearly YES; and 2) can something be done about it, to which the answer is also YES.