

Seward Peninsula Subsistence Regional Advisory Council

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Anthony Christianson, Chair
Federal Subsistence Board
c/o Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503

Dear Chairman Christianson:

The Seward Peninsula Subsistence Regional Advisory Council (Council) submits this FY-2020 annual report to the Federal Subsistence Board (Board) under the provisions of Section 805 (a)(3)(D) of the Alaska National Interest Lands Conservation Act (ANILCA). At its public meeting via teleconference on October 27th, 2020, the Council identified concerns and recommendations for this report. It approved this report at its winter 2021 meeting held March 11 via teleconference. The Council wishes to share information and raise a number of concerns aligned with the implementation of Title VIII of ANILCA and the continuation of subsistence uses in the Seward Peninsula Region.

1. Norton Sound Red King Crab Fishery

At its fall meeting held October 27–28, 2020 via teleconference, the Council heard from multiple individuals regarding updated biological data for Red King Crab in Norton Sound. Council members shared their concerns over dwindling subsistence harvests and the long term conservation of Red King Crab in Norton Sound.

Council members and other subsistence users are extremely frustrated with their inability to harvest this important traditional resource, despite the fact that the subsistence crab fishery is open 365 days a year with no size or catch limit. Users reported either a complete absence of crab altogether, or that any good size crab were extremely difficult to locate. One subsistence crabber noted he only caught 20–30 crabs when 200 was the customary harvest needed to feed his family.

Alaska Department of Fish and Game (ADF&G) reported that subsistence harvest of Norton Sound Red King Crab peaked this past decade. Sizable decreases in harvest began in 2017 and 2018, with only 4,000 Red King Crab harvested by Norton Sound subsistence users in 2019. In

2020, there was a marginal subsistence take of just 1,200 Red King Crab in Norton Sound, representing the lowest subsistence harvest in twenty years. Effort was also low, either because some users thought the season was closed to subsistence harvest or users were not interested in small crabs and throwback females. Only 80 permits for subsistence crab fishing were issued in 2020. This is a result of low harvest success.

The current commercial Red King Crab fishery closure sunsetted in December 2020. ADF&G explained that a commercial harvest goal for next season is already in place, with the crab fishery beginning through the ice in February and continuing through the summer. State managers were informed by a recent trawl survey conducted by the ADF&G, which showed that the female cohort and clutch size were larger and closer to normal than the past few years. ADF&G believes that many male Red King Crab increased in size this past year and were able to successfully mate with mature females. ADF&G representatives believe that although the population of legal size crab is currently at a low point, some younger crab will or are molting, and are expected to grow to legal size this coming year.

Based on ADF&G's trawl survey, described above, the Crab Planning Team's recommendations to the North Pacific Fishery Management Council (NPFMC) will be an Allowable Biological Catch of close to 400,000 crab, up nearly 200,000 from last year. The Guideline Harvest Level (GHL) may go up 100,000 pounds from last year's GHL of 170,000. The Council is deeply concerned with the increased GHL recommendation, particularly given that commercial crabbers were only able to harvest 80,000 pounds of the 170,000 GHL for legal sized Red King Crab in 2020.

Charlie Lean, Chair of the Northern Norton Sound Fish and Game Advisory Council, cited that the ADF&G trawl survey only observed three-quarters of the legal sized males compared to the previous year. He stated there is still concern that approximately one-third of mature males are failing to molt and grow because they are spending physical resources breeding. There continues to be a significant lack of mature males to mate with females. This discrepancy, combined with last season's reduced rate of egg fertilization and a market demand for larger than legal size crab, will likely result in a limited commercial opportunity in the near future. Mr. Lean also shared that while some recruitment will occur this year, the bulk of legal size crab readiness will occur in 2022 and thereafter.

The Council believes that allowing both a winter and summer commercial fishery at these levels could harvest most legal sized crab and result in the mortality of many of the sub-legal crab that will be handled during sorting. Handling mortality during winter months is particularly high since frost injury is likely to occur before undersized crab are returned to the water. Additionally, the market for Norton Sound Red King Crab requires crab to be 5 inches across the carapace rather than the legal requirement of 4.75, meaning half of legal size recruitment could be subject to handling mortality. Both subsistence and commercial users of this resource are opposed to this marginal fishery with the vast majority of crab being sub-legal and unmarketable.

The Council is also very disturbed that ADF&G is only "speculating" that the current population of sub-legal crabs will molt this year and become legal during the upcoming fishing season. This is a dangerous gamble for an already depleted resource, and should not be the driving factor

behind opening up the crab fishery in 2021 to commercial use. The Council is convinced that years of overharvest have resulted in the collapse of this fishery, and strong conservation measures are necessary to ensure its viability for future use. If commercial harvest is allowed to continue, it could result in the loss of Red King Crab for many years to come. Last year's reduced reproduction will also contribute to poor recruitment within seven or eight years. The Council also believes there may be environmental impacts to the population from warming ocean temperatures and contamination, in addition to acquiring reliable 2021 Red King Crab population data.

Recommendation:

The Council highly recommends that managers review actual crab statistics in 2021, and based upon that review, recommend whether or not to open the commercial fishery in 2022. The Council is also requesting that research be conducted to further understand how these changes to the ocean environment may be adversely affecting the resource.

The Council is strongly opposed to opening the Norton Sound Red King Crab commercial fishery in 2021. The Council has requested in a letter to the NPFMC that they work with ADF&G, the Alaska Board of Fisheries (BOF) and others to close the Red King Crab fishery in Norton Sound, while encouraging continued research and data gathering to monitor the recovery of this population before opening to any commercial use. The Council believes that commercial fishing for Red King Crab in Norton Sound should only be open when there is verifiable evidence that legal size crab populations have reached sustainable levels. Most importantly, successful subsistence harvest based on historic use and needs should unequivocally be an indicator of when commercial fishing should resume. Otherwise, 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.

2. Seward Peninsula Salmon

Council members are reporting seeing or harvesting very few Silver and Chum Salmon this past summer and fall. One member observed "millions" of Pink Salmon, which may be competing with Silver, Chum and Chinook Salmon for resources. The lack of healthy populations of Silver, Chum and Chinook Salmon are negatively affecting subsistence users throughout the region. Research on these species is lacking due to funding ineligibilities, as well as the motivation to determine what is happening to this critical subsistence resource.

This needed research is not eligible for Fisheries Resource Monitoring Program (FRMP) funding on most tributaries, drainages and rivers in the Seward Peninsula because they are not situated within and adjacent to Federal conservation units. Regardless, the Council expressed the need for salmon research on the Niukluk and Kuchablock Rivers, as well as Bear Creek.

Unfortunately, the State of Alaska does not see salmon research or management on these important waters as a priority and have even removed a Chinook Salmon escapement goal for Boston Creek. Despite the fact that fish coming from marine waters migrate largely through State lands, the Council would like to see the type of inventory currently underway in the northern part of the Seward Peninsula occur down in the Nome area and surrounding

communities. The Council requested research 10 years ago, but it never materialized. Subsistence users rely on these fish resources, regardless of whether or not they are in State or Federally managed waters.

Recommendation:

The Council would like the Board to encourage the State of Alaska to conduct research on Chinook, Silver and Chum salmon on multiple river drainages in the region that currently do not qualify for research funding under the FRMP. The Council would like the Board to stress that although these drainages do not currently qualify as a Federal nexus for management or research funding, they are critical to subsistence users in the region. The Council would also like the Board to reassess the Federal qualifications for waters in this region. The Council strongly supports a conservative approach to management of these resources, including minimal harvest by local subsistence users, particularly for Chinook Salmon.

Thank you for the opportunity for this Council to assist the Federal Subsistence Management Program in meeting its charge of protecting subsistence resources and uses of these resources on Federal public lands and waters. We look forward to continuing discussions about the issues and concerns of subsistence users of the Seward Peninsula Region. If you have questions about this report, please contact me via Karen Deatherage, Subsistence Council Coordinator, Office of Subsistence Management, at karen_deatherage@fws.gov, or 1-800-478-1456 or 907-474-2270.

Sincerely,



Louis Green, Jr.
Chair

cc Federal Subsistence Board
Seward Peninsula Subsistence Regional Advisory Council
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