

**RC #58****JUSTIFICATION FOR RC #48**

Currently the Cook Inlet Tanner Crab Management Plan calls for a three-year average of 100,000 legal male tanner crabs in order to reinstate any non-commercial fishery which includes sport, personal use and subsistence.

As the management plan reads; if the legal amount of male tanner crabs falls below 50,000 and to reopen the fishery we must maintain a 100,000 male tanner crab average for three years. In essence, this stipulation is a three-year death penalty for non-commercial users.

This year the abundance survey states that there were only approximately 22,000 legal tanner crabs, therefore, in order to open this fishery within the next two years the survey must average 190,000 legal crabs per year. This is not feasible as the fishery was closed due to numbers that fell below 50,000. It doesn't seem justifiable to have to now require a level of 190,000 crabs during the next two years in order to reopen the fishery for subsistence and personal use groups.

Why an average of 100,000? In response, the Board was concerned that the fishery would open and close randomly; therefore, elevated sustainable numbers are established to prevent that situation. RC #47 proposes a more equitable solution:

**1. Reduction of crab season from 7-1/2 months to 5 months – August 15 to November 15 and January 15 to March 15.**

- 33% reduction in fishing time
- August 15 start date
  - Minimizes "soft-shell" mortality
  - One month delay reduces highest effort and harvest.
  - Prevents lost pots due to heavy traffic/cut lines.
  - Encourages participation and economic value in fringe season.
- November 15 to January 15 closure to prevent:
  - Lost pots due to ice.
  - Mortality due to sorting in cold weather.
  - Inability to check pots due to inclement weather conditions.
  - More manageable for law enforcement.
  - Families happy because fisher is home for the holidays

**2. Establish a Flexible Crab Limit from 5 down to 2 Crab**

- Establishes range that managers and users can anticipate to meet sustainability.
- Minimizes exposure to over-harvest.
- Reduces the potential of the fishery being closed in a single year.

**3. Pot Size Limit 48 cubic feet (approximately 4 x 4 x 3)**

- Provides an appropriate tool to harvest a lower legal catch.
- Minimizes released crab with loss of legs, injuries, etc.
- Minimizes amount of time crab is out of water and exposed to inclement weather.
- Results in more accurate data as users are more likely to report realistic data when not handling so many crabs in one pull.
- Minimizes predation on released crab.
- Minimizes catch and release mortality due to cold, frozen eyes,
- Reduces overall harvest.

**4. March 15<sup>th</sup> Closing Date**

- Reduces lost pots due to heavy traffic during a king salmon derby.
- Conservative measure to keep harvest down before sudden increase in users.
- Protects crab going into pre-molt/molting season.

In 2011 this fishery was closed approximately six weeks after the survey was released and Fish and Game determined that there was not sufficient adult male crabs to continue. Although a shortened season and a limit reduction to 4 crabs. This season probably would have resulted in the highest harvest in the four years of the fishery. With a 5 crab limit the projected harvest was to be 19,500 mature male crabs.

In addition, Fish and Game recently stated that 2011 was the best recruitment class of juvenile crab on record for Kachemak Bay. If we are in a conservation mode, where did all these juvenile crab originate from? This fishery would give the Department another tool to more accurately determine sustainability and enumeration of Kachemak Bay tanner crab. The current troll survey appears to contain inconsistencies on how it assess harvestable surplus by multiplying captured legal male tanner crabs by approximately 400.

In closing, after revealing the troll data from Kamishak Bay, which shows zero crab and other troll data, realistically this crab fishery should be open for the 2014 season as an additional tool for the department to use to more accurately determine sustainability and abundance of male tanner crab. This fishery should be conducted under the parameters listed with RC #47 and have a 3 year sunset clause. We Alaskans who are subsistence and personal use fishers sincerely appreciate your attention to this matter.

**Submitted by Joe Hanes**