

Public Comments for King and Tanner Crab Meeting

March 22-27, 2011

Alaska Bering Sea Crabbers (ABSC) PC1

Alaska Trojan Partnership PC2

Aaron Anderson PC3

David Pinquoch PC4

Larry Gilman PC5

Alaska Bering Sea Crabbers (ABSC) PC6

Linda Kozak PC7

Golden King Crab Harvesters Association (GKCHA) PC8

Katherine Reedy-Maschner PC9

Prince William Sound Charter Boat Association (PWSCBA) PC10

Alaska Crab Coalition (ACC) PC11

City of Adak PC12

From: Edward Poulsen
Sent: Tuesday, February 15, 2011 2:12 PM
To: Marcotte, Jim R (DFG)
Subject: Proposal 305 - 5 AAC 34.910 King Crab Fishing Season Area Q

Hi Jim,

It was a pleasure meeting you a few weeks back in Juneau and I look forward to talking with you more during the upcoming Board of Fish meeting. As I mentioned when we spoke, I am the Executive Director of the Alaska Bering Sea Crabbers, which represents approximately 70% of the harvesters fishing crab in the Bering Sea. Our organization was previously known as ICEPAC, or Inter-Cooperative Exchange Policy Advocacy Committee. We submitted a proposal to the Board of Fish to change the fishing season for the St. Matthews blue king crab fishery which is listed in the Alaska Board of Fish 2010/2011 Proposed Changes book as proposal 305. **My Board has decided not to move forward with this proposal at this time so feel free to remove this from the upcoming Board of Fish agenda.**

Let me know if you need anything further from me on this.

Thanks,
Edward Poulsen
206-992-3260

To: Alaska Board of Fisheries 3/3/11
Vince Webster, Chairman
P.O. Box 25526
Juneau, Alaska 99802
FAX: (907) 465-6094
From: Alaska Trojan Partnership
RE: Mandatory Observer Coverage / WAG

To whom it may concern:

We own the F/V Alaska Trojan and currently are one of 3 boats fishing Golden King Crab in the Western Aleutians. We catch approximately 50% of the total TAC each year.

Under the current regulations for observer coverage, we are required to have observer coverage for 50% of the total TAC. Along with this requirement, the year is also separated into trimester requirements as well. Due to the additional trimester requirement, we are actually accumulating observer coverage for closer to 60% of the season rather than 50%. The trimester requirement forces us to do so, or face penalties from the State of Alaska.

The annual cost of observer coverage for our vessel is approximately \$120,000.00. This additional 10% costs us \$12,000.00 each year. These expenses include covering the observer's airfare, food, lodging and shelter. The trimester ruling also costs the State of Alaska more money as each and every time we receive a new observer there is briefing prior to leaving port, as well as debriefing following the trip.

We are proposing that the trimester requirement be examined further to actually ensure that we reach the 50% requirement, rather than being forced to pay for the extra 10%. In our opinion we could have the observer on for 50% of the time and split up between the front of the season and end of the season, or all at once, in order to meet this 50% requirement. With other fisheries the requirement is 20% to 30%. We don't understand the need for trimester requirements when the information can be obtained in a more expeditious, and less costly manner.

Respectfully submitted,

Alaska Trojan Partnership;
Ted Painter, David Capri

Public Comment #2

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MAR 02 2011

BOARDS

Aaron Anderson

Box 43

Chignik Lagoon, Ak 99565

Phone: 907-840-2274

► **Boards Support Section**
Alaska Department of Fish and Game

P.O. Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

Dear Board Members

As a resident of Chignik Lagoon, I would like to express my concerns on the Chignik tanner fishery and its future. I feel that the current regulation would allow too much gear per vessel. As participation increases our tanner fishery will become shorter and harder to manage. During your March meeting you will be looking at Proposal 309. This proposal is for the Alaska Peninsula Area King and South Peninsula District Tanner Crab. I think that limiting the gear per vessel is a very good idea.

I am in full support of Proposal 309, but if it carries and nothing is done for the Chignik Area we will see more boats jumping into the Chignik fishery in favor of the higher pot limits. I would like to see the Chignik Area adopt the same regulation changes as stated in Proposal 309. This would help ensure a more manageable and sustainable Tanner fishery in the Chignik area.

Thank You,


Aaron Anderson
F/V Alysa June
Chignik Lagoon
2/26/2011

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MAR 02 2011
BOARDS

Aaron Anderson

Box 43
Chignik Lagoon, Ak 99565
Phone: 907-840-2274

► **Boards Support Section**
Alaska Department of Fish and Game

P.O. Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

Dear Board Members

I am writing to express my concern about the timing of the board meetings. During the January finfish meeting, there were multiple fisheries going on. Many fishermen from the Chignik area could not attend the meeting and express their concerns on important issues. The Department of Fish and Game was also stretched very thin trying to manage the fisheries and attend the meetings.

I realize that there is probably not going to be the "perfect time" to have a meeting. But, I would like to see the meetings held at a time when we don't have multiple fisheries going on. I feel that it would benefit the public process if the board were to take into consideration the Department of Fish and Game's opinion on meeting times.

Thank You,



Aaron Anderson
F/V Alysa June
Chignik Lagoon
2/26/2011

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MAR 04 2011

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BOF Comments
Boards Support Section
Alaska Dept. of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

March 1, 2011

RE: Proposal 315 Regarding shrimp regulations for commercial enterprises

Greetings Alaska Board of Fisheries Members,

I would like to express my opposition to Proposal 315. I am a charter boat owner and feel Proposal 315 does nothing positive and will be burdensome to Fish and Game, license vendors, charter boat operators and our clients. It does nothing to protect the resource.

- Vendors receive no compensation for distributing permits
- Fish and Game will have the additional expense of more permits, more individual permits to process and will likely have to send out notices to additional people since a permit used only once is easily forgotten. **One permit for multiple groups is more efficient.**
- Charter boat operators will be required to put client names on buoys, often in the rain so the information may be unreadable which could result in a citation from State Troopers.
- Whittier Scenario - I have no charters booked so I set personal shrimp pots. Clients call to book a trip the next day and want to set shrimp pots. The wind is blowing 50 knots so I am unable to retrieve my pots that night. Because each boat is limited to 5 pots, if the wind has died down, I will have to go out that morning and retrieve them without clients onboard or if the wind is still blowing tell my clients they can't shrimp because I have my personal pots set. **This regulation creates unnecessary restrictions and hardship.** PS - 50 knots in Whittier isn't unusual

I know for a fact, at least in my application, the claim that the resource will be benefited by this regulation is not true. In 2008 I had my clients obtain their own shrimp permits for part of the season. What I found was that once the clients had taken the time to get a permit that it brought more attention to shrimping and I ended up catching more. When I pulled the pots on my permit I would usually pull pots 1-2 times on a 5 day trip with an average of 1.5 pulls per trip and an average catch of 6-10 pounds of shrimp. When clients had their own permits I averaged 3 pulls per trip and average catches were higher since the pots were usually soaking less time and I was getting optimum catches. **My harvest went up nearly 100%.**

Although I usually support law enforcement regulation changes, in this instance not only am I against it, I am offended by the issue statement - "Charter boat operators and crew who pull their own sport, personal use, subsistence shellfish pots and provide shellfish to paying clients are engaging in unlawful commercial fishing." If that is true, why have I been boarded multiple times and had my shrimp permit checked and nothing was ever said? Why when one of the day trip operators in Whittier who sometimes pull shrimp pots on day trip charters inquired with the Trooper who patrolled western Prince William Sound a few years back was he given the OK to use his own pots marked with his name? Now all of a sudden, we have a new Trooper in town and we are all criminals.

Shrimp permits were established to collect data, nothing more. Please keep it that way.

Thank you for your time, David Pinquoch

Board of Fish Comments
Alaska Dept of Fish and Game

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MAR 04 2011
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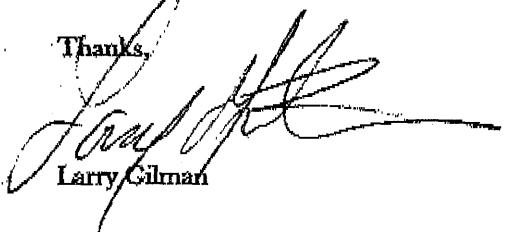
Proposal 315 - Oppose

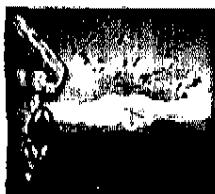
I was one of the highliners in the 2010 Prince William Sound commercial shrimping endeavor and I hope to be again in 2011. I read Proposal 315 to determine its benefit. I found none. In fact, I found a likelihood that it could create under reporting of sport harvest.

In this proposal a non-resident that comes up and fishes on a charter would be required to have his/her own shrimp permit. If they get the permit but fail to send it to Fish and Game then their catch would go unrecorded and the sport harvest would actually be higher than Fish and Games estimate. I don't believe there is a fine involved for failing to turn in the permit so what incentive does a non-resident have to return the permit if they aren't coming back to Alaska? If they only use it once there is a good chance they will forget about it. If there is a fine, why put non-residents in that position if it isn't necessary - we do want the tourism dollars don't we? I for one, certainly have more faith that charter boat captains are better suited to collect the data that Fish and Game needs to monitor the sport catch which will result in a more accurate division of the shrimp between sport and commercial.

Please vote no on Proposal 315,

Thanks,


Larry Gilman



**ALASKA
BERING SEA
CRABBERS**

Edward Poulsen, Executive Director
17249 15th Ave NW, Shoreline WA 98177
206-992-3260
alaskaberingseacrabbers@gmail.com
<http://alaskaberingseacrabbers.org/>

February 26, 2011

ATTN: BOARD OF FISHERIES COMMENT
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

RE: Proposal #307, Size limits for Bering Sea District C. bairdi Tanner crab harvest strategy, reduce the minimum size limit.

Dear Chairman Webster and Board of Fisheries Members:

The Alaska Bering Sea Crabbers (ABSC) represents approximately 70% of the harvesters fishing crab in the Bering Sea and supports Proposal #307 to lower the legal size limit for the Bering Sea bairdi fishery. ABSC also supports the research work accomplished by William R. Bechtol, Gordon H. Kruse, Joshua Greenberg, and Hans Geier, titled "Analysis of the Minimum Size Limit for Eastern Bering Sea Tanner Crab Fisheries". This analysis shows that the current legal size limit of 5.5" carapace width is in many cases greater than the maximum size these crab will ever achieve, particularly in the Pribilof area. The analysis explains that there are negative biological and economic consequences of having the legal size limit considerably higher than the size of maturity.

These negative consequences include:

- disproportionately higher fishing mortality rates for large-growing males than for small-growing males;
- reduced legal male catch-per-unit-effort (CPUE);
- increased handling mortality of sublegal males as the proportion of legal males declines;
- increased catch sorting time and costs during commercial fisheries

The existing minimum size limit of 5.5" is resulting in forgone harvest for a few reasons, particularly in the Pribilof area. First, many mature male crab are being discarded simply

because they will never reach 5.5". The current stock assessment model for bairdi assumes a handling mortality of 50%. This results in a very significant amount of estimated mortality both within the directed bairdi fishery as well as during the opilio fishery. Since these crab are below the legal limit, they are thrown back overboard. Our stock assessment models assume half these animals die. If the size limit were lowered, many of these animals could be retained resulting in significantly reduced bycatch mortality and possibly a higher directed TAC. In addition, lowering the size limit will also benefit female crab as fewer pots will be needed to harvest the TAC resulting in less female bycatch.

It is important to note that the analysis assumes a 20% bycatch mortality, which is probably more realistic, but it is not used in the bairdi model. Further, it was impossible for the analysts to perform any sort of realistic projections using a stock assessment model. However, it would be expected that the longer-term positive cumulative impacts of reducing bycatch mortality for both males and females would be significant under a lower size limit.

The second way that forgone harvest will continue to occur if no action is taken is that it is uneconomical, particularly in the Pribilof area, to target bairdi. In recent years when the fishery was opened, much of the TAC in the Pribilof area was left uncaught as the CPUE was very poor. These poor catch rates occur because the vast majority of bairdi in this area mature and stop growing at less than the current legal size. With a lower size limit, the commercial fishery will be better able to economically harvest the TAC.

There are likely other benefits of lowering the size limit for bairdi that are difficult, if not impossible, to quantify. For example, targeting the largest males in the fishery may not be appropriate because it is likely they are the most productive and also the most capable of protecting females while they molt.

ABSC supports the State of Alaska's position to lower the size limit to 4.0" in the Pribilof area and 4.4" in the Bristol Bay area. These size limits proposed by the State of Alaska are intended to match the size limit with the size of maturity. Although these size limits are lower than what is proposed in the analysis (5" in the Pribilof area with status quo in the Bristol Bay area), it would be appropriate to lower the size limit to match the average size of maturity.

Matching the legal size limit with average size of maturity is similar to what occurs in the opilio fishery where size of maturity is 3.1" as is the legal size limit. However, for market reasons, the industry standard size limit is 4.0". This 4.0" size limit for the opilio fishery is considered the "exploitable legal male" size for management purposes. It is expected that something similar would occur with the bairdi fishery and that the industry standard size limit would be higher than the legal limit for market reasons. This would provide industry the ability to adjust as needed to market demands as well as morphological changes while reducing the risk of fines to industry from delivery of undersize crab. At this time, industry is supporting an "exploitable legal male" size limit of 5.0" in the Pribilof area and 5.5" in the Bristol Bay area.

In summary, ABSC support Proposal #307 to lower the legal size limit for the Bering Sea bairdi fishery. Specifically, we support the State of Alaska's position to lower the size limit to 4.0" in the Pribilof area and 4.4" in the Bristol Bay area. Further, we are supportive of an exploitable legal male size limit of 5.0" in the Pribilof area and 5.5" in the Bristol Bay area.

Sincerely,



Edward Poulsen
Executive Director,
Alaska Bering Sea Crabbers

Kozak & Associates, Inc.
P. O. Box 2684 - Kodiak, Alaska 99615
Phone 907-486-8824 - Cell 907-539-5585
E-Mail - kozak@alaska.com

March 7, 2011

Mr. Vince Webster, Chairman
Alaska Board of Fisheries
P.O. Box 25526
Juneau, Alaska 99802

Sent by Fax: 907-465-6094

RE: Golden King Crab TAC and Model Development

Chairman Webster and Board Members:

The issue I'm addressing is not covered under proposals being addressed by the board at the March 2011 meeting. However, it has been the subject of previous board discussions and I am hoping the board will consider reviewing this issue in regard to providing a mechanism to address it in the near future.

In 2008 the Board of Fisheries adopted a 5% increased harvest limit for the Aleutian Islands golden king crab fishery (5 AAC 34.612). This increase was the result of concerns expressed by the industry that the department was unwilling to consider slight increases to the harvest limit even after clear indications that the stock status was robust and the catch per unit of effort had increased substantially.

The board adopted the increase as a stopgap measure until the stock assessment model, which was under development, could be finalized and adopted by the department. At that time, the board and industry were given the indication that the model would be finalized very soon.

In May of 2010 at the Crab Plan Team meeting, the industry was told that the model was still not ready for adoption and an increase in TAC could not be considered.

In the fall of 2010, I submitted an Agenda Change Request asking for the board to consider increasing the harvest limit slightly once again. Based in part on assurances from the department that the model should be finalized this year, the board denied the ACR. Therefore, this issue is not formally before the board at this time.

Subsequent to the board meeting, I have been told by department personnel that once the model is adopted by the Crab Plan Team, the department will then need to determine if they will even use it in the setting of total allowable catch (TAC). At the very least, a harvest strategy will need to be developed and approved by the board prior to the model being utilized in adjusting the TAC. My understanding from that conversation is that this process could take a year or longer.

Alaska Board of Fisheries
March 7, 2011
Page Two

Recently, based on my discussions with department personnel who are developing the model, I feel somewhat confident that the model is likely to be accepted at the May Crab Plan Team meeting.

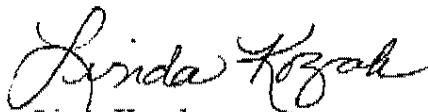
I have three recommendations for the board:

1. Request the department to give a full report on the status of this situation at your upcoming meeting March 22-26, 2011 in Anchorage.
2. Task the department with providing a written report following the May Crab Plan Team meeting, with definite timelines this year for development of a recommended harvest strategy designed around the stock assessment model.
3. Schedule this issue at the October work session for possible adoption of a new harvest strategy which can be in place for the August 2012 start of the season.

The Aleutian Islands golden king crab harvesters have waited years for this issue to be resolved and the producers believe the harvest of golden king crab is being arbitrarily constrained. This is unnecessarily depriving the fleet of revenue, the coastal communities that depend on fish tax dollars, as well as the American consumer. I believe the situation should be rectified and soon.

Thank you for considering these comments and recommendations. I plan to be at the upcoming Board meeting and will be available for further discussions on this issue.

Sincerely,



Linda Kozak

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MAR 07 2011
BOARDS

Golden King Crab Harvesters Association
P.O. Box 20449, Juneau, Alaska 99802
(907) 586-6077

March 7, 2011

Vince Webster, Chairman
Alaska Board of Fisheries
P.O. 25526
Juneau, Alaska 99802-5526

Re: Proposals 299 and 300

Dear Mr. Webster and Board Members:

The Golden King Crab Harvesters Association (GKCHA) submits these comments on two proposals you will be considering at your upcoming meeting on statewide shellfish proposals. These are proposals 299 and 300, which were submitted by GKCHA. The members of GKCHA hold the majority of federal harvester quota share in both the eastern and western Aleutian Islands golden king crab fisheries, and represent the interests of golden king crab harvesters.

Proposal 299

This proposal seeks to give the Department emergency order (EO) authority to extend the golden king crab season beyond the current season closing date of May 15 if necessary to fully harvest the guideline harvest level (GHL). Exercise of this EO authority is not mandatory but is entirely within the discretion of the Department. It would give the Department an additional tool to achieve full harvest of the GHL, particularly in the western Aleutians, where problems with processing capacity on Adak Island have resulted in significant portions of the GHL going unharvested in recent years.

Under the crab rationalization program adopted by the North Pacific Fishery Management Council and administered by the National Marine Fisheries Service (NMFS), half of the catcher vessel individual fishing quota (IFQ) and corresponding individual processor quota (IPQ) allocated to the western Aleutian Islands must be delivered and processed west of 174 ° W. longitude. This regional delivery requirement was intended to promote development of processing capacity on Adak and, to a lesser extent, on Atka. However, the plant on Adak is not currently operating and plans for developing crab processing capacity on Atka have not yet materialized. The Council and NMFS have responded by adopting a mechanism for an exemption from this regional delivery requirement, allowing west-designated IFQ/IPQ to be delivered and processed in Dutch Harbor, but it remains to be seen if this will completely solve the problem. The exemption requires agreement of all the parties – holders of harvester and processor

quota share and both communities of Adak and Atka – but there is no assurance that such an agreement will always be reached.

Nor does this exemption address all the possible reasons why the GHL might not be fully harvested. The golden king crab fisheries are prosecuted by a small number of highly specialized and equipped vessels, and if any of them became disabled inseason – due to an engine failure, for instance – mobilizing another vessel for the fishery would be no easy task and would be very time-consuming, and may well not be possible at all. It would thus fall to the rest of the fleet to harvest the remaining GHL.

GKCHA members therefore believe it would be useful for the Department to have EO authority allowing it to extend the season, if circumstances in the fishery have precluded full harvest of the GHL by May 15.

Proposal 300

Under 5 AAC 39.145, pots used to harvest golden king crab must have an escape mechanism that includes cotton twine with a thread count no larger than 30. This twine requirement is much too weak for the golden king crab fisheries, which are conducted in deep waters with very strong currents. Harvesters routinely find their pots blown open on retrieval, which is very inefficient and results in vessels having to fish longer, with more pot lifts, in order to harvest the GHL. This translates into higher operating costs for the vessels, especially for fuel, the price for which is increasing. GKCHA therefore proposes that the thread count in the golden king crab fishery be increased to 90.

GKCHA understands that the purpose of requiring biodegradable twine is to prevent ghost fishing by lost pots. This problem is minimal in the golden king crab fisheries, especially since implementation of the crab rationalization program. Increasing the thread count to 90 will not have any adverse biological effects. We note, for instance, that in Oregon, the thread count for Dungeness crab pots is 120. O.A.R. 635-005-0055(4). Allowing 90 count thread in the golden king crab fisheries will not compromise the purpose of having biodegradable twine, but will do much to promote a more efficient and cost-effective harvest, with fewer pot lifts and less time spent dealing with empty pots, and will also decrease the number of pots dropped onto the seabed.

GKCHA would also like to address a topic that is not the subject of a specific proposal but which the Board should discuss with the Department. Several members of GKCHA also hold quota share for Aleutian Islands red king crab. The Department has not been willing to open Area O to red king crab fishing out of concern for the size of the biomass and very limited survey data. The fishing grounds in the western Aleutian Islands cover a large area and, in the experience of GKCHA members, the red king crab in the area move around a lot. Allowing the IFQ fleet to conduct a small fishery for red king crab in this area would provide the Board and the Department with data on which to judge whether a viable fishery can be maintained on this stock. The alternative is to continue letting a potentially valuable resource go unsurveyed and unharvested.

Board of Fisheries

March 7, 2011

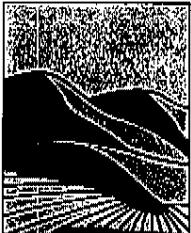
Page 3

Thank you for considering these comments. Members and representatives of GKCHA plan to attend the meeting, and will look forward to discussing these issues with you.

Sincerely,



Michael A. D. Stanley
Attorney - Advisor



**IDAHO
STATE
UNIVERSITY**

**Department of
Anthropology**
**American Indian
Studies Program**
921 South 8th Avenue,
Stop 8005
Pocatello, Idaho
83209-8005

March 8, 2011

Alaska Board of Fisheries
PO Box 115526
Juneau, Alaska 99811

Re: Comment on Proposals #311-314, Alaska Peninsula Subsistence Crab fisheries

King and Tanner Crab Statewide meeting, March 22-26, 2011

Dear Board Members,

I am writing to you to comment on four crab subsistence proposals submitted by Melanie Rotter from the village of Sand Point. I am a sociocultural anthropologist and have conducted my field research in the Alaska Peninsula and Aleutian Islands region for over a decade and have spent considerable time in Sand Point and neighboring communities studying their society and culture, and particularly their relationship to subsistence and commercial industries.

Sand Point and its neighbors harvest and eat crab. It is traded between communities, eaten in the celebration of birthdays and weddings, or part of the meal at a funeral. Prior to rationalization, a small number of local captains and young Aleut crewmen in the crab fleet would bring home "homepack" and share it with relatives and friends. This is a high status, high value food.

Crab rationalization has drastically reduced the number of local men in the crab fleet. Homepack counts against quota allocations, and fishermen are less likely to remove food from their catches. Further, crewmen must negotiate with their captains to take any crab home to their families. The result is that homepack is now a fraction of what it was. In my 2009 survey in False Pass, for example, total village homepack for King crab equaled 68 pounds, and for Tanners 144 pounds. A slow but steady loss of boats in local hands also contributes to the problem of subsistence access. Many households do not even own skiffs currently. Large boats are necessary to safely reach the subsistence crabbing areas and there is only one boat registered in Sand Point of necessary size. Of the 145 vessels registered in Sand Point in 2010 (including skiffs), only one is over 58'. In 2010, for the under 60' vessels, there were three Dungeness crab and 52 Tanner crab permits. For the over 60' vessels, there was only 1 Tanner permit and only 1 King crab permit (source: www.cfec.state.ak.us).

The loss of access to crab has radically altered the social environment around this valuable food. My current subsistence study (contracted with the U.S. Bureau of Ocean Energy Management, Regulation and Enforcement) in Akutan, False Pass, Nelson

Lagoon, and Port Heiden, in which all available households in these villages were surveyed for their 2009 annual subsistence harvests, use areas, household economics, and sharing patterns, shows a growing alienation from subsistence crab harvests and greater dependency on other foods, sharing with those who have better access to subsistence, and government transfer payments.

The geographic locations of these villages are such that one must travel to get crab. The number of adults available to harvest crab who own or have access to the right equipment in these four communities is limited. Of 90 households interviewed (out of 109 total), 20 of them harvested and/or used crab in these villages. Only four households reported harvesting king and Tanner crab, which is due to having small boats and/or being some distance from crabbing grounds. Most crab entering these households is given or traded into households from fishermen in other communities such as Sand Point, King Cove, or Unalaska who have only slightly better access to subsistence harvesting. These crabs can only be shared if they are sent with people moving between communities by boat or plane. A smaller but highly significant amount of crab entering these households is bought as frozen product from Peter Pan Seafoods or Trident Seafoods. All crabs are then heavily shared across the communities as gifts or meals.

Sand Point and its neighbors have lost a significant portion of the commercial crab fisheries in recent years. Therefore, the community requires an alternative means to access the crab to maintain the tradition. The regulations are for *Individual* harvesters to subsist for minimum size male king and Tanner with a permit, and daily bag limits of between 1 and 6 king crab per person depending on location and 12 Tanners per person. Twelve male Dungeness of minimum size may also be harvested daily. The concern here is that the regulations are for individuals with strict daily limits. The intent of proposals 311-314 is to allow those who are able to harvest to bring crab to those who are unable because of lack of manpower and equipment, their health or elderly status, or they are otherwise unable. They want to cooperatively go to crabbing areas in the North Pacific and Bering Sea to harvest crabs, which can then be shared across the community. Subsistence is supposed to have the priority for use, and these proposals are seeking to regain access.

Proposal 311 – Alaska Peninsula Community Harvest Permit for crab –Support

The creation of a community subsistence crab harvest permit for king and Tanner crabs is an innovative idea that would positively benefit local people. It allows people living on the Alaska Peninsula to recover access to subsistence crab using the limited equipment and personnel in the communities. The harvest permit and reporting system proposed here is clear and easy to track.

Proposal 312 – Daily bag limit changes –Support

Daily bag limits would not work under the proposed plan. They would still be in place for those not participating in the community harvest permit.

Proposal 313 – C&T use of shellfish –Support

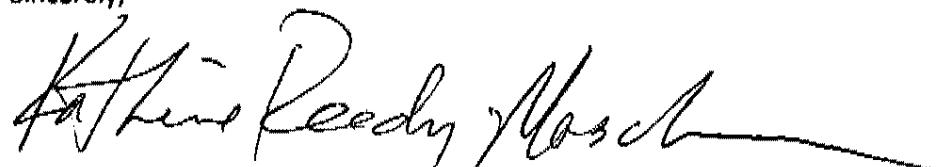
While the ANS numbers are not a limit to subsistence harvests, they are based on old information and appear to be low. The proposer is concerned that these outdated numbers would be used in determining harvest levels, and new information is needed given rapid changes in these communities. The proposal is asking for separate stock assessments in more discrete areas of the region for fear that certain areas near the villages are being overfished commercially. More refined information would greatly benefit managers and everyone who fishes for crab.

Proposal 314 – Proxy harvesters –Support

If #311 is passed, this proposal will no longer be necessary. However, as the regulations stand now, individuals cannot harvest crab for those who are elderly or infirmed. These individuals would have to be on the vessel as well. The community harvest permit will hopefully make this proposal redundant.

Thank you for your consideration.

Sincerely,



Dr. Katherine Reedy-Maschner

Prince William Sound Charter Boat Association

P. O. Box 2850

Valdez, AK 99686

March 4, 2011

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MAR 08 2011

BOARDS

Dear Board of Fish Members,

The Prince William Sound Charter Boat Association, approximately 25 members strong, voted unanimously to oppose Proposal 315.

Several of our members participated in the new commercial shrimp fishery in 2010. We understand the Whittier Fish and Game advisory committee, which is comprised mostly of commercial fisherman, also voted to oppose this regulation. The main premise of this proposal is that this regulation exists in South East Alaska, therefore it should be the same in South Central Alaska. You more than anyone should know that the diversity of users in a given area often results in different regulations being enacted in that area. Prince William Sound's sport shrimp fishery, thanks to you, is a bigger entity than commercial shrimpers and local conditions are quite different than southeast Alaska.

The author of Proposal 315 contends the quality of the resource will be improved. What evidence was offered to support this? Our experience found just the opposite - when clients must obtain a permit it puts shrimping as a higher priority and they end up harvesting more. We also know from experience that when we leave shrimp pots down for a period of time between charters that the optimum soak time is often not obtained and our shrimp numbers are not maximized. Hands on experience indicates it is more likely harvests will be higher if clients are required to obtain shrimp permits.

We are aware that the people who scream the most are the ones most affected by regulation changes. We are certainly the most affected in this case and we are definitely screaming as we cannot envision a benefit to this regulation. It does nothing to benefit the resource - it seems only to create additional regulation and additional paperwork for Fish and Game and our clients.

It is very disappointing to us as charter business owners that the "Department of Public Safety" considers charter boat operators that deploy shrimp pots labeled with our names while on charters are "engaging in unlawful commercial fishing". We have used our shrimp pots and permits for years, been boarded by State Troopers numerous times and nothing like this has ever been said. In fact, we have discussed this very issue with State Troopers and were told we were OK to use our pots without putting

clients names on them. Now we see it in writing that we are a engaging in criminal activity.

Thank you for reading this and please don't pass Proposal 315,



Ken L Larson

Secretary,

Prince William Sound Charter Boat Association

(907) 255-2798

Alaska Crab Coalition
3901 Leary Way N.W. Ste. #6
Seattle, Washington 98107
206.547.7560
Fax 206.547.0130
accrabak@earthlink.net

March 8, 2011

ATTN: BOARD OF FISHERIES COMMENT
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

RE: Proposal #307, Size limits for Bering Sea District C. Bairdi Tanner crab harvest strategy, lower the minimum legal size limit.

Dear Chairman Webster and Board of Fisheries Members:

The Alaska Crab Coalition (ACC) has been representing the owners and operators of crab vessels from Washington, Oregon and Alaska that are involved in the Bering Sea/Aleutian Islands King, C. Opilio (Snow) and Tanner crab fisheries to the Board of Fisheries and the NPFMC since 1986. ACC submitted Poposal #307.

ACC members serve on the PNCIAC and they have been involved in the development of the PNCIAC comments to the Board of Fisheries on Proposal #307, to reduce the minimum size limit of C. bairdi tanner crab in the Bering Sea District.

ACC supports the PNCIAC and ADFG recommendations:

- **To reduce the exploitation rate for the Tanner crab (TAC) based on 5.0 inches carapace width (CW) in the Western subdistrict and;**
- **To retain the exploitation rate of 5.5 inches CW in the Eastern subdistrict (status quo).**
- **ACC supports the PNCIAC and ADFG recommendation to reduce the minimum legal size limit for retention in the West from 5.5 inches CW to 4.0 inches CW, to match the revised average size at maturity.**
- **ACC also supports reducing the current legal size limit in the Bristol Bay area from 5.5 inches CW to 4.4 inches CW in the East to match the current average size at maturity.**

No alternative size limit was recommended in our proposal, the alternative size limit was to be based on the results of the industry funded analysis by University of Alaska

biologists and economists in conjunction with the Department's recommendations. In conversations with the ADFG this winter, ACC understands that the department has analyzed size at maturity data for Tanner crab in the Bering Sea and that the ADFG will be recommending minimum size limits for retention equal to 4.4 inches CW in the area east of 166° W long (status quo) and 4.0 inches CW in the area west of 166° W long.

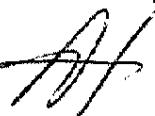
Two different size limits are proposed as ADFG recognizes two separate stocks in the Bering Sea district, thus differing exploitation rates are also applied in the areas east and west of 166° W long. The rates are applied to the biomass of exploited legal males with exploited legal males defined as "males greater than or equal to 5.5 inches CW in the area east of 166° W long and greater than or equal to 5.0 inches in the area west of 166° W long". Reducing the size definition of exploitable legal males in the area west of 166° W long from 5.5 inches CW to 5.0 inches CW will allow for a larger portion of the mature biomass to consist of exploited legal males and would reduce the harvest rate on the larger, faster-growing males in that area. Lowering the minimum legal size for retention relative to the minimum legal size of exploited legal males will reduce the bycatch mortality of mature males.

ACC supports the Department recommendation to lower the legal size limit to 4.0" in the Pribilof area and to lower the legal size limit to 4.4" in the Bristol Bay area. These size limits proposed by ADFG are intended to match the size limit with the size of maturity. Although these size limits are lower than what is proposed in the analysis (5" in the Pribilof area with status quo in the Bristol Bay area), it would be appropriate to lower the size limit to match the average size of maturity.

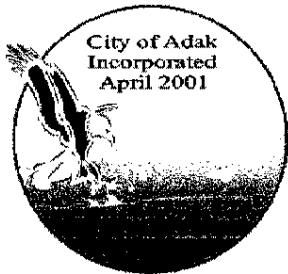
Matching the legal size limit with average size of maturity is similar to what occurs in the opilio fishery where size of maturity is 3.1" as is the legal size limit. However, for market reasons, the industry standard size limit is 4.0". This 4.0" size limit for the opilio fishery is considered the "exploitable legal male" size for management purposes. It is expected that something similar would occur with the bairdi fishery and that the industry standard size limit would be higher than the legal limit for market reasons. This would provide industry the ability to adjust as needed to market demands as well as morphological changes while reducing the risk of fines to industry from delivery of undersize crab. At this time, industry is supporting an "exploitable legal male" size limit of 5.0" in the Pribilof area and 5.5" in the Bristol Bay area.

Supporting information for reducing the minimum exploitable size limit to 5.0 " in the Pribilof area while maintaining the 5.5" limit in the Bristol Bay area is contained in the "Analysis of the Minimum Size Limit for Eastern Bering Sea Tanner Crab Fisheries," by Bechtol, Kruse, Greenberg and Geier, University of Alaska, February 2011. The PNCIAC comments summarize several supporting passages from the analysis in its comments.

Sincerely,



Arni Thomson, Executive Director



City of Adak

P.O. Box 2011 • Adak, Alaska 99546
(907) 592-4500 • Fax: (907) 592-4262

RESOLUTION NO. 2011-08

A RESOLUTION REQUESTING THE BOARD OF FISHERIES TO AMEND THE ALEUTIAN ISLAND STATE WATER PACIFIC COD MANAGEMENT PLAN TO ESTABLISH A PERMANENT SEASON IN STATE WATERS

WHEREAS, the City of Adak supported and appreciates the emergency action taken by the Board of Fisheries to open a parallel fishery for cod in the Aleutian Islands between 175 and 178 degrees longitude for vessels under 60 feet; and,

WHEREAS, the Board of Fisheries will be considering making the regulation permanent at its March 22nd meeting; and,

WHEREAS, the National Marine Fisheries Service (NMFS) final Biological Opinion ignored the 2010 Sea Lion Survey report which shows sea lion pup production has tripled in the Kanaga to Kasatochi area in question; and,

WHEREAS, the NMFS final Biological Opinion ignored the fact that no Atka mackerel or Pollock fishing has taken place inside critical habitat in the area in question; and,

WHEREAS, the NMFS final Biological Opinion did not incorporate the 2010 trawl groundfish survey data; and,

WHEREAS, the NMFS final Biological Opinion admits that its draft version contained mis-information critical to its conclusions concerning the exploitation rates of cod and mackerel, and the relative forage ratios of groundfish in the Aleutians, yet failed to change its conclusions in the face of revised information; and,

WHEREAS, the National Standards require NMFS to "*(A) provide for the sustained participation of such communities, and (B) to the extent practicable, minimize adverse economic impacts on such communities*"; and,

WHEREAS, the NMFS EA/RIR for the Biological Opinion found "*Of all the communities discussed here, Adak may have the most at risk for this action.*"; and,

WHEREAS, Congress allocated the Aleutian Island pollock to the Aleut Corporation specifically for the economic development of Adak, yet Adak has been precluded from benefitting from the pollock fishery by the total closure of Critical Habitat to pollock fishing; and,

WHEREAS, NMFS failed to comply with NEPA and did not analyze a reasonable range of alternatives that would have provided for the sustained participation of Adak; and,

WHEREAS, NMFS has sent intimidating letters to federal permit holders threatening to charge fisherman with violations for fishing the parallel fishery opened by the Board of Fisheries unless the fisherman surrender their federal permit; and,

NOW THEREFORE, BE IT RESOLVED, that the City of Adak requests the Board of Fisheries amend the Aleutian Island State Water Pacific Cod management plan to establish a permanent regulation to open the Aleutian Island State Water Pacific Cod fishery between 175 and 178 degrees during the A

Resolution 2011-08 • Page 2

season on January 1st of each year for vessels qualifying to fish under the Aleutian Island State Water Pacific Cod management plan.

ADOPTED by a duly constituted quorum of the City Council of Adak, Alaska this 4th day of March 2011.

Michael E. Swetzof
Michael E. Swetzof, Mayor

ATTEST:

Peggy Campbell
Peggy Campbell, City Clerk