

BOF March 20-24, 2017, Jim Stone comments on Proposals 250 through 261.

I have been fishing Bering Sea crab since 1979, owner of crab vessels Polar Sea and Ocean Hunter, home ported in Kodiak.

Prop 250; Allow retention of all snow crab in WBT fishery. Similar to proposals 255 and 256. In my opinion if a crab comes up, is legal and you are permitted for that species it is wasteful and irresponsible to throw it over only to try to catch it again later.

In 2016 the Polar Sea caught about 700,000 lbs. of Bairdi between EBT and WBT, at the same time we were bycatching and discarding the same amount or more of Snow crab. That is at least 700,000 lbs. of legal snow crab caught sorted and thrown overboard, only to come back in a few weeks to catch them all over again. Using the ADFG 30% assumed mortality we killed about 210,000 lbs of Bairdi. That is only one boat!!!

Later in 2016, the Polar Sea caught about 1,000,000 lbs. snow crab and estimate we bycaught and discarded about 500,000 lbs. of Bairdi. Using the ADFG 30% assumed mortality we killed about 150,000 lbs. of snow crab. Again, that is only one boat!!!

Just now in 2017 the Polar Sea caught about 600,000 lbs. snow crab and estimate we bycaught and discarded about 300,000 lbs. of Bairdi. Using the ADFG 30% assumed mortality we killed about 90,000 lbs. of snow crab. Again, that is only one boat!!! Please, see our video taken a few days ago, we will try to have it around during the meeting.

2017 As you know we had no Bairdi season, but we continue to see huge quantities of Bairdi as we harvest snow crab.

The Department has concerns that fishing snow crab with Bairdi gear could confound snow crab catch rate data. While this is true, most regulation changes we have made has had impacts on catch rates. Such as; fishing gear changes, effort changes, area changes and timing changes. There would still be pure snow crab fishing trips, without Bairdi to get catch rate data from. Many fishermen already use larger meshed gear than the legal sized minimum in the Opilio fishery in order to cull smaller crab on the bottom; doesn't this also "confound" data? Bering Sea crab fisheries are mostly managed by survey data with little input from catch rate data, so this concern of skewed catch rate data seems a bit exaggerated. The department biologists are smart people and I am sure they still can find ways to get useful catch data.

I would hope that the conservation concern over the wastage of hauling crab twice with the mortality associated would outweigh the concern of "confounded" catch data.

Safety concerns; Hauling crab twice greatly increases the days at sea and the odds of injury and accidents. If we had been able to keep snow crab during the Bairdi seasons last year (2015/16) we probably would have saved 45 days.

Costs; The FV Polar Sea's at sea costs of fuel, bait, provisions and wear & tear, are about \$3000 per day, the extra days fishing for crab that we have already caught once and have to catch again can quickly multiply into a tremendous number. (45 days x \$3,000 = \$135,000)

Department comments reference that we have an existing regulation allowing a 5% retention of snow crab during the WBT fishery, with very little historic use of this by fishermen, (.42% in 2015/16). The reason for this is it not enough poundage to pump down a separate snow crab tank. Also the potential of violation for exceeding the 5% allowance is too risky. I can guarantee our vessel would bring in a tank of snow crab while fishing WBT if we would be allowed.

Processor's concerns; We fully understand their concerns of the nightmare a mixed tank of snow and Bairdi crabs could create. The Fishermen and our coops can work closely with processors to ensure crab species are kept aboard the boats separately and we can work together on reasonable offload plans. If coordinated properly, I think

there can also be some efficiencies and advantages to Processors in reduced crab processing days. This (as most of the above points) goes for proposals 255 and 256, as well.

Prop 251; Extend WBT from March31 to April 15. I support. The Department comments on this refer to GOA and SE studies and no studies of the colder Bering Sea. From my fishing experience I believe the Bering Sea Tanners molt much later in the year (May & June) then they do in other regions, the observer data seems to verify this.

ADFG Observer data in Bering Sea, shows no molting (soft or New-pliable) Tanner in April, or even May. The below chart shows summary of data on the shell condition of Tanner crab sampled by observers during the snow crab fishery, 2006-2014, March-May. From Doug Pengilly ADFG to Ruth Christensen ABSC, January 20, 2015.

Summary of shell condition data of Tanner crab, regardless of sex or size.

Note: Shell condition codes corresponding to "pre-molt" or "very-very old" are not used in observer data collection.

Year	Month	Shell Condition						
		Not Recorded	Soft	New-pliable	New	Old	Very Old	
2006	March	15	4	0	3384	622	59	
2006	April	0	0	0	711	307	16	
2006	May	0	0	0	298	126	26	
2007	March	36	0	0	1663	1437	63	
2007	April	0	0	0	293	187	2	
2008	March	2	0	0	3644	697	11	
2008	April	0	0	0	991	150	0	
2009	March	1	0	0	2126	557	42	
2010	March	25	0	0	1922	419	45	
2010	April	0	0	0	61	21	2	
2011	March	0	0	0	1827	197	13	
2012	March	0	0	0	2555	279	8	
2012	April	0	0	0	940	205	12	
2012	May	0	0	0	270	68	14	
2013	March	0	0	0	2490	522	32	
2013	April	0	0	0	323	64	14	
2014	March	0	0	0	2499	374	71	
2014	April	0	0	0	1459	142	13	

Prop 252; Rig gear for another fishery at the end of the current fishery. I support. This is a safety and efficiency concern. Not allowing for this forces a boat to set gear with doors open and come back to re-haul, rig and bait them, an extra haul for no reason. Cheating is not possible as the vessel must first return to port and show empty tanks to ADFG.

Prop 253: Rig gear for another fishery at the end of the current fishery. I support. This is a safety and efficiency concern. Not allowing for this forces a boat to set gear with doors open and come back to re-haul, rig and bait them, an extra haul for no reason. Cheating is not possible as the vessel must first return to port and show empty tanks to ADFG.

Prop 254; Hybrids counted as Bairdi or Opie based on what you are fishing. After re-considering this one, I oppose because of marketing concerns keeping Bairdi a high profile sweeter flavored crab. Hybrids should count as snow crab. However a Bairdi fisherman should not face violations for accidentally retaining a few hybrids. Sorting through thousands Bairdi in rough weather in the middle of the night mistakes are going to happen and a few snow crab will fall in the tank. Once accidentally in the tank the snow crab cannot be removed until we get dockside.

Prop 255; Retain snow crab in EBT. I support for the same reasons as Prop 250. East of 166 was a large part of the snow crab catch in the early 80's, in the last few years we are again seeing snow crab in huge numbers during the EBT fishery. So wasteful to throw them over the side with an ADFG assumed mortality of 30%.

Prop 256; Retain Bairdi during King crab. I support. Similar arguments to Prop 250. King crab legal mesh is much larger than Bairdi, 9" vs 6.25" and Bairdi are excellent escape artists. As a result King crab pots are very inefficient for catching Bairdi. However there are times while fishing on King crab that we will run into a pile of Bairdi that end up landed on the boat. These crabs are mostly thrown overboard, with ADFG's assumed 30% mortality. Then we return after King crab to try to catch them again. As in Proposals 250 and 255, current regs cause a pointless waste on the resource, decreases crew safety and increases vessel costs.

Prop 257; Move eastern boundary for BSS from 166 to 165. I support.

This was an area of high abundance in the early 80's. This is where and when I first fished snow crab, these were big beautiful crabs in full pots for many many trips. The snow crab have returned to this area and we should be allowed to fish this area. During the 2014/15 and 2015/16 EBT fishery we saw many full pots of snow crab, but we could not fish them. The Department comments refer to only a small amount showing here in the summer survey, but we have found them to be here in large numbers month later during the EBT fisheries. The snow crab has returned to this area and we should be allowed to fish this area.

Prop 258; Move EBT boundary from 163 to 162. I support. Existing regs for rigid 3" tunnel eye openings keep small king crab out, doubtful the number of BBR bycatch would increase over the current relatively small numbers. Also the ADFG assumed 20% mortality make the harm from that bycatch even more minimal. (ADFG observed Average Bycatch 2251 female crab and 454 male crab, with a 20% mortality = 450 dead females, 90 dead males)

Prop 259; no opinion

Prop 260; no opinion

Prop 261; ADFG proposal to allow 5% retention BSS in EBT. Support, only if 255 fails. I appreciate the Department's help to ensure no tickets will be issued for accidental retention of snow crab during the EBT fishery.

Sincerely, Jim Stone, 3/20/17

