


Attn: Alaska Board of Fisheries

RC 6 ①

Re: Public Comment of Eric Osborne, Commercial  
Box 1761 Nome, Alaska 99762 Fisherman

Honorable Board of Fisheries,

I am submitting public comment  
on two topics brought forward by  
 the Northern Norton  
Sound Advisory Board.

First and most imperatively is  
the petition to close the Summer and  
Winter seasons of the Norton Sound  
Red King Crab fishery.

I began commercial fishing winter  
king crab in the winter of 1978-1979.  
The biomass of crab has had a couple  
of cyclical expansions and contractions during  
the ensuing decades. There has never  
been a closure. The winter quota is  
miniscule, in the 13,000 lb range  
this year.

The proposed Summer Red King Crab  
quota has been set by the most  
conservative statistical model ever applied  
by a respected team of excellent biologists.

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The moderate summer quota will address conservation of the resource and the ADFG's mandate under the Alaska Constitution to manage the fishery for "Maximum Sustainable Yield."

I also assert that [redacted] furiously misstates the fact in his petition that the majority of commercial crabbers want a closure. I've made many calls and contacts since very belatedly coming into awareness of this petition. None of those I contacted want a closure. These people are heavily invested in a business that sustains families. And accrues various forms of debt that need service.

We had markets fishermen developed prior to our CDQ group's entry into buying crab here. And their absence as a buyer this year will allow fishermen to explore more lucrative niche markets again.

Their support of the fishery has contributed to a distortion of perception of the crab biomass as well. NOAA trawl surveys show the crab biomass

has moved, due to warming seas I believe. (3)  
The biomass is centered west of Sledge Island,  
where the Seward Peninsula bends toward  
the Bering Strait. NSEDC's large modern  
tenders service a village fleet off  
Golovin Bay in Eastern Norton Sound. Its  
shallow water, and last year incredibly  
warm. Fresh long strands of Bull Kelp  
typically native to Southeast Alaska were  
washed up on Golovin's beach when I  
visited in July. I caught a strange yellow  
and black fish in my salmon net east of  
Nome. My first Atka Mackerel in 40 years.

Crab are now in deeper, swifter, rougher  
waters to the West. The other mitigating  
factor directly in front of Nome is the  
intense cluster of floating gold dredges  
that affect benthic habitat. Including organ-  
isms that crab feed on. A nutritional  
desert, if you will. This is where locals in  
Nome set subsistence pots. But farther West  
and East there are winter crab.

This proposed closure is going to be a political attempt to pardon to fear mongering locally to bolster self importance.

Norton Sound should not descend into becoming a petri dish for unscientific policy. This proposed methodology will potentially affect the management of other statewide crab fisheries.

The lack of public notice of the meeting leading to this decision. And the last minute change in time and venue without the legally mandated 1 week of notice bring into question the legality of the Northern Advisory Board's vote. This has been a long standing problem. While posting online at the State website meets legal criteria it does not meet the moral obligation to inform the public by posting on the various bulletin boards around town or placing notice in our local paper. Their history of calling membership votes during business hours deprives the working/hunting/fishing populace an opportunity to attend, nominate and vote.

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It leads to a stagnant leadership structure with a false sense of entitlement.

On the proposal to deny replacement of lost pots in the winter fishery, I would again disagree. Moving ice causes occasional, great losses of gear in the benthic crab fisheries in the northern Bering Sea. The vessels report losses and replace.

In Nome fishermen have accepted limitations in gear in the Winter King Crab fishery. From unlimited gear numbers, to 40 pots and then to 20 currently. These are small winter pots that crab often crawl out of when bait sours. And they have cotton escape panels. Again we need not become a petri dish for shortsighted policy that could in time be applied to other fisheries. Crabbing in all forms is inherently risky. There needs to be sufficient leeway in regulation to economically prosecute the fishery.

Thank you for your consideration of my views and sincere critique.