

Southeast Alaska Fishermen's Alliance



1008 Fish Creek Rd

Juneau, AK 99801

Email: kathy@seafa.org

Cell Phone: 907-465-7666

Fax: 907-917-5470

Website: <http://www.seafa.org>

March 8, 2022

Alaska Board of Fisheries

Board Support Section

P.O. Box 115526

Juneau, AK 99811-5526

Re: Proposals #190 & SUPPORT RC 10, Red King Crab Management Plan

Dear Chair Carlson-Van Dort and Board of Fisheries members,

Southeast Alaska Fishermen's Alliance supports the substitution of the regulatory language in RC 10 for Proposal #190 with no action taken on Proposal #191. The regulatory language in RC 10 is a management plan that was worked on and agreed to by industry and ADF&G working together.

SEAF A last fall before we were aware that ADF&G was close to developing a biological threshold and new management strategy sent out a letter polling the 60 SE red king crab permit holders in preparation for the Board of Fish meeting on proposal #190. In this survey we were asking about support for an equal quota share fishery (#190) and/or a co-op fishery (understanding all permit holders would have to agree every year) The results of the first survey is as follows with 26 responses:

Would you support an equal share fishery (proposal #190) as proposed? Yes 21 / No 4

Would you support a co-op fishery? Yes 22 / No 3

Do you have a preference between an equal share fishery or a co-op fishery?

Equal Share 11 / Co-op Fishery 22 / no answer 3

Would you block a co-op fishery if it was the only way to benefit economically from your permit for the year (remember this is only if a regular fishery won't be opened)? Yes 3 / No 22

Do you owe money on your permit? Yes 4 / No 22

Notes and comments on surveys:

1. If we can't harvest the harvestable surplus I don't think there should be any harvest at all! Share the burden of conservation! There is a sharp increase in PU fisheries around Petersburg!
2. Not a super supporter of equal split but if the only way will get to fish will tolerate
3. Connected to Co-op fishery – Think Dept would be less likely to not be supportive. My only concern is catcher vessel's would charge too much to harvest, then I'd just self market.

4. On one of the surveys where they had no preference between Co-op and equal share, Depends on what percent the co-op fishery wants
5. Also, of interest one of the individuals who did not support a co-op fishery actually is one of the few people who acknowledged they owe money on their permit.

Following the December 3rd task force meeting and the roll out of the Dept's red king crab strategy, we re-emailed out a new question to the fishermen on December 6th. The question was, "is the majority of the fleet willing to accept an equal share fishery at all levels of abundance going into the future?" (Original Dept plan did not have a competitive fishery that was negotiated into the plan later). This email received 15 responses supporting an equal share fishery and no one commenting against the proposal. Some of these responses were new responses, they didn't answer the first mailed letter/survey. We believe between the personal communications, emails and survey responses that the majority of the permit holders support this new red king crab management strategy and plan.

On 12/16/21 there was a follow up KTF meeting with the Dept to continue to discuss the management plan. At that meeting there were 23 people on the webinar. After discussion, the permit holders at the meeting agreed to have Jared Bright, KTF industry Co-chair, Megan O'Neil, Petersburg Vessel Owner Association and Kathy Hansen Southeast Alaska Fishermen's Alliance, the two industry groups that represent crab fisheries in Southeast Alaska to represent industry in discussions with ADF&G to try to finalize a plan that both could agree to.

Throughout the several meetings and email exchanges with the Dept, additional emails were sent out to the permit holders (90% of the permit holders email addresses are in our list) allowing permit holders to provide feedback, ask questions and we continued to receive support for the regulatory language in RC 10.

The king and tanner task force operates under a charge statement approved by the Board of Fisheries. The charge statements are 2002-214-FB¹ (this charge was aimed more at tanner crab issues at the time) and an updated charge statement was approved in 2012 (RC 47²).

The current regulations for a 200,000-pound threshold in order to prosecute a red king crab fishery was adopted in 2002 along with the finding 2002-213-FB³.

Please support RC 10 as substitute language for Proposal #190 as an industry and ADF&G agreed upon language.

This language does not change the allocation in District 11 between personal use and commercial and does not change the bag limit for other areas. It just provides a biological threshold rather than an economic threshold, a way to manage the commercial fishery in lower levels of abundances, and a competitive fishery in times of high abundance.

Sincerely,



Kathy Hansen
Executive Director

¹ <https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/findings/ff02214x.pdf>

² http://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2011-2012/se_shellfish/rc43-47.pdf & http://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2011-2012/se_shellfish/soa-se-shellfish.pdf pg 5 under Misc business

³ <https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/findings/ff02213x.pdf>