On-Time Public Comment List

Alaska Board of Fisheries: Statewide King & Tanner Crab
Anchorage, March 8-11, 2020

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Alaska Board of Fisheries: Statewide King & Tanner Crab
Anchorage, March 8-11, 2020

February 21, 2020

Alaska Board of Fisheries
Reed Morisky, Chair
Via email: dfg.bof.comments@alaska.gov

RE: Proposal 261 to adopt a new Bering Sea District C. bairdi Tanner crab harvest strategy

Chairman Morisky and Board Members:

Thank you for the opportunity to comment in advance of the Statewide King and Tanner Crab meeting of the Alaska Board of Fisheries (Board). The Ad Hoc Bairdi Crab Industry Committee (committee), a committee comprised of harvesters, processors, and community representatives, was formed in 2016 in response to significant instability in the Bering Sea commercial bairdi Tanner crab fishery, and an identified need to re-evaluate the Bering Sea bairdi Tanner crab harvest strategy. Ongoing efforts of the committee, the crab harvesting and processing associations with membership on the committee, the Bering Sea Fisheries Research Foundation (BSFRF), and the Alaska Department of Fish and Game (ADFG) are intended to help provide the Board with the necessary information to manage this important fishery, to meet the shared goal of long-term resource sustainability and fishery opportunity.

The Bering Sea bairdi Tanner crab fishery has fluctuated broadly over the last 40 years with several season closures. In recent years, it has reached a high of nearly 20 million pounds valued at nearly $50 million (gross ex-vessel), but is currently closed. Significant annual variability makes it difficult to maintain markets. When open, the fishery provides important economic support for local Alaska communities as well as for the crab harvesters and processors.

In the past few years, the committee and BSFRF have been working with ADFG to determine some short-term, science-based fixes to the harvest strategy, which were approved by the Board and implemented in May 2017. However, the committee has continued to keep its focus on a long-term, permanent solution to the multiple concerns with the current harvest strategy that have been raised over the past several years, and **strongly supports action under proposal 261 at this Board meeting to revise the current harvest policy.**

In addition to other factors, the Bering Sea bairdi Tanner crab harvest strategy has historically been the only harvest strategy for a Bering Sea crab species or in the State of Alaska that utilizes an isolated, female-only threshold for opening the fishery. Other major Bering Sea stocks such as snow crab and Bristol Bay red king crab have some form of spawning biomass threshold for determining a fishery opening. Current scientific understanding supports a change from status quo for bairdi crab, which employs an isolated female-only threshold in a commercial fishery which only targets mature male crab, and has very minimal bycatch of the

female and juvenile portions of the population. In effect, female biomass currently determines whether the fishery is open or closed, regardless of surplus mature male biomass.

The committee met with ADFG several times over the past few years and appreciates all of the work done to evaluate new harvest strategies for this fishery through a management strategy evaluation (MSE). The **committee's objectives** (in priority order) for revising the harvest policy continue to be:

1. Robust harvesting of exploitable males when warranted, and
2. Increasing fishery stability by reducing or eliminating the likelihood of season closures.

These objectives have guided our harvest policy evaluation and preferences. Given the characteristics of the bairdi crab stock, where pulses of recruitment create variability in stock abundance and where the crab turn old shell at a certain time after their terminal molt (a condition undesirable to consumers and markets), the intent is to harvest as many crab as possible when they are in their new shell condition and above legal size, without harming the long-term sustainability of the stock. After a recruitment event passes and crab are turning old shell, harvest would ramp down. As a secondary objective, we support a harvest strategy that minimizes disruption to markets and fishing businesses from significant annual variability and fishery closures.

Harvest Strategy Preferences and Rationale

The committee's bairdi harvest strategy preference is a 'female dimmer' approach, with a lower bound of 10% and an upper bound of 22.5%, with a cap of 50% of exploitable legal males (ELM). This approach was analyzed by the department and is included in the information provided to the Board. As a second preference, we would support a female dimmer approach with a lower bound of 10% and an upper bound of 20%, also with a cap of 50% of exploitable legal males.

While other harvest strategies evaluated also seem to meet both the conservation and economic objectives incorporated into the management strategies evaluation process to varying degrees, and would have provided more fishery opportunity (i.e., male only ramp; ABC control rule), the female dimmer approach with the above constraints appears effective in meeting the stated objectives while also accounting for female biomass in a more appropriate way than the status quo. We would note for the Board that the difference in risk from the MSE for the 22.5% versus 20% upper bound was minimal – both are greater than 80% likely to be below acceptable biological catch (ABC), and greater than 90% likely to be below overfishing levels (OFL).

Given the information available to-date, the committee supports this type of harvest strategy because it strikes a balance between allowing more aggressive harvest on the bairdi stock when the biology suggests it is appropriate to do so, while keeping conservation measures in place to

ensure enough breeding males remain in the water to renew the stock, and to lessen, but not eliminate, the influence of females in the formula for a male-only fishery.

Note that the Committee does not support any harvest strategy for bairdi that applies an ELM cap lower than 50%. The ELM cap is an additional buffer to manage risk. Our understanding of the science behind a 50% ELM cap, which is also in the current harvest strategy, is to keep at least half of the market-sized males in the ocean to reproduce. However, there is already another conservation buffer inherent in bairdi management because the size at maturity is smaller than the market size. Based on National Marine Fisheries Service (NMFS) survey estimates of mature male biomass of the stock over the last 20 years, more than half (about 55%) of mature males are below 5 inches and not targeted by the fishery, effectively leaving all of those crab on the grounds to be reproducing, *in addition to* the unexploited portion of 5-inch mature males. Given these conservation measures, which substantially buffer exploitation of spawning males, we do not support a cap on ELM below 50% with no biological basis for doing so.

Of the female dimmer options, the committee supports a lower bound of 10%. Based on both the risk evaluation from the updated MSE and the retrospective performance evaluation of potential harvest strategy control rules, a 10% floor in a female dimmer rule is warranted and would not be overly aggressive. We note that the mature female biomass tracking in the simulations was generally stable. We are also aware from some actual population trends for mature male bairdi crab evident in the NMFS survey that mature male and female trends can at times deviate or have a periodic lag. Specifically, during part of the recent, higher exploitation period, when mature male biomass was trending upward and mature female biomass was declining, the application of a lower floor on exploitation could have caused unnecessary, foregone harvest of available males. Applying a 10% floor better avoids missing opportunities on surplus new shell mature males in periods like this.

For the upper bound, the committee prefers 22.5%, but only if the harvest strategy retains the current 50% ELM cap for reasons described earlier. The 22.5% upper bound allows more aggressive harvest on market-size crab when the female and male mature trends are relatively high or increasing, and the stock can sustain this marginal increase in exploitation.

The industry group very much appreciates the years-long work of ADFG and the BSFRF in arriving at harvest policy options, the analysis of those options, and the formulation of preferences for consideration by the Board. As long-time participants in the Bering Sea king and Tanner crab fisheries, the members of the committee are actively concerned with and have a significant stake in the long-term health of the resource. We encourage the Board to adopt a new, more appropriate, and biologically-based harvest policy at this meeting and thank you for the opportunity to comment.

The Ad Hoc Bairdi Crab Industry Committee
Membership list attached

Ad Hoc Bairdi Crab Industry Committee members

Jamie Goen, Alaska Bering Sea Crabbers
Nicole Kimball, Pacific Seafood Processors Association
John Iani, North Pacific Crab Association
Heather McCarty, Central Bering Sea Fishermen's Association (Chair)
Scott Kent, Norton Sound Economic Development Corporation
Matt Robinson, Bristol Bay Economic Development Corporation
Frank Kelty, City of Unalaska
Mateo Paz-Soldan, City of Saint Paul
Stefanie Moreland, Trident Seafoods
Shannon Carroll, Trident Seafoods
Sinclair Wilt, Alyeska Seafoods
Jake Jacobsen, Inter-Cooperative Exchange
Joe Sullivan, Inter-Cooperative Exchange
Craig Lowenberg
Doug Wells
Edward Poulsen
Louie Lowenberg
Jim Stone
Lenny Herzog
Lance Farr
Gretar Gudmundsson
Nikolai Sivertstol
Mike Woodley
Kale Garcia
Kevin Kaldestad
Ian Pitzman
Craig Cross
Clair Widing
Tim Hobbs

ALASKA
Bering Sea Crabbers

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February 21, 2020

Alaska Department of Fish and Game
Board of Fisheries, Boards Support Section
PO Box 115526
Juneau, AK 99811-5526

RE: Alaska Bering Sea Crabbers comments on Proposals 261-263, 265, 268-272

Dear Chairman Morisky and Board Members:

The Alaska Bering Sea Crabbers (ABSC) is a non-profit trade association representing harvesters of king, opilio (snow), and bairdi (Tanner) crab in the Bering Sea and Aleutians Islands (BSAI) Crab Rationalization Program. ABSC is actively involved in fisheries management, policy development, scientific research, and marketing. Our fishery is jointly managed by the federal and state governments, at the state level through the Alaska Board of Fisheries (Board) and the Alaska Department of Fish and Game (Department or ADFG), as well as at the federal level through the National Marine Fisheries Service (NMFS or NOAA Fisheries).

ABSC offers comment on the following proposals for the upcoming Alaska Board of Fisheries meeting March 8-11, 2020. Areas of interest for ABSC harvesters include *Bering Sea and Aleutian Islands Area Commercial King and Tanner Crab* (261-263, 265, 268) and the *Onboard Observer Program* (269-272).

Bering Sea and Aleutian Islands Area Commercial King and Tanner Crab

Proposal 261 (*Adopt a new Bering Sea Tanner crab harvest strategy*)
ABSC supports a revised harvest strategy for *C. bairdi* (Tanner) crab and appreciates the hard work, transparency, and stakeholder involvement by ADFG, the Bering Sea Fisheries Research Foundation (BSFRF), and others while exploring options to the harvest strategy over the last couple of years. ABSC aligns with the Ad-Hoc Bairdi Crab Industry Committee (Committee) recommendations on Proposal 261 and hereby incorporates that Committee's comment letter by reference for further details. ABSC has participated as a stakeholder in the Committee throughout the bairdi management strategy evaluation (MSE) process. In summary, ABSC recommends a preference for a female dimmer approach with a lower bound of 10% and an upper bound of 22.5% including a cap of 50% of exploitable legal males (ELM). ABSC emphasizes keeping the ELM cap at 50% as a top priority. This female dimmer option allows robust harvesting on exploitable males when they are available and at levels to support higher harvest before turning old (dark) shell. In addition, this option includes two male conservation buffers – the 50% cap leaving half of the exploitable (5" and up) males on the grounds, plus no retained catch of mature males under 5" leaving another large amount of mature male crab on the grounds to reproduce. With these male conservation measures in place plus a mechanism in the new harvest strategy to decrease the harvest rate when female biomass is lower, ABSC recommends the Board adopt a female dimmer approach with a lower bound of 10% and an upper bound of 22.5% including a cap of 50% of ELM.

Proposal 262 (***Modify the Bering Sea C. opilio harvest strategy definition of "exploited legal males"***)
ABSC submitted this proposal on the opilio ELM size used in total allowable catch setting and is withdrawing it from the March 2020 Board of Fisheries meeting. ABSC, BSFRF, and other industry leaders are gathering further biological and market information and working with ADFG to explore the costs and benefits of a smaller ELM size for opilio. This is an ongoing effort to analyze the effect on future spawning biomass and the market value of crab relative to their size at harvest.

Proposal 263 (*Incidentally harvested Bering Sea District C. bairdi during directed a C. opilio season*)
ABSC submitted this proposal on incidental catch of bairdi and is withdrawing it from the March 2020 Board of Fisheries meeting. ABSC understands that any state level action of this issue would also require federal action under the Crab Rationalization Program regulations. Therefore, this issue could benefit from discussion through the Joint Protocol Committee between the Alaska Board of Fisheries and the North Pacific Fishery Management Council. ABSC will continue to pursue ways to address incidental catch and will bring those back to the Board, as needed.

Proposal 265 (*Update Bering Sea and Aleutian Islands crab registration regulations*)
ABSC supports proposed amendments to the crab registration regulations. The proposed changes would provide more flexibility for inspection locations, inspection requirements, preseason vessel registration deadlines, document delivery deadlines, and clarifies differences between preseason and fishery registrations. The proposal updates language that is consistent with the needs of the crab fishery to ensure compliance and well-defined requirements for the industry and ADFG.

Proposal 268 (*Allow gear transfers to be authorized by electronic mail*)
ABSC supports the proposed amendments to allow gear transfers between vessels by notifying ADFG via email. This will expand the current language that allows gear transfers but requires a multi-step process by the relinquisher and recipient in person at an ADFG office. As it currently stands, the regulation does not align with remote fishing activities in the Bering Sea and Aleutian Islands region and is not necessary. The proposal would improve efficiency and ensure compliance between the industry and ADFG.

Onboard Observer Programs

Proposals 269, 270, 271, 272 - ABSC supports amendments to the observer program regulatory language through ADFG's proposals to (269) revoke trainee permits based on their discretion, (270) brief and debrief trainee observers between fisheries to ensure communication and data quality, (271) ensure in writing that there are marine safety requirements for observers on board vessel, and (272) enforce a minimum education requirement including coursework. These proposals would increase flexibility in transitioning between fisheries, better align federal and state requirements, and could improve data quality used to inform fisheries management.

We are available to answer any questions you may have and will be at the upcoming March Board of Fisheries meeting.

Sincerely,

Jamie Goen
Executive Director
Alaska Bering Sea Crabbers
absc.jamie@gmail.com

Alaska Scallop Association
PO Box 8989
Kodiak, AK 99615
907-512-7018
Jim@AlaskaScallop.net

February 21, 2020

Alaska Department of Fish and Game
Board of Fisheries, Boards Support Section
PO Box 115526
Juneau, AK 99811-5526

RE: Comments on Proposals 269, 270, 271, 272

Dear Chairman Morisky and Board Members:

The Alaska Scallop Association supports the Department's proposals (269, 270, 271 & 272) amending the observer program regulations. Our scallop harvesting vessels are required to have 100% observer coverage during all fishing operations.

These proposed regulations will help in getting qualified observers, better align the State Observer program with the federal one, give flexibility to the department to move observers between fisheries with proper briefings and ensure a standard of safety for the observers while onboard the vessels. All the above could improve better data quality for fisheries management.

Sincerely

Jim Stone, President ASA.

Submitted By
Amy Daugherty
Submitted On
2/18/2020 1:20:57 PM
Affiliation
Alaska Trollers Association

Phone
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Email
alaskatrollers@gmail.com
Address
130 Seward St
#204
Juneau, Alaska 99801

February 18, 2020

Dear Chairman Morisky and Board of Fish Members,

Alaska Trollers Association (ATA) is a trade organization representing over 360 permit holders scattered throughout Southeast Alaska. Our members garner the highest prices for the salmon resource since we bring the fish aboard one at a time. We are proud of the quality our markets receive and have been catching fish in these waters for well over a century. ATA as an organization has been around since 1925.

Thank you for bringing forth Proposal 277 in your Statewide meeting this March 8 – 11th.

ATA supports the both the original proposal and its amended version as put forth to you by NSRAA. We appreciate the perseverance and collaboration extended by both the NSRAA staff, NSRAA troll representatives, ADFG staff and the Troopers. Undeniably, Crawfish Inlet chum trolling has been the most positive segment in recent history of our troll fishery. This enhancement project, specific to troll effort, has pushed more than one small business into the black.

This modified proposal provides more range and area flexibility for this fleet to harvest these chums. The difference between the original proposal 277 and the amended version is simply a boundary extension which has been thoroughly vetted by the parties earlier mentioned and allows for easier navigation on the drag and easier enforcement by the troopers.

ATA urges your support and passage of this new regulation, and reiterates our thanks to NSRAA staff and the NSRAA troll representatives for their leadership on this matter.

Thank you,

Amy Daugherty

Executive Director

Alaska Trollers Association

Submitted By
Alexandria Wenninger
Submitted On
2/5/2020 6:38:51 PM
Affiliation
Entomologist

I agree that Lumbricus earthworms have no place in Alaska, and their sale and transportation should be prohibited. They are a large species that overturns duff too fast, causing negative impacts on Alaskan soils, plants, and arthropods. Lumbricus earthworms prohibit spruce regeneration, facilitating the spread of grasses, which allows riverbanks to erode at a faster pace. The presence of these large earthworms also harms native earthworm communities, which in turn can affect the diversity of other soil arthropod and plant communities.

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February 19, 2020

Reed Morisky, Chairman
Alaska Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
Juneau, AK 99811

RE: 2020 Statewide King and Tanner Crab Meeting Comments Prop. 244, 245, 255

Chairman Morisky and Members of the Board of Fisheries,

Cordova District Fishermen United (CDFU) is a membership-driven non-profit organization that represents and advocates on behalf of the commercial fishing fleet in Prince William Sound, the Copper River, and the northern Gulf of Alaska. CDFU is organized into multiple divisions representing a variety of gear groups and fisheries. The following comments are submitted on behalf of the CDFU Shellfish Division, which is focused primarily on new and developing shellfish fisheries as an opportunity to diversify commercial fisheries within the Prince William Sound region and provide additional economic opportunity for coastal communities, and in turn, economic benefit to the State. As you deliberate on proposals 244, 245, and 255, we respectfully urge you to consider the following comments:

Proposal 244 - SUPPORT
5 AAC 34.210. Fishing seasons for Registration Area E.
Allow a commercial king crab fishery in the Northern and Western Districts in Prince William Sound.

This proposal was submitted by the CDFU Shellfish Division, and it is our hope to provide some background information in support of opening a small, sustainable commercial king crab fishery in Prince William Sound.

Recently, the commercial Tanner Crab fishery in Prince William Sound was reopened through a Commissioner's Permit fishery after a long term closure. Though the new Tanner crab fishery is conducted on a small scale, in a very limited area, this fishery has provided a significant economic boost to the coastal communities within Area E during the late winter months. The renewal of this fishery has also contributed to increased access to a local food resource for the broader region through catcher-seller sales over the dock. More importantly, the Tanner crab fishery has provided ADF&G with critical data

about the status of Tanner crab stocks within Prince William Sound. Thorough reporting is required daily for both legal and non-legal Tanner crab, providing a significant amount of data to ADF&G.

The success of the Tanner Crab fishery has further reinforced local interest in pursuing the reopening of king crab fisheries in Prince William Sound. Historically, the king crab fishery provided an additional income source for the community during the quieter winter months, however, this fishery was closed by EO in 1994 and never reopened, with the Board closing the fishery by regulation in 1999, 21 years ago. Golden king crab stocks in Prince William Sound have not been targeted in ADF&G surveys since 2006, at which time they were determined to be steady, but low.[1] Unfortunately, the lack of recent data on golden king crab stocks within Prince William Sound lies in direct opposition to the Board's Policy for King and Tanner Crab Resource Management (90-04-FB), which states that it is the policy of the Board to:

> *2. Routinely monitor crab resources to provide information on abundance of females as well as prerecruit, recruit, and postrecruit males. This is necessary to detect changes in the population which may require adjustments in management to prevent irreversible damage to the reproductive potential of each stock and to better achieve the benefits listed above. Harvests must be conducted in a conservative manner in the absence of adequate information on stocks.*

Because these stocks have not been routinely monitored in order to develop a harvest strategy, we are seeking regulation change to allow a small-scale king crab fishery that would adequately inform management of current biomass estimates in the absence of additional data, with the intention of rebuilding this critical winter fishery at a sustainable level. The current GHR in regulation is 40,000-60,000 lbs, and we are supportive of expanding this range in order to ensure management as much flexibility as possible. As an example, a GHR of 0 to 60,000 lbs would still maintain the upper end of the range and allow for a historically consistent harvest in the future, while allowing the department to prosecute a conservatively managed fishery until adequate biomass data has been determined. An expanded GHR would also closely align Prince William Sound golden king crab regulations with those in districts in Southeast Alaska king crab fisheries. Additionally, catch-per-unit-effort (CPUE) from harvest data is utilized in the SE Alaska golden king crab fishery to set GHLs annually within the GHR, and the SE Alaska fishery has been prosecuted with a moderately low, but consistent CPUE (ranging from 1.3 to 5.5 over the last 20 years)[2].

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[1] *ADF&G (Alaska Department of Fish and Game). 2017. Staff comments on statewide (except Southeast and Yakutat) king and Tanner crab and supplemental issues. Alaska Department of Fish and Game, Regional Information Report 4K17-01, Kodiak.*

[2] Stratman, J., T. Bergmann, K. Wood, and A. Messmer. 2017. Annual management report for the 2016/2017 Southeast Alaska/Yakutat golden king crab fisheries. Alaska Department of Fish and Game, Fishery Management Report No. 17-57, Anchorage.

For reference, the Annual Management Report for 2016/2017 Southeast Alaska/Yakutat Golden King Crab Fisheries notes that management for golden king crab stocks is independent of stock assessment work, and instead utilizes the fishery itself to inform management decisions:

> *For the golden king crab fishery in Southeast Alaska, managers rely on fishery observer, harvest ticket, and port sampling data to adjust guideline harvest levels (GHLs). No stock assessment work has been conducted on golden king crab stocks in Southeast Alaska. The life history of golden king crab in Southeast Alaska is poorly understood.*
>
> *Golden king crab stock status is determined and GHLs are set using fish ticket, logbook, dockside sampling, and onboard observer information. GHLs are adjusted based on trends in these data.*

It is also important to note that subsistence fisheries do exist for golden king crab within Prince William Sound, but there is low participation due to high costs associated with fuel, equipment, and effort for relatively little opportunity for harvest. Unfortunately, this lack of participation means that any data from subsistence fishery reporting is an unreliable indicator of the current biomass of king crab stocks.

Anecdotally, fishermen participating in the Tanner crab fishery have reported considerable numbers of king crab both in pots and also as riders on the outside of Tanner pots, though king crab numbers are not required on log sheets and are therefore not enumerated in ADF&G data from the Tanner fishery. It should also be stated that similar anecdotal information in SE Alaska was provided by pot shrimp fishermen, and led to an increase in the GHLs for the SE golden king crab fishery following these observations.

It is our hope to work collaboratively with ADF&G to establish a harvest strategy that is conservative and sustainable, and which provides a renewed economic opportunity for fishermen in Prince William Sound that has been lost for an entire generation.

<u>Proposal 245</u> - SUPPORT
5 AAC 34.210. Fishing seasons for Registration Area E

CDFU Shellfish Division is supportive of this proposal, as it offers a management tool for ADF&G to reopen the fishery in the absence of stock status assessment data. There is currently regulatory language in place in Area A for Commissioner's Permits for exploratory areas, and we would like to see this language extended into Area E, given the significant amount of time that has passed since any data on golden king

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crab stocks was gathered.

Proposal 255 - OPPOSE
5 AAC 35.408. Registration Area H Tanner crab harvest strategy; and 5 AAC 35.410. Fishing Seasons for Registration Area H.

The CDFU Shellfish Division opposes this proposal. The abundance indices in this proposal are *significantly* larger than current regulation, and in many cases, double or more. Stock thresholds for the Kamishak and Barren Islands District are proposed at 4,000,000 legal male Tanner crab, more that 5 times the current regulation requirement of 700,000 legal male Tanner crab. Further, the proposed regulations stipulate that a commercial fishery that has been closed for more than 3 years may only open following two years of trawl survey data. This comes at a time when ADF&G budgets are facing major funding constraints, and we are concerned that this may prevent any commercial crab fisheries from occurring at all in the future should the trawl surveys be eliminated from the ADF&G budget.

This region is adjacent to Prince William Sound, and many of the vessels participating in the small Commissioner's Permit fishery in Prince William Sound are based out of Homer or Seward, as Registration Area H and Registration Area E are adjacent. Some of the highest CPUE in the CP fishery in Area E is in the region directly east of Area H, and it our belief that a viable, small scale fishery could take place within this portion of Area H as well, and create additional economic opportunity for residents in those communities based on small amounts of harvestable surplus and provide access to the crab resource for residents unable to afford the equipment to harvest Tanner crab in noncommercial fisheries. Unfortunately, by increasing the thresholds for Tanner crab in Area H, it is unlikely that a sustainable and conservative small boat fishery may occur in the future for this region.

Thank you again for your time and consideration. Please do not hesitate to reach out with any questions or comments regarding our proposal and comments.

Sincerely,

Chelsea Haisman

Chelsea Haisman
Executive Director

Submitted By
Clay Koplin
Submitted On
2/21/2020 4:55:39 PM
Affiliation
Mayor, City of Cordova

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Clay Koplin, Mayor, Clty of Cordova

Support proposals 244 and 245 and Prince Wllliam Sound Tanner Crab Regulations Change to allow commissioner's premits in the Northern and Hinchenbrook Districts

Summary: Subsistence efforts indicate a harvestable abundance of Tanner and Golden King Crab in Prince William Sound. The eastern and western districts have allowed commissioner's permit fisheries in 2018 and 2019 which indicate good abundance and recruitment of tanner crab, and a high incidence of golden king crab in some ares of these districts. The northern and hinchenbrook districts have been closed by regulation for over 35 years, and efforts to work with the Department of Fish and Game have run into various regulatory barriers, including the limitations on test fisheries which do not allow for large enough samples sizes to adequately characterize the vast expanse of these districts. Subsistence efforts and the limited departmental test data for these two disricts indicate an even stronger population that in the eastern and western districts.

Proposals 244 and 245 both allow the Department to issue commissioner's permits to conduct controlled fisheries for king crab to periodically assess the resource to gather data, while alllowing a limited opportunity for economic beneift to neighboring communities and Alaska seafood markets.

A simple modification of Prince William Sound tanner crab regulations to strike Alaska Statue Title 16, Section 5 AAC 35.310 which prohibits tanner crab fishing in the Northern and Hinchenbrook Districts except by emergency order, and modifying 5 AAC 35.311 to allow commissioner's permits for Tanner crab in Northern and Hinchenbrook districts in addition to the eastern and western districts, allows the Department the flexibility to execute commissioner's permit fisheries if they choose to.

Shellfish fisheries once supported 200-300 winter seafood processing jobs in Cordova alone, and there are indications that crab stocks have recovered strongly. The Department needs legal mechanisms to exercise their repsonsibility to manage for sustainable yield and economic benefit.

I strongly support proposals 244 and 245 for king crab fishing and modifications to tanner crab regulations to allow commissioner's permit fisheries in the Northern and Hinchenbrook districts of Prince William Sound.

Respectfully,

Mayor Clay Koplin

City of Cordova

BERING SEA/ALEUTIAN ISLANDS
CRAB OBSERVER OVERSIGHT TASK FORCE

Date: February 21, 2020

To: Reed Morisky, Chair
Alaska Board of Fisheries

From: Linda Kozak, COOTF Co-Chair

Subject: 2020 Report to the Alaska Board of Fisheries
With Recommendations

The Bering Sea/Aleutian Islands Crab Observer Oversight Task Force (COOTF) was formed by the Alaska Board of Fisheries in 1999 and consists of crab industry stakeholders and representatives. The COOTF is charged with interacting and acting in an advisory capacity to the Department of Fish & Game, as well as report to and be advisory to the Board of Fisheries on issues relating to the state managed BSAI shellfish onboard observer program.

The purpose of the COOTF is to review and recommend specific action for all aspects of the BSAI crab observer program, including the following:

- Funding mechanisms for observers
- Budget and reserve priorities
- ADF&G suggested program receipt requests

The COOTF meets annually with ADF&G to review reports on the previous year's deployment of observers, along with budgeted and actual costs of the program. The COOTF also reviews and comments on department recommendations for deployment and funding for the program through the test fish receipt authority.

The BSAI crab observer program is funded through Legislative approved test-fish funds and federal crab rationalization funds. Each of the BSAI crab fisheries has a percentage of coverage objective which provides the department with necessary information to manage the fishery. In 2019, the department conducted two test fisheries to help fund the observer program, with $650,000 being received from the harvest and sale of Bristol Bay red king crab and $300,000 from the Aleutian Islands golden king crab resource.

Proposal Recommendations

The COOTF supports the department proposals for the shellfish observer program:

#269 - Amend observer trainee permit revocation regulation
#270 - Specify briefing and debriefing requirements
#271 - Specify marine safety requirements for fishing vessels carrying observers
#272 - Amend observer trainee minimum qualifications

COOTF Continuation and Membership Recommendations

1. The members of the COOTF recommend and request consideration by the Alaska Board of Fisheries to approve the continuation of the Task Force.

2. The members further recommend the following individuals be reappointed for a term of three years.

   Lance Farr
   Linda Kozak
   Craig Lowenberg
   Jeff Stephan
   Doug Wells

3. The members recommend the appointment of two new members to join the Task Force with a term of three years. Shown below is a short summary of their background.

   Jamie Goen – Executive Director, Alaska Bering Sea Crabbers
   Since May of 2018, Jamie has worked as Executive Director of the Alaska Bering Sea Crabbers. Her background includes work on crab and halibut boats in Alaska, as well as work with governmental organizations. She previously worked with the International Pacific Halibut Commission, overseeing survey and fisheries data collection programs, as well as a Fishery Policy Analyst with NOAA Fisheries.

Paul Wilkins – Quota Manager, Coastal Villages Region Fund (CVRF)
CVRF has made significant vessel investments into the rationalized BSAI crab fisheries, as well as harvesting and processing quota. Paul has worked with CVRF as quota manager since February 2017. His background includes a B.S. degree in zoology and working as an observer in multiple fisheries, including the crab fisheries in the Bering Sea. Additionally, he worked for the Alaska Fisheries Science Center as an observer debriefer and auditor of groundfish observer data. From 2008-2011, he worked as sole office manager for the Fisheries Monitoring and Analysis Division for NMFS in Dutch Harbor.

The members of the COOTF believe this Task Force has been very successful working in cooperation with the department for the past 21 years and we are grateful for the support and exchange of information provided by the department.

We believe our input and ideas have helped shaped the Bering Sea/Aleutian Islands shellfish observer program into a cost-efficient and effective program which provides valuable information for the management of the crab stocks of the BSAI.

Thank you for reviewing our report and recommendations.

Submitted By
Dan Anderson
Submitted On
2/18/2020 9:56:50 AM
Affiliation

After attending the UCI meeting in it's entirety, I have ran out of interest to return to Anchorage, to further support a proposal I subbmitted (proposal 251).

I participate in this sport fishing activity. While doing this I have seen the many different shapes of pots that are being used. With my knowledge of the tidal influences in the Cook Inlet region coupled with winter wind events and large vessel traffic(draging and/or clipping bouys off pots). My concern is the posibility of ghost pots continueing to capture crab with no way out, hence mortality. The participants in this fishery, that I know, are very passionate about the ability to be allowed to do so. The AC(Homer)membership that I have a seat on, are also very interested having this activity continue long into the future. I feel, I must also add once again to you board members, that having extensively participated in a fishery many miles away from Alaska, I have experienced first hand the perception and results of ghost fishing gear. By supporting this proposal which will cost a participant in this fishing activity something less than 1(one)US dollar, will greatly MINIMIZE the negative inpacts of lost pots in the Cook Inlet and North Coast tanner crab sport fishery. I am hoping that as board members, you finally have the wisdom to do whats really right for this fishery. Lets give this crab stock a little more protection.

Submitted By
Dennis Zadra
Submitted On
2/20/2020 10:20:34 AM
Affiliation

I would like to express my support of Proposals 244 and 245. There has not been a commercial king crab fishery in PWS in 26 years and ADF&G has not done any surveys for 14 years. I have seen very large numbers of golden king crab in my brief subsistence trips and believe it could support a small well regulated commercial fishery. This could greatly help the economies of Cordova, Whittier, Chenega and Tatitlek where the opportunites for wintertime fishing income are extremely limited.

I oppose proposal 255 as it is a radical change from the way this fishery has been previously managed.

Submitted By
Derek Derek Sikes Sikes
Submitted On
2/10/2020 2:37:30 PM
Affiliation

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dssikes@alaska.edu
Address
1962 Yukon Dr., University of Alaska Museum, UAF
Fairbanks, Alaska 99775

I'd like to comment on the proposal prohibiting the use of live Lumbricus earthworms as bait. Alaska is unique in many ways - one of which is how few non-native species we have. Unfortunately, non-native earthworms are now spreading in Alaska, almost entirely as a result of human activity. Some of these worms, like the nightcrawer (Lumbricus), are particularly damaging to our Alaskan forest ecosystems. These worms destroy the organic layer and thus eliminate a great deal of habitat for small organisms, damage the fungal-plant symbioses thus weakening our native plants, and increase the release of carbon that had been trapped in that organic layer. Please help Alaska's ecosystems remain intact and free from damaging non-native species like Lumbricus.

Thanks, Derek Sikes

Submitted By
Dia Kuzmin
Submitted On
2/21/2020 11:55:30 PM
Affiliation

Proposal 257: Open the kodiak district tanner crab fishery December 15, as follows: change the opening date to December 15. Dear chairman Morisky and board of fish members, I wish to amend proposal 257 that I submitted for the following reasons: The status of the federal pacific cod fishery which was almost concurrent with the tanner crab fishery have changed from when I submitted the proposal. Rather than December 15 opening date I wish to amend the opening date to January 25. At this time there is more support for a later opening date of January 25 rather than December 15. Best regards Dia kuzmin

Submitted By
Earl Samuelson sr.
Submitted On
2/20/2020 11:35:10 AM
Affiliation
Napaskiak resident

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Box 6061
Napaskiak , Alaska 99559

Ref: proposal 280. I Earl Samuelson would like to show support for proposal 280. This would enable the users to target other species of fish that are in the river. Also be used as another tool for ADFG. Thank you.

Submitted By
Eric Jordan
Submitted On
2/14/2020 7:00:54 PM
Affiliation
NSRAA Board Troll Representative

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907738-2486
Email
chumtroller@gmail.com
Address
103 Gibson Place
Sitka, Alaska 99835

Board of Fisheries

Statewide Meeting, Anchorage March 2020

Support Proposal 277 with Amended Area for 5 AAC 29.112. Management of Troll Fishery

Dear Chairman Morisky and Board of Fish Members:

I am writing you as a lifelong SE Alaska salmon troller. Starting in the 80's I helped pioneer hatchery chum trolling. It has become a mainstay of my and many others troll businesses. It is conducted in protected waters with excellent tender service and often nearby processing facilities. Thus making it an ideal fishery for the many small trollers in our fleet.

I helped found NSRAA in 1976 -77 and am a long time board member. The Crawfish Inlet chum salmon remote release project was initiated to help trollers with their SE enhanced salmon allocation plan harvest value percentages. Because of the nature of the deep water trench leading into West Crawfish, an extended drought and warm weather leading to decreased snow pack and subsequent reduced run-off into the Crawfish Inlet release site the last two years, a significant portion of the enhanced NSRAA chum run, which shows up in late July and early August, enter the West Crawfish area and stage before either moving through the narrow and shallow Cedar Pass or backing all the way out to stage and eventually migrate through the also shallow and narrow First Narrows-Second Narrows area.

The August coho closure, occurring in early August when these chums are staging in the First Narrows West Crawfish Area, severely reduces the amount of these chums available to trollers when they are both biting well and optimum troll quality. The troll closure and subsequent loss of access to these chums during the closure last year cost the troll fleet tens of thousands of these fish produced primarily for trollers.

Years ago I proposed what became: 5 AAC 29.112. Management of chum salmon troll fishery .

This proposal has worked well in Sitka Sound and been expanded to the Neets Bay area. Since the coho closures are a conservation closure most of the time, a high by-catch of coho or Chinook salmon in the area would be a problem even if trollers were carefully releasing them. Let me assure you, by-catch of Chinook salmon and coho, while practically non-existent in most chum troll fisheries because of the specialized gear that Chinook salmon, in particular, are not likely to bite, is not an issue in West Crawfish. Very few coho and Chinook are in the area during this time of year. Plus, the nature of chum trolling, with its small hooks, slow speed of trolling, and high gear turnover means the very few, if any, coho or Chinook inadvertently hooked, are likely to die.

NSRAA General Manager, Steve Reifenstuhl's letter to you (part of which I have included here) sums up the decision making process that led to the modified boundaries. I have been involved in proposing boundaries and boundary changes for trollers since the 70's. Many of them are in place today like the Sitka Sound Chum Troll Fishery management plan, and enhanced Chinook spring troll fishery areas. I try to keep the proposed lines simple, enforceable, facilitate the nature of trolling, and most importantly, achieve the purpose of the boundary. The original proposed line at the mouth of West Crawfish meets the first two criteria: enforceable and simple, but does not meet the last two, particularly given the nature of chum trolling and the behavior of chums in this area.

Chum trollers often separate their gear by pulling float bags well astern of their boats. They also commonly fish 20-40 leaders a line one fathom apart while trolling 1-1.5 knots. Thus, turning sharply in a short distance can lead to tangles and congestion as maneuvering at that speed with all that gear is challenging even without the current and common breeze blowing into the inlet. Plus, the originally proposed line in the entrance to West Crawfish cuts off a good part of a commonly observed milling area of these chums off the mouth of West Crawfish and to the North of First Narrows as they stage to move into West Crawfish and through First Narrows toward Crawfish Inlet. The proposed amended line moves the North West line into the shallows where chum trollers are not likely to be fishing the line and moves the South West line into an area where there is plenty of room and water to easily make turns without tangling. So, the modified boundary achieves all four boundary line goals. Simple, enforceable, facilitates the nature of "chum" trolling, and better achieves the purpose of this proposal.

Trollers have worked hard with ADF&G, Enforcement, and other gear groups to make this amended proposal the best possible solution. We have achieved support from SE gear groups, NSRAA, the JRPT, and many others. Please adopt this amended proposal.

Sincerely,

Eric Jordan,

F/V I Gotta

chumtroller@gmail.com

From Steve Reifenstuhl: Thank you for approving the October BOF Work Session ACR 1 to be considered as Proposal 277 at the March 2020 BOF Statewide Meeting. Subsequent to the Board adopting ACR 1 in October, NSRAA hosted a workgroup with the ADF&G Area Management biologist, the S.E. Troll Biologist, Alaska Wildlife Troopers, Alaska Trollers Association (ATA), NSRAA troll representatives, and NSRAA management to review Crawfish Inlet harvest data by time and area, stock composition, and fishermen harvest observations. The general consensus of the workgroup was to support modified and extended boundaries to those presented in ACR 1 (see page 2 below). The proposed terminal fishery boundaries are specific only for the ADF&G coho closure period.

Background to the boundary modification: The boundary extension presented here on page 3 would allow Trollers to harvest chum salmon in or near the chum salmon Crawfish terminal harvest area; this is identical in concept to the Sitka Sound/Eastern Channel area which has been open to chum trolling during an August coho closure for the past two decades (5AAC 29.112 (a)(1)). The department does not have conservation concerns for coho or chinook in the proposed area during the August period which is based on demonstrated low interception of wild Chinook and coho during this period and area. The proposed expanded area would allow troll vessels, sometimes as many as 80 boats, to more easily execute the 180 degree turn-around that is necessary to navigate back up West Crawfish Inlet. The extended boundary lines would also be more easily adhered to by fishermen and enforceable than the lines in Proposal 277.

Southeast fishing groups – SEAS, USAG, and ATA, and the Southeast Joint Regional Planning Team support this proposal

A simple addition to the regulation that applies only during ‘coho closures’ will rectify this situation in 2020:

5 AAC 29.112. Management of chum salmon troll fishery

(a) The commissioner may open, by emergency order, a hatchery chum salmon troll fishery only during the summer coho salmon troll fishery closures specified in 5 AAC 29.110 (b)(2).

(b) If the commissioner opens a season under (a) of this section, chum salmon fishing will occur only

(1) in the waters of Sitka Sound and the Eastern Channel east of a line from Vitskari Rock Light to Inner Point, south of a line from Inner Point to Black Rock at 57_ 03.12' N. lat., 135_ 25.63' W. long., to Signal Island Light at 57_ 02.78' N. lat., 135_ 23.58' W. long., and north of a line from Cape Burunof at 56_ 59.03' N. lat., 135_ 23.23' W. long., to Kulichkof Rock at 56_ 59.52' N. lat., 135_ 26.62' W. long., to Vitskari Rock Light;

(2) in the waters of Neets Bay east of the longitude of Chin Point to the longitude of the easternmost tip of Bug Island; and

(3) in the portions of Crawfish Inlet east of 135_ 11.05' W. long.; in waters of the Crawfish Inlet Terminal Harvest Area south of 56°47.14' N. lat. in Cedar Pass, northeast of a line from 56°43.83' N. lat., 135°16.13' W. long. to 56°43.49' N. lat., 135°15.50' W. long. in Middle Channel, and north of a line from 56°43.01' N. lat., 135°12.93' W. long. to 56°43.25' N. lat., 135°12.18' W. long. in Walker Channel; and as determined by the department for conservation management reasons.

(4) in the portions of West Crawfish Inlet, sub-district 113-32; as determined by the department for conservation management reasons. in waters of West Crawfish Inlet and Windy Passage, southeast of a line from 56°47.11' N. lat., 135°18.87' W. long. to 56°46.89' N. lat., 135°19.92' W. long., northeast of a line from 56°45.80' N. lat., 135°20.06' W. long. to 56°45.30' N. lat., 135°17.64' W. long., and northwest of a line from 56°42.32' N. lat., 135°16.99' W. long. to 56°45.36' N. lat., 135°16.89' W. long. in first narrows.

Submitted By
Ezekiel Brown
Submitted On
2/20/2020 9:39:57 PM
Affiliation

Chairman Morisky and Members of the Board of Fisheries,

I am a resident of Cordova Alaska and a Commercial fisherman in Prince William sound. I am unable to attend this meeting as I am currently participating in the Prince William sound Tanner crab fishery.

I support proposals 244 and 245.

Ask anyone who has dropped a king crab pot in Prince William sound, it is a travesty that we are not fishing on this healthy population and thereby letting it go to waste.

The king crab regulations in Prince William sound, Specifically 5AAC 34.210, have kept the fishery closed for my entire life. With no funding for stock assessment there is no way for the department to ever develop a harvest strategy and this regulation will effectively continue to close the fishery forever. I hope the board will use this opportunity to change the PWS king crab regulations to more closely resemble Yakutat or southeast's regulations.

The 30 year+ closure of all crab fisheries in PWS should be a lessen that stock assessment needs to be done with small scale commercial fisheries. ADFG stock assessments are rarely funded and when they are are much to small of a scale to determine crab population. Test fisheries like the one in 2016 and 2020 are awarded to the lowest bidder and too small of scale to be of use. To have any idea of what the crab population actually looks like you need to allow a small scale fishery to take place. Nobody at ADFG had any idea the commissioners permit fishery in western PWS was going to be so successful. Imagine how much opportunity is going unclaimed all over PWS due to overly restrictive management and lack of real data.

I see no long term damage that can be done by allowing occasional small scale fishery's to occur to asses populations but my community has experienced 30 years of unnecessary hardship by not having them.

I oppose proposal 255:

The increases in required abundance indices to have a fishery in this regulation are extreme and unwarranted and will result in a permanent closure of yet another fishery.

Thank you for your time,

Ezekiel Brown

Submitted By
Gary Cline
Submitted On
2/21/2020 11:39:35 PM
Affiliation

Phone
9078432811
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cline.bristolbay@gmail.com
Address
PO Box 837
Dillingham, Alaska 99576

Dear Alaska Board of Fisheries Members,

I support proposal 279 to allow two Bristol Bay drift gillnet CFEC permit holders to fish concurrently from the same vessel and jointly operate 200 fathoms of drift gillnet gear when the Naknek River Special Harvest Area is open. Mainly for the reasons posted below.

I purchased a drift permit in 2018 with the plan to "D" up with another vessel, because I did not have enough funds to purchase a vessel within the same year. This allowed me to receive an extra crew share by bringing the extra 50 fathoms of gear on board the boat. Originally, I was planning to save money to purchase a vessel within the next three years from the extra crew share. However, when ADF&G pulled the "D" permit configuration from the Nushagak district because they moved the fishers into the Nakanek River Special Harvest Area, it altered my financial planning.

Whole-heartedly, I did not understand why we had to pull off our extra gear when there was no biological concern for the Nushagak salmon run. When that happened, my "D" share got cut, and I had some serious financial concerns. For instance, how long will this be imposed? Will I be able to make my annual permit payment by September? Because, honestly, I did not know about this regulation, especially when considering the healthy salmon runs we have had for several years. Ultimately, it rushed my financial plans to lease a vessel the next salmon season because I was nervous it would happen again.

Virtually, I believe this regulation negatively impacts those that practice the "D" permit configuration in it's original intent, and I believe this was an error in the regulation when it was adopted. Currently, I am in the market to purchase a vessel and will be operating a single permit boat. So, the decision made on this issue may not have a substantial impact on my livelihood. Mainly, because I am not concerned about a large influx of boats migrating from different districts to the Nushagak, since the majority of boats have been fishing in the Nushagak. But, more importantly, I would feel bad if I remained silent on how the "D" permit configuration has helped me or could help others access the fishery in the future.

Thank you for your time and consideration,

Gary Cline

Febuary 15 2020

TO: BOARD OF FISH
FROM: GUST TUNGUING JR.

I would like to support Proposal 279 to remove the elimination of D permits in the Nushagak salmon fishing district when Naknek fishing district goes to the Naknek inriver area. We live in Koliganek Ak., and have utilized the D permits in the Nushagak for over 6 years. When my son got a drift permit, the first couple years, he fished with me on my boat to make his permit payments with his permit, giving us a D permit with 200 fathoms. He eventually got his own boat, and I have been fishing with an extra permit on my boat with another of my sons, who has been getting an emergency transfer permit lease. My daughter, who is 18 years old and has been fishing with us, is applying to buy a drift permit, and she will also fish on my boat as a D permit holder. This will help us make more money to make the permit payment, and payoff the permit. She also hopes to eventually learn enough to get her own boat like my son.

I do not think there is any biological justification to reduce gear in the Nushagak when Naknek goes to the special harvest area, and having a D permit has been a real benefit to me and my kids. I am a lifelong commercial salmon fisher living in a small Bristol Bay village. I am 53 years old, and have been fishing since I was 5 years old. Both me and my kids live and plan on living in Koliganek, and the D permit has helped make us enough money to sustain our village lifestyle. Without a biological justification, I do not want to see the D permit eliminated when Naknek goes to the Special Harvest Area.

Thank You

Gust Tunguing Jr.

Gust Tunguing Jr.
Box 5040
Koliganek Alaska 99576

Febuary 12, 2020

TO: ALASKA BOARD OF FISH
RE: PROPOSAL 279

I support passing proposal 279 which would leave D permits open to fish in the Nushagak salmon district when Naknek/Kvijak goes to the special harvest area. There is no biological basis for closing D permits in the Nush when Naknek/Kvijak goes to the restricted area of fishing. This is a poor precident to require altering fishing oportunity in one district when another district is having escapement problems, unless there is some biological concern. There is not any proof that the Nushagak district intercepts Naknek fish, so why should the Nushagak have restrictions when Naknek does.

Please support this proposal, 279, and disentangle the two fishing districts, if there is no biological concern.

Jerry Liboff, Bristol Bay drift fisher
Box 646
Dillingham Alaska

Submitted By
Katherine Schake
Submitted On
2/13/2020 3:53:41 PM
Affiliation
Homer Soil and Water Conservation District

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432 E Pioneer Ave, Ste C
Homer, Alaska 99603

As a professional working in the invasive species field and a concerned citizen, I am submitting comments on **Proposal 281 prohibiting fishing in fresh water with live earthworms in the genus *Lumbricus.*** At first glance, earthworms may seem to pose little threat, however for species in the genus *Lumbricus* we know that these worms drastically change the soil and plant communities where they have been introduced. This threatens the natural riparian vegetation, soil composition, and insect communities that our salmon depend upon along the streambanks in which they live.

At this point in time the *Lumbricus* worms have been found in established populations only at boat launch areas; they are introduced due to their use as live bait for fishing. There are over 5 location sites throughout the Kenai Peninsula and several sites within the Mat-Su Valley where they have been found, and at every site they have drastically altered the composition of leaf litter and soil. Once they are established, there is nothing we can do to get rid of these pests. The best thing we can do is prevent them from being introduced in the first place. Why not prevent a salmon habitat threat before it becomes a problem?

There are several other worm species that can be used as live bait that are not harmful to the wild Alaskan environment that we all value. Please support this ban on the use of Lumbricus worms as live bait.

Best,

Katherine Schake, *Invasive Plant Coordinator for Kenai Peninsula Cooperative Weed Management Area; and Natural Resource Specialist with Homer Soil & Water Conservation District.*

KAWERAK, INC.

REPRESENTING
Brevig Mission
Sitaisaq
Council
Diomede
Iŋaliq
Elim
Niviarcaurluq
Gambell
Sivuqaq
Golovin
Chinik
King Island
Ugiuvak
Koyuk
Kuuyuk
Mary's Igloo
Qawiaraq
Nome Eskimo
Sitnasuak Inuit
Savoonga
Sivungaq
Shaktoolik
Saktuliq
Shishmaref
Qikiqtaq
Solomon
Aŋuutaq
St. Michael
Taciq
Stebbins
Tapraq
Teller
Tala
Unalakleet
Uŋalaqliq
Wales
Kiŋigin
White Mountain
Iġałuik /
Nutchirviq

February 20, 2020

Alaska Department of Fish and Game
Board of Fish
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Marisky and Board of Fish Members,

Kawerak is in support of closing the Norton Sound King Crab Commercial Fishery starting this season until crab stocks have recovered enough to merit a commercial crab fishery. Kawerak's role in the Norton Sound is to advocate for subsistence issues such as catching king crab for our subsistence practices.

Recent efforts by subsistence crabbers to catch king crab here in Norton Sound have not been met. When there is sufficient shorefast ice both in thickness and distance from shore we place crab pots through the ice to catch king crab. Reports from subsistence crabbers this winter have been that crabbing is very slow to non-existent. Most of the subsistence crabbers are pulling their pots out because the time and work involved in checking a pot without catching crabs is very disheartening.

The ADF&G Norton Sound Commercial King Crab fishery had to shut down due to poor catching reports in the summer of 2019, which correlates to our experience this winter of 2020. We also read the letter sent from NNSAC Chairman Charlie Lean demanding that there be no commercial king crab fishery until stocks rebound enough to yield a commercial fishery. We fully support the letter and ask that the ADF&G Board of Fish do the same. Thank you for your time and consideration.

KAWERAK, INC.

Sincerely,
Melanie Bahnke, President

Norton Sound Crab Management Petition

To: The Alaska Board of Fisheries and the Commissioner of Fish and Game

Subject: Fishery collapse and reproductive crisis of Norton Sound red king crab

This petition requests a closure of commercial red king crab fisheries in Norton Sound for the 2020 calendar year. Alaska Department of Fish and Game (ADF&G) managers have announced a guideline harvest level of 170,000 pounds based on the maximum Allowable Biological Catch (ABC) adopted by the North Pacific Fishery Management Council (NPFMC). The joint state and federal management of king crab is partitioned to cooperatively agree on fishing rules and policy. This agreement recognizes ADF&G's ability to respond with in-season management and has left the Emergency Order tool by state managers intact for that reason.

In the recent Norton Sound Red King Crab (NSRKC) Assessment findings, the NPFMC bolded the statement, "the SSC is quite concerned about this stock and instead recommends a more conservative 30% buffer resulting in an ABC of 0.201 million pounds for 2020." This caution is backed by the fact that if mature male biomass (MMB) of any crab stock falls below the minimum stock size threshold for two years, a federal rebuilding plan will be instituted. In the case of NSRKC, a 40% decline in MMB from the current level is more probable if a natural mortality is compounded by additional commercial fishery mortality. The triggering of a federal rebuilding plan should be avoided as it would prevent commercial fishing in subsequent years until the estimated NSRKC MMB exceeded B_{MSY}, the level of biomass needed to provide for maximum sustained yield. The biomass would need to increase 25% above the current estimate.

A solid majority of fishery stakeholders (subsistence and commercial) have expressed grave reservations over ADF&G's approach to the 2020 crab fishery. Both a federal and a separate ADF&G trawl survey indicate very low numbers of legal male crab. Both the summer and winter through-the-ice fisheries reached less than half the guideline harvest level set in 2019, and fishery ex-vessel value fell 80% from the 2018 season. However, this decline fails to fully capture the additional impacts to the fish processor and its employees. A quick analysis of 2019 mature female ovigerity data from trawl surveys and commercial fishery observers shows that the proportion of females with egg clutches of 50% or greater fell to a third of the previous six-year average (less than one-fifth of 2018). Perhaps more alarmingly, there was a two- to five-fold increase in the proportion of mature females with egg clutches less than 25% full compared to the previous seven years. In summary, biologists, commercial and subsistence fishers, and the female crab have been unable to find enough mature male crab to meet their needs. Allowing a harvest on those males that remain will further jeopardize the stock's ability to reproduce.

The Norton Sound red king crab fishery experienced a very similar event in the early 1980s. It took nearly 20 years for the stock to recover and support our small-vessel local fishery. This was the same era when red crab fisheries of the Gulf of Alaska collapsed, and Bristol Bay red king crab stock productivity was permanently diminished to a remnant of its historic level. The exploitation rates of that era were perhaps twice the maximum rates of today. The Alaska Board of Fisheries' (board) well-crafted *Policy on King and Tanner Crab Resource Management* is essentially an after-action analysis of

these failed management practices of the 1970s and 1980s. It is with great frustration; we witness the current crab management by the department violate nearly every directive in that policy. Furthermore, it is mystifying and disappointing to hear the buck being passed back to stock assessment modelers and the board when the department clearly has the biological justification and legal framework to respond to the current conservation concern with NSRKC. The Department is required in the Policy to address conservation concerns with in-season Emergency Order closures or fishing reductions. Current issues include: near zero catch per unit effort, inability to capture the Guideline Harvest, late season soft shell crab due to excessively long soak times, depressed reproductive rate, impacted subsistence harvests, high pot loss due to fishing on unstable ice, and broad economic impacts to the businesses supporting fishing. Some of these policy mandates have been violated for several years. Despite public inquires of the management staff over the past year, they have dismissed the urgent concerns conveyed from stakeholders concerning stock decline as short term or inconsequential. Recently, managers announced the intent to essentially allow the commercial fishery to harvest all it can under ABC which the Crab Planning Team and SSC both expressed reservations over.

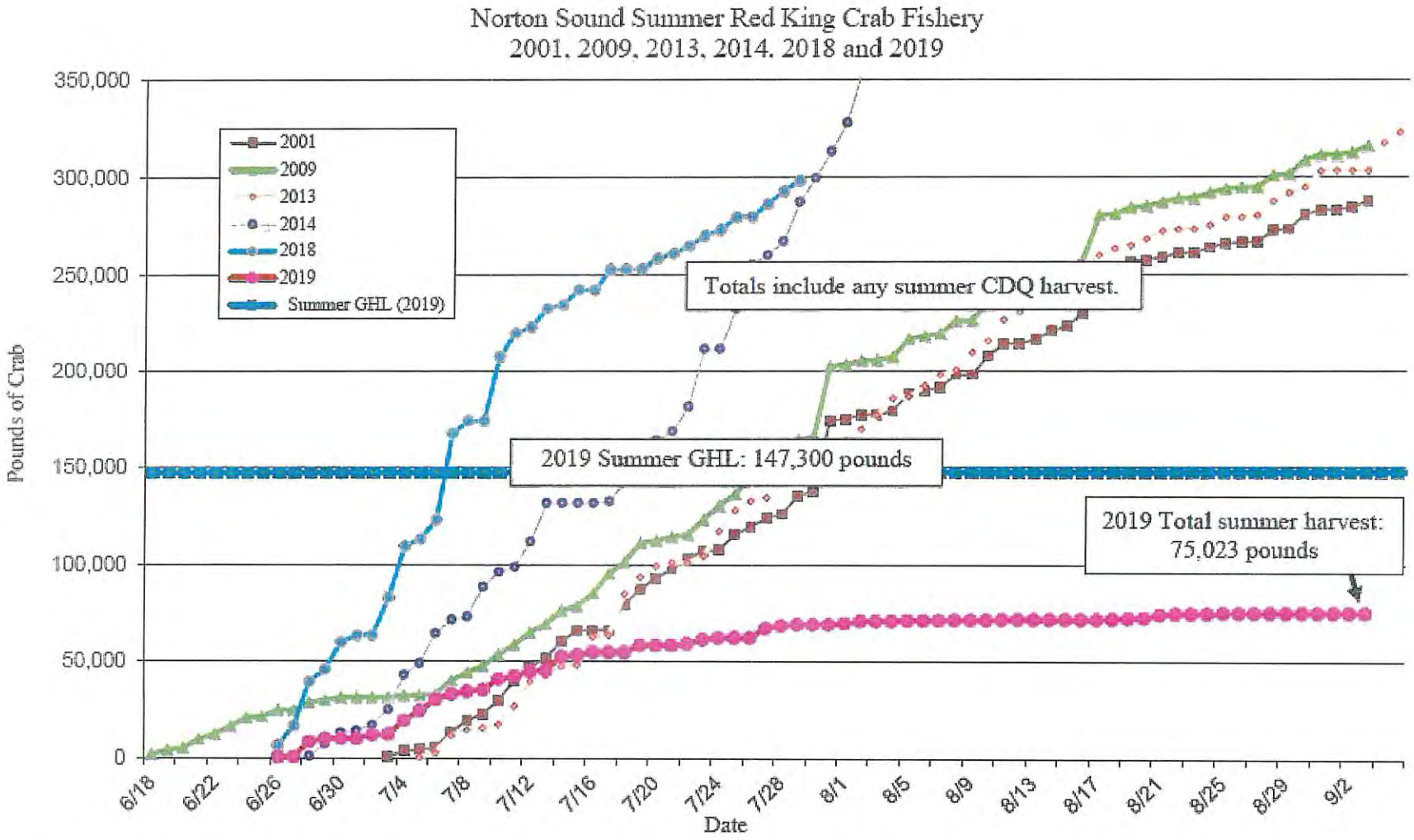
We are finding in our discussions with various stakeholders that there is support for stock assessment model improvements, evaluation of current and alternative harvest policies, of more precise estimates of abundance or biomass, and a more thorough assessment of socio-economic impacts. While all these actions are warranted, they are tangential to the crisis at hand.

The primary issue is the stock has experienced a reproductive failure. If the deficiency in fertilized females is not addressed as quickly and effectively as possible, all the rest is a moot point. Significant recruitment of market-sized legal male crab into the fishery is not expected until at least 2022. Until then, any commercial harvest will exacerbate mature male natural mortality and the low fertilization rates seen in the mature female population. **The board's policy states when continued fishing effort would jeopardize the reproductive viability of king crab stocks or would act in contravention to the goals and policies established by the board, fishing will be closed by Emergency Order.** All sources of information point toward a highly stressed spawning population of red king crab in Norton Sound and it is our contention that the board's policy warrants an emergency closure to avoid inflicting irreparable harm to the reproductive viability of the Norton Sound red king crab stock. The potential long-term risk to the subsistence and commercial fisheries in Norton Sound is unacceptably high and greatly outweighs any short-term economic benefits that could be derived by fishing on the stock in its current state. Should the department issue an Emergency Order to open the commercial fishery in both the summer and winter seasons, we respectfully request that it be quickly reversed and closed to prevent irreversible harm to the stock and the fisheries that it supports.

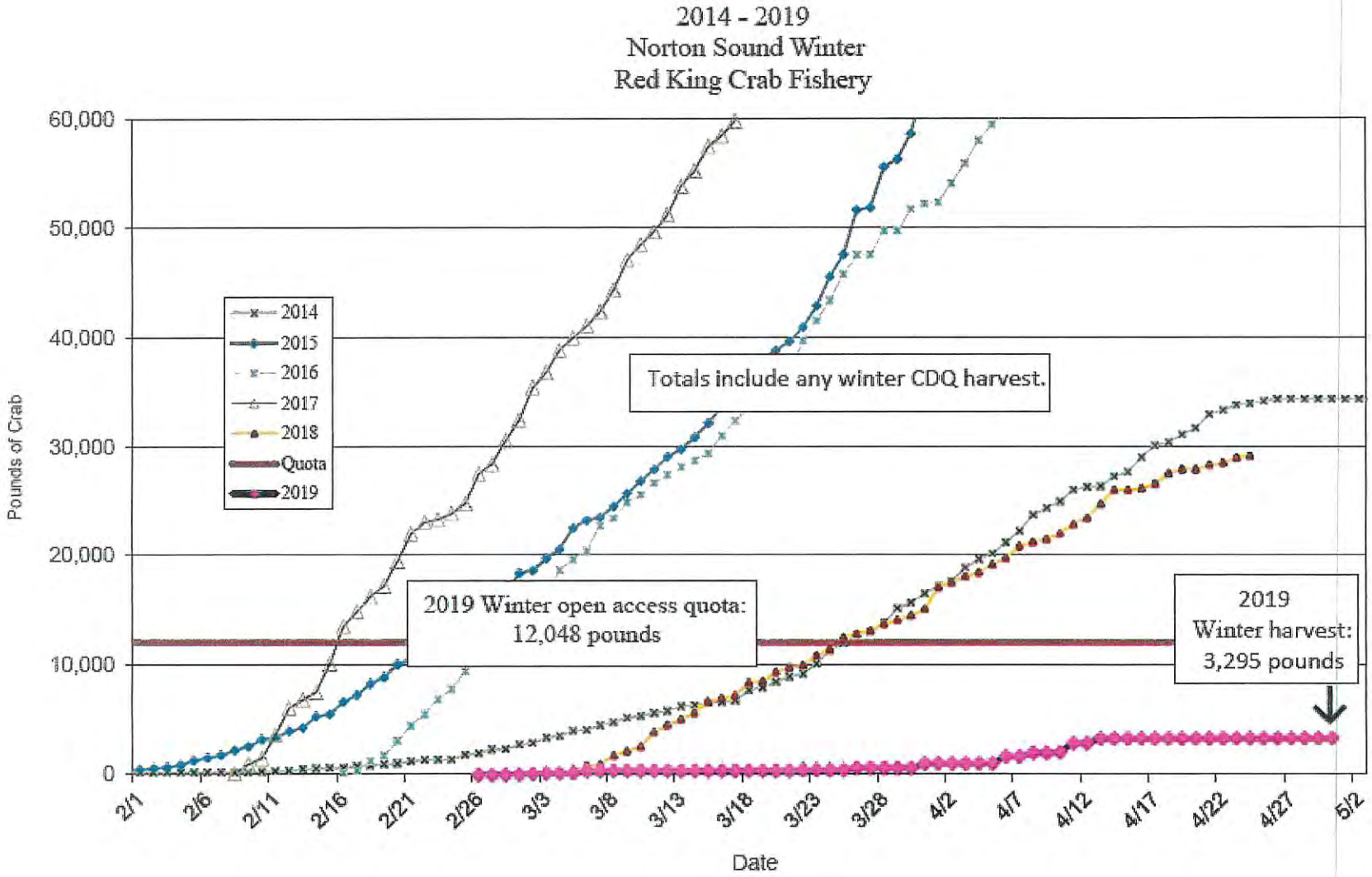
Respectfully,

Charles Lean

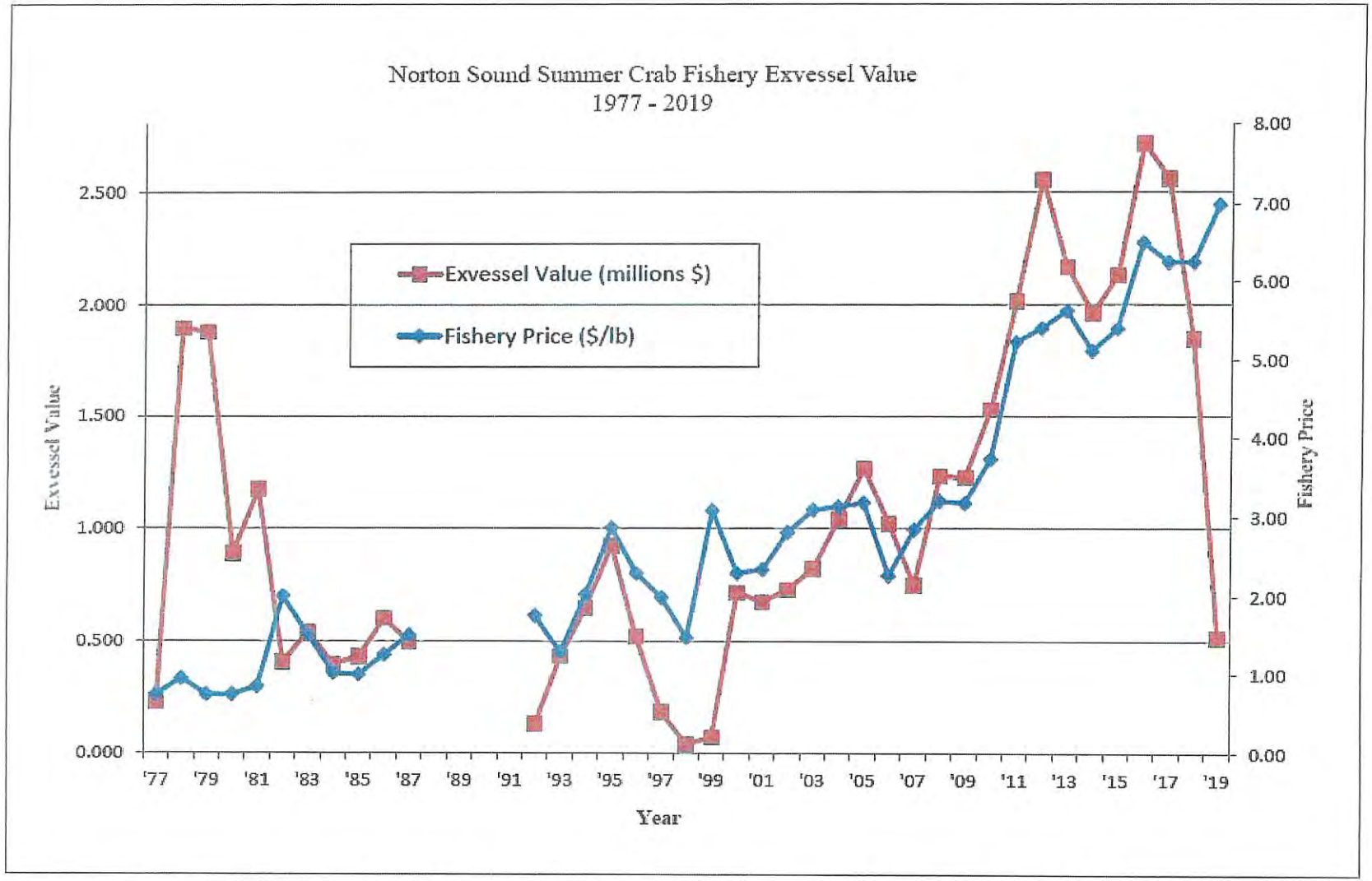
Chairman, Northern Norton Sound Fish and Game Advisory Committee



Taken from "2019 Norton Sound Winter & Summer Commercial Crab Season Summaries" (ADFG)

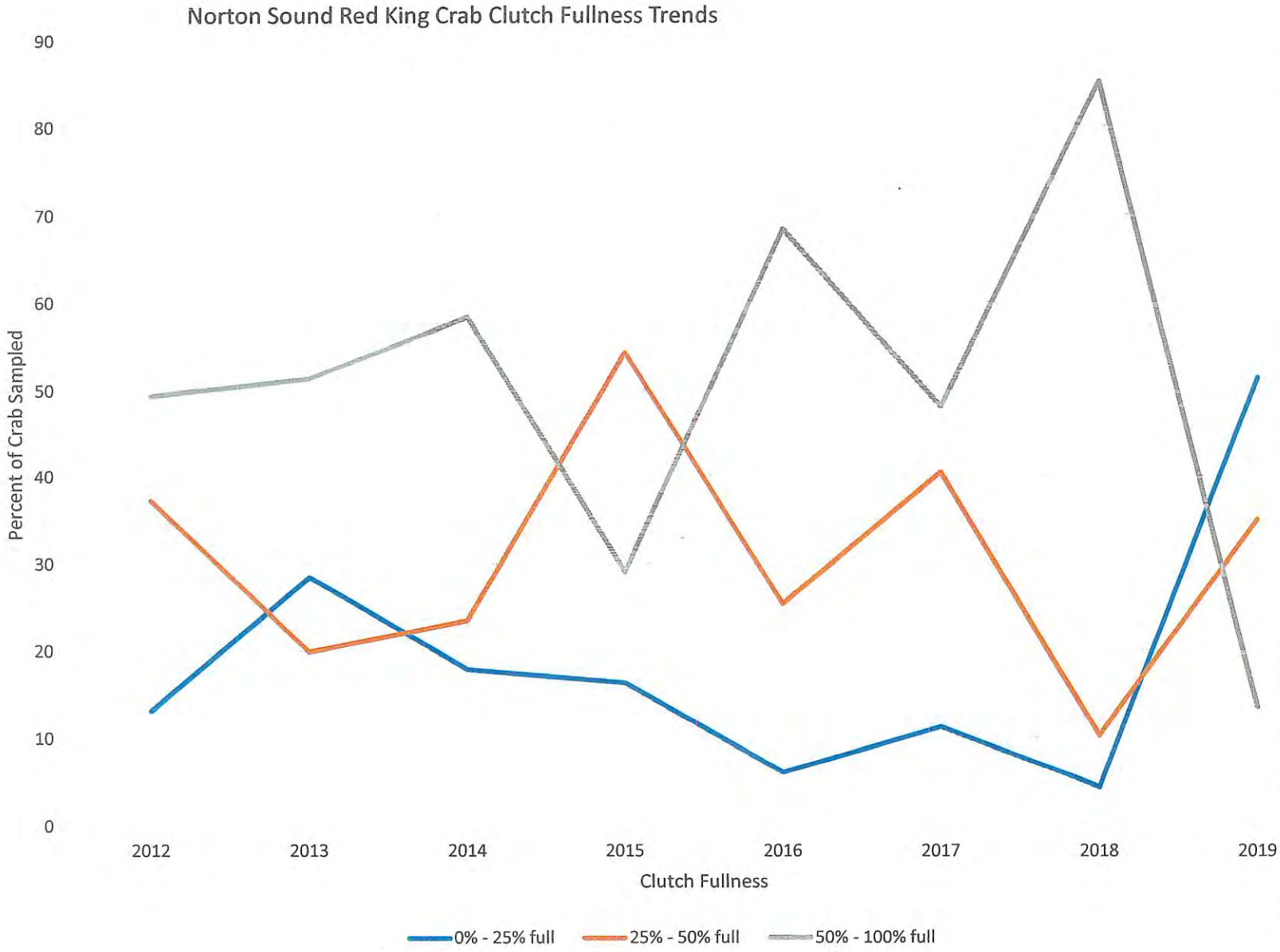


Taken from "2019 Norton Sound Winter & Summer Commercial Crab Season Summaries" (ADFG)



Notes: Pricing information was not available for 1988–1990. No summer commercial fishery occurred in 1991.
Figure 5.–Norton Sound crab exvessel value and fishery price per pound, 1977–2019.

Taken from "2019 Norton Sound Winter & Summer Commercial Crab Season Summaries" (ADFG)


Norton Sound Red King Crab Clutch Fullness Trends
Percent of Crab Sampled
90
80
70
60
50
40
30
20
10
0
2012
2013
2014
2015
2016
2017
2018
2019
Clutch Fullness
0% - 25% full
25% - 50% full
50% - 100% full

Red King Crab (common name)

Paralithodes camtschaticus (scientific name)

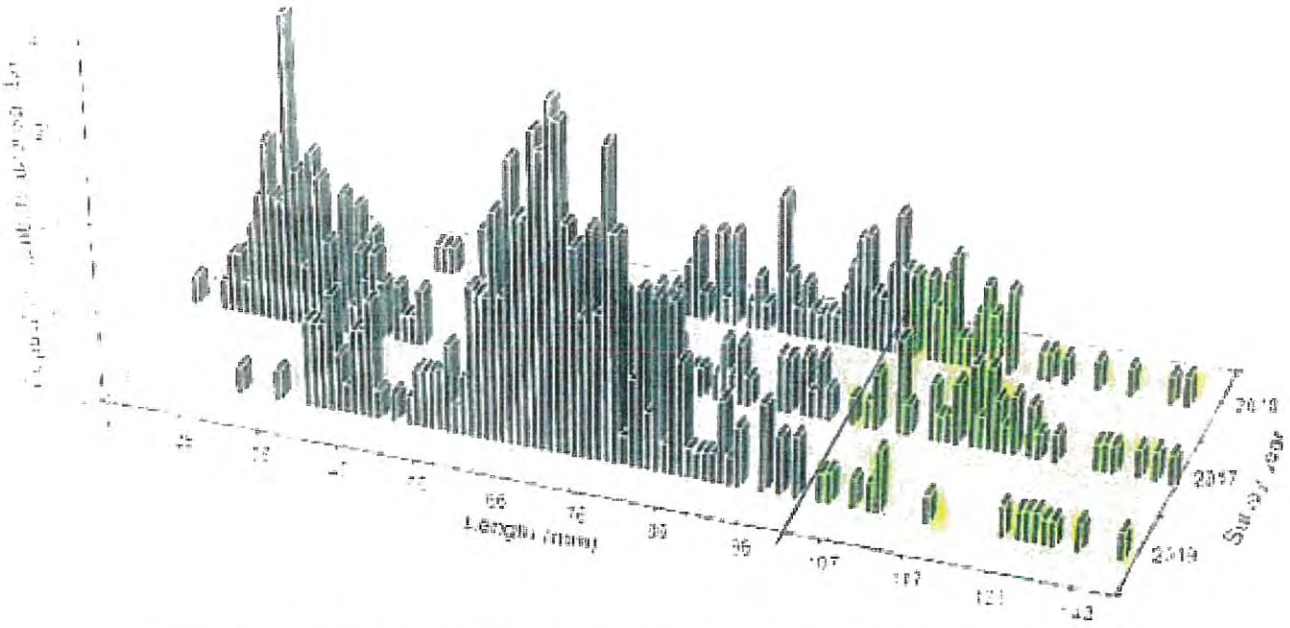


Figure 29. Total abundance-at-size of red king crab in the NBS during 2010, 2017 and 2019.

Taken from "Northern Bering Sea Groundfish and Crab Trawl Survey Highlights" (NOAA)

Modeled crab abundance Feb 01

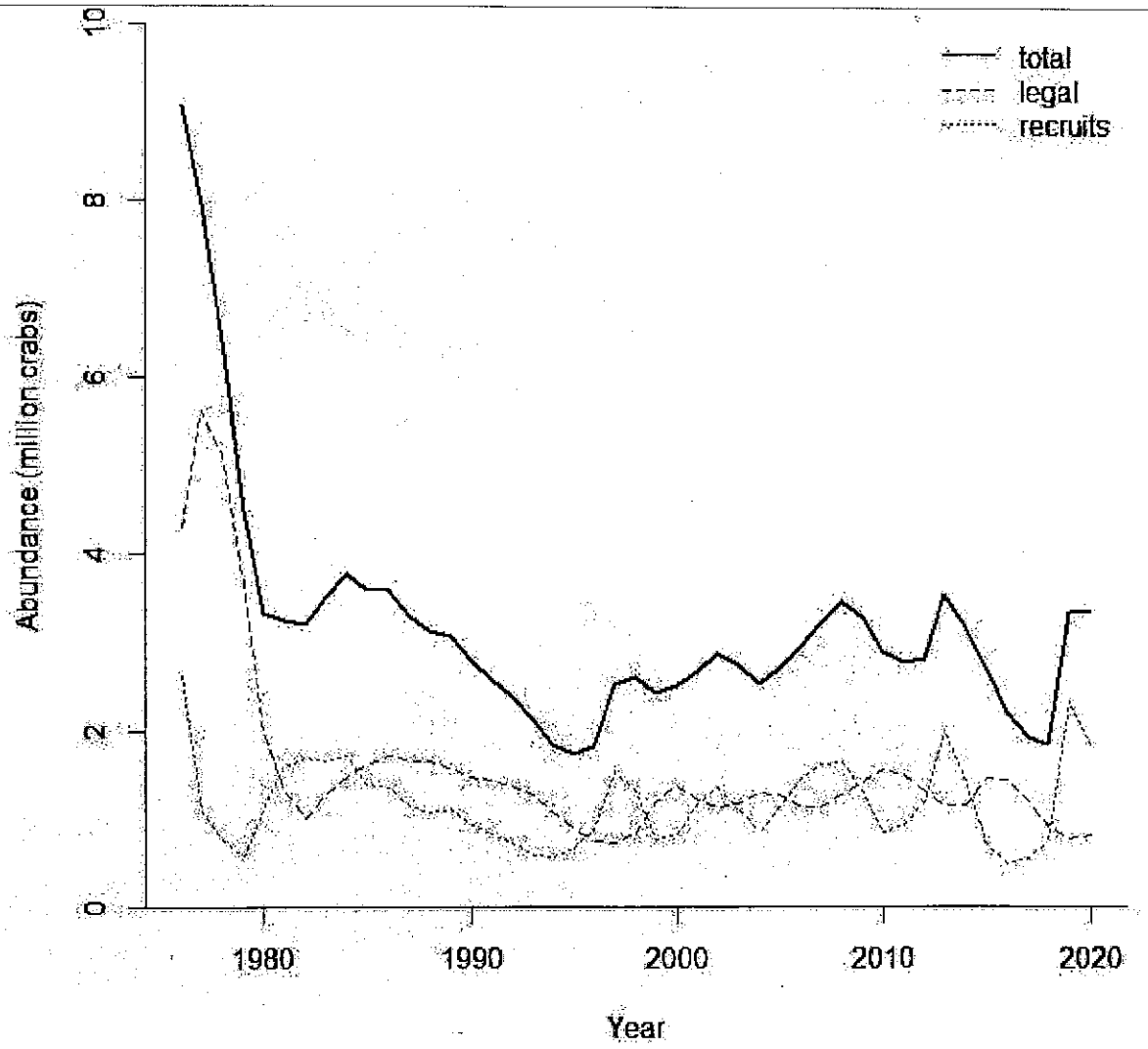


Figure 4. Model estimated abundances of total, legal (CL>104mm) and recruit (CL 64-94nn) males during1976-2019.

Taken from "Norton Sound Red King Crab Stock Assessment for the fishing year 2020" (ADFG)

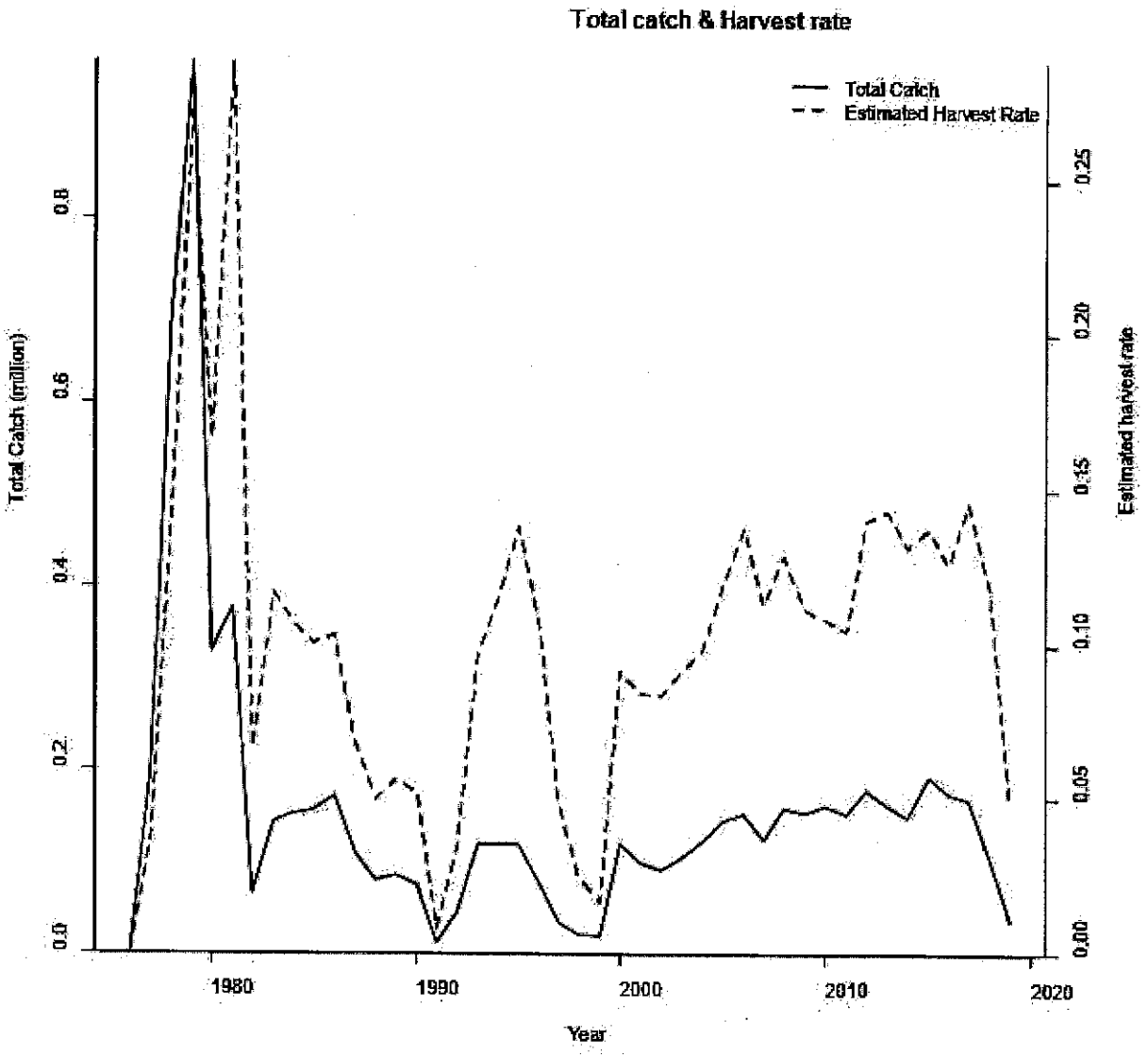


Figure 6. Commercial catch and estimated harvest rates of legal males over time.

Taken from "Norton Sound Red King Crab Stock Assessment for the fishing year 2020" (ADFG)

Linda Kozak – Kozak & Associates, Inc.
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WRITTEN COMMENTS – OPPOSING PROPOSAL #266

These comments reflect the position of the owners and crew of the F/V Alaska Trojan. Owners of the vessel have participated in the Aleutian Islands golden king crab fishery since 1981, when the fishery began. The vessel was deployed to the Western Aleutians in 1985 and has fished there since that time, helping to pioneer this unique fishery.

I am writing in opposition to Proposal #266, which would change the season dates for this fishery. There are a number of practical and biological reasons why a change in season date would be concerning.

- Concentrating the fishing effort in the summer months could increase deadloss from warm water concerns.

- While golden king crab are asynchronous, with mating and molting throughout the year, recent field lab studies have shown there is increased reproductive activity in the spring and summer.

- Market uncertainties have not been considered in this proposal. Traditional markets and promotions during the winter months would be disrupted.

- The proposal would completely change current scheduling and family planning for crew members participating in this lengthy and remote fishery and would result in hardship for those who depend on summer family activities.

- Shipyard and gear work would be more difficult to schedule during the winter months and this could be problematic.

There are also regulatory reasons to oppose this proposal and some are listed below:

- Timing of the stock assessment and model development at the Crab Plan Team would be impacted as the ABC/OFL and model are adopted in May, followed by SSC and Council approval in June.

- The “crab fishing year” is defined in federal regulations and this would need to be fully analyzed by the North Pacific Fishery Management and National Marine Fisheries Service staff prior to consideration for a change.

- Fishing seasons are a Category 2 management measure under the Fishery Management Plan and any change to season dates would need to also be approved by the North Pacific Fishery Management Council.

- If the proposal were adopted, the costs for managing the fishery would increase due to the timing of the fishery that would be significantly outside of the other crab fisheries in the Bering Sea.

Thank you for reviewing our comments and concerns about this proposal. Again, we are opposed to adoption of Proposal #266 for the reasons stated above.

Submitted By
Makena O'Toole
Submitted On
2/21/2020 6:40:03 PM
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CDFU

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My name is Makena O'Toole, I am a PWS commercial fishermen and the current Shellfish Division chair at CDFU. I would like to write in support of proposals 244 and 245. This resource has gone completly un-assessed since 2006. When the fishery was closed in 1988, it was still well within the GHR of 40,000-60,000lbs with a harvest that year of 48,442 lbs brought in by only five boats. I have participated in the PWS Commissioner permit Tanner fishery for the last two years. During that fishery I have seen pots coming up with anywhere from 20-80 king crab in them. I firmly believe that given the opportunity to have a small fishery on these stocks. We will be able to prove that the current stock levels are extremely healthy and able to support commercial opportunity. Stocks in SE are managed solely on commercial catch data. The fishery is the survey. This is how it needs to be in PWS. The Communities of PWS have been denied access to this resource for three decades due to lack of data. We all know that stocks in SE are declining but thats no reason to not asses stocks here. If the department truly believes that the health of the two stocks is tied together then why were we not looking at the stocks in 2013 when SE's fishery was nearly 20 times its current GHL?

I believe a small scale commissioners permit fishery poses no significant biological harm to the resource. With daily reporting, the worst case scenario the department closes the fishery on 24hrs notice. More likely we will find as we have in the Comissioners Permit Tanner fishery, that the current biomass far exceed's ADFG's estimates. Cordova's fishermen have been denied this opportunity for winter time income for decades. Please support these proposals so that any future closures may be based on science and not on presumption. It is simply unacceptable to close any fishery for decades and do nothing to monitor for its recovery. I would like to thank the board for their consideration on this matter. Unfortunately due to the timing of this meeting most of the stake holders will be unable to attend due to participating in the Tanner fishery.

Makena O'Toole

Submitted By
Matt Bowser
Submitted On
2/21/2020 10:39:32 AM
Affiliation

Since the time that proposal 281, which dealt with the use of *Lumbricus* earthworms (including nightcrawlers) as live bait, was initially submitted, a team of researchers led by soil scientist Dr. Kyungsoo Yoo (University of Minnesota) has continued studying (1) how exotic earthworms are being brought to and moved around within Alaska and (2) the consequences of these introductions.

They found more evidence that *Lumbricus* earthworms are being introduced to new areas in Southcentral Alaska by their use as live bait.

Yoo's team presented a poster on their recent work on earthworms in Alaska at the American Geophysical Union Fall Meeting. The paragraph below is a quote from their poster.

Human-mediated introduction of earthworms are ubiquitous throughout the entire Alaska. But the mechanisms vary greatly by regions. ... Recreational fishermen in Fairbanks, Mat-Su Valley, and inland Kenai buy and use nightcrawlers as fishing bait. In the Alaskan Coast, however, instead of earthworms, salmon eggs are the choice of baits. This difference affects the types and extents of earthworm invasion in Alaska.

An article on this team's work in Alaska appeared in Popular Science (URL below).

https://www.popsci.com/story/environment/earthworm-invasion-global-warming/

Their continuing research on the effects of earthworm invasion in Alaska confirms their initial work and is consistent with how non-native earthworms have changed natural systems in other parts of the world. The main consequence is the rapid loss of leaf litter layers, which leads to changes in plant and animal communities. Grasses increase while ferns and other understory plants decrease.

We still know little about how invasion by earthworms will affect fish in Alaska. However, because Dr. Yoo's team found that the changes that earthworms bring about to soils and plant communities of terrestrial systems in Alaska are substantial, we can reasonably predict that the most important consequences for fish will be mostly indirect, having to do with nutrient runoff and changes to the overstory plants over streams.

Most of Alaska is still free of Lumbricus earthworms. When they are introduced to new areas and become established, this change is permanent. There is no approved method to eradicate earthworms. Because moving earthworms to new areas causes irrevocable, substantial changes to habitats in Alaska, I think it is unwise to allow them to be spread to new areas by their use as fishing bait.

Submitted By
Mike Friccero
Submitted On
2/17/2020 11:45:15 AM
Affiliation
F/V Miss Gina

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Regarding Proposal 279 Requierements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay -

As a 40 yr veteran of the Bristol Bay Drift Fishery I support Proposal 279 for the following reasons:

- Gear reduction in the Nushagak when NRSHA is in effect creates unnecessary foregone harvest and overescapement in the Nushagak district
- Run timing and run volume are so different between the Naknek-Kvichak district and the Nushagak that linking these districts together has detrimental effects that were unforeseen when these dual permit guidelines were implemented
- The dual permit operation has become so widely utilized that many permit holders become impacted when the extra net can not be deployed. Many of the entry level and watershed participants are in danger of losing significant income when these gear reduction steps are in force and consideration should be given to avoid unnecessary loss in opportunity
- Many of the permit holders that do not own vessels are severely impacted by the uncertainty that is present under the current regulations. This is an unforeseen and unnecessary consequence that should be corrected.

In summary, over time the use of dual permits has benefitted all stakeholders due to the overall vessel and gear reduction that has resulted from the widespread implementation of the dual permit operations. The management of the Nushagak district does not benefit from the arbitrary gear reduction (present in the current regulation) that this proposal seeks to terminate. Please vote in support of Proposal 279

Respectfully Submitted

Michael Friccero

F/V Miss Gina

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic Atmospheric Administration
National Marine Fisheries Service
P.O. Box 21668
Juneau Alaska 99802-1668

February 21, 2020

Alaska Department of Fish and Game
Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Morisky:

The Alaska Region National Marine Fisheries Service (Alaska Region) wishes to provide the Board of Fisheries (Board) with the following information on two regulatory proposals (263 and 266) for your consideration during the upcoming meeting in Anchorage, Alaska. These proposals would require corresponding federal regulation changes in order to achieve the desired effect. Krista Milani from the Alaska Region will be attending the Board meeting and will be available to answer questions concerning our letter.

Sincerely,

James D. Balsiger, PhD.

Administrator, Alaska Region

Bering Sea and Aleutian Islands Crab Rationalization Fisheries
Joint Management of Crab FMP Species
Alaska Board of Fisheries Meeting – March 8-11, 2020
NMFS Comments (Proposals 263 and 266)

Proposal 263: 5 AAC 35.506. Area J registration.

Conflicting Federal regulations with proposal 263:

- ***Participants would continue to be required to adhere to federal regulation outlined in 50 CFR part 680, which prohibits the retention of Tanner crab without a valid IFQ permit.***
- ***Allowing for deadloss of Tanner crab in regulation would be counter to guidelines outlined in the MSA.***
- ***The desired effect of this proposal will not be achieved without corresponding federal regulatory changes. NMFS recommends coordination with the Council through the Joint Protocol Committee if there is an interest to proceed with this proposal***

Proposal 263 seeks to allow retention of incidental catch of Bering Sea *C. bairdi* Tanner crab while participating in the Bering Sea snow crab (BSS) fishery after the closure of the Bering Sea Tanner (BST) crab fishery. The proposal states that any *C. bairdi* Tanner crab on board the vessel during the time of the landing would be forfeited and would not accrue towards any quota. BSS and BST crab are both CR species and managed in partnership between the State and NMFS. Both agencies have regulations concerning CR crab species. Creating a regulation that allows for incidental catch of a CR species that would not accrue towards a quota without corresponding changes made through the Council process would cause a conflict between State and Federal regulation.

Under federal regulation, all crab is considered a prohibited species and must be discarded at sea with a minimum of harm (50 CFR 679.21) unless operating in a directed crab fishery. Participants with a federal crab vessel permit who are not operating in a Community Development Quota (CDQ) fishery are only allowed to retain CR species if there is a valid IFQ permit with available IFQ (§ 680.6) onboard the vessel. There is further federal regulation that states that all CR crab that is retained, including deadloss, must be weighed and debited from the appropriate IFQ/IPQ account (§ 680.5). It is unclear if the quota the proposal is referring to is the overall TAC set by the State, or IFQ, which is issued by NMFS. Regulations regarding IFQ can only be amended through the Council process. Should the State adopt regulations allowing any CR crab to be landed without accruing towards a quota, CR participants would still need to adhere to these federal regulations unless corresponding regulatory amendments were made through the Council process.

Section 303(a)(11) of the MSA requires FMPs to "include conservation and management measures that, to the extent practicable and in the following priority, (A) minimize bycatch; and (B) minimize the mortality of bycatch which cannot be avoided" (16 U.S.C. 1853(a)(11)). In addition, FMPs must be consistent with ten national standards for fishery conservation and

management. National Standard 9 states that "[c]onservation and management measures shall, to the extent practicable, (A) minimize bycatch and (B) to the extent bycatch cannot be avoided, minimize the mortality of such bycatch" (16 U.S.C. § 1851(a)(9)). Although it is unavoidable that some bycatch species will be retained and go unutilized, a regulation that allows crab bycatch to be retained and brought to the dock as deadloss would be in conflict with the statutory provisions cited above. Allowing deadloss of BST crab at the dock would remove an important and fully utilized resource from the ocean, prevent those animals from spawning and contributing to future biomass, and would not contribute to the overall food resources of the Nation.

The BSS crab total allowable catch (TAC) for the 2019/20 crab year is 34,019,000 lbs. Under Proposal 263 the permissible deadloss of BST crab would be 680,380 lbs at 2%, 1,020,570 lbs at 3%, 1,360,760 lbs at 4%, and 1,700,950 lbs at 5% (Table 1). According to the crab stock assessment and fishery evaluation report (SAFE), the Tanner crab handling mortality rate for at-sea discards in the crab fisheries is 32.1%. It is estimated that the remaining 67.9% of Tanner crab caught in crab pot gear survive and could therefor contribute to the spawning biomass if returned immediately to the sea. In addition, the proposal does not clarify if female and sublegal BST crab deadloss would be permissible.

Table 1. Permissible deadloss of Tanner crab while snow crab fishing under Proposal 263 in pounds.

Crab Year	Snow Crab TAC	Eastern Tanner Crab TAC	Western Tanner Crab TAC	Permissible Tanner Crab Deadloss Under Proposal 263			
				2%	3%	4%	5%
2015/16	40,611,000	11,272,000	8,396,000	812,220	1,218,330	1,624,440	2,030,550
2016/17	21,570,000	Closed	Closed	431,400	647,100	862,800	1,078,500
2017/18	18,961,000	Closed	2,500,200	379,220	568,830	758,440	948,050
2018/19	27,581,000	Closed	2,439,000	551,620	827,430	1,103,240	1,379,050
2019/20	34,019,000	Closed	Closed	680,380	1,020,570	1,360,760	1,700,950

Background on Crab FMP and Rationalization management:

The Fishery Management Plan (FMP) for the commercial king and Tanner crab fisheries in the Bering Sea and Aleutian Islands (BSAI) was established in 1989 and has been amended several times since its implementation. The FMP establishes State of Alaska (State) and Federal cooperative management that delegates crab management to the State with Federal oversight. The FMP states that the State will have responsibility for developing State fishing regulations which must assure consistency with the Magnuson-Stevens Act (MSA), the FMP, and other applicable Federal law.

In April 2005, the Crab Rationalization (CR) program was developed and implemented by the North Pacific Fishery Management Council (the Council) for the following crab fisheries; Bristol Bay red king crab (*Paralithodes camtschaticus*), Western Aleutian Islands golden king crab

(*Lithodes aequispinus*), Eastern Aleutian Islands golden king crab, Western Aleutian Islands red king crab, Pribilof Islands blue king crab (*P. platypus*) and red king crab, St. Matthew Island blue king crab, Bering Sea snow crab (*Chionoecetes opilio*), and Bering Sea Tanner crab (*C. bairdi*). The CR program allocates BSAI crab resources among harvesters, processors, and coastal communities. Individual Fishing Quota (IFQ) and Individual Processing Quota (IPQ) is issued by the National Marine Fisheries Service (NMFS) in accordance with regulations outlined in 50 CFR part 680. In addition, there are many other Federal regulations concerning the CR program which are primary found in 50 CFR part 680.

Proposal 266: 5 AAC 34.610. Fishing seasons for Registration Area O.

Conflicting Federal regulations with proposal 266 and other issues:

- ***Participants would still be required to adhere to deadlines outlined in 50 CFR part 680.***
- ***NMFS would be unable to issue IFQ/IPQ outside of the federal crab year currently defined as July 1 through June 30.***
- ***Because participants would have to adhere to both State and Federal regulation, this proposal would result in an "interrupted" crab year where participants could not begin fishing until IFQ/IPQ was issued (late July or early August) and would have to stop fishing on September 1. On March 1, they could begin fishing again on the same IFQ/IPQ issued in August. They would have to complete fishing sometime in June to ensure reports and applications were submitted before the federal deadlines.***
- ***The desired effect of this proposal will not be achieved without corresponding federal regulatory changes. NMFS recommends coordination with the Council through the Joint Protocol Committee if there is an interest to proceed with this proposal.***

Proposal 266 seeks to change the State's season dates for the Aleutian Islands golden king crab (AIGKC) fisheries from August 1 through April 30 to March 1 through October 31. The AIGKC fishery is part of the CR program and managed in partnership between the State and NMFS. Both agencies have regulations concerning the AIGKC fishery. Changing the season dates of the fishery without corresponding changes made by the Council and implemented by NMFS would cause a conflict between Federal and State regulations. In addition, it would require modifications to several NMFS systems and programs that are used for the CR program.

Federal regulation defines the crab fishing year as the period from July 1 of one calendar year through June 30 of the following calendar year. The crab fishing year is referenced throughout federal regulation to describe the time period for many actions: calculating the crab cost recovery fee liability, the timeframe for which federal permits (IFQ, IPQ, Registered Crab Receiver, and federal crab vessel permits) are valid; the amount of time records must be kept; participation requirements to be eligible to hold IFQ; harvest limitations for vessels that participate outside of a cooperative; arbitration agreements; the effective dates for a Western AIGKC exemption from the west regional delivery requirement; timeframe for the eligible crab community organization (ECCO) annual report; and calculating catcher/processor (CP) ex-vessel value. These reports, applications, and fees apply to all crab fisheries in the CR program, including AIGKC. If the

season dates for the AIGKC fishery were changed in State regulation to March 1 to October 31 it would create conflicts with the crab year in federal regulation.

In addition, there are many dates set in federal regulation indicating the due dates for fee collection, applications, and reports. NMFS' permit database (Alders) is programmed to perform annual IFQ processes which correlates to the federal regulatory definition of a crab year and cannot run successfully if due dates are missed for fee payment, reports, and applications. If these due dates are missed by an individual or company, then they would not be included in the overall IFQ calculation or issued permit pools. These regulations include:

- ***Registered Crab Receiver (RCR) ex vessel value and volume report*** – This report is due by May 31 and is used to calculate the annual cost recovery fee percentage. Invoices are generated and mailed to RCR permit holders and payment is due by July 31. If fees for RCRs are not paid before the annual IFQ process takes place, processor quota share (PQS) cannot be issues. If PQS is not issued for all processors, crab cooperative representatives are unable to correctly determine share matching between IFQ and IPQ.
- ***IFQ/IPQ Permit Applications*** – This application is due June 15. Applications not entered in Alders by the due date are flagged for untimely submission and are not included in the quota share (QS) pool calculation nor can permits be issued unless the flags have been manually removed.
- ***Crab Harvesting Cooperative Application*** – This application is due June 15. Applications not entered in Alders by the due date are flagged for untimely submission and will not be included in the QS pool calculations nor can permits be issued until the flag has been manually removed.
- ***Economic Data Report (EDR)*** – This report is due July 31 and is submitted to Pacific States Marine Fisheries Commission for review. If these have not been submitted by the due date, the annual IFQ process will flag any of the associated permit holders, cooperatives, or processors and prevent them from being included in the QS calculation pool.
- ***Recent Participation Requirements –*** The due date is June 15. Applicants must provide proof of recent participation in the crab fisheries for at least one of the three previous crab years. If this is not provided by June 15, NMFS notifies the individual and provides them with an opportunity to submit it within 30 days. If the applicant wants to join a cooperative but does not provide recent participation proof before the fishery opens, they are excluded from the cooperative QS pool and share matching between IFQ and IPQ will not be correctly calculated.

Regulations regarding the due dates of these permits and applications would need to be amended through the Council process for AIGKC to accommodate new State seasons. Currently fees and reports are based on a culmination of all CR crab fished in the federal crab year. If the definition of the federal crab year were to change for AIGKC only, then NMFS, with help from the Council, would need to determine how AIGKC fees and reports could be collected independently of other CR crab fisheries. NMFS and other interagency staff would also have to determine how to split out their CR costs between the AIGKC and other CR crab fisheries. This could result in NMFS using more CR funds to cover staff time needed to run the process twice.

Alders would also need to be modified to account for the new dates which would require time and resources. In addition, NMFS is required to adhere to the Office of Management and Budget (OMB) guidelines regarding information collection. The OMB must approve any changes to the information collected on the forms, in addition to due dates, before the application or form can be posted and utilized by industry. Adding a separate crab fishing year would likely require a new form which would need to be approved by the OMB. This process can take anywhere from 60 days or more.

Should the State's fishing season change to a timeframe outside of the federal crab year, participants in the AIGKC fishery would still need to adhere to all deadlines currently in federal regulation unless corresponding federal regulatory amendments were made through the Council process. In addition, NMFS would be unable to issue permits outside of the timeframes currently in regulation. If the State's crab fishing dates for AIGKC changed to March 1 to October 31, NMFS would only be able to issue IFQ/IPQ for the federal crab fishing year (July 1 to June 30). Although participants could theoretically fish their IFQ July 1 to October 31 and again from March 1 to June 30 and still be within the federal crab fishing year, this interrupted fishery would likely pose additional problems. Participants would still be required to submit applications and reports in the timeframe currently in regulation. As a result, it is unlikely that NMFS would be able to issue any IFQ/IPQ in time for the fishery to begin on July 1. Likewise, many reports are due towards the end of the crab fishing year which would require all fishing to be completed, thus making it unlikely that participants could fish their IFQ all the way up to June 30. An interrupted crab season would also make it difficult for the stock assessment author to utilize fishing data from the previous crab fishing year to inform the model.

Currently the AIGKC fishing season in State regulation is August 1 through April 30 with an option to open on July 15 based on the State's evaluation of survey and stock assessment. In the 2019/20 crab year, the AIGKC fishery opened on July 15 to facilitate a survey. NMFS struggled to issue IFQ/IPQ in time for the opening of the fishery because numerous processors had not paid their fees as they were not due until July 31. Because some fees were not paid by July 15 (two weeks earlier than outlined in regulation), some permit holders were flagged and not included in the QS calculation pool which caused share matching calculations to be inaccurate. To correctly issue IFQ/IPQ in time for the July 15 season opening, development staff had to modify database tables each time an entity paid their fees which took time and resources. Due to the issues with opening the AIGKC season July 15, it is unlikely that NMFS will be able to issue IFQ permits before August 1 in the future without a regulatory change and modifications being made to Alders.

Background on Crab FMP and Rationalization management:

As discussed in Proposal 263, the FMP establishes State of Alaska (State) and Federal cooperative management that defers crab management to the State with Federal oversight. Individual Fishing Quota (IFQ) and Individual Processing Quota (IPQ) is issued by the National Marine Fisheries Service (NMFS) in accordance with regulations outlined in 50 CFR part 680. In addition, there are many other Federal regulations in 50 CFR part 680 concerning the CR program including fee collections, application deadlines, and reporting.

Submitted By
John C. Whissel
Submitted On
2/21/2020 11:24:11 AM
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Native Village of Eyak

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Proposal 244: SUPPORT

Crab fisheries in Prince William Sound have only recently begun after decades of closure, despite a robust stock existing. Crab surveys in Prince William Sound have been reduced over the years and have now been eliminated, a victim of reduced funding for ADFG and low prioritization because of a lack of commercial use. At their best, these trawl survey underestimated the abundance of harvestable male Tanner crab, and do not adequately estimate king crab. Efforts to fill data gaps in test fisheries have fallen short due to inexperienced captains and restrictive requirements, and have, again focused on Tanner crab.

As a result, limited management data has resulted in continued conservative management, while large stocks of harvestable golden king crab and Tanner crab seem to be present as indicated in subsistence catches and commercial bycatch. However the areas most likely to hold these stocks have not been part of recent Commissioner's Permit crab fisheries, and these areas need to be explored.

While ADFG has been responsive and has been working with Cordovans to develop these fisheries, we have run into regulatory issues that preclude what should be considered some common-sense approaches to re-establishing these fisheries, through no fault of any ADFG staff.

This proposal could establish king crab fisheries in Prince William Sound and gather some abundance data from these areas in a low-risk manner, and at a low cost by utilizing a Catch Per Unit Effort analysis on this harvest. It is important we establish baseline population data on this resource as soon as is possible because Prince William Sound is subject to high levels of Ocean Acidification (OA) compared to neighboring fisheries. According to recent NOAA OA analyses, golden king crab are expected to do well and prosper under increasing OA due to their occupying deeper water that is already coorosive, allowing them to have evolved tolerance to OA. It is likley that Prince Willam Sound will see its golden king crab do very well as OA advances and we should be considering these very reasonable steps now. We urge the board to consider this proposal and allow the expansion of this fishery by establishing a reasonable and sustainable

Proposal 245: SUPPORT

Crab fisheries in Prince William Sound have only recently begun after decades of closure, despite a robust stock existing. Crab surveys in Prince William Sound have been reduced over the years and have now been eliminated, a victim of reduced funding for ADFG and low prioritization because of a lack of commercial use. At their best, these trawl survey underestimated the abundance of harvestable male Tanner crab, and do not adequately estimate king crab. Efforts to fill data gaps in test fisheries have fallen short due to inexperienced captains and restrictive requirements, and have, again focused on Tanner crab.

As a result, limited management data has resulted in continued conservative management, while large stocks of harvestable golden king crab and Tanner crab seem to be present as documented in subsistence catches and commercial bycatch. However the areas most likely to hold these stocks has not been part of recent Commissioner's Permit crab fisheries, and these areas need to be explored.

While ADFG has been responsive and has been working with Cordovans to develop these fisheries, we have run into regulatory issues that preclude what should be considered some common-sense approaches to re-establishing these fisheries, through no fault of any ADFG staff.

This proposal provides a reasonable and limited means of accessing a harvestable surplus of golden king crab in Prince William Sound in a measured and sustainable manner, after giving the area adequate time to recover following a fishery closure. A regulation such as this would prevent the unnecessary extended closure of crab fisheries in the future and we urge the Board of Fish members to vote in support.

NORTHERN *SOUTHEAST REGIONAL AQUACULTURE ASSOCIATION, INC.*

PC27
1 of 3

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February 11, 2020

Board of Fisheries

Statewide Meeting, Anchorage March 7-11 2020

Support Proposal 277 with Amended Area for 5 AAC 29.112. Management of Troll Fishery

Dear Chairman Morisky and Board of Fish Members:

Thank you for approving the October BOF Work Session **ACR 1** to be considered as **Proposal 277** at the March 2020 BOF Statewide Meeting. Subsequent to the Board adopting ACR 1 in October 2019, NSRAA hosted a workgroup with the ADF&G Area Management biologist, the S.E. Troll Biologist, Alaska Wildlife Troopers, Alaska Trollers Association (ATA), NSRAA troll representatives, and NSRAA management to review Crawfish Inlet harvest data by time and area, stock composition, and fishermen harvest observations. The general consensus of the workgroup was to support modified and extended boundaries to those originally presented in ACR 1 (see page 2 below). The proposed terminal fishery boundaries would apply only during the ADF&G coho closure period **(5AAC 29.110(b))**.

Background to the requested modification: The boundary extension presented here on page 3 would allow Trollers to harvest chum salmon in or near the chum salmon Crawfish terminal harvest area; this is identical in concept to the Sitka Sound/Eastern Channel hatchery chum salmon troll fishery area which has been open to chum trolling during an August coho closure for the past two decades (5AAC 29.112 (a)(1)). The department does not have conservation concerns for coho or chinook in the proposed Crawfish Inlets' area during the August timeframe which is based on demonstrated low interception of wild Chinook and coho during this period and area. The proposed expanded area would allow troll vessels, sometimes as many as 80 boats with four 30 fathom lines out, to more easily execute the 180 degree turn-around that is necessary to navigate back up West Crawfish Inlet. The extended boundary lines would be beneficial to fishermen, and are more easily enforceable than the line in Proposal 277.

Southeast fishing groups – SEAS, USAG, and ATA, and the Southeast Joint Regional Planning Team support this proposal.

A simple addition to the regulation that applies only during 'coho closures' will rectify this situation beginning in 2020:

5 AAC 29.112. Management of chum salmon troll fishery

(a) The commissioner may open, by emergency order, a hatchery chum salmon troll fishery only during the summer coho salmon troll fishery closures specified in 5 AAC 29.110 (b)(2).

(b) If the commissioner opens a season under (a) of this section, chum salmon fishing will occur only

(1) in the waters of Sitka Sound and the Eastern Channel east of a line from Vitskari Rock Light to Inner Point, south of a line from Inner Point to Black Rock at 57_ 03.12' N. lat., 135_ 25.63' W. long., to Signal Island Light at 57_ 02.78' N. lat., 135_ 23.58' W. long., and north of a line from Cape Burunof at 56_ 59.03' N. lat., 135_ 23.23' W. long., to Kulichkof Rock at 56_ 59.52' N. lat., 135_ 26.62' W. long., to Vitskari Rock Light;

(2) in the waters of Neets Bay east of the longitude of Chin Point to the longitude of the easternmost tip of Bug Island; ~~and~~

(3) ~~in the portions of Crawfish Inlet east of 135_ 11.05' W. long.;~~ **in waters of the Crawfish Inlet Terminal Harvest Area south of 56°47.14' N. lat. in Cedar Pass, northeast of a line from 56°43.83' N. lat., 135°16.13' W. long. to 56°43.49' N. lat., 135°15.50' W. long. in Middle Channel, and north of a line from 56°43.01' N. lat., 135°12.93' W. long. to 56°43.25' N. lat., 135°12.18' W. long. in Walker Channel;** and ~~as determined by the department for conservation management reasons.~~

(4) ~~in the portions of West Crawfish Inlet, sub-district 113-32; as determined by the department for conservation management reasons.~~ **in waters of West Crawfish Inlet and Windy Passage, southeast of a line from 56°47.11' N. lat., 135°18.87' W. long. to 56°46.89' N. lat., 135°19.92' W. long., northeast of a line from 56°45.80' N. lat., 135°20.06' W. long. to 56°45.30' N. lat., 135°17.64' W. long., and northwest of a line from 56°42.32' N. lat., 135°16.99' W. long. to 56°45.36' N. lat., 135°16.89' W. long. in first narrows.**

Thank you for your attention to this matter.

Respectfully,

Steve Reifenstuhl
General Manager, Northern Southeast Regional Aquaculture Assoc.

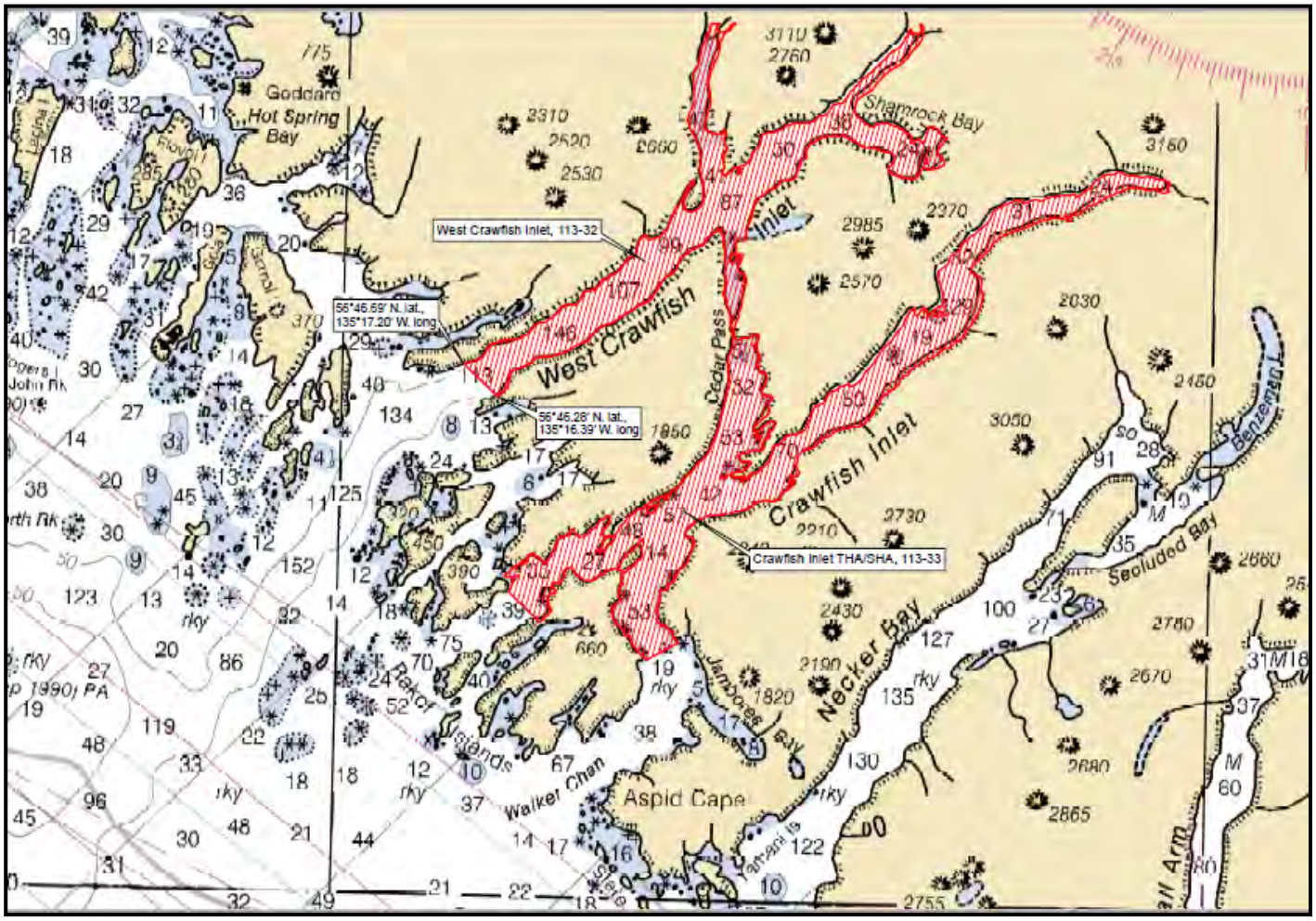

Figure 1. ACR 1 & Proposal 277 Area map for Trolling in Crawfish Inlet Terminal Area during August Coho Closure

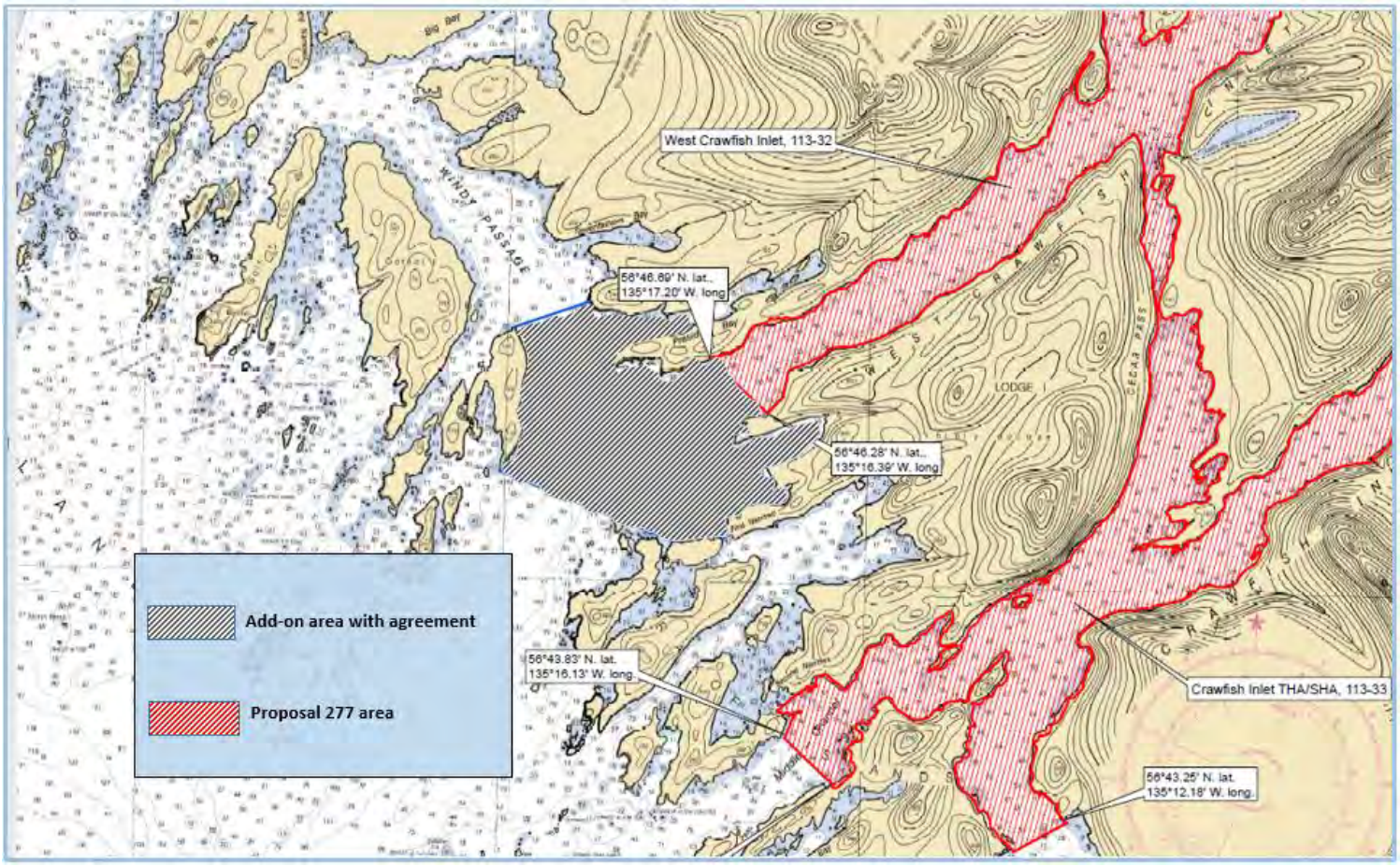

Figure 2. ***Modified Area Boundaries for Proposal 277****: Supported by Fishermen Groups, ADF&G Management, Joint Regional Planning Team, & NSRAA Board. Specific latitude and longitudes for each point of expanded area are included in the regulatory language in the letter above.*

United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE
1011 East Tudor Road
Anchorage, Alaska 99503

In Reply Refer to:
FWS/IR11/OSM 20002.GP

FEB 19 2020

Mr. Reed Morisky, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Morisky:

The Alaska Board of Fisheries (Board) will consider 37 proposals, among other issues, at its Statewide King and Tanner Crab and Supplemental Issues meeting in Anchorage beginning March 7, 2020. We have reviewed the proposals the Board will be considering at this meeting.

The U.S. Fish and Wildlife Service, Office of Subsistence Management, working with other Federal agencies, has developed the enclosed preliminary recommendations for proposal 280 that may have potential impacts on Federal subsistence users and fisheries resources in this area.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with the Board and the Alaska Department of Fish and Game on these issues. Please contact Mr. George Pappas, State Subsistence Liaison, 907-786-3822, with any questions you may have concerning this material.

Sincerely,

Gregory S. Risdahl
acting for:

Thomas Doolittle
Acting Assistant Regional Director

Enclosure

cc: Anthony Christianson, Chair, Federal Subsistence Board
Greg Risdahl, Acting Deputy Assistant Regional Director, Office of Subsistence Management
Suzanne Worker, Acting Subsistence Policy Coordinator, Office of Subsistence Management
Acting Fisheries Division Supervisor, Office of Subsistence Management
Acting Anthropology Division Supervisor, Office of Subsistence Management
Doug Vincent-Lang, Commissioner, Alaska Department of Fish and Game
Glenn Haight, Executive Director, Alaska Board of Fisheries
Ben Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Southcentral Subsistence Regional Advisory Council
Interagency Staff Committee
Administrative Record

OFFICE OF SUBSISTENCE MANAGEMENT RECOMMENDATIONS ON

ALASKA BOARD OF FISHERIES PROPOSALS

for the

STATEWIDE KING AND TANNER CRAB AND SUPPLEMENTAL ISSUES

Alaska Board of Fisheries Meeting

March 7-11, 2020
Anchorage, Alaska

PROPOSAL 280 seeks to allow the use of 6-inch stretch mesh gillnets to harvest salmon other than Chinook Salmon and other non-salmon fish species on the Kuskokwim River for subsistence purposes during times of Chinook Salmon conservation. The proponent additionally requests removing the requirement of nets to be restricted to operation within 100 feet of the ordinary high water mark of the shoreline the net is attached to while fishing.

Current Federal Regulations:

§100.14 Relationship to State procedures and regulations.

(a) State fish and game regulations apply to public lands and such laws are hereby adopted and made a part of the regulations in this part to the extent they are not inconsistent with, or superseded by, the regulations in this part.

§100.27 Subsistence taking of fish.

(4) (ii) For the Kuskokwim area, Federal subsistence fishing schedules, openings, closings, and fishing methods are the same as those issued for the subsistence taking of fish under Alaska Statutes (AS 16.05.060), unless superseded by a Federal Special Action.

(xiv) The maximum depth of gillnets is as follows:

(A) Gillnets with 6-inch or smaller stretched-mesh may not be more than 45 meshes in depth;

(B) Gillnets with greater than 6-inch stretched-mesh may not be more than 35 meshes in depth.

Is a similar issue being addressed by the Federal Subsistence Board? No. If this proposal is adopted, a proposal may be submitted to the Federal Subsistence Board which will be accepting fisheries proposals in spring 2020 for deliberation during its winter 2021 meeting.

Impact to Federal Subsistence users/fisheries: Adopting this proposal may provide Federally qualified subsistence users additional opportunity to harvest fish and salmon other than Chinook Salmon under State fishing regulations. Current Federal subsistence regulations and the authority delegated to the Federal subsistence in-season manager already allow the use of 6-inch stretch mesh. Unlike the State's early season set net placement regulations, the Federal subsistence regulations do not require nets to be attached to shore within 100 feet of ordinary high water mark, although, the Refuge Manager can and has utilized the net placement restriction in 2019. Adopting this proposal may lead to conservation concerns if the larger mesh nets catch Chinook Salmon at an unexpected rate. Adopting this proposal may result in fewer larger and more fecund Chinook Salmon from reaching their respective spawning grounds.

Additionally, adopting this proposal as written will result in similar State and Federal fishery regulations reducing user confusion and enforcement concerns.

Federal Position/Recommended Action: The OSM recommendation is limited to addressing the subsistence fishery. The OSM position on this proposal is to **support** the option to increase the gill net mesh size from 4-inch to 6-inch stretch mesh when warranted. OSM **opposes** the portion of the proposal which would remove the restriction to operate gillnets no more than 100 feet from the ordinary high water mark.

Rationale: Since 2017, the Alaska Department of Fish and Game (ADF&G) has provided two 4-inch set gillnet fishery openings per year during the early season front-end closure. For most of these openings, in-season harvest estimates have not been available; however, in 2018 a very basic harvest estimate was produced for the June 6 opening. During the June 6 fishery opening it was estimated between 60-140 Chinook Salmon and 200–400 nonsalmon species were harvested.

During 2019 the Refuge Manager provided two 6-inch gillnet Federal subsistence fishing openings during the same time as the ADF&G offered 4-inch set gillnet fishery openings. Both the State and Federal fishery openings restricted the use of set gillnets to no more than 100 feet from the ordinary high water mark, even though the maximum gill net mesh size differed between the two fisheries. Inseason harvest estimates were produced for both of these fishing openings, which resulted in a harvest of an estimated 1,000 Chinook Salmon.

Adopting this proposal as written could potentially provide additional opportunity for Federally qualified subsistence users to harvest fish and other than Chinook Salmon species during times of Chinook Salmon conservation concerns early in the season. Maintaining the 100' maximum distance from high water mark for set net placement should reduce incidental and directed catch of Chinook Salmon. Maintaining the maximum distance a set net is operated of no more than 100 feet from the normal high water mark along a river bank prevents users from using gillnets to fish deeper channels of the river where Chinook Salmon typically swim.

Additionally, if ADF&G or the Refuge Manager have conservation concerns for any fish species, both agencies may restrict gillnet mesh size to something less than 6-inch mesh by Emergency Order or Fisheries Special Action authorities.

PACIFIC NORTHWEST CRAB INDUSTRY ADVISORY COMMITTEE (PNCIAC)

Lance Farr, Chair
fffish@hotmail.com

February 21, 2020

Mr. Glenn Haight
Executive Director, Alaska Board of Fisheries
PO Box 115526
Juneau, AK 99811-5526

Re: PNCIAC Recommendations to Board of Fisheries on Proposals 261-272

The Pacific Northwest Crab Industry Advisory Committee (PNCIAC) is the Alaska Board of Fisheries (BOF) and North Pacific Fishery Management Council (NPFMC) designated non-resident industry advisory committee, representing industry participants from Washington and Oregon. It was established in 1990 at the time that the Bering Sea and Aleutian Islands King and Tanner Crab Fishery Management Plan was approved by the Governor of the State of Alaska, followed by the Secretary of Commerce. PNCIAC has balanced representation of harvesters and processors. PNCIAC, since its beginnings, has worked with the BOF, Alaska Department of Fish and Game (ADFG), the National Marine Fisheries Service (NMFS), and the NPFMC. Together, PNCIAC and the agencies have worked together to improve resource management.

Proposal 261 (*New Bairdi Harvest Strategy*)
PNCIAC supports a revised bairdi harvest strategy using the female dimmer option with a lower bound of a 10% exploitation rate on mature male biomass and an upper bound of 20%, with a 50% cap on exploited legal males (ELM, or 5" males) to ensure 5" males are left on the grounds to reproduce. This option is shared between ADFG and the industry Ad-Hoc Bairdi Committee (comprised of harvesters and processors). While there may be other options for industry, including some that could be scientifically justified, this is a shared option among the agency and industry preferences. This option has been vetted through a management strategy evaluation (MSE) process with stakeholder involvement along the way. Industry involved in the MSE process noted appreciation for the transparency and positive working relationship with ADFG and a desire to maintain that.

Through the MSE process and stakeholder involvement, industry has noted they want robust harvesting of exploitable males when warranted while limiting the likelihood of season closures. Many of the options evaluated in the MSE achieve that. In addition, the preferred options from the MSE need to consider the balance between conservation and economic objectives. PNCIAC considered the difference in the floor values of 5% and 10% as explored in the MSE. Ultimately, PNCIAC noted they want to harvest crab when there are more clean shell crab available which are more valuable. PNCIAC thinks the 10% floor would work better for that. PNCIAC briefly discussed the female dimmer option with an upper bound of 22.5%, noting it hits the 50% ELM

cap more often which may be undesirable. The male-only options in the MSE do not consider females in the equation. PNCIAC has heard from ADFG that this would create more uncertainty and likely require additional buffers in the TAC setting, making it an undesirable option.

Proposal 265 (*Update Bering Sea and Aleutian Islands crab registration regulations*)
PNCIAC supports this proposal because it would provide more flexibility.

Proposal 268 (*Allow gear transfers to be authorized by electronic mail*)
PNCIAC supports this proposal, noting it would benefit industry by providing flexibility.

Proposals 269, 272 (*Observers*)
PNCIAC supports these proposals because they would result in better fisheries data used in management by raising qualification standards and making it easier to terminate poor performing observers.

Thank you in advance your consideration.

Regards,

Lance E. Farr
Chair
PNCIAC

Sitka Tribe of Alaska

Tribal Government for Sitka, Alaska

February 20, 2020

Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Sitka Tribe of Alaska Comments on Board of Fisheries Proposal 277

Dear Alaska Board of Fisheries:

Sitka Tribe of Alaska (STA) is the federally recognized tribal government for more than 4,400 enrolled tribal citizens in Sitka, Alaska, organized under the Indian Reorganization Act of 1934 as amended. STA is responsible for the health, safety, welfare, and cultural preservation of its tribal citizens and their use of the Sitka Tribe traditional territory. STA submits the following comments in opposition of proposal 277.

Hatchery chum salmon releases began in Crawfish Inlet in 2015. The 2016 release was almost 28 million chum fry and similar releases occurred in 2017 and 2018. We could not find definitive information on 2019 or planned 2020 releases. Large returns of chum salmon to the general Crawfish Inlet area occurred in 2018 and 2019.

Straying is a major issue for Crawfish Inlet releases. While just over two million Crawfish Inlet chums were harvested in 2019, under half of those fish were harvested in Crawfish Inlet! Approximately 885,000 chums were harvested in West Crawfish Inlet, an area the Alaska Department of Fish & Game states has "significant wild stock production of pink, chum, and coho salmon." An ADF&G chum salmon index stream attests to the area's importance for wild chum production - despite being one of nine index streams in the Northern Southeast Outside subregion, the West Crawfish stream

represents nearly a quarter of the production from those streams. In addition, over 58,000 Crawfish Inlet hatchery chums were harvested in Whale Bay, 84,000 in Deep Inlet and Sitka Sound, and nearly 12,000 chums in southern Southeast Alaska.

While some of these fish may have been harvested while migrating to the Crawfish Inlet area, it is clear that many strayed into wild salmon streams. Surveys in two West Crawfish streams in early September 2019 found well over 90% of the 17,000 fish present were hatchery strays; similar straying was observed in West Crawfish in 2018 as well. Over 60% of the 5,000 chums sampled in late August 2019 in Whale Bay were hatchery strays. The true number of hatchery fish straying into wild salmon streams throughout the region is likely several times (and potentially an order of magnitude) greater.

Spawning habitat is limited, and the later spawning hatchery chums likely dug up and negatively impacted wild pink and chum salmon redds. It is unlikely that the spawn timing of wild and hatchery chums was completely separate. Some wild chums mated with hatchery chums, however this exact number is unknown. ADF&G has long recognized the important implications of straying by hatchery fish, stating in its Genetics Policy that "massive spawning by hatchery strays may jeopardize a wild population by displacement on spawning habitat and superimposition of redds, as well as, genetic influx." It is important to note that Crawfish Inlet was selected as a release site for "its reasonably good-sized terminal harvest area that likely would have minimal impacts on West Crawfish Inlet fisheries or other fisheries." Extensive straying, redd superimposition and potential genetic introgression is not minimal impact and violated the ADF&G Genetic Policy in 2019! Additionally, the first goal of Phase III of the Comprehensive Salmon Enhancement Plan is to "enhance" salmon fisheries "while minimizing the impact of enhancement on wild stocks"; this goal is "paramount and will be given priority."

Hatchery salmon releases in Crawfish Inlet are a new challenge. Another 1.5 million Crawfish Inlet hatchery releases are forecast to be harvested in 2020. Given the extensive straying of the second and third years of returns, the best course of action is to reduce releases to minimize straying and impacts to wild salmon. The Alaska Policy for Management of Sustainable Salmon Fisheries (5 AAC 39.222) states a precautionary

approach requires "… avoidance of potentially irreversible changes" ((5)(A)(i)) and "initiation of any necessary corrective measure without delay" ((5)(A)(iii)).

Fishing pressure in West Crawfish has increased above historic levels. This is a result of hatchery straying and the need to limit the amount of hatchery fish entering stream systems and impacting wild stocks. The proposer indicates that this action will address the harvest imbalance between the trollers and other gear groups. **While this proposal may address that imbalance, it will also have a negative impact on the wild chum stocks within West Crawfish. The increased fishing pressure associated with this proposal will have minimal impact on the vast number of hatchery chums entering the index stream but will have a significant impact on the limited number of wild chum making it back to their natal stream.**

For the reasons listed above, STA reiterates its opposition to proposal 277. If you have any questions regarding these comments, contact Resource Protection Director Jeff Feldpausch at jeff.feldpausch@sitkatribe-nsn.gov or call (907)747-7469.

Sincerely

KathyHope Erickson
Chairman

• 456 Katlian Street • Sitka, Alaska 99835 • Phone: (907) 747- 3207 • Fax: (907) 747- 4915 •

Southeast Alaska Fishermen's Alliance

1008 Fish Creek Rd
Juneau, AK 99801

Email: seafa@gci.net

Phone: 907-586-6652 Cell Phone: 907-465-7666
Fax: 907-523-1168 Website: http://www.seafa.org

February 18, 2020

Board of Fisheries
Mr. Reed Morisky, Chairman
P.O. Box 115526
Juneau, AK 99811-5526

RE: Proposal #277: SUPPORT - Add Crawfish THA and portions of West Crawfish to 5AAC 29.112 (allow chum salmon troll opening during coho closures)

Dear Chairman Morisky and Board of Fish Members,

Southeast Alaska Fishermen's Alliance (SEAFA) supports in Northern Southeast Regional Aquaculture Association's (NSRAA) proposal #277 to allow chum salmon trolling in the Crawfish THA and West Crawfish during coho closures. We supported the adoption of the ACR 1 that generated this proposal at the October work-session. The Crawfish hatchery chum return was recognized as a troll priority project both at the Regional Planning Team (RPT) and at the Northern Southeast Regional Aquaculture Association (NSRAA) board because of the current status of the Southeast Alaska Enhanced Salmon Allocation Plan.

SEAFA supports the modified boundaries as presented NSRAA's comments to this proposal that was the result of a workgroup including ADF&G management staff and Enforcement. During the workgroup meeting the Dept of ADF&G did not have any coho or chinook conservation concerns. The extended boundary line would be beneficial to the trollers, and are more easily enforceable than the line originally proposed in Proposal #277.

SEAFA is a non-profit commercial fishing association representing our 330+ members involved in the salmon, crab, shrimp fisheries of Southeast Alaska and longline fisheries. Within our Southeast salmon division we represent gillnet, troll and seine fisheries.

Sincerely,

Kathy Hansen
Executive Director

P.O. Box 714
Ward Cove, AK 99928
(907) 220-7630
info@seiners.net **www.seiners.net**

Board of Fisheries

Statewide Meeting, Anchorage March 7-11 2020

Support Proposal 277 with Amended Area for 5 AAC 29.112. Management of Troll Fishery

Dear Chairman Morisky and Board of Fish Members:

Southeast Alaska Seiners Association (SEAS) has represented purse seine fishermen in Southern Southeast Alaska for more than 50 years; we supported the original proposal and also support the amended area in the proposal as written.

SEAS, USAG, and ATA, and the Southeast Joint Regional Planning Team all support this proposal. The department does not have conservation concerns for coho or chinook in the proposed Crawfish areas during the August timeframe, and this would allow Trollers to harvest chum salmon in and around the Crawfish terminal harvest area. The extended boundary lines would be beneficial to fishermen, and are more easily enforceable than the lines in the original Proposal 277.

The language submitted under 5 AAC 29.112. simply adds additional area that the Commissioner may open under section(a)-

(a) *The commissioner may open, by emergency order, a hatchery chum salmon troll fishery only during the summer coho salmon troll fishery closures specified in 5 AAC 29.110 (b)(2),* by adding language under sections (3) and (4) to allow for this expanded area.

SEAS' fully supports this proposal, as amended, and would encourage the Board to vote in the affirmative. Thank you for your consideration.

Respectfully,

Susan Doherty
Executive Director SEAS

Stosh Anderson
Box 310
Kodiak AK 99615

8 Feb 2020

Alaska BoF

Re: March 2020 meeting Proposal 279 (ACR 8)

Dear Sir,
I support the adoption of proposal 279.
During the 2018 and 2019 seasons the situation arose that the Department implemented the Naknek River Special Harvest Area (NRSHA) due to conservation issues in the Kvichak. In 2018 fishermen in the Nushagak district that were using 200 fms of gear were reduced to 150 fms. Rivers in the Nushagak had exceeded the upper range of their escapement so the net result was more over escapement and less fish harvested. This occurred at no conservation benefit to the Kvichak River system as fish traveling through the Nushagak will not enter the Kvichak system. It is a misconception that many vessels will move to Nushagak when the NRSHA is in place. In 2019 restriction in the Nushagak were not implemented while NRSHA was implemented. This was the right thing to do even when there wasn't clear authority to do so.
It is not in the interest of fishermen, processors or the State of Alaska to reduce economic opportunity for no conservation benefit in this situation.

I support adoption of proposal 279.

Stosh Anderson

CITY OF UNALASKA
43 Raven Way - P.O. Box 610
Unalaska, Alaska 99685
TEL (907) 581-1251 FAX (907) 581-1417

February 19, 2020

Reed Morisky, Chairmen
State of Alaska Board of Fisheries
Attn Board Support
PO Box 115526
Juneau, Alaska 99802

Subject: Letter of Support for State of Alaska Board of Fisheries Proposal 261

Dear: Reed Morisky, and Members of the State of Alaska Board of Fisheries

I'm writing today in support of Board of Fisheries Proposal 261 on behalf of the City of Unalaska where I serve as their Fisheries Consultant. A short bio on my background, I have been involved in the Bering Sea Crab fisheries for many years. I have worked in Unalaska as seafood plant manager running crab and cod operations for 30 years. I have also served Unalaska as an elected official for 20 years serving as Mayor, City Council Member. I served as the Chairmen of the ADFG Unalaska Fish &Game Advisory Committee for over 20 years and have served on many state and federal fishery related committees.

Proposal 261 5AAC 35.508 Bering Sea District C. *bairdi* Tanner Crab harvest strategy; this proposal was submitted by ADFG is very important to the City of Unalaska. Unalaska depends on the fishery resources of the Bering Sea for are economic wellbeing, the Seafood Industry in Unalaska is our only industry, and all sectors of the community depend on the stainability of the fishery resources of the region. The City of Unalaska believes Proposal 261 will help stabilize the Tanner Crab fishery and hopefully allow for sustainable directed fisheries in both the Eastern and Western districts of the Bering Sea. Proposal 261 would include female Tanner crab in the biomass calculation for the entire stock. This scenario is already taking place in the total biomass calculation for Bristol Bay Red King Crab and C. *opilio* Tanner crab stock (Snow Crab). The purpose of this change is to reduce probability of fishery closures, and allow for the best application of populations estimates, and improve yield, and stability for stakeholders of which Unalaska as the nation's #1 commercial fishing port would certainly be included.

In Unalaska estimation this proposal should be supported by the Board of I believe this proposal would lead to a more stable fishery for all stakeholders involved. I would also like to point out that the Unalaska Fish and Game Advisory committee supported proposal 261 unanimously at their meeting in early February. Unalaska also supports the comments of the Ad-Hoc BSAI *bairdi* Tanner Industry Committee. The committee laid out their preferred Tanner harvest policy preferences, of which Unalaska supports, and I hope the Board of Fisheries will include in the new harvest strategy for Bering Sea Tanner Crab fishery.

In Closing, we urge the Board of Fisheries to adopt Proposal 261 we be believe this will proposal will help stabilize the Tanner Crab fishery and allow for sustainable directed fisheries in both the Eastern and Western districts in the Bering Sea, which will benefit all stakeholders harvesters, processors, and communities of the region.

Sincerely

Frank Kelty
City of Unalaska

CC: City Manager Erin Reinders
Mayor Vincent Tutiakoff
Unalaska City Council Members