My Name is Ezekiel Brown, I am a lifelong cordova resident and a first generation fisherman. I currently commercially seine for salmon and shrimp trawl in PWS. In the past I have participated in the PWS tanner crab commissioners permit fishery and Drift gillnetting.

I would like to talk to you about Tanner crab, specifically in opposition of proposal 75 and in support of proposal 69.

The reliance on trawl surveys by the department is simply bad science. I have participated in the commissioners permit fishery for tanner crab and I also trawl for shrimp in Prince william sound and I know I can't get my trawl to the spots where the tanner crab are. If Trawls worked to harvest crab, commercial fishermen would use trawls instead we use pots.

In adfg's proposed harvest strategy you saw they have set a harvest level using historic abundance estimates based on harvest in pots by the commercial fishery from 1977–1988 and trawl survey data from 1990–2015. How can you compare these two abundance estimates when there is no overlap? There was never a commercial fishery at the same time as a trawl survey until the last few years commissioners permit fishery but the department does not proof their trawl survey against this commercial harvest.

If you look at this data that we now have from the commissioners permit fishery and compare it to the trawl survey proposed by adfg and conducted last year you'll see the trawl survey is obviously flawed.

You saw in the department's report that the area 3 trawl survey in 2021 resulted in an estimate of 6,242 historic legal crab. We just went out and fished that area for the last four years in the commissioners permit fishery and caught an average of 33,642 crab a year. So either we caught all the crab in a couple weeks with 8 boats or this assessment is completely inaccurate

The department's trawl survey information was proven completely inaccurate when the board adopted language in 2017 allowing for a commissioner's permit fishery in parts of pws. The department has responded to this by simply expanding the same failed method of trawl surveying to these areas and is asking you to close down this successful commissioners permit fishery. Instead what needs to be done is expand the commissioners permit fishery to encompass all of pws so that we can go see what is actually out there and develop a harvest strategy that will result in the possibility of a fishery.

The department has made the argument that commissioners' permits should only be used for new and experimental fisheries. Which I would argue this is. Much has changed since the historic fishery in the 70s and 80s. Across species we have seen large changes in range and size and we must adapt as fishermen and managers.

Please support proposal 69 with the new language found in rc21 to open all of pws to a commissioners permit fishery

Table 3.–Prince William Sound Commissioner's Permit Tanner crab fishery harvest and effort information by statistical area, 2018-2021.

			St	atistical Area 486	6005			
	Year	Pot lifts	Harvest (No. of crab)	Harvest (lb)	CPUE (crab per pot)	Vessels	Percent of total harvest	
Area 3:	2018	1,071	14,868	29,853	13.9	11	36%	
	2019	551	5,324	10,254	9.7	9	8%	
	2020	588	3,560	7,088	6.1	10	7%	
	2021			Closed				
	Average	737	7,917	15,732	9.9	10	17%	
		Statistical Area 485931						
	2018	732	16,036	25,813	21.9	3	31%	
	2019	2,635	51,994	83,837	19.7	9	67%	
	2020	2,873	39,436	65,948	13.7	15	61%	
	2021	1,862	27,099	45,111	14.6	8	80%	
	Average	2,026	33,642	55,177	17.5	9	59%	
	Statistical Area 476007							
	2018	895	7,028	10,873	7.9	6	13%	
	2019	472	3,436	6,174	7.3	4	5%	
	2020	568	3,246	5,514	5.7	9	5%	
	2021	424	2,357	3,862	5.9	5	7%	
	Average	581	4,000	6,576	6.7	6	7%	
	Statistical Area 476003							
	2018	128	1,534	2,643	12.0	5	3%	
	2019	793	9,962	17,522	12.6	5	14%	
	2020	590	5,725	9,397	9.5	6	9%	
	2021	132	150	273	1.1	3	0.5%	
	Average	413	4,344	7,459	8.8	5	8%	

Note: CPUE is catch per unit effort.

Prince William Sound Area Tanner Crab New Bottom Trawl Assessment Area 3

