

ALASKA DEPARTMENT OF FISH AND GAME

**STAFF COMMENTS ON
STATEWIDE SHELLFISH, PRINCE WILLIAM SOUND SHRIMP, AND
SUPPLEMENTAL ISSUES
REGULATORY PROPOSALS
FOR**

**STATEWIDE SHELLFISH, PRINCE WILLIAM SOUND SHRIMP, AND
SUPPLEMENTAL ISSUES**

**ALASKA BOARD OF FISHERIES MEETING
ANCHORAGE, ALASKA**

March 11–16, 2025



Regional Information Report No. 5J25-01

The following staff comments were prepared by the Alaska Department of Fish and Game (department) for use at the Alaska Board of Fisheries (board) meeting, March 11–16, 2025, in Anchorage, Alaska. The comments are forwarded to assist the public and board. The comments contained herein should be considered preliminary and subject to change as new information becomes available. Final department positions will be formulated after review of written and oral public testimony presented to the board.

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Weights and measures (metric)		General		Acronyms	
centimeter	cm	Alaska Administrative		Acceptable Biological Catch	ABC
deciliter	dL	Code	AAC	Alaska Board of Fisheries	board
gram	g	all commonly accepted		Alaska Department of Fish	department
hectare	ha	abbreviations	e.g., Mr., Mrs., AM, PM, etc.	and Game	/ADF&G
kilogram	kg			Amount Necessary for	
kilometer	km	all commonly accepted		Subsistence	ANS
liter	L	professional titles	e.g., Dr., Ph.D., R.N., etc.	Alaska Wildlife Troopers	AWT
meter	m			Biological Escapement Goal	BEG
milliliter	mL	at	@	Central Gulf of Alaska	CGOA
millimeter	mm	compass directions:		Coded Wire Tag	CWT
		east	E	Commercial Fisheries Entry	
Weights and measures (English)		north	N	Commission	CFEC
cubic feet per second	ft³/s	south	S	Cook Inlet Aquaculture	
foot	ft	west	W	Association	CIAA
gallon	gal	copyright	©	Customary and Traditional	C&T
inch	in	corporate suffixes:		Department of Natural	
mile	mi	Company	Co.	Resources	DNR
nautical mile	nmi	Corporation	Corp.	Demersal Shelf Rockfish	DSR
ounce	oz	Incorporated	Inc.	Emergency Order	EO
pound	lb	Limited	Ltd.	Guideline Harvest Level	GHL
quart	qt	District of Columbia	D.C.	Gulf of Alaska	GOA
yard	yd	et alii (and others)	et al.	Global Positioning System	GPS
		et cetera (and so forth)	etc.	Individual Fishing Quota	IFQ
Time and temperature		exempli gratia		Local Area Management Plan	LAMP
day	d	(for example)	e.g.	Lower Cook Inlet	LCI
degrees Celsius	°C	Federal Information		Mean Low Water	MLW
degrees Fahrenheit	°F	Code	FIC	Mean Lower Low Water	MLLW
degrees kelvin	K	id est (that is)	i.e.	No Data	ND
hour	h	latitude or longitude	lat or long	National Marine Fisheries	
minute	min	monetary symbols		Service	NMFS
second	s	(U.S.)	\$, ¢	National Oceanic and	
		months (tables and		Atmospheric Administration	NOAA
Physics and chemistry		figures): first three		Nick Dudiak Fishing Lagoon	NDFL
all atomic symbols		letters	Jan,...,Dec	North Pacific Fishery	
alternating current	AC	registered trademark	®	Management Council	NPFMC
ampere	A	trademark	™	Optimum Escapement Goal	OEG
calorie	cal	United States		Pelagic Shelf Rockfish	PSR
direct current	DC	(adjective)	U.S.	Prince William Sound	PWS
hertz	Hz	United States of		Prior Notice of Landing	PNOL
horsepower	hp	America (noun)	USA	Private Nonprofit Salmon	
hydrogen ion activity	pH	U.S.C.	United States	Hatchery	PNP
(negative log of)			Code	River Mile	RM
parts per million	ppm	U.S. state	use two-letter	Special Harvest Area	SHA
parts per thousand	ppt, ‰		abbreviations	Sustainable Escapement Goal	SEG
			(e.g., AK, WA)	Trail Lakes Hatchery	TLH
volts	V			Upper Cook Inlet	UCI
watts	W			Western Gulf of Alaska	WGOA

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ANCHORAGE, ALASKA**

March 11–16, 2025

by
Alaska Department of Fish and Game

Alaska Department of Fish and Game
Division of Sport Fish, Research and Technical Services
333 Raspberry Road, Anchorage, AK 99518–1565

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ABSTRACT

This document contains Alaska Department of Fish and Game (department) staff comments on statewide shellfish, Prince William Sound shrimp, and supplemental issues regulatory proposals. These comments were prepared by the department for use at the Alaska Board of Fisheries (board) meeting March 11-16, 2025, in Anchorage, Alaska. The comments are forwarded to assist the public and board. The comments contained herein should be considered preliminary and subject to change as new information becomes available. Final department positions will be formulated after review of written and oral public testimony presented to the board.

Keywords: Alaska Board of Fisheries (board), Alaska Department of Fish and Game (department) staff comments, finfish, shellfish, shrimp, salmon, herring, groundfish, Dungeness crab, Tanner crab, snow crab, red king crab, golden king crab, razor clam, management, management plan, regulatory proposals, inriver, subsistence, personal use, sport, guided sport, commercial fisheries, biological escapement goal (BEG), sustainable escapement goal (SEG), optimal escapement goal (OEG), stock of concern (SOC)

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Summary of department positions on regulatory proposals for statewide shellfish, Prince William Sound shrimp, and supplemental issues; Anchorage, Alaska, March 11–16, 2025.

Proposal No.	Department Position	Issue
272	N	Modify the start of the fishing season to open July 1 instead of June 15.
273	O	Modify the start of the winter fishing season.
274	N	Increases the legal size of male red king crab and size of pot escape mechanisms.
275	NA	Update Bristol Bay red king crab harvest strategy used to set annual harvest limits.
276	N	Amend longline king pot storage depth from 75 to 100 fathoms or less.
277	N	Establish Aleutian Islands state-waters golden king crab fishery.
278	N	Establish pot limit for the Aleutian Islands golden king crab fishery.
279	N	Amend vessel gear sharing and transfer provisions in the rationalized Aleutian Islands golden king crab fishery.
280	S	Amend contracting agent performance standards
281	S	Amend observer trainee minimum qualifications.
282	S	Amend escape mechanism requirements for Kodiak District commercial Tanner crab gear.
283	N	Allow longlining of Bering Sea District commercial snow and Tanner crab pot gear.
284	N	Allow catcher vessels to operate as tenders during the Kodiak District commercial Tanner crab fishery.
285	O	Repeal and replace the South Peninsula District Tanner crab harvest strategy.
286	O	Repeal South Peninsula District Tanner crab harvest strategy and replace with size, sex, and season management.
287	O	Amend definition of preferred sized males in the commercial Bering Sea District Tanner crab harvest strategy.
288	O	Amend definition of preferred sized males in the commercial Bering Sea District.
289	N	Amend pot limit for the Kodiak District commercial Tanner crab fishery.
290	N	Change season opening date for the Kodiak District commercial Tanner crab fishery.
291	S	Formalize the closure of Bristol Bay waters east of 163°W longitude to directed Tanner crab fishing.
292	S	Amend Tanner crab landing requirements for Registration Area J.
293	N	Amend season dates for the Kodiak District commercial Dungeness crab fishery
294	N	Establish 58-foot vessel length limit for Alaska Peninsula District.
295	S	Amend Dungeness crab season dates for the North Peninsula District.
296	S	Amend Registration Area J Dungeness crab vessel inspection requirements.
297	S	Amend Dungeness crab pot gear operation requirements for Registration Area J.
298	N, O	Amend the State-Waters Weathervane Management Plan.
299	N	Develop a Prince William Sound pot shrimp management plan.
300	N	Modify the Prince William Sound noncommercial shrimp fishery management plan.

N = Neutral; S = Support; O = Oppose; NA = No Action; WS = Withdrawn Support

Proposal No.	Department Position	Issue
301	N	Modify the Prince William Sound noncommercial shrimp fishery management plan.
302	O	Modify the Prince William Sound shrimp pot fishery guideline harvest level.
303	O	Modify the Prince William Sound shrimp pot fishery guideline harvest level.
304	N	Delay the season opening by two weeks in the noncommercial and commercial shrimp fisheries.
305	O	Prohibit noncommercial shrimp participants from carrying additional shrimp.
307	N	Align the season start time of the Prince William Sound noncommercial and commercial shrimp fisheries.
306	O	Modify the Prince William Sound shrimp pot reporting requirements
308	N	Reduce the total number of shrimp pots allowed in the Prince William Sound shrimp pot fishery.
309	O	Change season dates for Registration Area J commercial shrimp fishery.
310	O	Remove the Prince William Sound shrimp pot fishing area rotation.
311	N	Allow vessels participating in shrimp pot fishery to operate as tenders.
263	N	Open the Cook Inlet subsistence Dungeness crab fishery.
264	N	Allow harvest of Dungeness crab in the Cook Inlet sport Tanner crab fishery.
265	N	Establish season, bag, possession, annual, and size limits, and methods and means for Dungeness crab in Cook Inlet–Resurrection Bay.
266	N	Add loop traps and foldable nets as legal gear.
267	S	Allow additional gear types in the personal use crab fishery.
268	N	Prohibit harvest of Tanner crab from a charter vessel.
269	S	Implement a permit for harvesting razor clams in Cook Inlet sport and personal use fisheries.
270	S	Modify the East Cook Inlet Razor Clam Sport and Personal Use Fishery Management Plan.
271	S	Reduce the East side razor clam bag limit.
312	N	Extend season of the commercial dip net fishery.
313	N	Add beach seine nets as legal gear.
314	S, N	Create a Kvichak River Special Harvest Area.
315	N	Allow set gillnet permit holders operating as a joint venture fish 350 fathoms of gear.
316	N	Change regulatory language for Kodiak commercial sac roe fishery.

N = Neutral; S = Support; O = Oppose; NA = No Action; WS = Withdrawn Support

COMMITTEE OF THE WHOLE–GROUP 1: COMMERCIAL SHELLFISH
(27 PROPOSALS)

CRAB (26 PROPOSALS)

PROPOSAL 272 – 5 AAC 34.910. Fishing season for Registration Area Q.
›Modify the start of the fishing season to open July 1 instead of June 15

PROPOSED BY: Adem Boeckman.

WHAT WOULD THE PROPOSAL DO? This would change the starting date of the Norton Sound king crab summer season commercial fishery from on or after June 15 to on or after July 1.

WHAT ARE THE CURRENT REGULATIONS? Current regulation opens the king crab commercial fishery for male red king crab, blue king crab, and Hanasaki king crab on or after June 15 (5 AAC 34.910. (d)(1)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

This would not significantly change the management of the fishery. The major buyer in Norton Sound often delays buying operations until the third week in June. In addition, this may shorten the fishing season by two weeks in years when the guideline harvest level (GHL) has not been harvested by the regulatory closure date of September 3.

BACKGROUND: When the Norton Sound summer commercial king crab fishery was established in 1977, the season opening date was August 1. The opening date was changed to July 1 when the fishery was designated as super-exclusive in 1993. Beginning in 2000, a Community Development Quota (CDQ) fishery was allowed to occur after the open access fishery closed. However, lack of fishing effort, marginal weather, and increased occurrence of double-shelled crab in September made it difficult to harvest the CDQ allocation of 7.5% of the Norton Sound red king crab GHL. Therefore, beginning with the 2002 summer commercial fishing season, the CDQ fishery began June 15 and closed June 28. If the CDQ fishery failed to take its 7.5% allocation, the fishery could open again after the open access fishery closed. There were concerns that the CDQ fishery opening 14 days prior to the open access fishery would give fishermen participating in the CDQ fishery an advantage in allowing them to prospect for crab prior to the open access fishery opening. In 2008, in response to those concerns, the board adopted a season opening date of on or after June 15 and the CDQ fishery can open at any time when the commercial king crab season is open. Since the season opening date was changed to on or after June 15, there have been 5 years when the Norton Sound red king crab season opened on June 15 and 12 years when it opened after June 15 and the CDQ fishery has opened concurrent with or after the open access fishery.

Fishing seasons are a Category 2 management measure under the federal *Fishery Management Plan for Bering Sea/Aleutian Islands King and Tanner Crabs* (FMP), Section 8.2.5. Category 2 management measures are part of the framework in the FMP and must be consistent with the criteria set out in the FMP and the Magnuson-Stevens Fishery Conservation and Management Act (MSA) National Standards.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal and has no biological concerns. This proposal would revert to the king crab season opening date that had been previously adopted into regulations from 1993 to 2008.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional direct cost for a private person to participate in this fishery. Adoption of this proposal is not expected to result in additional direct cost to the department.

PROPOSAL 273 – 5 AAC 34.910. Fishing seasons for Registration Area Q.
›Modify the start of the winter fishing season

PROPOSED BY: Northern Norton Sound Advisory Committee.

WHAT WOULD THE PROPOSAL DO? This would give the department discretion to open the Norton Sound winter king crab commercial fishery on or after February 1 in years when a commercial fishery is scheduled.

WHAT ARE THE CURRENT REGULATIONS? Current regulations direct the department to open the winter king crab commercial fishery on February 1 (5 AAC 34.910 (d)(2)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This could delay the start of the winter king crab fishery based on the judgement of sea ice conditions by department staff who may differ in their assessment of risk. Additionally, ice conditions in Norton Sound vary significantly from one location to the next and an area with good ice conditions could be closed based on marginal ice conditions in other areas, thus potentially reducing fishing time and harvest.

BACKGROUND: By regulation, season dates were initially set from January 1 to April 30, but in its March 1985 meeting, the Alaska Board of Fisheries (board) set season opening dates from November 15 to May 15. In March 2015, a proposal adopted by the board set new season dates with the start date to be established by emergency order on or after January 15 and the regulatory closure to occur on April 30 unless extended by emergency order. This action was initiated to reduce pot loss and potential ghost fishing by lost pots because the shorefast ice is relatively more stable and solid from mid-January to April. In 2020, a proposal adopted by the board set February 1 as the season opening date.

Fishing seasons are a Category 2 management measure under the federal *Fishery Management Plan for Bering Sea/Aleutian Islands King and Tanner Crabs* (FMP), Section 8.2.5. Category 2 management measures are part of the framework in the FMP and must be consistent with the criteria set out in the FMP and the MSA National Standards.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. The department does not have the expertise or training to assess when sea ice conditions are safe in Norton Sound. Maintaining a regulatory opening date removes the department from making judgement calls on sea ice conditions. If adopted, the department requests the board outline specific criteria for when conditions would allow opening the commercial winter king crab fishery. Additionally, the department doesn't foresee any biological concerns with this proposal.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional direct cost for a private person to participate in this fishery. Adoption of this proposal is not expected to result in additional direct cost to the department.

PROPOSAL 274 – 5 AAC 34.920. Size Limits for Registration Area Q. and 5 AAC 34.925. Lawful Gear for Registration Area Q.

Increases the legal size of male red king crab and size of pot escape mechanisms

PROPOSED BY: Northern Norton Sound Advisory Committee.

WHAT WOULD THE PROPOSAL DO? Increases the minimum legal male red king crab size from 4.75 inches to 5 inches carapace width and adjusts escape mechanisms to adhere to the new legal minimum size limit.

WHAT ARE THE CURRENT REGULATIONS? Current regulations set the legal minimum carapace width at 4.75 inches (5 AAC 34.920(d)(1)) and require escape mechanisms be a minimum of four rings with an inside diameter of no less than 4.5 inches within one mesh of the bottom vertical plane or at least one half of a vertical plane of a square pot, or the sloping surface of a pyramid or conical pot composed of no less than 6.5-inch stretched mesh webbing (5 AAC 34.925(b)(3)). Additionally, the *Norton Sound Section red king crab harvest strategy* (5 AAC 34.915) provides tiered threshold levels of abundances of legal male red king crab, which guide the department in determining the exploitation rate for the upcoming season.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

This would increase the minimum legal carapace width to 5-inches and require fishermen to install new escape mechanisms in their existing pots. Since the Board of Fisheries modified the *Norton Sound Section red king crab harvest strategy* (5 AAC 34.915) in March 2012, the Guideline Harvest Level (GHL) has been consistently constrained by the Over Fishing Limit (OFL) and Allowable Biological Catch (ABC) determined by the *Fishery Management Plan for Bering Sea/Aleutian Islands King and Tanner Crabs* (FMP), which sets the cooperative framework for king crab management. The red king crab GHL would not change by increasing the minimum legal size from 4.75 inches to 5 inches (Table 1). The exploitation rate of Legal Male Biomass (LMB) outlined in 5 AAC 34.915 is greater than what has been used to establish the GHL, which must not exceed the ABC. However, in years when the current LMB is near the minimum threshold to allow for a commercial red king crab fishery, changing legal size to 5-inch carapace width may preclude commercial fishing. Additionally, this proposal advocates for no change to the current king crab pot escape mechanism in Norton Sound.

BACKGROUND: Legal size for the Norton Sound red king crab fishery has been 4.75 inches minimum carapace width male king crab since the fishery's inception in 1977. This minimum legal size was based on assumptions of the life history of red king crab in Norton Sound. However, recent research has shown evidence that the functional maturity for red king crab is smaller than was assumed and that Norton Sound male red king crab can mate multiple times prior to attaining legal size.

Commercial allocation of the king crab resources in Norton Sound are divided into a summer season (June 15–Sept. 3), winter season (Feb. 1–April 30), and Community Development Quota (CDQ) groups. Summer season is allocated 84.5%, winter season is allocated 8%, and CDQ is allocated 7.5% of the available GHL. The CDQ allocations may be harvested in either the summer or winter season or a combination of both.

Management of the Norton Sound red king crab fishery is based on the federal FMP, which establishes a cooperative structure that delegates most management measures for Bering Sea and Aleutian Islands (BSAI) king and Tanner crab fisheries to the State of Alaska, with federal oversight. The GHL for this fishery is set in accordance with the *Norton Sound section red king crab harvest strategy* (5 AAC 34.915) based on the estimated legal male biomass. Conversely, the North Pacific Marine Fisheries Council process establishes a yearly OFL and ABC based on the estimated total biomass. In recent seasons, the OFL and ABC has been established below the maximum level of legal male biomass allowed in the state's harvest strategy, effectively constraining the GHL.

Markets have fluctuated in Norton Sound and are currently split between catcher/sellers selling crab locally over the dock, mainly during the winter season, and one main buyer located in Nome that operates during the summer season. Markets have existed outside of the Nome area recently during the summer season, but effort has been minimal. The local buyer has instituted a minimum carapace width of no less than 5 inches in recent years to comply with size preferences of their market.

Minimum size limits are a Category 2 management measure under the federal FMP (Section 8.2.1). Category 2 management measures are part of the framework in the FMP and must be consistent with the criteria set out in the FMP and the Magnuson–Stevens Fishery Conservation and Management Act National Standards.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal and there are no biological concerns with raising the legal minimum size.

COST ANALYSIS: Adoption of this proposal would result in additional direct cost for a private person to participate in this fishery if red king crab pot escape mechanism are increased due to the larger legal size. Approval of this proposal is not expected to result in an additional cost to the department.

Table 274-1.—Difference in Legal Male Biomass, GHL, and Harvest Level for the Norton Sound Rid King Crab fishery, 2025.

Legal size (in)	LMB	ABC	GHl	Maximum harvest level	Actual Harvest Level
4.75	4.56	440,000	410,000	15%	8.99%
5	4.43	440,000	410,000	15%	10.80%

Note: LMB = Legal Male Biomass; ABC = Allowable Biological Catch; GHl = Guideline Harvest Level.

PROPOSAL 275 – 5 AAC 34.816. Bristol Bay Red King Crab Harvest Strategy.

Update Bristol Bay red king crab harvest strategy used to set annual harvest limits

PROPOSED BY: Alaska Department of Fish and Game.

WHAT WOULD THE PROPOSAL DO? The intent of this proposal is to provide opportunity to revise and update the Bristol Bay red king crab (BBRKC) harvest strategy used to set annual harvest limits. Exploration towards this effort indicates a more comprehensive analysis is needed to effectively provide options and recommend changes to the existing management strategy. The scope of this work extends beyond what could be accomplished this regulatory cycle, so the department recommends taking no action on this proposal at this time.

WHAT ARE THE CURRENT REGULATIONS? The BBRKC harvest strategy is composed of minimum stock size thresholds established to ensure for conservation of the stock during periods of low abundance, an abundance-based harvest control rule used to set an exploitation rate when stock size thresholds are met, and a maximum harvest cap on legal males.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The existing BBRKC harvest strategy would remain in effect. Current practices are responsive to balancing stock conservation and fishing opportunity needs consistent with state and federal crab management objectives.

BACKGROUND: The current BBRKC harvest strategy was last updated in the mid-1990s. Over the last decade, the BBRKC stock has undergone a broad decline. During this time the commercial fishery has occurred under reduced harvest limits or was closed because estimated abundance of mature female crab was below regulatory thresholds. The recent fishery closures have focused attention on identifying causes underlying the population decline and the efficacy of the regulatory thresholds that resulted in lost opportunity for industry.

A management strategy evaluation (MSE) is a quantitative tool that compares projected stock dynamics across a suite of alternative harvest strategy scenarios to balance tradeoffs between conservation and economic objectives. In coordination with industry stakeholders, the department recently advanced MSE-derived recommendations to the board for the adoption of new harvest strategies for Aleutian Islands golden king crab (2018) and Eastern Bering Sea Tanner crab (2020) fisheries. Accordingly, the department recommends completing a MSE for Bristol Bay red king crab prior to amending the existing strategy. Work to identify options and advance efforts to conduct a MSE is underway.

The BBRKC harvest strategy is a Category 2 management measure under the federal *Fishery Management Plan for Bering Sea/Aleutian Islands King and Tanner Crabs* (FMP) (Section 8.2.2). Changes to Category 2 management measures are part of the framework in the FMP and must be consistent with criteria set out in the FMP and the Magnuson–Stevens Fishery Conservation and Management Act National Standards.

DEPARTMENT COMMENTS: The department recommends taking **NO ACTION** on this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional direct cost for the department.

PROPOSAL 276 – 5 AAC 34.627. Lawful Gear for Registration Area O.
Amend longline king pot storage depth from 75 to 100 fathoms or less

PROPOSED BY: Mark Medjo.

WHAT WOULD THE PROPOSAL DO? Increase pot storage depth limit from waters 75 fathoms or less in depth to 100 fathoms or less in depth for longline king crab pot gear in Aleutian Islands golden king crab fishery (AIG).

WHAT ARE THE CURRENT REGULATIONS? In Registration Area O, longline pot gear may be stored in waters 75 fathoms or less in depth. Pot gear can be stored year-round provided doors are secured open and all bait containers removed. Longline pot gear is the only legal gear type in the AIG fishery.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Vessel operators would have additional area and flexibility to store longline pot gear in the AIG fishery. According to vessel operators, storing longline pot gear in deeper water and further from shore would improve safety by reducing the likelihood of other vessels becoming entangled in stored gear when sheltering from weather in the lee of islands near shore. Entangling stored gear results in damage or potential loss of the stored gear and is dangerous to vessels that might become entangled. Vessel operators also indicate increased storage area would provide more flexibility to store in areas that minimize spatial overlap with vessels participating in adjacent groundfish fisheries.

BACKGROUND: The AIG fishery was rationalized prior to the 2005/06 season under the federal Crab Rationalization Program and the stock is comanaged by ADF&G and National Marine Fisheries Service (NMFS). Aleutian Islands golden king crab are considered a single stock but managed as two separate fisheries, east and west of 174°W longitude, with a total allowable catch set for each fishery (Figure 276-1).

The bottom topography along the Aleutian Islands is made up of deep interisland passages with steep ledges and strong currents. In this type of area, single-lined pots can easily be swept off steep edges into deep water and be lost. For that reason, only longline pot gear is permitted when fishing for golden king crab in Area O (Aleutian Islands Area). Vessels longline pots with up to 80 pots per string and set multiple strings of pots that cover different depths over an extensive area. The ends of the strings are marked with clusters of buoys, but due to the distance between ends of the strings and strong tides, the buoys are not always visible. Vessels typically operate between 1,500 and 2,000 pots per vessel each season. Due to the high volume of gear used and large distances between fishing grounds and fishing ports, most gear is stored in the water during the off season in close relative proximity to where fishing occurs.

At-sea observer and dockside sampler data from the 2023/24 AIG fishery indicates 5.5% of total harvest and 3.1% of total effort occurred in waters 100 fathoms or less, compared to 0.4% of total harvest 0.2% of total effort that occurred in waters 75 fathoms or less (Table 276-1). This indicates gear stored within the current and proposed maximum storage depths have generally limited overlap with most depths targeted in the AIG fishery.

Gear storage is a Category 3 management measure under the federal *Fishery Management Plan for Bering Sea/Aleutian Islands King and Tanner Crabs* (FMP) (Section 8.3.3). Changes to Category 3 management measures occur at the discretion of the board but must be consistent with Magnuson–Stevens Fishery Conservation and Management Act National Standards.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional direct cost for the department.

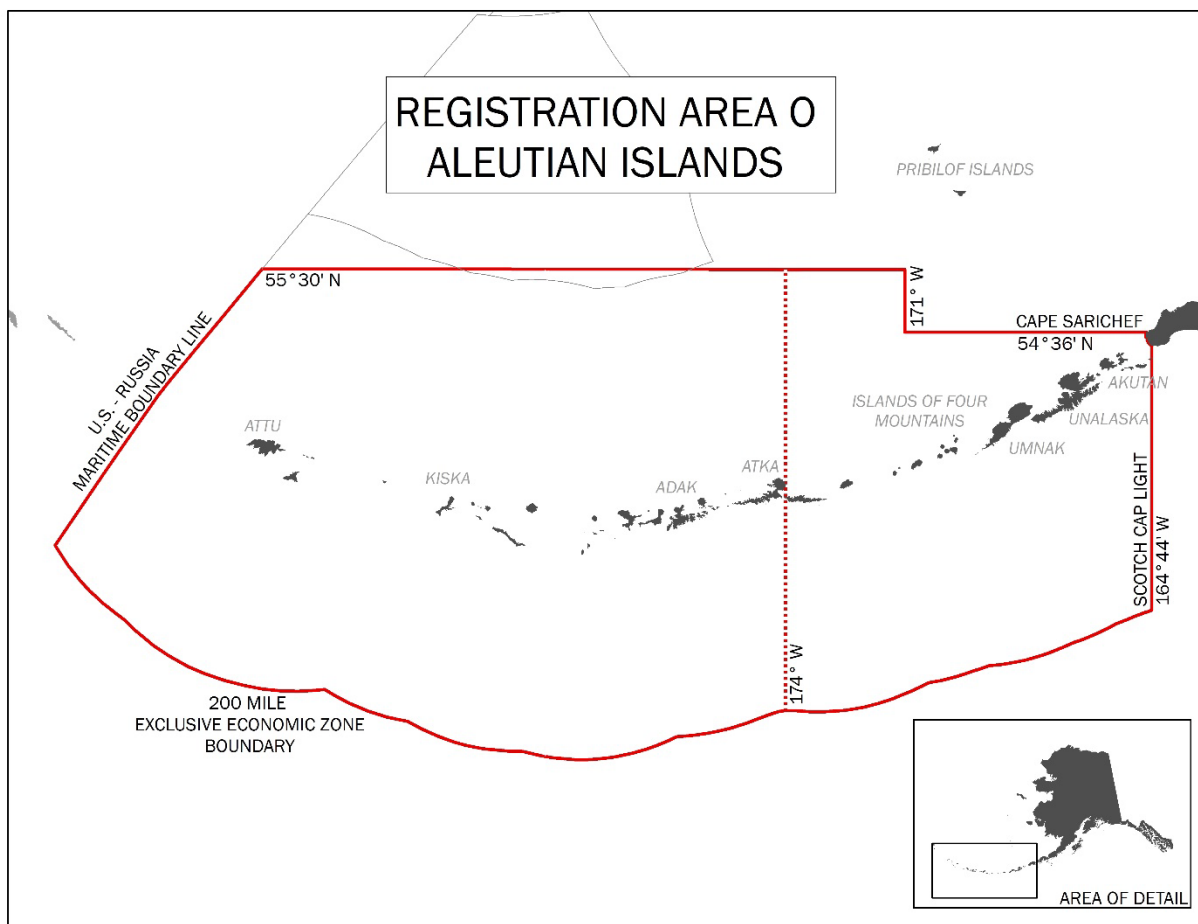


Figure 276-1.—King crab Registration Area O (Aleutian Islands Area).

Table 276-1.—Percentage harvest and effort in the 2023/24 Aleutian Islands golden king crab fishery by depth, relative to current and proposed maximum pot gear storage depths.

2023/24 AIG	Depth	
	≤ 75 fathoms	≤ 100 fathoms
Harvest (number of crab)	2,339	36,191
<i>Percentage of total fishery harvest</i>	<i>0.4%</i>	<i>5.5%</i>
Effort (number pot lifts)	77	973
<i>Percentage of total fishery effort</i>	<i>0.2%</i>	<i>3.1%</i>

PROPOSAL 277 – 5 AAC 35.6XX. New Section; Aleutian Islands State-waters Golden King Crab Management Plan.

Establish Aleutian Islands state-waters golden king crab fishery

PROPOSED BY: Roger Rowland.

WHAT WOULD THE PROPOSAL DO? Establish an open-access state-waters golden king crab fishery in the waters of Registration Area O (Aleutian Islands Area) east of 169°W longitude. Proposed management plan provisions include: 1) establish a regulatory fishing season of September 1–April 30 with a GHLL set annually by the department not to exceed 100,000 pounds of golden king crab; 2) limit participation to vessels 58 feet in length and under; 3) establish single king crab pots as legal gear and the limit amount of gear at no more than 90 pots per vessel; 4) limit operation of gear from 8:00 a.m. to 7:59 p.m. daily with catch reported daily to the department; and 5) close state waters of Registration Area O (Aleutian Islands Area) east of 169°W longitude to longline king crab pot gear.

WHAT ARE THE CURRENT REGULATIONS? Aleutian Islands golden king crab (AIG) fisheries are rationalized fisheries under the federal Crab Rationalization Program, and the stock is comanaged by the department and National Marine Fisheries Service (NMFS). The stock is managed as two separate fisheries—east of 174°W longitude (EAG) and west of 174°W longitude (WAG)—with a total allowable catch (TAC) set for each fishery (Figure 277-1). TAC is further allocated by NMFS as 90% Individual Fishing Quota (IFQ) and 10% Community Development Quota (CDQ). The fisheries are open by regulation from August 1 through April 30 and only male golden king crab 6.0 inches or greater in carapace width may be taken. Longline king crab pot gear is the only legal gear type and there are no pot limits or vessel length restrictions. All catcher vessels participating in the rationalized AIG fishery are required to carry onboard observers during the time that at least 50% of the retained catch is harvested in each of the three trimesters of the 9-month fishing season. Harvest occurs in both state and federal waters of Registration Area O with all harvest accruing toward the TACs established for each fishery.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would create a new state-managed only fishery by allocating a portion of the current rationalized EAG fishery to vessels 58 feet and under in state waters (0–3 miles) east of 169°W longitude (Figure 277-2). Golden king crab harvest opportunity would become available to smaller vessels that do not currently hold golden king crab IFQ under the federal Crab Rationalization Program. Vessels currently operating in the AIG fishery exceeding 58 feet in length would be excluded from the proposed state-waters fishery. This state-waters season would provide access to a small, high-value fishery for local vessels during a time between other more established groundfish and shellfish fisheries in the Bering Sea/Aleutian Islands (BSAI). The proposed harvest provisions (vessel size limit, pot limit, limited fishing hours, single pot only, and daily catch reporting) aim to slow the pace of harvest to provide adequate fishing opportunity for participants and aid management of the relatively small GHLL.

Establishing a maximum annual GHLL of 100,000 lb of golden king crab in the portion of EAG within state-waters east of 169°W longitude would require coordination with the rationalized EAG fishery to avoid exceeding federal harvest limits established annually for the stock. During some

years, allocating up to 100,000 lb of golden king crab to a new state-waters fishery could result in lower a EAG TAC for rationalized fishery participants.

BACKGROUND: Golden king crab occur from the Japan Sea to the northern Bering Sea and as far south as northern British Columbia. Commercially viable concentrations occur throughout the Aleutian Islands, generally in high-relief habitat such as inter-island passes, on various sea mounts, at depths of 100–550 fathoms and on structurally complex bottom types.

The AIG fishery began in the Dutch Harbor Area in 1961 and in Adak Area in 1975/76 as incidental catch to the red king crab fishery. Directed golden king crab landings were first reported in the 1981/82 and were harvested in two directed fisheries occurring in the Adak and Dutch Harbor Registration Areas divided at 171°W longitude. The fishery was initially managed with size, sex, and season restrictions and harvest levels were based on catch in prior seasons. In March 1996, the board replaced the Adak and Dutch Harbor areas with the newly created Aleutian Islands Registration Area O and directed the department to manage the golden king crab fishery in the areas east and west of 174°W longitude (Figure 277-1). That redesignation of management areas was intended to more accurately reflect golden king crab stock distribution. While Aleutian Island golden king crab is considered one stock, the fishery has been managed in two areas (EAG and WAG) separated at 174°W longitude since the 1996/97 season. From 1996/97 to 2016/17 seasons, the EAG and WAG fisheries were managed under a constant-catch harvest strategy, thus retained catch remained relatively stable (Table 277-2; Figure 277-3). Beginning in 2018, the board adopted a new harvest strategy that sets annual harvest limits based on annual estimates of abundance.

Beginning in 2005/06, the AIG fishery has been prosecuted under the federal Crab Rationalization Program, which substantially changed fishing practices. Most notably, fleet size reduced and average pot soak time increased. Under rationalization, the EAG fleet decreased from an average of 16 vessels to an average of four vessels, while the WAG fleet size decreased from an average of nine vessels prior to two vessels. Average soak times increased from four to 15 days east of 174°W longitude and from nine to 24 days west of 174°W longitude, which enabled crab to “self-sort” on bottom, reducing on-deck sorting time and bycatch of sublegal and female crab.

The bottom topography along the Aleutian Islands is composed of deep interisland passages with steep ledges and strong currents. In these areas, single-lined pots can easily be swept off steep edges into deep water and be lost. For that reason, only longline pot gear is currently permitted when fishing for golden king crab in the Aleutian Islands Area. Vessels longline pots with up to 80 pots per string and vessels set multiple strings of pots that cover different depths over a large area.

The proposed area east of 169°W longitude for the state-waters fishery includes waters surrounding the islands of Umnak, Unalaska, and Akutan. Most depths that support golden king crab are found along the north (Bering Sea) side of the islands. Given these areas are not located in interisland passages, currents are lower relative to fishing areas west of 169°W longitude and more conducive to fishing with single pot gear, although pot loss could still occur.

Reported commercial harvest of golden king crab in the proposed waters east of 169°W longitude dates to 1986. From 1986 to 2020, a total of 1,766,448 lb (370,899 crab) of golden king crab have

been harvested in the proposed area, with 212,039 lb or 12% of the total harvested inside state waters. Catch per unit effort (CPUE) of legal males in state waters was four crab per pot, which is considerably lower than CPUEs from the remainder of the EAG (Table 277-1, Figure 277-3). Overall, the proposed area of Registration Area O east of 169°W longitude has historically contributed very little to the total harvest of golden king crab in the EAG fishery; most productive fishing occurs further to the west (Table 277-2).

Average exvessel value over the past ten EAG seasons (2014/15–2023/24) was \$4.49 per lb (initial dock price) with an average total exvessel fishery value of approximately \$16 million. In the 2023/24 EAG fishery, harvesters were paid an initial average price of \$5.05 per lb, the second highest EAG exvessel price since the inception of the fishery. The previous year (2022/23) the initial average price of \$6.01 per lb was the highest price on record. Total exvessel fishery value in the 2023/24 EAG fishery was estimated to be about \$20 million (Table 277-3).

The federal *Fishery Management Plan for Bering Sea/Aleutian Islands King and Tanner Crabs* (FMP) establishes a State/Federal cooperative management regime that delegates most management measures to the State of Alaska with Federal oversight (NPFMC 2024). The FMP applies to 10 king and Tanner crab stocks in the BSAI, including AIG. Status determination criteria for crab stocks are annually calculated using a five-tier system that accommodates varying levels of uncertainty of information. Under this system, overfishing levels (OFL) and acceptable biological catch (ABC) levels are established annually. The OFL approximates maximum sustainable yield and is derived through the annual assessment process. The ABC is set below the OFL to account for scientific uncertainty and, in practice, sets the limit for total annual fishery mortality.

Annual TACs established by the department are required to be set at a level below the federally established ABC to prevent overfishing. In practice, the department sets preseason TACs such that annual retained catch is sufficiently below the ABC so that the sum of all other sources of fishing mortality (cost-recovery fisheries, bycatch mortality in the directed fishery, bycatch mortality in all other nondirected fisheries, and the proposed state-waters GHF) do not exceed the ABC.

Current regulations only require onboard observers during rationalized crab fisheries in the BSAI. As proposed, state-waters golden king crab vessels operating east of 169°W longitude would not be required to carry onboard observers.

Fishing seasons, pot limits, guideline harvest levels, minimum size limits, and sex restrictions are all Category 2 management measures under the federal FMP (Sections 8.2.1, 8.2.2, 8.2.5, 8.2.6, and 8.2.7). Category 2 management measures are frameworked in the FMP and must be consistent with the criteria set out in the FMP and the Magnuson–Stevens Fishery Conservation and Management Act (MSA) National Standards.

Reporting requirements are a Category 3 management measure under the federal FMP (Section 8.3.1). Category 3 management measures occur at the discretion of the board but must be consistent with MSA National Standards.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal. This proposal does not present any biological or fishery management concerns.

COST ANALYSIS: Approval of this proposal would result in an additional direct cost for a private person to participate in this fishery. In addition to initial startup costs, participants would be required to purchase a CFEC permit card (K09O; \$75) and 90 buoy tags at \$1.50 per tag.

A new Area O state-waters golden king crab fishery is not expected to result in significant additional costs for the department. The proposed season dates and inseason management needs generally align with existing workloads for department staff in Dutch Harbor.

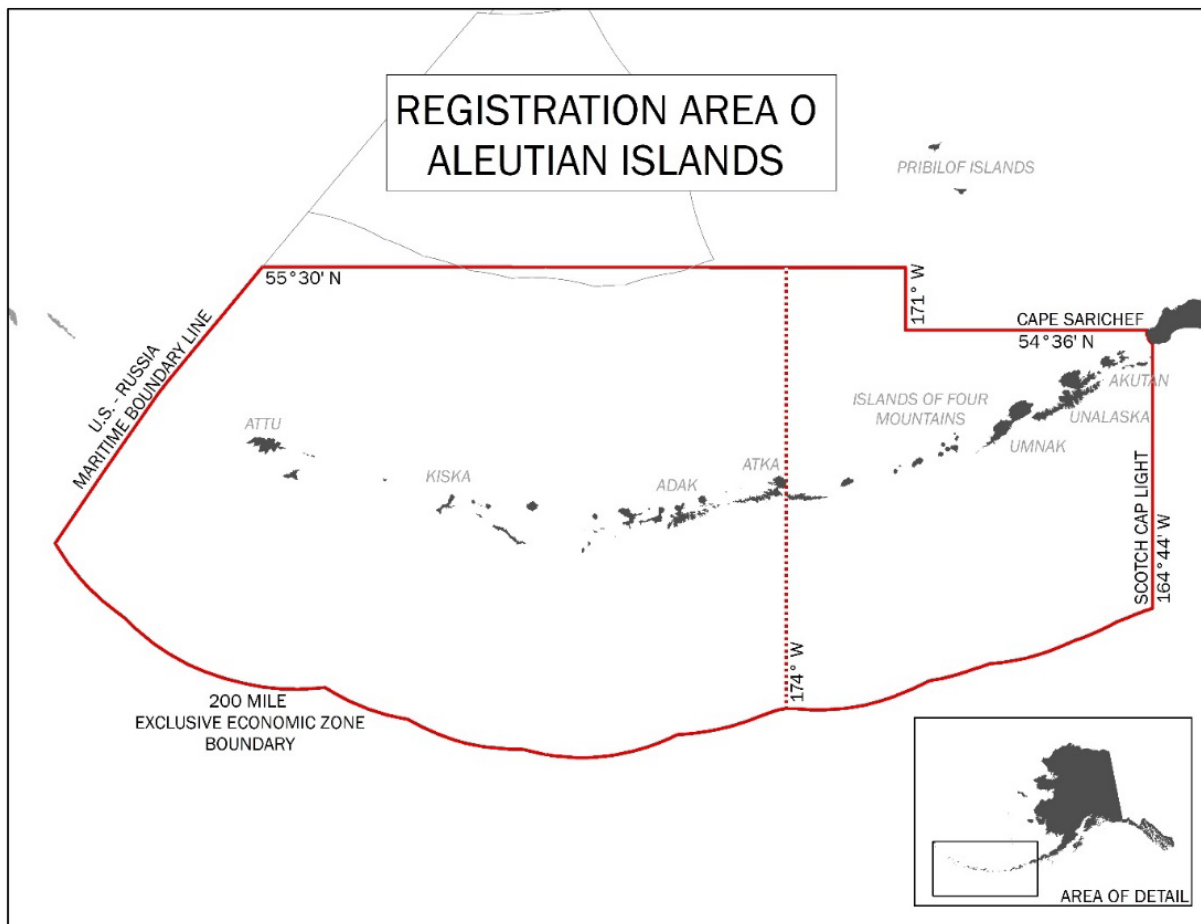


Figure 277-1.—King crab Registration Area O (Aleutian Islands Area).

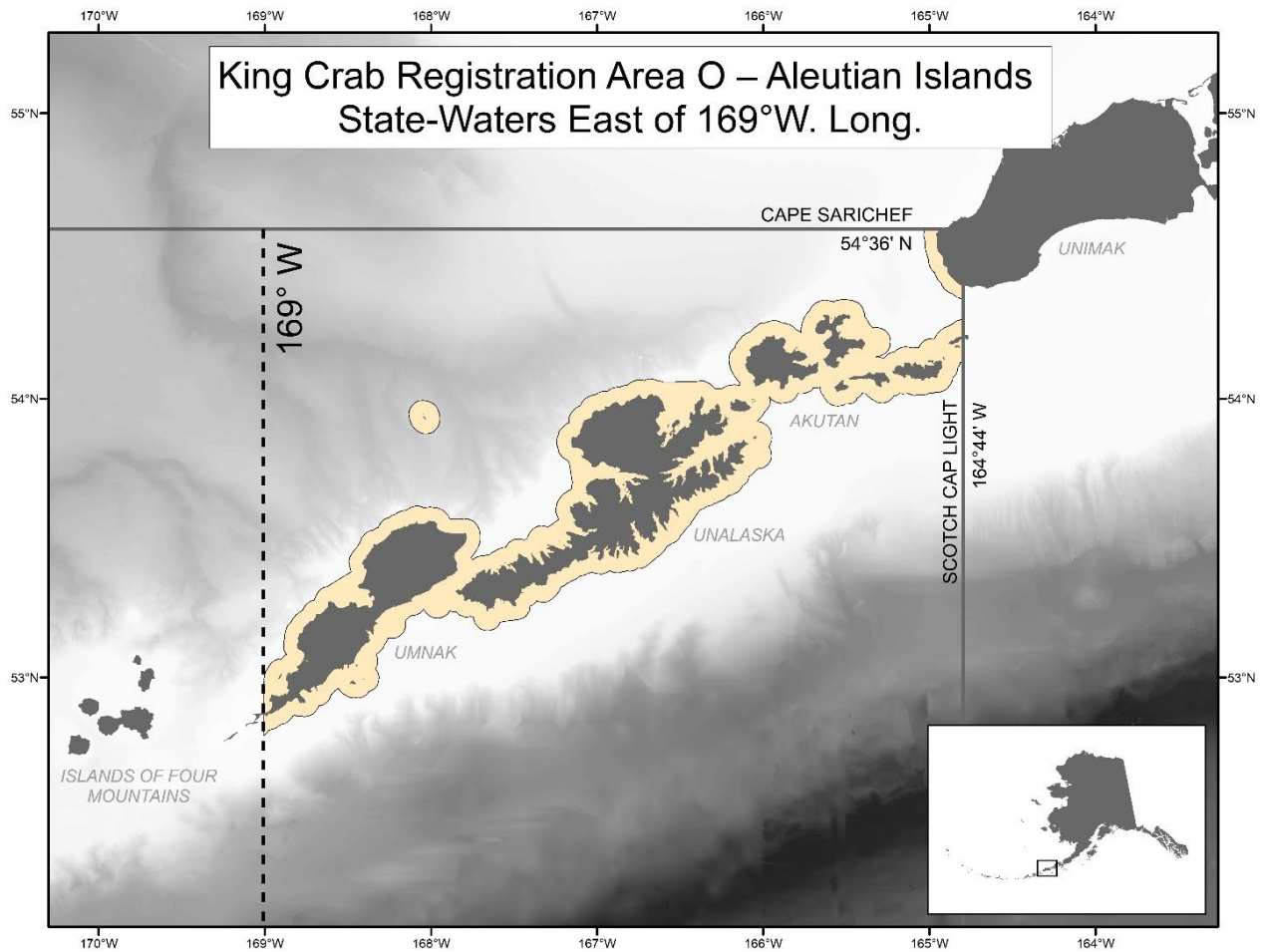


Figure 277-2.—King crab Registration Area O (Aleutian Islands Area), state-waters east of 169°W longitude.

Table 277-1.—Registration Area O (Aleutian Islands Area) commercial golden king crab harvest in waters east of 169°W longitude, 1986–2023.

Area	Number				CPUE ^a	Avg. wt. (lb)
	Vessels	Landings	Pots	Pounds		
State waters	15	49	10,644	212,039	4	4.71
Federal waters	29	180	83,311	1,554,409	4	4.78
Total	31	188	93,955	1,766,448	4	4.76

^aCatch per unit effort (CPUE); number of legal crab per pot lift.

Table 277-2.—Aleutian Islands golden king crab commercial fishery harvest data, 2005/06–2023/24.

Season	Location	TAC ^{a,b}	Harvest ^{a,c}	Number of			Average	
				Vessels ^d	Landings	Pots lifted	CPUE ^e	Weight ^{g,f}
2005/06	East of 174°W	3,000,000	2,866,602	7	39	24,569	25	4.6
	West of 174°W	2,700,000	2,653,716	3	47	30,116	21	4.2
	TOTAL	5,700,000	5,520,318	8	82	54,685	23	4.4
2006/07	East of 174°W	3,000,000	2,992,010	6	38	26,195	25	4.6
	West of 174°W	2,700,000	2,270,332	4	37	26,110	20	4.3
	TOTAL	5,700,000	5,262,342	7	74	52,305	23	4.5
2007/08	East of 174°W	3,000,000	2,989,997	4	42	22,653	28	4.7
	West of 174°W	2,700,000	2,518,103	3	39	29,950	20	4.2
	TOTAL	5,700,000	5,508,100	5	76	52,603	23	4.5
2008/09	East of 174°W	3,150,000	3,144,423	3	37	24,466	27	4.7
	West of 174°W	2,835,000	2,535,661	3	42	26,200	22	4.3
	TOTAL	5,985,000	5,680,084	5	79	50,666	25	4.5
2009/10	East of 174°W	3,150,000	3,150,474	3	39	26,298	26	4.6
	West of 174°W	2,835,000	2,761,813	3	41	26,489	24	4.4
	TOTAL	5,985,000	5,912,287	5	80	52,787	25	4.5
2010/11	East of 174°W	3,150,000	3,148,188	3	35	25,851	26	4.7
	West of 174°W	2,835,000	2,820,661	3	38	29,944	21	4.5
	TOTAL	5,985,000	5,968,849	5	73	55,795	23	4.6
2011/12	East of 174°W	3,150,000	3,150,374	3	41	17,915	37	4.7
	West of 174°W	2,835,000	2,814,042	3	40	26,326	23	4.6
	TOTAL	5,985,000	5,964,416	5	81	44,241	29	4.6
2012/13	East of 174°W	3,310,000	3,315,115	3	45	20,827	33	4.8
	West of 174°W	2,980,000	2,952,644	4	36	32,716	21	4.4
	TOTAL	6,290,000	6,267,759	6	81	53,543	25	4.6
2013/14	East of 174°W	3,310,000	3,302,061	3	42	20,687	34	4.7
	West of 174°W	2,980,000	2,970,514	3	34	41,835	16	4.3
	TOTAL	6,290,000	6,272,575	5	76	62,522	22	4.5
2014/15	East of 174°W	3,310,000	3,307,016	3	33	16,406	42	4.8
	West of 174°W	2,980,000	CF	2	44	CF	CF	CF
	TOTAL	6,290,000	CF	5	77	CF	CF	CF
2015/16	East of 174°W	3,310,000	3,302,480	3	34	18,481	39	4.6
	West of 174°W	2,980,000	CF	2	50	CF	CF	CF
	TOTAL	6,290,000	CF	5	84	CF	CF	CF
2016/17	East of 174°W	3,310,000	3,307,162	4	38	23,401	32	4.4
	West of 174°W	2,235,000	2,236,651	3	37	38,118	14	4.1
	TOTAL	5,545,000	5,543,813	5	75	61,519	21	4.3
2017/18	East of 174°W	3,310,000	3,308,185	4	40	24,617	31	4.3
	West of 174°W	2,235,000	2,234,723	3	41	30,885	17	4.3
	TOTAL	5,545,000	5,542,908	5	81	55,502	23	4.3
2018/19	East of 174°W	3,856,000	3,854,105	3	47	24,481	37	4.3
	West of 174°W	2,500,000	2,501,344	3	36	29,156	20	4.3
	TOTAL	6,356,000	6,355,449	5	83	53,637	27	4.3

-continued-

Season	Location	TAC ^{a,b}	Harvest ^{a,c}	Number of			Average	
				Vessels ^d	Landings	Pots lifted	CPUE ^e	Weight ^{a,f}
2019/20	East of 174°W	4,310,000	4,308,530	3	48	29,675	34	4.2
	West of 174°W	2,870,000	2,839,143	3	44	42,924	15	4.4
	TOTAL	7,180,000	7,147,673	5	92	72,599	23	4.3
2020/21	East of 174°W	3,650,000	3,650,255	3	47	28,833	30	4.2
	West of 174°W	2,960,000	2,792,835	3	38	46,701	15	4.1
	TOTAL	6,610,000	6,443,090	5	85	75,534	20	4.2
2021/22	East of 174°W	3,610,000	3,614,798	3	47	29,478	28	4.4
	West of 174°W	2,320,000	2,189,000	3	41	46,161	12	4.1
	TOTAL	5,930,000	5,803,798	5	88	75,639	18	4.2
2022/23	East of 174°W	3,320,000	3,321,060	3	45	20,239	38	4.3
	West of 174°W	1,730,000	1,729,215	3	31	32,786	13	4.0
	TOTAL	5,050,000	5,050,275	5	76	53,025	23	4.2
2023/24	East of 174°W	3,720,000	3,714,561	3	55	22,400	38	4.3
	West of 174°W	1,810,000	1,808,552	3	38	34,850	13	4.0
	TOTAL	5,530,000	5,523,113	5	93	57,250	23	4.2

Notes: CF = confidential, NA = not available.

^a In pounds.

^b Total allowable catch (TAC).

^c Deadloss included.

^d Many vessels fished both east and west of 174°W longitude, thus total number of vessels reflects the entire Aleutian Islands.

^e Number of legal crab per pot lift.

^f Retained catch

Table 277-3.—Aleutian Islands golden king crab commercial fishery value and season dates, 2008/09–2022/23.

Season	Location	Value		Season length		
		Exvessel ^a	Total	Opened	Closed	Days
2008/09	East of 174°W	\$3.42	\$10,678,756	08/15/08	05/15/09	274
	West of 174°W	\$1.91	\$4,791,631	08/15/08	05/15/09	274
2009/10	East of 174°W	\$1.98	\$6,174,304	08/15/09	05/15/10	274
	West of 174°W	\$1.96	\$5,322,370	08/15/09	05/15/10	274
2010/11	East of 174°W	\$3.03	\$9,315,401	08/15/10	05/15/11	274
	West of 174°W	\$3.53	\$9,803,355	08/15/10	05/15/11	274
2011/12	East of 174°W	\$3.80	\$11,880,146	08/15/11	05/15/12	275
	West of 174°W	\$3.72	\$10,313,779	08/15/11	05/15/12	275
2012/13	East of 174°W	\$3.47	\$11,218,989	08/15/12	05/15/13	274
	West of 174°W	\$3.30	\$9,554,574	08/15/12	05/15/13	274
2013/14	East of 174°W	\$3.48	\$11,376,784	08/15/13	05/15/14	274
	West of 174°W	\$3.50	\$10,081,665	08/15/13	05/15/14	274
2014/15	East of 174°W	\$3.34	\$10,936,484	08/15/14	05/15/15	274
	West of 174°W	CF	CF	08/15/14	05/15/15	274
2015/16	East of 174°W	\$3.64	\$11,815,476	08/01/15	04/30/16	274
	West of 174°W	CF	CF	08/01/15	04/30/16	274
2016/17	East of 174°W	\$4.52	\$14,660,890	08/01/16	04/30/17	273
	West of 174°W	\$4.50	\$9,664,768	08/01/16	04/30/17	273
2017/18	East of 174°W	\$3.59	\$11,691,725	08/01/17	04/30/18	273
	West of 174°W	\$3.67	\$7,997,779	08/01/17	04/30/18	273
2018/19	East of 174°W	\$4.50	\$17,118,842	08/01/18	04/30/19	273
	West of 174°W	\$4.49	\$10,987,299	08/01/18	04/30/19	273
2019/20	East of 174°W	\$4.64	\$19,740,830	07/15/19	04/30/20	291
	West of 174°W	\$4.50	\$12,530,763	07/15/19	05/07/20	298
2020/21	East of 174°W	\$4.56	\$16,492,203	08/01/20	04/30/21	273
	West of 174°W	\$4.51	\$12,311,834	08/01/20	05/13/21	286
2021/22	East of 174°W	\$5.03	\$18,046,612	07/01/21	04/30/22	304
	West of 174°W	\$5.49	\$11,728,085	08/01/21	05/23/22	296
2022/23	East of 174°W	\$6.01	\$19,799,560	07/01/22	04/30/23	304
	West of 174°W	\$6.04	\$10,211,923	08/01/22	04/30/23	273
2023/24	East of 174°W	\$5.05	\$18,594,722	07/01/23	04/30/24	305
	West of 174°W	\$5.06	\$8,924,798	08/01/23	04/30/24	274

Note: CF = confidential.

^a Initial average exvessel price per lb.

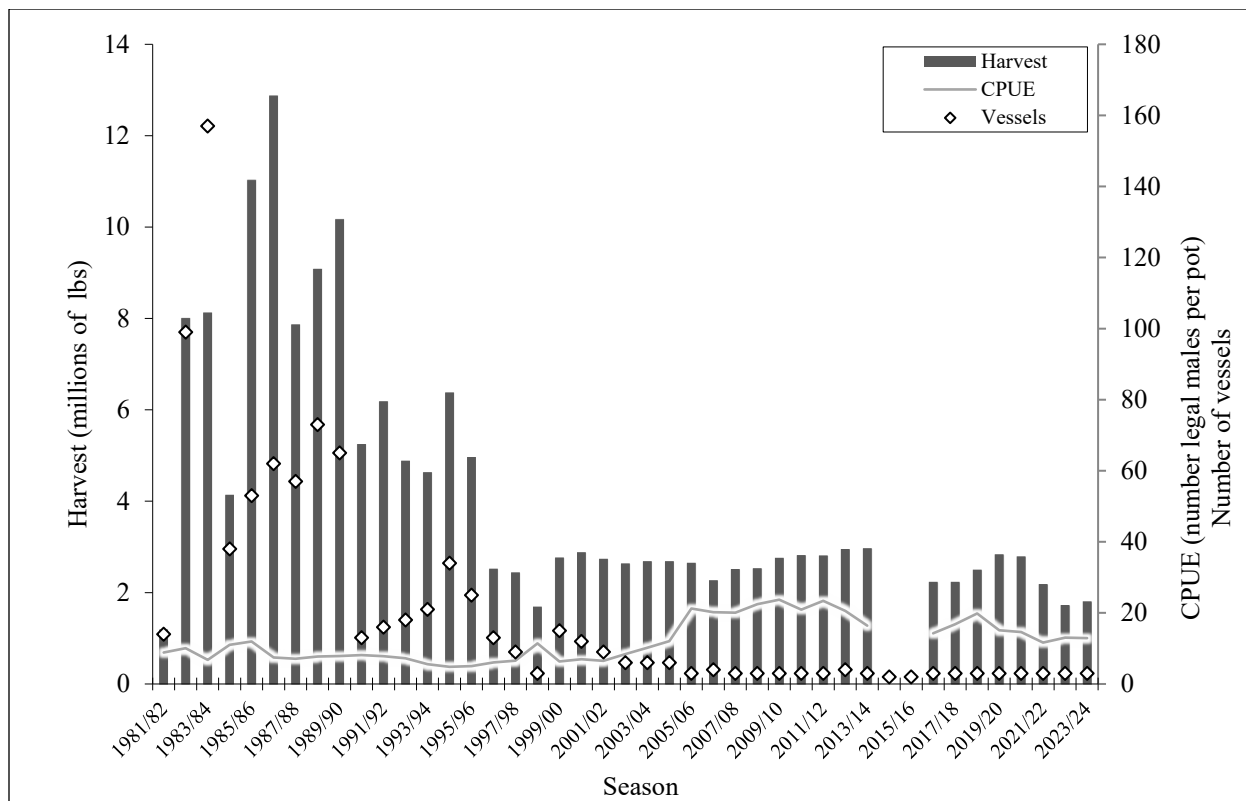


Figure 277-3.—Eastern Aleutian Islands golden king crab commercial fishery harvest, catch per unit effort (CPUE; number legal males per pot), and number of vessels, 1981/82–2023/24.

PROPOSAL 278 – 5 AAC 35.625. Lawful Gear for Registration Area O.
Establish pot limit for the Aleutian Islands golden king crab fishery

PROPOSED BY: F/V Alaska Trojan.

WHAT WOULD THE PROPOSAL DO? Establish a 2,500 per vessel pot limit for the Aleutian Islands golden king crab (AIG) fishery.

WHAT ARE THE CURRENT REGULATIONS? In the AIG fishery, king crab pot gear must be configured as a longline that consists of at least 10 shellfish pots. There are no pot limits, and vessels may file a cooperative gear authorization form to operate other vessels' gear when both vessels are registered for the same fishery. Additionally, once done fishing for the season, vessel operators can choose to transfer their gear operation rights and responsibilities to another vessel registered for the fishery.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Vessels would be restricted to operating no more than 2,500 pots in aggregate during the season. Few vessels initially register to operate 2,500 or more pots so the effects on individual vessels would vary and overall effects on the fishery are generally unknown. Vessels forced to reduce the amount of gear to accommodate the proposed limit could experience lower efficiency if more trips become necessary to catch their annual quota limit or spend more time searching for productive fishing within the large management area.

A pot limit may reduce the total amount of gear operated in the fishery which could reduce gear interactions with other fisheries or reduce grounds preemption within the AIG fishery. Alternatively, participants could add gear to reach the 2,500-pot limit to maintain competitiveness adding more gear to the fishery overall compared to historical post-rationalization effort.

Observer data indicates vessels that operate higher amounts of gear have a corresponding increase in average pot soak time and deadloss. However, the observed rate of deadloss is relatively consistent across all vessel fishing trips within similar geographic regions suggesting vessels that operate higher amounts of gear typically have higher catch (retained and deadloss) overall.

If adopted, vessels that initially register and operate 2,500 pots would be prevented from cooperative gear sharing or end of season gear transfers as those boats would already be operating the maximum aggregate number of pots specified in this proposal. Vessels that initially register and operate less than 2,500 pots would be limited to sharing or receiving transfer of cooperative gear only up to the proposed 2,500 pot limit. However, monitoring and enforcing the number of pots any individual boat chooses to operate when two or more vessels are sharing gear during a season could be challenging.

BACKGROUND: The AIG fishery was rationalized prior to the 2005/06 season and the stock is comanaged by the department and National Marine Fisheries Service (NMFS). Aleutian Islands golden king crab are considered a single stock but managed separately, east and west of 174° W. long., with separate TACs established for each area. Each season TACs are further allocated as Individual Fishing Quota (IFQ), Community Development Quota (CDQ), or Adak Community

Allocation to each vessel and a vessel may not harvest an amount of crab beyond the total amount of quota share held by that vessel.

AIG vessels typically longline pots with up to 80 pots per string and set multiple strings of pots that cover different depths across an extensive area. The ends of the strings are marked with clusters of buoys, but due to the distance between ends of the strings and strong tides, the buoys are not always visible. Pots are lost when the groundline breaks, but lost gear is commonly recovered. For the past five seasons, observer data indicates that an average of 69 pots are lost each season. In portions of the Aleutian Islands, gear is heavily concentrated and conflicts between fishers occur, however not all grounds known to support golden king crab are currently fished and more remote or less productive grounds are less targeted in the fishery.

Five vessels participated in the AIG fishery for the last five seasons (Table 278-1). On average, vessels fished 1,854 pots in the east and 1,947 pots in the west. Only one vessel has registered more than 2,500 pots in both the east and the west areas.

Pot gear soak times in the AIG fisheries are substantially longer compared to other Bering Sea-Aleutian Islands crab fisheries. Recent observer data indicates that average soak time for golden king crab pots fished west of 174° W. long. was 29 days. Soak times averaged 22 days east of 174°W longitude.

The department issues buoy tags to aid enforcement of most fisheries with established pot limits. Department issued tags are typically affixed to the buoy cluster for each pot allowing for relatively efficient enforcement of the tag requirement and pot limit. As proposed for the AIG, buoy tags would need to be affixed to the longlined pots themselves as opposed to the buoy clusters on either end of the longline given the number of pots in each string commonly vary.

Due to the vast area of the AIG and use of longlined pots, there is limited enforcement presence in this fishery. Currently, Alaska Wildlife Trooper (AWT) patrol vessels are not configured to operate longline king crab pot gear. Additionally, AIG crab pots are not typically transported to and from port and the beginning and end of each season as is customary in other pot gear fisheries. Most AIG gear is instead placed in wet storage near the fishing grounds. Record keeping of 2,500 pot tags and reporting lost buoy tags could create added workload for fishery participants. Additionally, due to the distance of the fishing grounds from Dutch Harbor, requesting and receiving replacement buoy tags from the department during the season would take time. This could significantly reduce the number of pots vessels could legally operate if many buoy tags are lost during a trip.

The stock assessment model used to estimate annual abundance of AIG golden king crab which informs TAC setting, predominantly relies on fishery dependent data (CPUE) derived from the onboard observer program. Consistency in fleet behavior and fishing practices such as the amount of gear used by each vessel generally yields more precise management quantity estimates but is not essential for effective regulation of this fishery.

Pot limits are a Category 2 management measure under the federal *Fishery Management Plan for Bering Sea/Aleutian Islands King and Tanner Crabs* (FMP) (Section 8.2.7). Category 2

management measures are frameworked in the FMP and must be consistent with criteria set out in the FMP and the Magnuson – Stevens Fishery Conservation and Management Act National Standards.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. If adopted, the department recommends fishery stakeholder, AWT, and board engagement relative to developing options to monitor and enforce a 2,500-pot limit.

COST ANALYSIS: Approval of this proposal could result in an additional direct cost for vessels to participate in this fishery should the board adopt a buoy tag requirement along with the proposed pot limit. Participants would be required to purchase 2,500 buoy tags. Buoy tags for other regional crab fisheries typically range from \$1.00 to \$1.50 per tag. This could also result in direct costs to the department if administering a complex pot limit structure is necessary.

Table 278-1.—Aleutian Islands golden king crab number of vessels and effort, 2019/20–2023/24.

Season	Fishery	Number of vessels	Pots			
			Number	Lost	Rail dumped	Average soak time (days)
2019/20	East of 174°W.	3	5,650	18	30	18
	West of 174°W.	3	5,460	124	35	32
2020/21	East of 174°W.	3	6,046	22	79	23
	West of 174°W.	3	5,461	116	432	26
2021/22	East of 174°W.	3	4,965	39	250	18
	West of 174°W.	3	5,450	60	39	25
2022/23	East of 174°W.	3	6,337	66	746	25
	West of 174°W.	4	8,050	60	226	41
2023/24	East of 174°W.	3	4,810	61	706	25
	West of 174°W.	3	6,731	125	131	22

PROPOSAL 279 – 5 AAC 39.670. Bering Sea/Aleutian Islands Individual Fishing Quota (IFQ) Crab Fisheries Management Plan.

›Amend vessel gear sharing and transfer provisions in the rationalized Aleutian Islands golden king crab fishery

PROPOSED BY: F/V Alaska Trojan.

WHAT WOULD THE PROPOSAL DO? Prohibit vessels from sharing and operating cooperative pot gear while both vessels are registered and participating in the rationalized Aleutian Islands golden king crab (AIG) fishery west of 174°W longitude (WAG).

WHAT ARE THE CURRENT REGULATIONS? There are no pot limits established for the AIG fishery. Vessels may file a cooperative gear authorization form (gear co-op) to operate other vessels gear when both vessels are registered for the same fishery. This allows vessels to haul and reset gear multiple times while both vessels are participating in the same fishery. Gear cooperatives can include multiple vessels.

Additionally, once done fishing for the season, vessel operators can choose to transfer their gear operation rights and responsibilities to another vessel still registered for the fishery. This transfer allows a recipient vessel to operate another vessel's gear, in addition to their own gear, for the remainder of the season after the relinquishing vessel has checked out of the fishery. A gear transfer includes all the pots registered to the relinquishing vessel and may not be split among more than one recipient vessel. Vessels can receive transferred gear from multiple other vessels with no overall limit to the number of transferred pots that can be operated by the recipient vessel. Absent a gear sharing agreement, a vessel may only operate gear labeled with the unique ADF&G identification number that matches the vessel operating that gear.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Within a gear sharing cooperative and when multiple vessels are actively fishing, each vessel would be restricted to operating only pots specifically registered to that vessel. As noted in the proposal, prohibiting gear sharing could reduce the amount of gear available to a vessel to operate which could reduce gear interactions with other fisheries and/or reduce grounds preemption within the WAG fishery. For vessels that commonly share gear during a season, this proposal could reduce the number of pots traditionally available to a vessel to fish or reduce the amount of fishing grounds co-op vessels could effectively target. Less gear might lower efficiency and extend the amount of time needed to catch a vessel's IFQ.

BACKGROUND: The AIG fishery was rationalized prior to the 2005/06 season and the stock is comanaged by the department and National Marine Fisheries Service (NMFS). Aleutian Islands golden king crab are considered a single stock but managed separately, east and west of 174°W longitude, with separate TACs established for each area. Vessels longline pots with up to 80 pots per string and set multiple strings of pots that cover different depths across an extensive area.

Over the last five seasons, participation in the WAG fishery has ranged from two to four vessels (Table 279-1). During this time, vessels registered to fish 1,947 pots on average each season. Gear cooperative regulations were adopted concurrent to crab rationalization in 2005 to improve efficiency and lower costs for vessels participating in rationalized fisheries. Vessels registered in

the same fishery can share crab pot gear during the season while both vessels are actively registered for the fishery. Vessels are required to request and have the department authorize a gear co-op before they share gear. Accounting on how often vessels share gear and how much gear is shared is not tracked beyond the initial paperwork required to authorize gear sharing. Over the last five seasons, filed gear co-ops for the WAG fishery ranged from zero to three (Table 279-2). Additionally, during three of the last five seasons at least one vessel has transferred their pots to another vessel after the transferer vessel departed the fishery.

Current, or amended gear sharing provisions for the WAG fishery would be subject to the Proposal 278 pot limit, if adopted. If Proposal 278 is adopted, vessels would be limited to operating no more than 2,500 pots in aggregate regardless of gear sharing or transfer opportunities.

Gear replacement and removal is a Category 3 management measure under the federal *Fishery Management Plan for Bering Sea/Aleutian Islands King and Tanner Crabs* (Section 8.3.2). Changes to Category 3 management measures occur at the discretion of the board but must be consistent with Magnuson–Stevens Fishery Conservation and Management Act National Standards.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

Table 279-1.—Aleutian Islands golden king crab number of vessels and registered pots, 2019/20–2023/24.

Season	Number of vessels	Total pots
2019/20	3	5,460
2020/21	3	5,461
2021/22	3	5,450
2022/23	4	8,050
2023/24	3	6,731

Table 279-2.—Western Aleutian Islands golden king crab number of gear co-op and gear transfers filed, 2019/20-2023/24.

Season	Number of gear co-op	Number of gear transfers
2019/20	0	2
2020/21	2	1
2021/22	3	0
2022/23	3	0
2023/24	2	1

PROPOSAL 280 – 5 AAC 39.645. Shellfish onboard observer program.

>Amend contracting agent performance standards

PROPOSED BY: Alaska Department of Fish and Game.

WHAT WOULD THE PROPOSAL DO? Remove regulatory performance standards for at-sea observer providers that no longer reflect current observer recruitment and retention trends, do not yield improved data, and are generally unenforceable.

WHAT ARE THE CURRENT REGULATIONS? Observer provider companies must achieve a 65% deployment rate of total observer days annually with certified observers.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Shifting observer deployment performance standards from regulation to regularly renegotiated contractual agreements between observer companies and the State of Alaska removes regulatory burden and allows for more responsive and flexible observer program oversight.

BACKGROUND: The Bering Sea and Aleutian Islands (BSAI) crab observer program was established in 1988 to collect fishery-dependent data used to characterize crab fisheries and inform stock assessment and management. Crab fisheries covered by the observer program include Bristol Bay red king crab, eastern and western Bering Sea Tanner crab, Bering Sea snow crab, eastern and western Aleutian Islands golden king crab, and several smaller nonrationalized crab fisheries. Each crab fishery has unique deployment rates, data collection protocols, and sampling guidelines.

Crab observers are employed by independent contractors; however, the department trains and provides direct performance and data handling oversight. Observers are deployed on commercial crab vessels that are randomly selected preseason for each crab fishery. Approximately 25 to 30 observers are deployed seasonally to achieve fishery coverage rates ranging from 20% to 100%, depending on fishery and stock assessment data needs.

Through a competitive procurement process, the State of Alaska contracts with a single observer company to supply observers for BSAI rationalized crab fisheries. Contracts are renegotiated every three to five years. Observers must meet education and experience requirements, complete a department-administered training, and are assessed before and after each deployment to ensure data quality standards are achieved.

After passing the department training course, observers initially deploy as trainees. After multiple deployments and further performance evaluation by department staff, trainees can be classified as certified observers. Certified observers generally require less oversight and typically earn higher pay.

Observer training and data collection methodology undergo regular review and updates to reflect fishery monitoring and assessment needs. The current 65% observer day deployment rate standard was initially established concurrent with rationalization in 2005 and is intended to ensure data consistency and quality across years, but the 65% certified deployment standard is rarely achieved due to poor workforce retention in the observer industry. Removing the regulatory performance

standard would allow the department to better address accountability and retention challenges through performance-based contract negotiations consistent with the State procurement process.

State of Alaska crab observer regulations are a Category 3 management measure under the *Fishery Management Plan for Bering Sea/Aleutian Islands King and Tanner Crabs* (Section 8.3.7). Category 3 management measures occur at the discretion of the board but must be consistent with the Magnuson–Stevens Fishery Conservation and Management Act

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal would not result in an additional cost to the department.

PROPOSAL 281 – 5 AAC 39.646. Shellfish onboard observer trainee program qualifications and requirements.

›Amend observer trainee minimum qualifications

PROPOSED BY: Alaska Department of Fish and Game.

WHAT WOULD THE PROPOSAL DO? Modify observer trainee qualifications by removing the statistics course requirement.

WHAT ARE THE CURRENT REGULATIONS? To qualify as an observer trainee, the candidate must have a Bachelor degree or higher from an accredited college or university with a major in the sciences of biology, any branch of biology, or limnology that includes a minimum of 30 semester hours in applicable biological sciences with use of dichotomous keys in at least one course, and the successful completion of at least one course each in mathematics and statistics with a minimum of five semester hours total for both.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Removing the statistics course requirement would broaden the applicant pool while maintaining all other relevant qualifications for observer trainees.

BACKGROUND: The Bering Sea and Aleutian Islands crab observer program was established in 1988 to collect fishery-dependent data used to characterize crab fisheries and inform stock assessment and management. Crab fisheries covered by the observer program include Bristol Bay red king crab, eastern and western Bering Sea Tanner crab, Bering Sea snow crab, eastern and western Aleutian Islands golden king crab, and several smaller nonrationalized crab fisheries. Each crab fishery has unique data collection protocols and sampling guidelines.

Crab observers are employed by independent contractors, however, the department trains and provides direct performance and data handling oversight. Observers are deployed on commercial crab vessels that are randomly selected preseason for each crab fishery. Approximately 25 to 30 observers are deployed seasonally to achieve fishery coverage rates ranging from 20% to 100%, depending on fishery and stock assessment data needs.

Minimum educational requirements ensure observer trainees are prepared to collect at-sea data typically through achieving a bachelor's degree in biological sciences. Bachelor degree programs have broadened in scope over time and now trend towards more multidisciplinary degrees that do not always align well with the observer educational requirements in regulation. The department finds the statistics course requirement is unnecessary for the role and the course requirement has been identified as a barrier to recruitment by observer provider companies. In practice, department led training and inseason observer oversight are the strongest determinants of successful observer deployments.

State of Alaska crab observer regulations are a Category 3 management measure under the *Fishery Management Plan for Bering Sea/Aleutian Islands King and Tanner Crabs* (Section 8.3.7). Category 3 management measures occur at the discretion of the board but must be consistent with the Magnuson – Stevens Fishery Conservation and Management Act.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal would not result in an additional cost to the department.

PROPOSAL 282 – 5 AAC 35.525. Lawful gear for Registration Area J.

Amend escape mechanism requirements for Kodiak District commercial Tanner crab gear

PROPOSED BY: Ron Kavanaugh.

WHAT WOULD THE PROPOSAL DO? Amend escape mechanism requirements for Kodiak District of Registration Area J commercial Tanner crab gear. Rectangular and pyramid pots would be required to have at least one-third of one vertical surface of the pot composed of not less than 6.75-inch stretched mesh webbing. Cone pots would be required to have at least one-third of one vertical surface of the pot composed of not less than 6.75-inch stretched mesh webbing or have at least eight 5-inch circular escape rings installed on a vertical surface.

WHAT ARE THE CURRENT REGULATIONS? To aid escapement of undersize crab, *C. bairdi* Tanner crab pot gear in the Kodiak District must have 1) at least one-third of one vertical surface covered in mesh webbing that measures no less than 6.75-inch when stretched or 2) at least four 5-inch circular escape rings installed on a vertical surface. Only male Tanner crab with a 5.5-inch carapace width or greater may be retained.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? An unknown amount of pot gear used in the Kodiak District commercial Tanner crab fishery would need to be reconfigured. Rectangular and pyramid pot gear would be required to incorporate a panel of escape mesh; cone pot gear would be required to include a panel of escape mesh or eight escape rings. The proposer made accommodations for cone pots to continue using escape rings due to concerns that it may be difficult for vessel operators and enforcement to determine what constitutes “one-third of one vertical surface” on a cone pot. To increase escapement of nontarget crab from cone pots, the number of required escape rings for cone pots would double, from four rings to eight rings.

Proper placement of escape rings and mesh allows for escapement of undersized male and female Tanner crab, thereby reducing handling time on deck and associated mortality of nontarget crab. The proposed escape mechanism amendment would increase the amount of surface area available for female and sublegal male Tanner crab to escape the gear.

BACKGROUND: Appropriately sized escape rings and mesh effectively retain legal sized crab in the pot while allowing smaller crab to escape. Inefficient escape mechanisms retain more nontarget crab (female and sublegal male crab) leading to higher on-deck sorting and associated handling mortality and decreases efficiency of the fishing operation. Registration Area J *C. bairdi* Tanner crab minimum escape mesh and ring sizes were first adopted in 1996. In 1997, the department conducted a study near Kodiak comparing retention of Tanner crab in pot gear configured with either 7-inch escape mesh or four 5-inch circular escape rings. The results of the study indicated no significant difference between the two escape mechanisms: all pots retained similar numbers of legal male, sublegal male, and female Tanner crab. While this study was intended to inform the board’s actions in establishing regulatory escape mesh and ring sizes at the 1996 board meeting, it was not completed in time, and the board adopted a regulation requiring a minimum of 7.25-inch mesh or four 5-inch rings. In 2021, the board amended the minimum mesh

size to 6.75-inch mesh, and the size and minimum number of escapement rings were unchanged for all Area J Tanner crab fisheries except the Bering Sea District.

In the Bering Sea District, eight circular escapement rings or the use of escapement mesh is required for the *C. opilio* (snow crab) fishery. In 2000, the board increased escapement mesh size and the minimum number of escape rings from four to eight for snow crab in conjunction with the North Pacific Fishery Management Council's adoption of a snow crab rebuilding plan after the stock was declared overfished. While the 1997 study did not specifically look at the effectiveness of using more than four circular escape rings, it was determined that the use of escapement mesh or eight escapement rings was more conservative and beneficial for rebuilding the snow crab stock.

If escapement rings are used, all management areas currently require a minimum of four circular escapement rings for *C. bairdi* Tanner crab fisheries and current ring size in the Kodiak District is larger (retains less crab) than other areas with the same size legal Tanner crab (Table 282-1). If escapement mesh is used, current escapement mesh size in the Kodiak District is smaller (retains more crab) than other areas with the same size legal Tanner crab (Table 282-1). Kodiak District Tanner crab fisheries can be fast paced with gear soak times less than 12 hours. Short soak times reduce the effectiveness of escape mechanisms. An increase in the surface area of escape mechanisms would provide more opportunity for nontarget crab to escape when soak time duration is short.

DEPARTMENT COMMENTS: The department **SUPPORTS** stakeholder-led efforts to decrease handling mortality through improvement of escape mechanisms. While the department has no specific data regarding the effectiveness of 6.75-inch mesh compared to 5-inch rings, it's generally accepted that mesh panels offer more opportunity for nontarget crab to escape pots given mesh panels cover a higher proportion of a pot's overall surface area.

COST ANALYSIS: After initial costs to reconfigure pot gear escapement mechanisms, approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

Table 282-1.—*C. bairdi* Tanner crab legal size, minimum escape mesh size, minimum escape ring size, and minimum number of escape rings by registration area.

Registration area	<i>C. bairdi</i>			
	Tanner crab legal size (in)	Min escape mesh size (in)	Min escape ring size (in)	Min number of rings
A (Southeast)	5.50	7.00	4.75	4
D (Yakutat)	5.50	7.00	4.75	4
E (Prince William Sound)	5.00	-	4.75	4
H (Cook Inlet)	4.50	-	4.75	4
J (Kodiak, Chignik, South Peninsula, and Eastern Aleutian Districts)	5.50	6.75	5.00	4
J (Bering Sea east of 166°W.)	4.80	6.50	4.50	4
J (Bering Sea west of 166°W.)	4.40	6.50	4.50	4

PROPOSAL 283 – 5 AAC 35.525. Lawful gear for Registration Area J.

Allow longlining of Bering Sea District commercial snow and Tanner crab pot gear

PROPOSED BY: Gabriel Prout.

WHAT WOULD THE PROPOSAL DO? Allow commercial snow and Tanner crab pot gear to be longlined in the Bering Sea District.

WHAT ARE THE CURRENT REGULATIONS? Vessels participating in the snow and Tanner crab commercial fisheries in the Bering Sea District must use single pots with at least one buoy bearing the vessel's ADF&G vessel number on each pot. There are no pot limits established for the rationalized Bering Sea snow and Tanner crab fisheries.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would allow vessels participating in the rationalized Bering Sea District snow and Tanner crab fisheries to operate either single or longlined pots. The proposer suggests longlining pots would create efficiencies in fishing operations, potentially increase vessel safety, and increase pot soak times which would allow crab to better “self-sort” on the bottom, reducing on-deck sorting time and bycatch of sublegal and female crab.

Longlining pots in these crab fisheries may increase gear conflicts and gear loss. Given that pots have not historically been longlined in the Bering Sea snow and Tanner crab fisheries, the overall effects on the fisheries are generally unknown.

BACKGROUND: The Bering Sea District for Tanner crab includes all waters north of Cape Sarichef (54°36'N latitude). Although both snow and Tanner crabs occur in the same geographical area, the fisheries differ in season dates, gear configuration, and stock assessments. Tanner crab in the Bering Sea is considered a single stock but prosecuted as two distinct fisheries in the Bering Sea District, divided east and west of 166°W longitude in order to distribute effort across the stock's expansive distribution area. The eastern Tanner crab fishery (EBT) occurs between 163°W longitude and 166°W longitude, and the western Tanner crab fishery (WBT) occurs westward of 166°W longitude (Figure 283-1). Both Tanner crab fisheries are open October 15 through March 31. Bering Sea Snow crab (BSS) is prosecuted as a single fishery in the Eastern Subdistrict west of 165°W longitude and the Western Subdistrict of the Bering Sea District (Figure 283-1). BSS is open from October 15 through May 15 east of 173°W longitude and through May 31 west of 173°W longitude. Despite the long regulatory fishing season, the BSS fishery is typically prosecuted January through April.

Fishermen target both snow and Tanner crab within the Bering Sea District using an assortment of single-lined rectangular pots, typically ranging from 6 ft × 6 ft to 8 ft × 8 ft in size. Pots are generally set in waters 50–100 fathoms in depth and left unattended for 24–72 hours using a combination of ground herring and whole Pacific cod to attract crab to the pot (Table 283-1). Pots are hauled to the surface individually and the crab catch is sorted and either retained or discarded at sea. Pots are then reset in the same location or stacked aboard the vessel and deployed in a different location. Most vessels are unable to transport their full complement of pots at one time. From 2013/14 to 2023/24 on average, vessels in the BSS and EBT fisheries registered 180 pots per vessel, and vessels in the WBT fishery registered 125 pots per vessel (Table 283-1).

Vessels will sometimes discard the entire catch of a pot prior to sorting, known as “rail dumping.” Rail dumping occurs when a vessel still has baited gear on the grounds after their IFQ has been achieved, or in cases where there are high catches of nontarget crab, sublegal males, females, or poor-quality crab. Pot loss occurs in both the snow and Tanner crab fisheries and varies annually, typically increasing with larger TACs (more effort, more lost pots) and sea ice extent (pots are lost to advancing ice). Average numbers of lost pots and rail-dumped by fishery from 2013/14 to 2023/24 are reported in Table 283-1.

Catch per unit effort (CPUE) of legal males in the Bering Sea snow and Tanner crab fisheries varies season to season and generally reflects increases and decreases in survey estimated abundance. The Bering Sea Tanner crab fisheries have much lower fishery CPUEs than in the Bering Sea snow crab fishery (Tables 283-1, 283-2, and 283-3). Areas of high legal male CPUE are targeted by the fleet over the course of the season with legal male CPUE being the primary determining factor in spatial distribution of catch and effort. Catches of female, sublegal male, and certain legal male crab are discarded at sea in both the snow and Tanner crab fisheries; legal male crab that are below the industry preferred size (four inches for snow crab, five inches for Tanner) or are of poor quality are typically discarded. However, the regulatory escapement requirements for snow and Tanner crab pots are intended to reduce the number of discarded crab by allowing them to exit the pot prior to being hauled. Discard rates vary within and across the snow and Tanner crab fisheries (Table 283-4).

Legal Tanner crab pot gear must have at least one-third of one vertical surface of the pot composed of not less than 6.5-inch stretched mesh webbing or no less than four circular escape rings of no less than 4.5 inches installed on a vertical surface no higher than one full mesh from the bottom of the pot. Legal gear for snow crab must be configured with at least eight escape rings (four rings on two sides) with an inside diameter of no less than 4 inches installed on the vertical surface no higher than the first full mesh up from the bottom of the pot or have one half of one side composed of not less than 5.25-inch stretched mesh webbing (Table 283-5).

Longlining pots to target snow and Tanner crab is common practice in other countries (e.g., Canada) and often includes using conical pots. Conical pots are stackable (freeing up deck space) and allow smaller vessels to more safely fish a relatively large number of pots compared to non-stacking types. When longlining pots, ends of strings are marked with clusters of buoys but depending on the distance between ends of the strings, the buoys may not always be visible. Potential gear conflicts may arise if vessels are fishing in close proximity and set over another vessel’s gear. There may also be conflicts between other gear types fishing in the area; gear conflicts can lead to increased gear loss, but the extent of the impact of longlining pots in these fisheries is unknown. Additionally, Alaska Wildlife Trooper (AWT) patrol vessels capable of patrolling the Bering Sea are currently not configured to operate longline pot gear for enforcement.

Gear modifications are a Category 3 management measure under the federal *Fishery Management Plan for Bering Sea/Aleutian Islands King and Tanner Crabs* (Section 8.3.5). Changes to Category 3 management measures occur at the discretion of the board but must be consistent with Magnuson–Stevens Fishery Conservation and Management Act National Standards.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: Approval of this proposal may result in additional direct cost for a private person to participate in this fishery should participants chose to longline gear. Initial costs include upgrading vessel equipment to allow for the operation of longlined pots and purchasing longline gear and pots. Approval of this proposal is not expected to result in an additional cost to the department.

Table 283-1.—Eastern Bering Sea Tanner (EBT), Western Bering Sea Tanner (WBT), and Bering Sea snow (BSS) crab commercial fishery data, 2005/06–2023/24.

Fishery	Vessels	Pots registered	Average				Depth ^a	Soak time ^b	CPUE ^c
			Pots per vessel	Pots lifted	Pots rail-dumped	Pots lost			
EBT	31	5,558	180	55,997	330	85	50	62	44
WBT	38	4,772	125	66,952	289	60	61	61	24
BSS	63	11,308	180	166,967	1,002	289	70	64	168

^a Depth in fathoms.

^b Soak time in hours.

^c Number of retained crab per pot lift.

Table 283-2.—Bering Sea Tanner crab (EBT and WBT) commercial fishery harvest data, 2005/06–2023/24.

Season	Location	TAC ^a	Harvest ^{b,c}	Number of			CPUE ^d
				Vessels	Landings	Pots lifted	
2005/06	East of 166°W long.		No commercial fishery				
	West of 166°W long.	1,620,000	952,887	43	103	32,389	14
	TOTAL ^f	1,620,000	952,887	43	103	32,389	14
2006/07	East of 166°W long.	1,875,000	1,401,743	37	63	29,129	20
	West of 166°W long.	1,094,000	720,846	39	78	28,140	12
	TOTAL ^f	2,969,000	2,122,589	52	141	57,269	16
2007/08	East of 166°W long.	3,445,000	1,582,858	20	65	33,515	20
	West of 166°W long.	2,176,000	523,796	34	61	21,938	11
	TOTAL ^f	5,621,000	2,106,654	41	126	55,453	17
2008/09	East of 166°W long.	2,763,000	1,830,031	22	66	36,698	21
	West of 166°W long.	1,537,000	109,552	42	101	30,175	2
	TOTAL ^f	4,300,000	1,939,583	50	167	66,873	12
2009/10	East of 166°W long.	1,350,000	1,324,578	17	51	16,770	29
	West of 166°W long.		No commercial fishery				
	TOTAL ^f	1,350,000	1,328,356	41	113	42,006	12
2010/11–2012/13			No commercial fishery				
2013/14	East of 166°W long.	1,463,000	1,456,357	30	74	26,468	27
	West of 166°W long.	1,645,000	1,330,488	64	261	131,524	6
	TOTAL ^f	3,108,000	2,786,845	66	335	157,992	9
2014/15	East of 166°W long.	8,480,000	8,450,485	42	143	87,875	50
	West of 166°W long.	6,625,000	5,253,942	58	237	142,820	22
	TOTAL ^f	15,105,000	13,704,427	64	380	230,695	33
2015/16	East of 166°W long.	11,272,000	11,263,562	49	202	139,171	43
	West of 166°W long.	8,396,000	8,378,816	62	247	145,638	33
	TOTAL ^f	19,668,000	19,642,378	70	449	284,809	38
2016/17			No Commercial Fishery				
2017/18	East of 166°W long.		No commercial fishery				
	West of 166°W long.	2,500,200	2,496,734	34	91	29,903	45
	TOTAL ^f	2,500,200	2,497,033	40	107	33,738	40
2018/19	East of 166°W long.		No commercial fishery				
	West of 166°W long.	2,439,000	2,441,201	36	101	41,922	33
	TOTAL ^f	2,439,000	2,441,227	37	111	45,984	30
2019/20			No Commercial Fishery				
2020/21	East of 166°W long.		No Commercial Fishery				
	West of 166°W long.	2,348,000	1,449,543	41	84	47,340	18
	TOTAL ^f	2,348,000	1,449,545	41	85	47,980	18
2021/22	East of 166°W long.		No Commercial Fishery				
	West of 166°W long.	1,100,000	1,089,707	20	76	22,433	35
	TOTAL ^f	1,100,000	1,089,707	20	76	22,433	35

-continued-

Table 283-2.–Page 2 of 2.

Season	Location	TAC ^a	Harvest ^{b,c}	Number of			CPUE ^d
				Vessels	Landings	Pots lifted	
2022/23	East of 166°W long.	1,163,000	1,164,897	17	55	19,434	35
	West of 166°W long.	850,000	848,601	14	55	18,130	32
	TOTAL ^f	2,013,000	2,013,498	17	110	37,564	34
2023/24	East of 166°W long.	760,000	757,342	16	43	7,037	57
	West of 166°W long.	1,320,000	1,315,761	15	59	22,861	36
	TOTAL ^f	2,080,000	2,073,103	17	102	29,898	41

^a Total allowable catch (TAC).

^b In pounds.

^c Deadloss included.

^d Number of retained crab per pot lift.

^e Retained catch.

^f Bering Sea District totals include limited tanner crab harvest incidental to the Bering Sea Snow and Bristol Bay Red king crab fisheries

Table 283-3.—Bering Sea snow crab (BSS) commercial fishery harvest data, 2005/06–2023/24.

Season	TAC ^a	Harvest ^{b,c}	Number of			CPUE ^d
			Vessels	Landings	Pots lifted	
2005/06	37,184,000	36,973,890	78	350	121,029	203
2006/07	36,566,000	36,355,649	69	307	89,419	331
2007/08	63,034,000	63,028,036	78	513	144,110	349
2008/09	58,550,000	58,547,849	77	487	163,537	281
2009/10	48,017,000	48,014,089	69	354	137,292	257
2010/11	54,281,000	54,263,200	68	386	147,478	256
2011/12	88,894,000	88,830,652	72	724	270,602	224
2012/13	66,350,000	66,254,528	70	505	225,627	210
2013/14	53,983,000	53,983,286	70	450	231,614	181
2014/15	67,950,000	67,941,587	71	543	286,920	192
2015/16	40,611,000	40,611,446	74	390	217,054	136
2016/17	21,570,000	21,570,915	63	266	118,548	138
2017/18	18,961,000	18,963,473	63	261	118,034	133
2018/19	27,581,000	27,578,244	61	313	127,432	176
2019/20	34,019,000	34,024,553	59	373	188,958	151
2020/21	45,000,000	45,001,190	62	407	171,678	218
2021/22	5,600,000	5,548,238	43	140	40,032	115
2022/23–2023/24			No commercial fishery			

^a Total allowable catch (TAC).

^b In pounds.

^c Deadloss included.

^d Number of retained crab per pot lift.

^e Retained catch.

Table 283-4.—Estimated percentage of crab discarded at sea by sex and size class relative to total fishery catch for Eastern Bering Sea Tanner (EBT), Western Bering Sea Tanner (WBT), and Bering Sea snow (BSS) crab fisheries, 2005/06–2022/23.

Fishery	At-sea discards			Total discards
	Females	Sublegal males	Legal males	
EBT	0.8%	22.0%	7.1%	29.9%
WBT	1.8%	14.3%	17.0%	33.2%
BSS	0.2%	0.5%	24.7%	25.4%
Average	1.0%	12.3%	16.3%	29.5%

Table 283-5.—Escapement requirements for pot gear in the Bering Sea snow crab (BSS) and Bering Sea Tanner crab (EBT/WBT) fisheries.

Fishery	Escapement webbing		Escapement rings		
	Dimensions (in)	Placement	Number	Dimensions (in)	Placement
EBT/WBT	6.5	1/3 of one vertical surface OR	4	4.5	1 mesh size from bottom of pot on a vertical surface
BSS	5.25	1/2 of one side OR	8	4	1 mesh size from bottom of pot on vertical surface (4 rings per 2 sides)

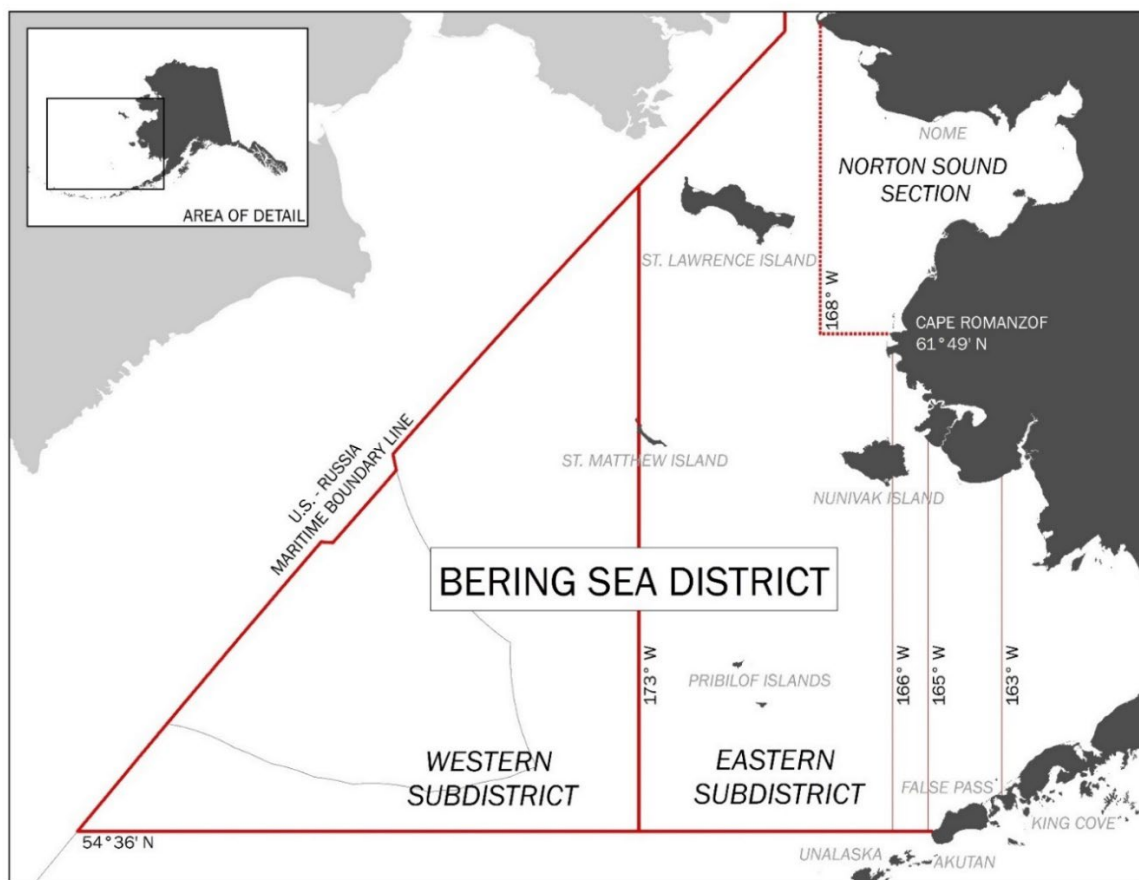


Figure 283-1.—Bering Sea District Tanner crab commercial fishery Registration Area J including subdistricts and sections.

PROPOSAL 284 – 5 AAC 35.5XX. New section.

Allow catcher vessels to operate as tenders during the Kodiak District commercial Tanner crab fishery

PROPOSED BY: Kevin Abena.

WHAT WOULD THE PROPOSAL DO? Allow Tanner crab catcher vessels to simultaneously tender Tanner crab from other Tanner crab catcher vessels in the Kodiak District of Registration Area J.

WHAT ARE THE CURRENT REGULATIONS? A vessel used to tender Tanner crab may not have Tanner crab gear on board and may not be used to fish for Tanner crab while tendering. Tender operators must register with ADF&G in the appropriate registration area or district prior to taking Tanner crab deliveries.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Tendering Tanner crab in the Kodiak District is currently allowed but not common practice. Allowing catcher vessels to also act as tender vessels would likely increase the number of vessels operating as tenders in the fishery. More tender vessels may benefit smaller vessels with limited hold capacity, or vessels operating in remote locations, by providing additional opportunity to deliver Tanner crab to a catcher/tender and remain on the fishing grounds for longer periods of time. Additional fishing time could increase yield and/or decrease operating expenses for some vessels. This proposal may also provide smaller vessels some safety benefit if they can deliver catch on the grounds to reduce weight during poor weather or after the season when vessels typically stack and transport gear back to port.

Based on language found in the proposal, there may also be a financial incentive for catcher vessel operators to act as tender vessels as this would increase the feasibility of delivering Tanner crab to processors outside of the Kodiak District and potentially receiving a higher exvessel price for the crab.

A catcher/tender operator would be the first purchaser of crab on behalf of a shore-based or floating processor and would be required to complete an ADF&G fish ticket at the first point of delivery from another catcher vessel. Processors may be held liable for undersize or female crab inadvertently landed on their behalf by a tender.

BACKGROUND: The Kodiak District is a limited entry, super-exclusive registration district for Tanner crab. A vessel registered for the Kodiak District Tanner crab fishery may not be used to take Tanner crab in any other registration district in the state during the same registration year. The Kodiak District Tanner crab fishery opens by regulation starting January 15. Depending on the GHF no more than 20 or 30 pots may be operated by a vessel and vessel operators may only pull gear from 8:00 a.m. to 5:59 p.m. daily.

Only male Tanner crab with a 5.5-inch carapace width or greater may be retained. Kodiak District commercial Tanner crab limited entry permits are divided into two vessel length categories, <60 feet (73% of permits) and ≤120 feet (27% of permits). Guideline harvest levels are established annually based on Tanner crab abundance estimates from an ADF&G stock assessment trawl

survey. During some years, regulatory minimum stock thresholds are not met, and the fishery does not open (Table 284-1). Since 2000, an average of 80 vessels landed 1.21 million lb of crab annually worth approximately \$3.39 million each year when a fishery occurred (Table 284-1).

Tanner crab populations are known to undergo wide, quasi-periodic fluctuations in population abundance. Tanner crab in the Kodiak District have undergone 4 major abundance pulses since 2000, the largest of which resulted in a 5.8-million-pound GHL in 2023 and a 3.0-million-pound GHL in 2024 (Table 284-1). Tanner crab fisheries of this magnitude have not occurred in the Kodiak District since 1986.

Historically, the use of tenders in the Tanner crab fishery is generally low. Due to large GHGs in recent years, vessels have sought tenders to both reduce offload wait times and expand availability to other markets. In 2023 and 2024, processor delivery schedules were protracted, and some vessels waited up to nine days to offload (Table 284-2). Additionally, higher volumes of Tanner crab were delivered to other ports outside of Kodiak or to catcher processors during these years (Table 284-3). In 2023, tendered deliveries had more deadloss than nontendered deliveries; however, this was largely due to a single vessel experiencing mechanical issues (Table 283-4). In 2024, tendered deliveries had slightly less deadloss than nontendered deliveries (Table 283-4).

The Kodiak District is divided into eight sections for Tanner crab management (Figure 284-1). The district is managed as a single stock but separate GHGs are established for each section. To effectively manage Tanner crab section GHGs, catcher vessel operators must register to fish in only one section of the Kodiak District at a time and all onboard crab harvested from a section must be delivered prior to registering and fishing in a different section. During some years, GHGs are harvested quickly and sections only remain open for several days.

Long transit times to processors in Kodiak or long processor offload times can preclude vessels from delivering catch in time to return to the fishing grounds to fish in a different section before that section's GHG is achieved. Thus, the ability to satisfy the section delivery requirement by delivering to a tender on the fishing grounds would offer specific advantage to vessels with tender service during years with fast paced fisheries. It is unspecified in the proposal if a catcher vessel also registered as a tender could deliver that vessel's own catch to itself to gain the advantage described above. Should this practice become common, the department anticipates many vessels would seek to register as dual catcher/tenders with no intent of tendering crab from other catcher vessels. This could undermine fishery manageability during some years and create added workload for department and processor staff.

Statewide provisions for Dungeness crab fisheries do not allow tenders to have Dungeness crab gear on board and may not be used to fish for Dungeness crab while tendering; however, in 2009, the board adopted regulation to allow a vessel that is registered to catch Dungeness crab to simultaneously register to tender Dungeness crab in the Kodiak District of Registration Area J. Tender usage in the Dungeness crab fishery remains low with an average of two catcher vessels utilizing tenders annually.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. Should this proposal be adopted, the department recommends the board adopt language prohibiting

catcher/tender vessels from tendering their own catch for the purposes of satisfying delivery requirements related to switching inseason section registration.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

Table 284-1.–Kodiak District commercial Tanner crab guideline harvest level (GHL), effort, harvest, and value, 2000–2024.

Season	GHL	Number			Avg. price per lb	Exvessel value
		Vessels	Landings	Pounds		
2000			No commercial fishery			
2001	500,000	145	192	510,407	\$2.30	\$1,173,936
2002	500,000	181	279	361,166	\$2.20	\$794,565
2003	510,000	72	276	511,324	\$2.48	\$1,268,084
2004	795,000	66	252	566,218	\$2.45	\$1,387,234
2005	1,750,000	76	291	1,806,416	\$1.73	\$3,125,100
2006	2,100,000	68	249	2,123,931	\$1.53	\$3,249,614
2007	800,000	50	96	765,092	\$1.84	\$1,407,769
2008	500,000	33	64	425,353	\$1.98	\$842,199
2009	400,000	31	48	359,056	\$1.80	\$646,301
2010	700,000	52	84	650,315	\$1.58	\$1,027,498
2011	1,490,000	80	131	1,537,384	\$3.04	\$4,673,647
2012	950,000	64	93	1,078,106	\$3.00	\$3,234,318
2013	660,000	59	115	658,194	\$2.70	\$1,777,124
2014–2017			No commercial fishery			
2018	400,000	56	65	431,991	\$4.52	\$1,952,599
2019	615,000	82	119	620,726	\$4.40	\$2,731,194
2020	400,000	49	114	400,990	NA	NA
2021			No commercial fishery			
2022	1,100,000	88	128	1,252,699	\$8.29	\$10,384,874
2023	5,800,000	133	280	5,897,298	\$3.33	\$19,638,002
2024	3,000,000	134	221	3,102,791	NA	NA
Avg. 2000–2024	1,208,947	80	163	1,213,656	\$2.97	\$3,389,904

Table 284-2.–Kodiak District commercial Tanner crab fishery maximum offload wait time estimated by subtracting the date of last delivery from the date of fishery closure, 2010–2024.

Season	Date of closure	Date of last delivery	Number of days
2010	January 26	January 28	2
2011	February 1	February 1	0
2012	February 16	February 17	1
2013	March 31	March 20	0
2018	January 22	January 26	4
2019	January 29	January 30	1
2020	March 14	March 18	4
2022	January 22	January 25	3
2023	February 9	February 17	8
2024	January 22	January 31	9
Avg. 2010–2024			3

Table 284-3.—Percent of landings that occurred in the Port of Kodiak or at another port during the Kodiak District commercial Tanner crab fishery, 2010–2024.

Season	GHL	Percent of landings	
		Port of Kodiak	Other port ^a
2010	700,000	100%	0%
2011	1,490,000	99%	1%
2012	950,000	100%	0%
2013	660,000	100%	0%
2018	400,000	100%	0%
2019	615,000	100%	0%
2020	400,000	100%	0%
2022	1,100,000	99%	1%
2023	5,800,000	75%	25%
2024	3,000,000	72%	28%
Avg. 2010–2024		89%	11%

^a Includes shoreside processors and floating catcher processors outside the Port of Kodiak.

Table 284-4.—Kodiak District commercial Tanner crab harvest in pounds (lb) and deadloss as a percent of harvest by tendered and not tendered deliveries, 2010–2024.

Season	Tendered		Not Tendered ^a		Total	
	Harvest	Deadloss %	Harvest	Deadloss %	Harvest	Deadloss %
2010	0	0.0%	650,315	0.6%	650,315	0.6%
2011	0	0.0%	1,537,384	0.6%	1,537,384	0.6%
2012	CF	CF	1,078,106	1.1%	1,078,106	1.1%
2013	0	0.0%	658,195	0.8%	658,195	0.8%
2018	0	0.0%	431,991	0.7%	431,991	0.7%
2019	0	0.0%	620,726	1.1%	620,726	1.1%
2020	0	0.0%	400,990	1.2%	400,990	1.2%
2022	0	0.0%	1,252,699	1.1%	1,252,699	1.1%
2023	1,347,204	5.3%	4,550,094	1.8%	5,897,298	2.6%
2024	765,553	0.9%	2,369,970	1.1%	3,135,523	1.1%
Avg. 2010–2024		3.7%		1.2%		1.6%

Note: CF=Confidential data.

^a Includes shoreside processors and floating catcher processors.

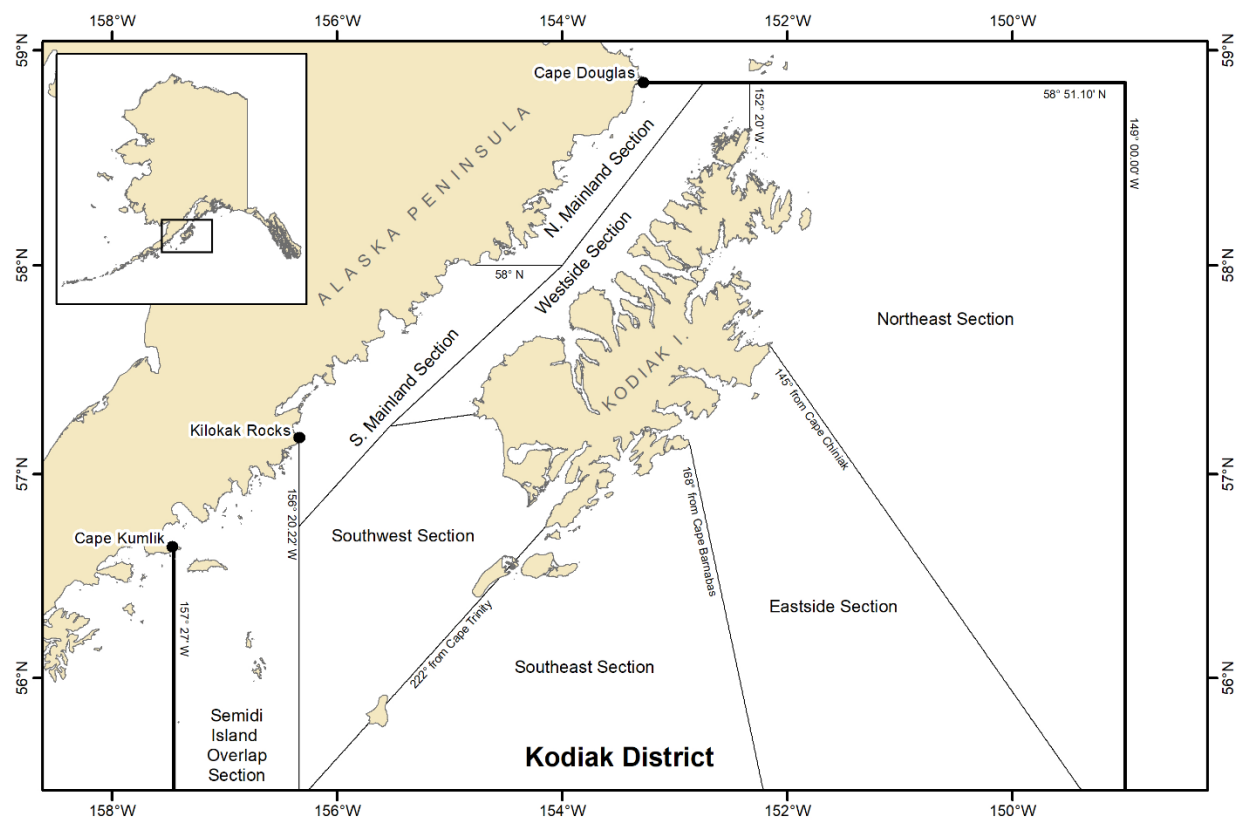


Figure 284-1.—Kodiak District commercial Tanner crab sections.

**PROPOSAL 285 – 5 AAC 35.507. Kodiak, Chignik, and South Peninsula Districts
C. bairdi Tanner crab harvest strategies.**

Repeal and replace the South Peninsula District Tanner crab harvest strategy

PROPOSED BY: Andrew Manos, Kiley Thompson, Ben Ley, Julian Manos, and Ken Mack.

WHAT WOULD THE PROPOSAL DO? Repeal and replace the South Peninsula District Tanner crab harvest strategy with management components derived from the Registration Area A (Southeast) Tanner crab harvest strategy. Current South Peninsula District pot limits and vessel length limits would be retained.

WHAT ARE THE CURRENT REGULATIONS? The South Peninsula District is divided into two management units for Tanner crab management (Eastern and Western Sections). Abundance must be sufficient to provide for a guideline harvest level (GHL) of at least 200,000 lb before a district can open for commercial fishing. Vessels participating in the South Peninsula District Tanner crab fishery may not exceed 58 feet in length. The South Peninsula District Tanner crab fishery is an open access fishery and a nonexclusive registration district for Tanner crab. The commercial Tanner crab season is January 15 through March 31. Pot gear may only be operated for ten hours each day, from 8:00 a.m. to 5:59 p.m. Only male Tanner crab with carapace width of 5.5 inches or greater may be retained; all other crabs incidentally captured must be immediately returned to the water unharmed.

The South Peninsula District is managed as a single stock but separate GHLs are established for each section. The current harvest strategy contains three primary components: 1) mature male abundance thresholds that must be met or exceeded before a commercial fishery may occur; 2) a ramped harvest control rule for establishing maximum legal male exploitation rates based on both mature male and mature female abundance; and 3) minimum GHLs that must be met or exceeded before a commercial fishery may be opened.

The South Peninsula Tanner crab pot limit is based on the size of the annual GHL, as follows:

- GHL less than 2 million lb = 20 pots;
- GHL 2–3 million lb = 30 pots; or
- GHL greater than 3 million lb = 50 pots.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The effects of this proposal are largely unknown given Tanner crab stocks, fleet dynamics, and geography vary considerably between Southeast Alaska and the Alaska Peninsula. Additionally, key provisions found within the Registration Area A Tanner crab harvest strategy (5 AAC 35.113) do not readily translate directly to the South Peninsula District fishery and alternatives are not specified in the proposal. At this time, the department is unable to make comparative estimates or assumptions on the relative effect across the current and proposed harvest strategies.

BACKGROUND: The South Peninsula District Tanner crab fisheries developed in the 1970s and were managed by ADF&G until December 1978 when a federal fishery management plan (FMP) was adopted. Under the FMP, ADF&G managed Tanner crab in state waters (0–3 nautical miles [nmi] offshore) and the federal government managed Tanner crab in federal waters (3–200 nmi

offshore). Joint jurisdiction occurred until 1987, when the state again assumed full management authority.

In the early 1980s, Tanner crab abundance and commercial harvests began a decline that continued through the 1990s. During that time, thresholds for opening and closing fisheries were not used in practice or established by regulation, and harvest was only regulated by applying a fixed 40% exploitation rate on legal males. Recognizing a need for abundance-based management, the board approved a new harvest strategy in 1999, which was specifically designed to allow commercial fisheries only when defined harvestable surpluses of crab were available.

The new strategy was composed of three components: 1) biological thresholds that required mature male abundance to meet or exceed 50% of the long-term average abundance of mature male crab met before fishing could occur, 2) an abundance based stair-step control rule used to set GHs based on exploitation rates of 10% or 20% of molting mature male abundance, and 3) a cap that limited GHs to no more than 30% of the total estimated legal males in the stock.

This harvest strategy was informed by crab abundance estimates generated by the ADF&G large-mesh trawl survey program conducted on the R/V *Resolution*. The survey has been conducted annually in the South Peninsula using the same vessel, net configuration, station grid, and survey timing since 1988, providing a robust time series for comparing current abundance estimates to past trends.

Tanner crab populations are known to undergo large, periodic fluctuations in population abundance. Given the high variability in abundance that currently characterizes this stock, the harvest strategy was repealed and replaced in 2022. The current harvest strategy is modeled after the “female dimmer” sloping control rule first adopted by the board for Bering Sea Tanner crab in 2020 (Figure 285-1). In general, the strategy maximizes exploitation when crab are most valuable to industry (high abundance and in newshell condition) while still providing for a conservative management approach that better reflects the reproductive status of the stock. The prescribed maximum legal male exploitation rates vary between 5% and 20% based on both mature male and mature female abundance relative to long-term average abundance. The harvest rate on legal males is scaled to match current abundance trends such that harvest rates increase during periods of high abundance and decrease when the population is in decline. The maximum harvest rate of 20% on legal males only applies when estimates of both mature male and mature female crab are above the long-term averages.

A full description of the analytical approach, results, and department recommendations for the 2022 harvest strategy update can be found in *Updated Tanner Crab Harvest Strategies for Kodiak, Chignik, and South Peninsula Districts: A Report to the Alaska Board of Fisheries* (Board meeting information for the Cook Inlet, Kodiak, Westward, Arctic Shellfish and Shellfish General Provisions, and Prince William Sound Shrimp March 26–April 2, 2022).

The Registration Area A (Southeast) Tanner crab harvest strategy uses a decision matrix that translates survey abundance estimates into days of fishing time based on the magnitude of mature male biomass and the number of pots registered for the fishery. The Area A plan additionally distributes fishing time across four different categories of fishing areas (core areas, noncore areas, inside exploratory areas, and outside exploratory areas) in a prescribed way.

To implement the Area A Tanner crab harvest strategy in South Peninsula District as proposed, the following provisions of the Area A harvest strategy, as they apply to the South Peninsula District, should be further specified:

- The Area A strategy allows for an initial fishing period of “at least five days” if the minimum mature male biomass threshold is met or exceeded. The department can implement an initial fishing period in the South Peninsula District as proposed but seeks guidance on whether a provision to close the fishery after the initial 5-day opening should be included if catch data indicate a closure is warranted. South Peninsula section GHGs are commonly achieved, and the entire fishery is often closed within five days under existing harvest policy.
- Abundance thresholds in the Area A strategy are based on a long-term average, which is currently defined in regulation as average abundance from 1997 to 2007. The department seeks guidance on what time period should be used as the basis to compute the long-term average in the South Peninsula.
- The Area A strategy uses two tiers of mature male biomass, 50% of the long-term average and approximately 120% of the long-term average, to determine the number of additional days to be added to the initial fishing period. The current South Peninsula strategy uses 50% and 100% of long-term average in the harvest control rule. The department seeks guidance on which long-term average thresholds should be used to compute the number of additional fishing days.
- The Area A strategy uses seven tiers of “number of registered pots” to determine the number of additional days to be added to the initial fishing period. The department seeks specific definition of what ranges are to be used for the South Peninsula District pot tiers. The number of pots in the lowest Area A pot tier currently exceeds the total number of pots typically registered for the entire South Peninsula District fishery.
- The department seeks guidance on how the South Peninsula District should be divided into “core,” “noncore,” “inside exploratory,” and “outside exploratory” areas.
- The South Peninsula District is divided into two management units (Eastern and Western Sections). The department seeks guidance on whether core, noncore, inside exploratory, and outside exploratory area designations would replace the South Peninsula sections or be in addition to the existing sections.
- After the initial fishing period closes in the core areas, the department seeks clarification on how many additional days of fishing should be allowed in the noncore, inside exploratory, and outside exploratory areas.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal as it lacks sufficient detail for the department to adequately describe or consider potential effects. Should the board consider repealing and replacing the existing South Peninsula District harvest strategy, the department recommends tabling this effort to allow for adequate stakeholder engagement and effects analysis. The Southeast Alaska approach provides fewer conservation benefits relative to the current South Peninsula harvest strategy with GHGs set annually, based on Tanner crab

abundance. If the proposal is adopted, the board may wish to consider whether current regulations continue to provide reasonable opportunity for subsistence uses of Tanner crab.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

SUBSISTENCE REGULATION REVIEW:

- 1. Is this stock in a nonsubsistence area?** No
- 2. Is the stock customarily and traditionally taken or used for subsistence?** Yes. The board made a positive customary and traditional use finding for Tanner crab in the Alaska Peninsula-Aleutian Islands Area (5 AAC 02.566(a)).
- 3. Can a portion of the stock be harvested consistent with sustained yield?** Yes.
- 4. What amount is reasonably necessary for subsistence uses?** The board found that 4,200 – 16,200 Tanner crab are reasonably necessary for subsistence uses in the Alaska Peninsula-Aleutian Islands Area, which includes 1,500 – 8,000 Tanner crab within the waters west of the longitude of Scotch Cap Light and east of 168° W. long (5 AAC 02.566(b)).
- 5. Do the regulations provide a reasonable opportunity for subsistence uses?** This is a board determination.
- 6. Is it necessary to reduce or eliminate other uses to provide a reasonable opportunity for subsistence use?** This is a board determination.

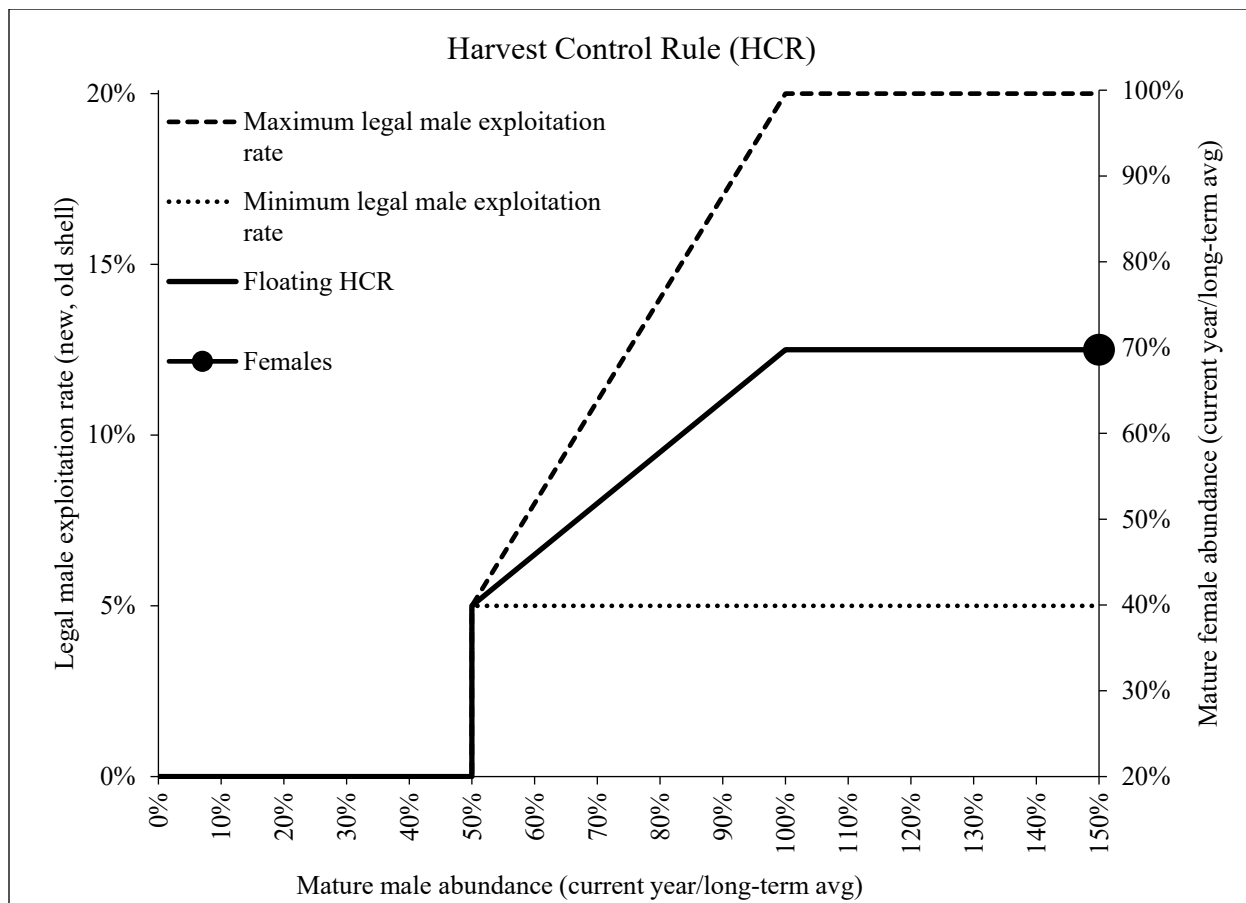


Figure 285-1.—South Peninsula District Tanner crab harvest control rule for exploitation rates on new and old shell legal males based on mature male abundance ratios of current to long-term average abundance and reduced using mature female abundance ratios of current to long-term average abundance (female dimmer).

**PROPOSAL 286 – 5 AAC 35.507. Kodiak, Chignik, and South Peninsula Districts
C. bairdi Tanner crab harvest strategies.**

Repeal South Peninsula District Tanner crab harvest strategy and replace with size, sex, and season management

PROPOSED BY: Andrew Manos, Kiley Thompson, Ben Ley, Julian Manos, and Ken Mack.

WHAT WOULD THE PROPOSAL DO? Repeal South Peninsula District Tanner crab harvest strategy and replace with size, sex, and season management.

WHAT ARE THE CURRENT REGULATIONS? The South Peninsula District is divided into two sections for Tanner crab management (Eastern and Western Sections). Abundance must be sufficient to provide for a guideline harvest level (GHL) of at least 200,000 lb before a district can open for commercial fishing. Vessels participating in the South Peninsula District Tanner crab fishery may not exceed 58 feet in length. The South Peninsula District Tanner crab fishery is an open access fishery and a nonexclusive registration district for Tanner crab. The commercial Tanner crab season is January 15 through March 31. Pot gear may only be operated for ten hours each day, from 8:00 a.m. to 5:59 p.m. Only male Tanner crab with carapace width of 5.5 inches or greater may be retained; all other crabs incidentally captured must be immediately returned to the water unharmed.

The South Peninsula District is managed as a single stock but separate GHLs are established for each section. The current harvest strategy contains three primary components: 1) mature male abundance thresholds that must be met or exceeded before a commercial fishery may occur; 2) a ramped harvest control rule for establishing maximum legal male exploitation rates based on both mature male and mature female abundance; and 3) minimum GHLs that must be met or exceeded before a commercial fishery may be opened.

The South Peninsula Tanner crab pot limit is based on the size of the annual GHL, as follows:

- GHL less than 2 million lb = 20 pots;
- GHL 2–3 million lb = 30 pots; or
- GHL greater than 3 million lb = 50 pots.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The current abundance-based harvest strategy would be replaced with a size, sex, season (3-S) management regime. Male Tanner crab with a carapace width of 5.5 inches or greater could be retained from January 15 through March 31. No annual harvest limit would be established.

A 76-day long season (Jan 15–Mar 31), with no limit on the amount of crab that could be harvested, would attract additional vessels from other areas with more restrictive Tanner crab seasons. Given the South Peninsula District is an open access Tanner crab fishery, there would be no limit on the number of vessels that could participate. A largely unregulated fishery with largely unrestricted access would likely exhaust the South Peninsula District Tanner crab resource.

During the 2024 South Peninsula District fishery the estimated number of legal male Tanner crab was 2.07 million crab or 4.95 million lb. The 2024 South Peninsula District GHL (480,000 pounds)

was fully harvested by 41 vessels in two days, at which point the department closed the fishery (Table 286-1). Using the 2024 fishery harvest rate (240,000 lb per day), 100% of survey estimated legal male biomass in South Peninsula District could have been caught in 21 days assuming fishery performance remained constant. Fishery performance would decline as Tanner crab abundance became depleted during an extended season, but assuming the 2024 harvest rate reduced by up to 75%, full depletion of legal sized crab could still occur over the proposed season length even absent anticipated increases in the number of vessels in the fishery.

Overfishing the Tanner crab stock could lead to a situation where natural mortality exceeds recruitment and the stock would not be capable of rebound, similar to the Alaska Peninsula red king crab stock that collapsed in the 1980s and remains at historically low density to date.

Without the need to inform a harvest strategy and set annual Tanner crab GHs for the South Peninsula District, the department would likely reallocate Tanner crab trawl survey days away from South Peninsula District to other Area J districts with abundance-based harvest strategies and no longer conduct a survey or produce an annual assessment of crab distribution and abundance.

BACKGROUND: The South Peninsula District Tanner crab fisheries developed in the 1970s and was managed by ADF&G until December 1978 when a federal fishery management plan (FMP) was adopted. Under the FMP, ADF&G managed Tanner crab in state waters (0–3 nmi offshore) and the federal government managed Tanner crab in federal waters (3–200 nmi offshore). Joint jurisdiction occurred until 1987, when the state again assumed full management authority.

In the early 1980s, Tanner crab abundance and commercial harvests began a decline that continued through the 1990s. During that time, thresholds for opening and closing fisheries were not used in practice or established by regulation and harvest was only regulated by applying a fixed 40% exploitation rate on legal males. Recognizing a need for abundance-based management, the board approved the new harvest strategy in 1999, specifically designed to allow commercial fisheries only when defined harvestable surpluses of crab were available.

The new strategy was composed of three components: 1) biological thresholds that required mature male abundance to meet or exceed 50% of the long-term average abundance of mature male crab met before fishing could occur, 2) an abundance based stair-step control rule used set GHs based on exploitation rates of 10% or 20% of molting mature male abundance, and 3) a cap that limited GHs to no more than 30% of the total estimated legal males in the stock.

The harvest strategy was informed by crab abundance estimates generated by the ADF&G large-mesh trawl survey program conducted on the R/V *Resolution*. The survey has been conducted annually in the South Peninsula using the same vessel, net configuration, station grid, and survey timing since 1988, providing a robust time series for comparing current abundance estimates to past trends.

Tanner crab populations are known to undergo large, periodic fluctuations in population abundance. Given the high variability in abundance that currently characterizes this stock, the harvest strategy was repealed and replaced in 2022. The current harvest strategy is modeled after the “female dimmer” sloping control rule first adopted by the board for Bering Sea Tanner crab in 2020 (Figure 285-1). In general, the strategy maximizes exploitation when crab are most valuable

to industry (high abundance and in newshell condition) while still providing for a conservative management approach that better reflects the reproductive status of the stock. The prescribed maximum legal male exploitation rates vary between 5% and 20% based on both mature male and mature female abundance relative to long-term average abundance. The harvest rate on legal males is scaled to match current abundance trends such that harvest rates increase during periods of high abundance and decrease when the population is in decline. The maximum harvest rate of 20% on legal males only applies when estimates of both mature male and mature female crab are above the long-term averages.

A full description of the analytical approach, results, and department recommendations for the 2022 harvest strategy update can be found in *Updated Tanner Crab Harvest Strategies for Kodiak, Chignik, and South Peninsula Districts: A Report to the Alaska Board of Fisheries* (Board meeting information for the Cook Inlet, Kodiak, Westward, Arctic Shellfish and Shellfish General Provisions, and Prince William Sound Shrimp March 26–April 2, 2022).

A 3-S management regime is typically employed for crab stocks when information on stock status is not available or for species that do not aggregate in a way that leads to high catch rates and rapid depletion. Area J Dungeness crab fisheries are an example of stocks that are managed under 3-S. South Peninsula Tanner crab are a highly aggregated species, a robust time series of survey estimated abundance is available, and abundance-based management has occurred since 2000.

Repealing the current Tanner crab harvest strategy and reverting to a 3-S management regime would be inconsistent with the board’s *Policy on King and Tanner Crab Resource Management* (90-04-FB; March 23, 1990), which states that management measures should be established based on the best available information. There are no established commercial Tanner crab fisheries in the state regulated by 3-S management.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal because it violates the department’s constitutional and statutory obligation to manage fisheries for sustained yield and would result in overfishing. The department would not open the South Peninsula District Tanner crab fishery under a 3-S management scheme. Given South Peninsula District pot limits are currently based on the size of the GHL, the department seeks guidance from the board as to what the pot limit should be in the absence of a GHL, should this proposal be adopted. If this proposal were adopted, the board may wish to consider whether regulations would continue to provide reasonable opportunity for subsistence uses of Tanner crab.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

SUBSISTENCE REGULATION REVIEW:

1. **Is this stock in a nonsubsistence area?** No
2. **Is the stock customarily and traditionally taken or used for subsistence?** Yes. The board made a positive customary and traditional use finding for Tanner crab in the Alaska Peninsula-Aleutian Islands Area (5 AAC 02.566(a)).
3. **Can a portion of the stock be harvested consistent with sustained yield?** Yes.

4. **What amount is reasonably necessary for subsistence uses?** The board found that 4,200 – 16,200 Tanner crab are reasonably necessary for subsistence uses in the Alaska Peninsula-Aleutian Islands Area, which includes 1,500 – 8,000 Tanner crab within the waters west of the longitude of Scotch Cap Light and east of 168° W. long (5 AAC 02.566(b)).
5. **Do the regulations provide a reasonable opportunity for subsistence uses?** This is a board determination.
6. **Is it necessary to reduce or eliminate other uses to provide a reasonable opportunity for subsistence use?** This is a board determination.

Table 286-1.—South Peninsula District commercial Tanner crab guideline harvest level (GHL), effort, harvest, and value, 2000–2024.

Year	GHL	Number			Avg. price per lb	Exvessel value
		Vessels	Landings	Pounds		
2000			No commercial fishery			
2001	375,000	56	69	260,982	\$1.46	\$381,034
2002–2004			No commercial fishery			
2005	300,000	42	68	295,741	\$1.66	\$490,930
2006	290,000	15	47	287,749	\$1.20	\$345,299
2007	200,000	6	15	165,811	\$0.79	\$130,991
2008	250,000	9	42	236,241	\$1.50	\$354,362
2009	275,000	12	66	265,560	\$1.50	\$398,340
2010	500,000	41	72	583,202	\$1.39	\$810,651
2011	2,300,000	51	134	2,866,041	\$2.47	\$7,079,121
2012	1,620,000	56	117	1,875,277	\$2.24	\$4,200,620
2013	230,000	24	44	343,293	\$2.29	\$786,141
2014–2021			No commercial fishery			
2022	500,000	45	89	506,671	\$8.30	\$4,205,369
2023	1,100,000	50	96	1,151,132	\$3.25	\$3,741,179
2024	480,000	41	45	468,765	NA	NA
Avg. 2000–2024	647,692	34	70	715,882	\$2.34	\$1,910,336

Note: GHL = guideline harvest level (lb); NA = not available

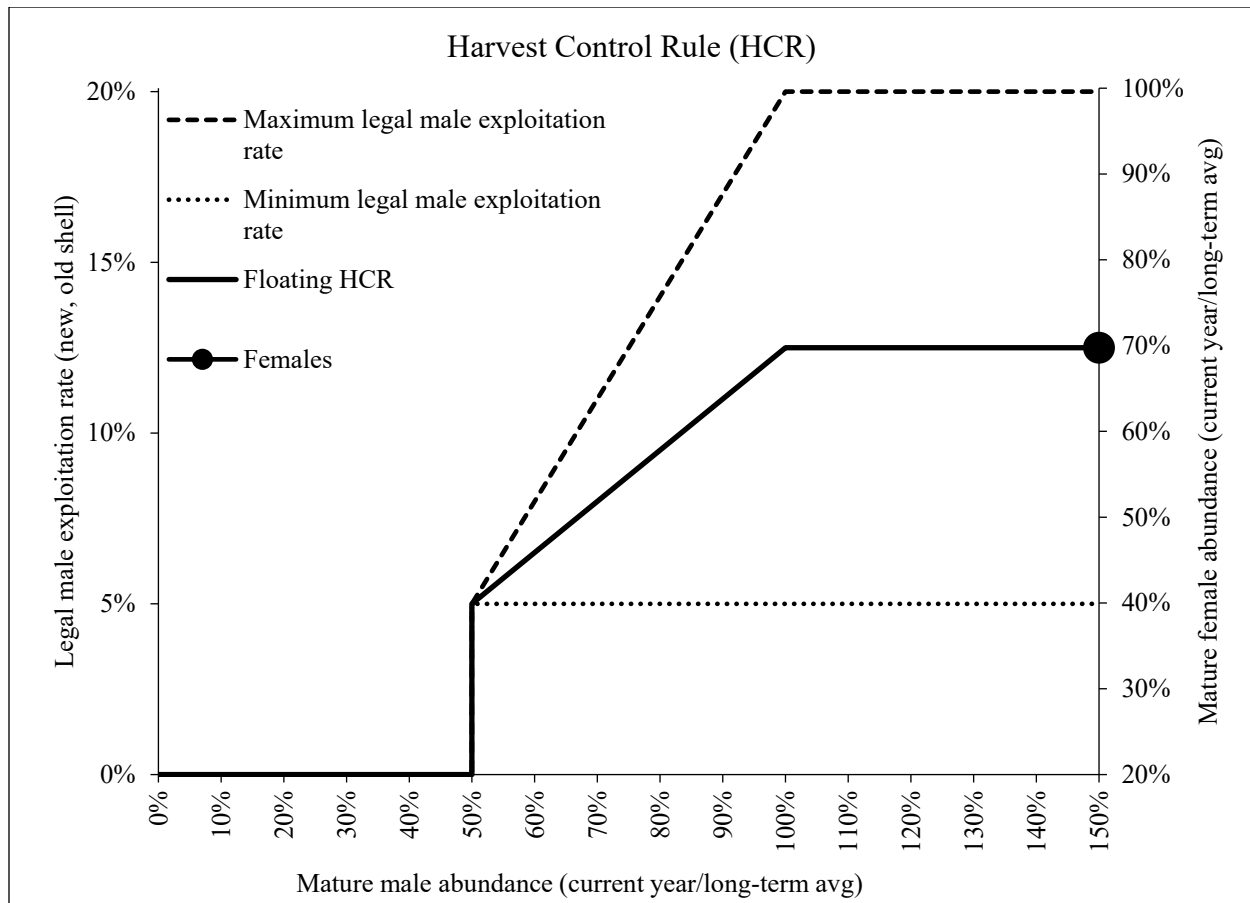


Figure 286-1.—South Peninsula District Tanner crab harvest control rule for exploitation rates on new and old shell legal males based on mature male abundance ratios of current to long-term average abundance and reduced using mature female abundance ratios of current to long-term average abundance (female dimmer).

PROPOSAL 287 – 5 AAC 35.508. Bering Sea *C. Bairdi* Tanner Crab Harvest Strategy.

>Amend definition of preferred sized males in the commercial Bering Sea District Tanner crab harvest strategy

PROPOSED BY: Alaska Bering Sea Crabbers.

WHAT WOULD THE PROPOSAL DO? Adjust the annual Bering Sea District Tanner crab TAC calculation in the regulatory harvest strategy. The intent of the proposal is to align the harvest strategy with a reduction in industry-preferred Tanner crab size otherwise known as the exploited legal male (ELM) size, from 127 mm (5.0 inches) carapace width (CW) to a size to be determined by the department based on landed sizes from the previous open season's retained catch. It is unspecified in the proposal what measure or methodology the department should use to compute ELM from the previous season's retained catch although the proposal identifies that ELMs should be no lower than 112 mm (4.4 inches) west of 166°W longitude (WBT) and 122 mm (4.8 inches) east of 166°W longitude (EBT).

WHAT ARE THE CURRENT REGULATIONS? Legal size for male Tanner crab in the WBT (west of 166°W longitude) is 4.4 inches CW. Legal size for male Tanner crab in the EBT (east of 166°W longitude) is 4.8 inches CW. For TAC setting, ELM for Tanner crab in both the EBT and WBT are defined in regulation as male Tanner crab 5.0 inches (127 mm) CW and greater.

Tanner crab pot gear in the Bering Sea District must have at least one-third of one vertical surface of the pot composed of not less than 6.5 inch stretched mesh webbing or have no less than four circular escape rings of no less than 4.5 inches inside diameter installed in on the vertical surface of the pot so that the bottom of a ring is no higher on the vertical surface than the first full mesh from the bottom of the pot.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? In general, lower ELM size would provide for higher TACs, specifically in the WBT, than would otherwise be computed using the current ELM definition of five inches. The degree to which TACs would increase varies and primarily depends on the size and shell condition composition of male Tanner crab and the estimated total and retained-catch fishery selectivity of male Tanner crab by size and shell condition.

This change could reduce discarding of legal-size crab during the fishery as smaller sized crab (i.e. 4.4 inches compared to 5.0 inches in the WBT) would be retained in the fishery at a higher rate compared to current harvest practices. Retaining a wider range of sizes of mature males could improve fishery CPUE and reduce discard mortality.

A lower ELM size may negatively impact market preference and fishery value given the long-standing tradition of targeting and marketing industry preferred size Tanner crab.

Pot gear escape mechanisms in the form of stretched mesh or circular rings are scaled to match retention standards. If ELM were to change across seasons based on size composition data from the previous year's landed catch as proposed, escape mesh and rings on Tanner crab pots would also be required to change accordingly. Due to the potential for ELM size to change across years,

the board would need to remove escapement mechanism definitions for Bering Sea Tanner crab pot gear currently prescribed in regulation and grant the department ADF&G emergency order authority to annually establish ring and mesh sizes concurrent to changes in ELM.

BACKGROUND: The Bering Sea District for Tanner crab includes all waters north of Cape Sarichef (54° 36'N latitude). Bering Sea Tanner crab are considered a single stock but prosecuted as two distinct fisheries in the Bering Sea District, divided east and west of 166°W longitude to distribute effort across the stock's expansive distribution area. The eastern Tanner crab (EBT) fishery occurs between 163°W longitude and 166°W longitude, and the western Tanner crab fishery (WBT) occurs westward of 166°W longitude (Figure 287-1). Both fisheries are managed under the federal crab rationalization program and are open October 15 through March 31.

The current Bering Sea District Tanner crab harvest strategy was adopted by the board in 2020 resulting from a collaborative management strategy evaluation between state, federal, and crab industry stakeholders. The strategy includes a sloping control rule known as a “female dimmer” which establishes an exploitation rate ranging from 5% to 20% based on relative stock status of mature female biomass and mature male biomass and is then applied to mature male biomass to determine a *computed* TAC. A *maximum* TAC is derived by applying 50% exploitation on 5-inch exploitable legal males and is meant to prevent overharvest of the large (>5.0 inches) males when they are in relatively low abundance compared to small (<5.0 inch) mature males. The final TAC advances the lesser of the two quantities as the final annual harvest limit. A change in ELM size (i.e., from 5.0 inches to 4.4 inches) would increase the amount of crab available to the harvest strategy via the maximum TAC computation. Maximum TACs are computed due to long standing crab industry preference of only retaining Tanner crab that are five inches or larger. In some years, the abundance of small (<5.0 inch) mature male Tanner crab compared to large (≥5.0 inches) mature male Tanner is relatively high (Figure 287-2). In these instances, establishing a TAC using a smaller ELM size would result in higher TAC levels, which could result in excessive exploitation on the largest males in the population.

The Tanner crab life cycle includes a terminal molt (to maturity), after which crabs no longer grow for the remainder of their life span. For males, the terminal molt includes a morphological change in chela size from “small claw” to “large claw”, which is referred to as morphological maturity. The male terminal molt occurs across a range of sizes, and the size at terminal molt is generally believed to be caused by temperature conditions and/or population density. As such, size at terminal molt likely varies in time and space depending on regional environmental conditions. Determination of male morphological maturity is accomplished by direct observation of chela morphology of a subset of crab captured during preseason surveys or fisheries. The average size at maturity is smaller for Tanner crab in the WBT compared to EBT resulting the differential legal sizes.

The proposal did not specify new ELM sizes to consider for TAC setting, indicating the department could compute new ELMs annually based on the size distribution of landed crab from the previous season. Although the department collects size, and other biological data, from nearly all Bering Sea Tanner crab landings each season, the total number of retained crab measured for carapace width compared to the total number of crab landed each season is low (<1%). In years when the average retained catch size varied only by small amounts compared to the previous season (i.e. 1–

3 mm), minor adjustments to ELM and resulting TACs comes with the risk of making management decisions based on measurement error rather than retained catch selectivity which could add uncertainty and unpredictability to the TAC setting process overall.

The proposal specifies that 4.8 inches for EBT and 4.4 inches for WBT would serve as the minimum permissible ELM sizes for TAC setting. For retrospective comparison, preliminary simulations suggest changing retention size from 5.0 inches to 4.8 inches (legal size) in the EBT would result in generally status quo outcomes in TAC (Figure 287-3). In contrast, changing retention size from 5.0 inches to 4.4 inches (legal size) in the WBT would result in a larger net increase (mean 12% increase, maximum 57% increase) to annual TACs (Figure 287-3). The larger impact to WBT TACs is related to the smaller size at maturity: proportionally fewer animals reach 5.0 inches in the WBT than in EBT. Current understanding of Tanner crab size at maturity supports that a smaller retention size in the WBT may benefit the stock by better distributing retained catch across a broader range of mature sized males. Although overall fishery exploitation would likely increase in the WBT with a shift to smaller retention size, negative biological impacts on future spawning biomass might be mitigated by the current harvest strategy.

While a lower ELM size may yield higher TACs on average, committing smaller crab to long standing markets could also potentially lower value. As proposed, computed ELMs could be different for the EBT and WBT resulting in different sized Bering Sea Tanner crab (EBT vs WBT) entering commerce. Given these tradeoffs, harvesters and processors should reach consensus on Tanner crab retention sizes prior to any regulatory change to ensure market effects do not result in unintended fishing behavior such as discarding or high grading.

Minimum size limits are a Category 2 management measure under the *Fishery Management Plan for Bering Sea/Aleutian Islands King and Tanner Crabs* (FMP) (Section 8.2.1). Category 2 management measures are frameworked in the FMP and must be consistent with the criteria set out in the FMP and Magnuson – Stevens Fishery Conservation and Management Act National Standards.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal as written. Annually computing ELMs based on landed crab size from previous seasons would add uncertainty and unpredictability to the TAC setting process. Further exploration into appropriate Tanner crab fishery retention size is warranted, particularly for the WBT, but any resulting regulatory change should be well defined and synchronized across all stakeholders.

COST ANALYSIS: Approval of this proposal would result in some additional direct cost for a private person to participate in this fishery. Tanner crab pot gear would need to be refitted with new escape mesh or rings to match any change in crab retention size. Approval of this proposal is not expected to result in an additional cost for the department.

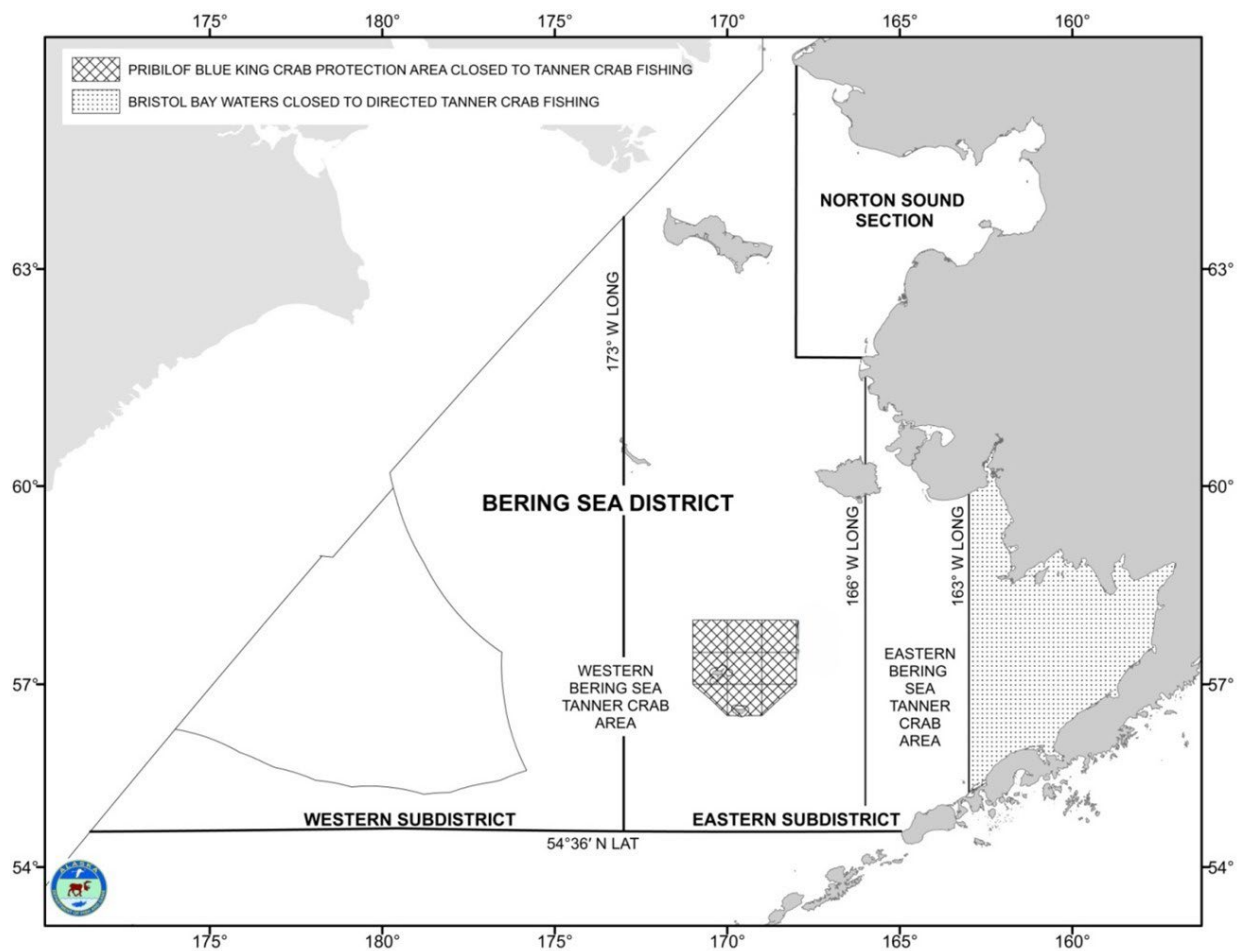


Figure 287-1.—Bering Sea District for commercial *C. bairdi* Tanner crab.

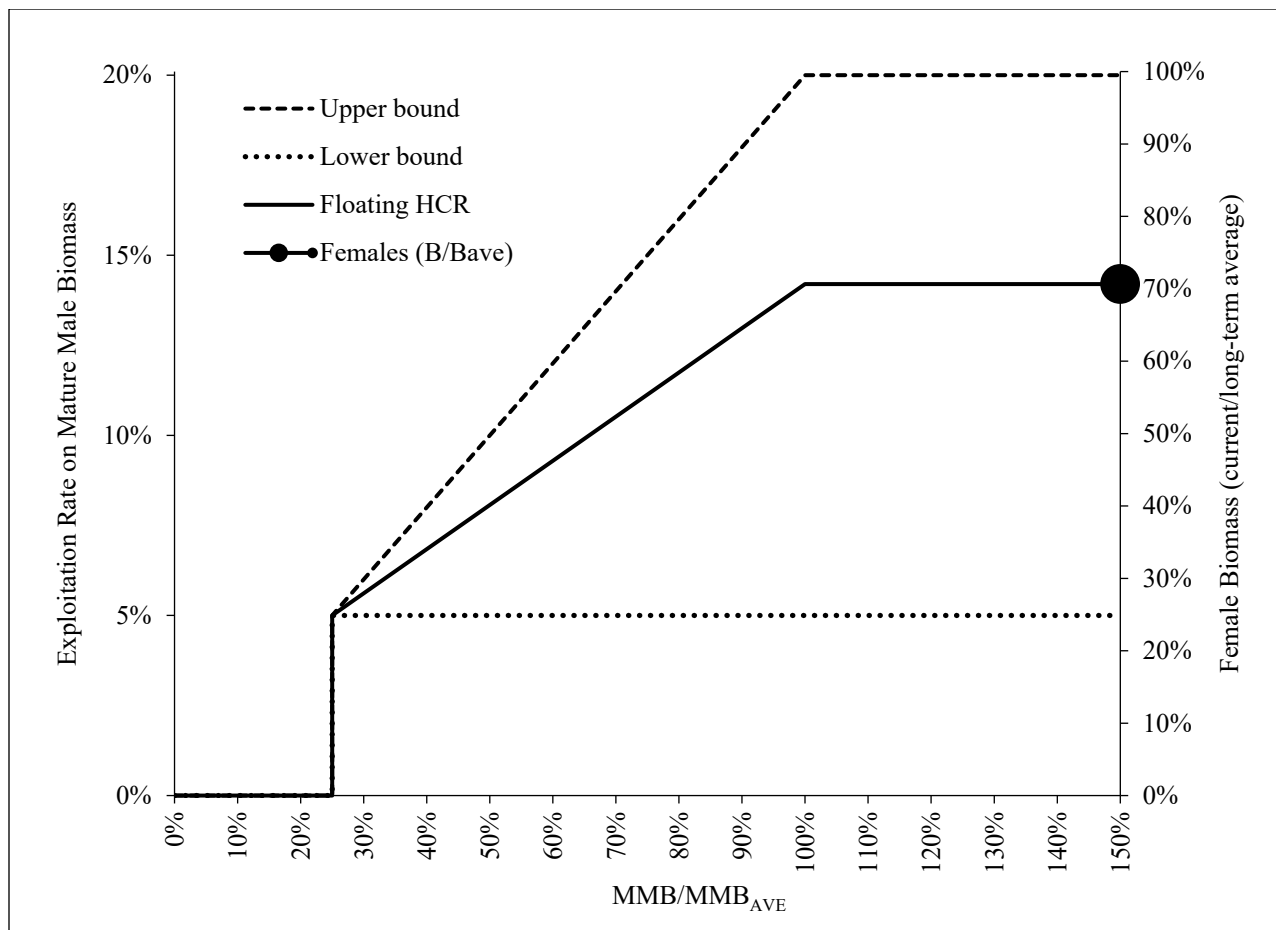


Figure 287-2.—Bering Sea District Tanner crab harvest control rule.

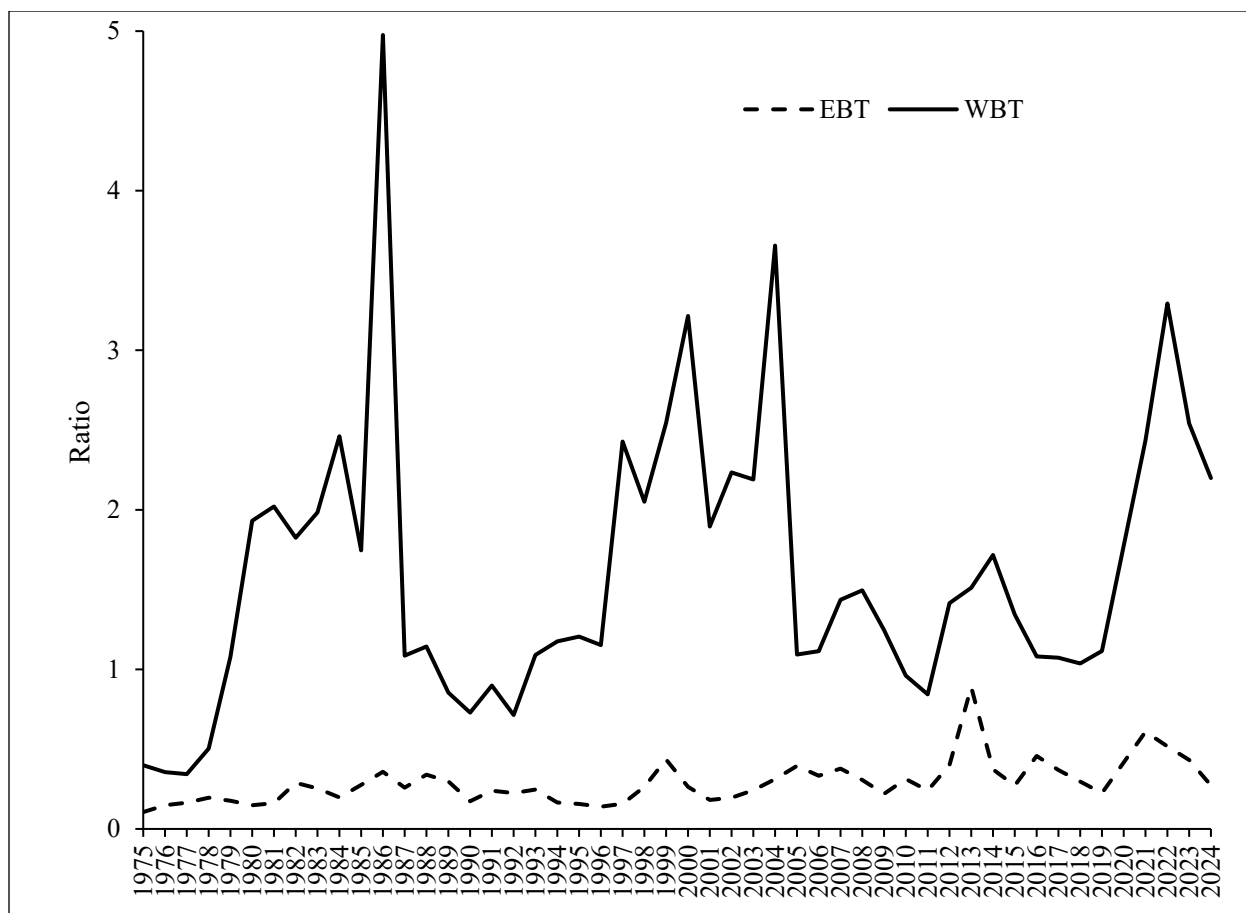


Figure 287-2.—National Oceanic and Atmospheric Administration (NOAA) eastern Bering Sea survey data timeseries of the ratio of male Tanner crab abundance in size categories 4.8–5.0 inch carapace width (CW) to >5.0 inch CW (EBT, dash line) and 4.4–5.0 inch CW to >5.0 inch CW (WBT, solid line).

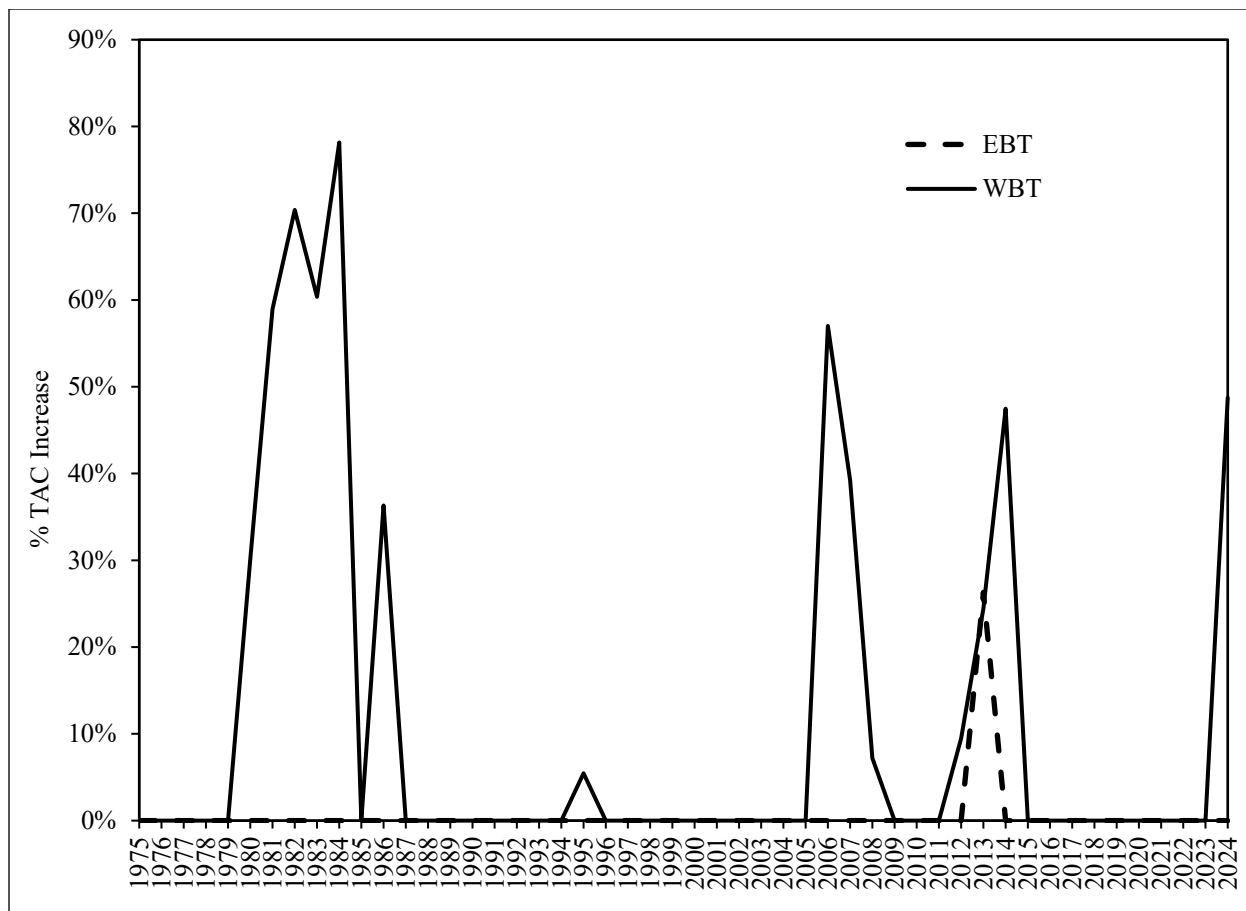


Figure 287-3.—The % change (increase) in final TAC when using 120 mm CW (EBT, dash line) and 110 mm CW (WBT, solid line) to define exploitable legal males compared to 125 mm CW.

PROPOSAL 288 – 5 AAC 35.517. Bering Sea *C. Opilio* Tanner Crab Harvest Strategy.

>Amend definition of preferred sized males in the commercial Bering Sea District snow crab harvest strategy

PROPOSED BY: Alaska Bering Sea Crabbers.

WHAT WOULD THE PROPOSAL DO? Adjust the annual Bering Sea District commercial snow crab total allowable catch (TAC) calculation in the regulatory harvest strategy. The intent of the proposal is to align the commercial harvest strategy with a reduction in industry-preferred snow crab size otherwise known as the exploited legal male (ELM) size, from 102 mm (4.0 inches) carapace width (CW) to a size to be determined by the department based on landed sizes from the previous open season's retained catch. It is unspecified in the proposal what measure or methodology the department should use to compute ELM from the previous season's retained catch although the proposal identifies that measure should result in an ELM that is at least 95 mm (3.74 inches) in size.

WHAT ARE THE CURRENT REGULATIONS? Male snow crab greater than 3.1 inches CW may be retained during the commercial fishery. For TAC setting, ELM for Bering Sea snow crab are defined in regulation as male snow crab 4.0 inches (102 mm) CW or greater.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? In general, a lower ELM size would provide for higher TACs than would otherwise be computed using the current ELM definition of four inches. The degree to which TACs would increase primarily depends on the size and shell condition composition of male snow crab and the estimated total and retained-catch fishery selectivity of male snow crab by size and shell condition. This change could reduce discard mortality of legal-size crab during the fishery as smaller sized crab (3.74 inches compared to 4.0 inches) would likely be retained in the fishery at a higher rate compared to current harvest practices. However, this proposal would result in a higher overall exploitation on mature male crab abundance that could increase to a level that harms reproductive potential of the stock.

A lower ELM size may negatively impact market preference and fishery value given the long-standing tradition of targeting and marketing four-inch snow crab. Snow crab supplied from larger snow crab fisheries around the world (Canada, Russia, and Norway) tend to be smaller in size compared to the Alaska fishery.

BACKGROUND: The board adopted the current framework for the Bering Sea snow crab harvest strategy in 2002. Prior to 2000, there was no regulatory harvest strategy used to determine annual harvest limits for Bering Sea snow crab. The season opened January 15 and closed by emergency order when a GHL established by the department was reached. In 1999, the Bering Sea snow crab stock was declared overfished by the North Pacific Fishery Management Council (NPFMC) due to low mature crab biomass. In response, the board adopted an interim harvest strategy in 2000 to rebuild the stock. This temporary harvest strategy specified only legal male crab 3.1 inches or greater in CW could be retained and was the first instance where 4.0-inch exploitable legal males were defined in regulation. In practice, harvesters have targeted crab greater than 4.0 inches CW since the inception of the domestic fishery. Industry preference for larger crab provides for higher product yield and marketability as opposed to a biological or conservation benefit to the stock.

The snow crab stock collapsed starting in 2019 due to a marine heatwave in the eastern Bering Sea resulting in estimated mortality of approximately 90% of the stock. The fishery was subsequently declared overfished, and the 2021–2023 seasons were closed due to low abundance. The fishery reopened for the 2024/25 season with the smallest TAC on record. Future conditions are predicted to include continued warming temperatures and reductions in sea ice cover. Warming conditions are expected to continue to impact Bering Sea snow crab through complex interactions of physiological (e.g., thermal stress, reduced calcification via ocean acidification), and ecological (e.g., shifts in adult spatial distribution, changing circulation patterns and associated larval transport, temporal mismatch of larvae and spring phytoplankton blooms) processes. Other Bering Sea crab stocks, including Bristol Bay red king crab are also at or near time series low abundance in recent years, suggesting contemporary environmental conditions are likely suboptimal for crab production in the Bering Sea.

Generally, the snow crab harvest strategy derives two TACs and advances the lesser of the two quantities as the final annual harvest limit. These TACs include a *computed* TAC based on mature male biomass and a *maximum* TAC which limits the amount crab based on the definition of ELM. The computed TAC uses a sloping control rule ranging from 10.0% to 22.5% exploitation on mature male biomass (based on relative stock status), whereas the maximum TAC is derived by applying 58% exploitation on 4.0-inch exploitable legal males. While the harvest strategy is “tuned” to mature male biomass as the currency of management, the maximum TAC is meant to prevent overharvest of the large (>4.0 inches) males when they are in relatively low abundance compared to small (<4.0 inch) mature males. A change in ELM size (i.e. from 4.0 inches to 3.74 inches) would increase the amount of crab available to the harvest strategy via the maximum TAC computation. Maximum TACs are computed due to long standing crab industry preference of only retaining snow crab that are four inches or larger. In some years, the abundance of small (<4.0 inch) mature male snow crab compared to large (≥ 4.0 inch) mature male snow crab is relatively high (Figure 288-1). In these instances, establishing a TAC using a smaller ELM size would result in higher TAC levels, which could result in excessive exploitation on the largest males in the population. Preliminary simulations suggest relatively small changes in ELM size (3.74 inches versus 4.0 inches) could result in significant increases (mean 12% increase, maximum 90% increase) to annual TACs (Figure 288-1).

The snow crab life cycle includes a terminal molt (to maturity), after which crabs no longer grow for the remainder of their life span. For males, the terminal molt includes a morphological change in chela size from “small claw” to “large claw”, which is referred to as morphological maturity. The male terminal molt occurs across a range of sizes, and the size at terminal molt is generally believed to be caused by temperature conditions and/or population density. As such, size at terminal molt likely varies in time and space depending on regional environmental conditions. Determination of male morphological maturity is accomplished by direct observation of chela morphology of a subset of crab captured during preseason surveys or fisheries. It is generally believed that the largest males have the highest reproductive value as they are thought to be more active in mating dynamics due to their competitive advantage over smaller males. Functional maturity refers to the portion of the mature males that actively participate in mating.

Bering Sea harvest policy assumes all mature male snow crab have equal reproductive potential regardless of size, yet there is recent and ongoing debate among the scientific community about how best to define the “currency of management” for Bering Sea snow crab. State and federal

harvest control rules apply an exploitation rate on mature males, yet calculated management reference points (including TAC) can vary substantially depending on definitions of male maturity and the size composition of the population.

The department cautions that changes to ELM size without a comprehensive review of the entire snow crab harvest strategy could risk sustainable management of this vulnerable stock. Further analyses are needed to identify best practices for defining management currency (morphological vs functional maturity) and to assess the biological impacts of harvesting smaller sized mature male snow crab, particularly with respect to impacts on future spawning biomass under suboptimal environmental conditions. A management strategy evaluation (MSE) is a quantitative tool that compares projected stock dynamics across a suite of alternative harvest strategy scenarios to balance tradeoffs between conservation and economic objectives. In coordination with industry stakeholders, the department recently advanced MSE-derived recommendations to the board for the adoption of new harvest strategies for Aleutian Islands golden king crab (2018) and Eastern Bering Sea Tanner crab (2020) fisheries. Accordingly, the department recommends completing a MSE for Bering Sea snow crab prior to amending the existing strategy. Work to identify options and advance efforts to conduct a MSE for snow crab is underway.

Minimum size limits are a Category 2 management measure under the *Fishery Management Plan for Bering Sea/Aleutian Islands King and Tanner Crabs* (FMP) (Section 8.2.1). Category 2 management measures are frameworked in the FMP and must be consistent with the criteria set out in the FMP and Magnuson–Stevens Fishery Conservation and Management Act National Standards.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal until further analyses are completed to fully understand effects.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost for the department.

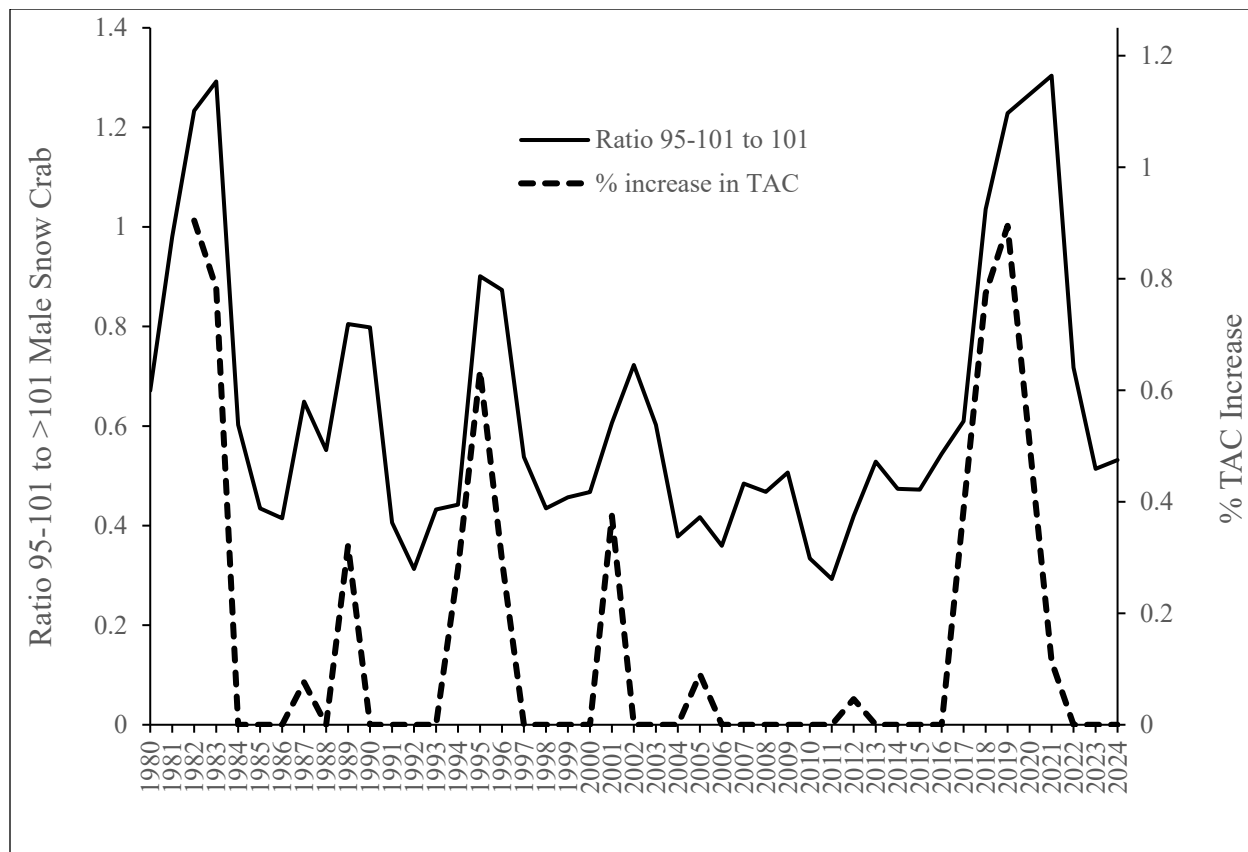


Figure 288-1.—National Oceanic and Atmospheric Administration (NOAA) eastern Bering Sea survey data timeseries of 1) the ratio of male snow crab abundance in size categories 95–101 mm carapace width (CW) to >101 mm CW (black line), and 2) the % change (increase) in final TAC when using 95 mm CW to define exploitable legal males compared to 101 mm CW (green line). Note that the increases in TAC generally align with increases in relative abundance of “smaller” (95–101 mm CW) crabs.

PROPOSAL 289 – 5 AAC 35.525. Lawful Gear for Registration Area J.
Amend pot limit for the Kodiak District commercial Tanner crab fishery

PROPOSED BY: Raymond May.

WHAT WOULD THE PROPOSAL DO? Establish a fixed pot limit of 20 pots per vessel for the Kodiak District commercial Tanner crab fishery.

WHAT ARE THE CURRENT REGULATIONS? The Kodiak District commercial Tanner crab pot limit ranges from 20 to 30 pots per vessel based on the annual GHL set for each season (Table 289-1). The Tanner crab season is open January 15 through March 31. A vessel may only operate Tanner crab pots between 8:00 a.m. and 5:59 p.m. each day while the fishery is open. The Kodiak District is divided into eight sections for Tanner crab management. The district is managed as a single stock but separate guideline harvest levels (GHLs) are established for each section. Abundance must be sufficient to provide for a GHL of at least 100,000 pounds in a section of the Kodiak District.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Under prevailing conditions, this proposal would result in similar pot limits as currently allowed under the existing regulation. Since 2000, the proposed change would have resulted in a different pot limit once (2023). At GHLs of five million pounds or more, the proposed limit of 20 pots would result in a 33% reduction in the pot limit (Table 289-1). A lower pot limit could reduce harvest rates and lead to longer seasons but effects are likely unique to each vessel and may vary by vessel size.

BACKGROUND: The Kodiak District commercial Tanner crab fishery is a limited entry fishery where permits are divided into two vessel length categories, <60 ft (73% of permits) and ≤120 ft (27% of permits). Guideline harvest levels are established annually based on applying Tanner crab abundance estimates from an ADF&G stock assessment trawl survey to a regulatory harvest strategy. During some years, regulatory minimum stock thresholds are not met, and the fishery does not open (Table 289-2). Since 2000, an average of 80 vessels landed 1.21 million lb of crab annually worth approximately \$3.39 million each year (Table 289-2).

Prior to 2000, the pot limit in the Kodiak District commercial Tanner crab fishery was 75 pots regardless of the GHL. A 4-tier pot limit was adopted in 2000 with pot limits between 20 and 60 pots, dependent on GHL. In 2021, the 4-tiered pot limit was replaced with a 2-tier pot limit, currently in effect (Table 289-1). In 2023, a 30-pot limit was in place with a GHL of 5.8 million lb, and the GHL was harvested in 11 days.

Abundance-based pot limits, as currently established for the Kodiak District, generally aid fishery management; however, they largely reflect user preferences and address allocative issues due to the wide range of vessel size and capacity within the fishery.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

Table 289-1.—Current and proposed pot gear limits and the difference between current and proposed pot gear limits for the Kodiak District commercial Tanner crab fishery.

GHL	Pot limit		% Difference
	Current	Proposed	
<5,000,000	20	20	0%
≥5,000,000	30	20	-33%

Table 289-2.—Kodiak District commercial Tanner crab guideline harvest level (GHL), effort, harvest, and value, 2000–2024.

Year	GHL	Number			Avg. price per lb	Exvessel value
		Vessels	Landings	Pounds		
2000			No commercial fishery			
2001	500,000	145	192	510,407	\$2.30	\$1,173,936
2002	500,000	181	279	361,166	\$2.20	\$794,565
2003	510,000	72	276	511,324	\$2.48	\$1,268,084
2004	795,000	66	252	566,218	\$2.45	\$1,387,234
2005	1,750,000	76	291	1,806,416	\$1.73	\$3,125,100
2006	2,100,000	68	249	2,123,931	\$1.53	\$3,249,614
2007	800,000	50	96	765,092	\$1.84	\$1,407,769
2008	500,000	33	64	425,353	\$1.98	\$842,199
2009	400,000	31	48	359,056	\$1.80	\$646,301
2010	700,000	52	84	650,315	\$1.58	\$1,027,498
2011	1,490,000	80	131	1,537,384	\$3.04	\$4,673,647
2012	950,000	64	93	1,078,106	\$3.00	\$3,234,318
2013	660,000	59	115	658,194	\$2.70	\$1,777,124
2014–2017			No commercial fishery			
2018	400,000	56	65	431,991	\$4.52	\$1,952,599
2019	615,000	82	119	620,726	\$4.40	\$2,731,194
2020	400,000	49	114	400,990	\$4.25	\$1,704,208
2021			No commercial fishery			
2022	1,100,000	88	128	1,252,699	\$8.29	\$10,384,875
2023	5,800,000	133	280	5,897,298	\$3.33	\$19,638,002
2024	3,000,000	134	233	3,135,523	NA	NA
Avg. 2000–2024	1,208,947	80	164	1,215,378	\$2.97	\$3,389,904

Note: GHL = guideline harvest level (lb); NA = not available.

PROPOSAL 290 – 5 AAC 35.510. Fishing seasons for Registration Area J.
>Change season opening date for the Kodiak District commercial Tanner crab fishery

PROPOSED BY: David Ivanov.

WHAT WOULD THE PROPOSAL DO? Change the season opening date for the Kodiak District commercial Tanner crab fishery from January 15 to February 20.

WHAT ARE THE CURRENT REGULATIONS? The Kodiak District Tanner crab fishery opens at 12:00 noon, January 15, unless delayed by weather. If the 4:00 a.m. National Weather Service (NWS) marine forecast on January 14 contains a gale warning for January 14 or January 15, the season will be delayed for 24 hours. If after the initial weather delay, the 4:00 a.m. NWS marine forecast for January 15 or January 16, again contains a gale warning, the season opening will be delayed an additional 24 hours. Season opening delays may continue on a rolling 24-hour basis until 12:00 noon January 25, when the season will open regardless of the marine forecast.

While registered for the Kodiak District commercial Tanner crab fishery, a person or vessel may not operate any other commercial, subsistence, or sport pot gear. If a person or vessel intends to participate in the Kodiak District commercial Tanner crab fishery, they may not operate any commercial, subsistence, or sport, or pot gear during the 14 days prior to the fishery opening. There is no prohibition against operating other gear types (e.g., trawl, longline, jig, etc.) in the 14 days prior to the commercial Tanner crab fishery opening.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The effects of this proposal would vary and most likely impact fishing operations that participate across multiple and sometimes overlapping winter fisheries. The current Tanner crab season opening date of January 15 largely precludes vessels from targeting Pacific cod with pot gear during the federal/parallel season prior to targeting Tanner crab. A February 20 start date would allow up to 5 weeks of federal/parallel Pacific cod fishing opportunity for individuals who choose to participate in the federal/parallel Pacific cod pot prior to Kodiak Tanner crab. However, a February 20 start date could disadvantage individuals who participate in both Kodiak Area state-waters Pacific cod pot gear and Tanner crab fisheries by making it more likely that those two fisheries will occur simultaneously. On average, 35% of vessels that participated in the Kodiak Tanner crab fishery also fished in one or more Kodiak groundfish fisheries from January to March during the same year (2022–2024). Overall, aligning season dates that increase potential for vessels to more fully participate in overlapping regional fisheries may benefit some users but that advantage could be negligible if competition within or across fisheries increase overall.

Kodiak seafood processors are typically fully engaged with groundfish during late February and March. The department anticipates additional delivery schedule coordination would be necessary across all users with priority given to groundfish stakeholders during the proposed Tanner crab season. The effects of a later start date on crab market availability and price are unknown.

Weather delay regulations would still apply. Based on the NWS marine forecast, the fishery may be delayed on a 24-hour rolling basis for up to 10 days. If delayed the maximum amount, this would result in an opening date of 12:00 noon March 1 or 2 (depending on leap year) with

registration validation beginning at 10:00 a.m. February 28 or March 1. However, the fishery opening is typically only delayed 1–3 days, if at all. On average, the Kodiak District Tanner crab season lasts 35 days although most harvest occurs within the first 7 to 10 days after a season opens.

The mating and molting season for Tanner crab occurs from March 31 to October 15. A February 20 start date would not likely have adverse biological impacts to the crab stock, although it would increase the likelihood closing by regulation on March 31 prior to catching the full guideline harvest level (GHL), particularly in years with lengthy weather delays or below average fishing.

BACKGROUND: The Kodiak District commercial Tanner crab fishery is a limited entry fishery. GHLs are established annually based on Tanner crab abundance estimates from an ADF&G stock assessment trawl survey. During some years regulatory biological and management thresholds are not met, and the fishery does not open (Table 290-1). Since the modern management plan was adopted in 2000, on average 80 vessels landed 1.22 million lb with a combined exvessel value of \$3.39 million annually (Table 290-1).

Federal/parallel Pacific cod seasons open January 1 and close when each sector harvests their allocation. Generally, the federal/parallel pot gear sector closes mid-February and the longline gear sector closes mid- to late March. The Kodiak Area state-waters Pacific cod pot gear fishery opens seven days after the federal/parallel Pacific cod pot gear fishery closes. Due to overlap in Pacific cod and Tanner crab seasons, participants typically must forego some or all fishing opportunity in one fishery to participate in the other.

Regulations that prohibit operation of any pot gear 14 days prior to the Tanner crab season are intended to prevent grounds preemption and prospecting for Tanner crab prior to the season start. At any time, a person may choose to invalidate their Tanner crab registration, cease Tanner crab fishing, and enter another pot gear fishery (e.g., Pacific cod).

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

Table 290-1.–Kodiak District commercial Tanner crab guideline harvest level (GHL), effort, harvest, and value, 2000–2024.

Year	GHL	Number			Avg. price per lb	Exvessel value
		Vessels	Landings	Pounds		
2000			No commercial fishery			
2001	500,000	145	192	510,407	\$2.30	\$1,173,936
2002	500,000	181	279	361,166	\$2.20	\$794,565
2003	510,000	72	276	511,324	\$2.48	\$1,268,084
2004	795,000	66	252	566,218	\$2.45	\$1,387,234
2005	1,750,000	76	291	1,806,416	\$1.73	\$3,125,100
2006	2,100,000	68	249	2,123,931	\$1.53	\$3,249,614
2007	800,000	50	96	765,092	\$1.84	\$1,407,769
2008	500,000	33	64	425,353	\$1.98	\$842,199
2009	400,000	31	48	359,056	\$1.80	\$646,301
2010	700,000	52	84	650,315	\$1.58	\$1,027,498
2011	1,490,000	80	131	1,537,384	\$3.04	\$4,673,647
2012	950,000	64	93	1,078,106	\$3.00	\$3,234,318
2013	660,000	59	115	658,194	\$2.70	\$1,777,124
2014–2017			No commercial fishery			
2018	400,000	56	65	431,991	\$4.52	\$1,952,599
2019	615,000	82	119	620,726	\$4.40	\$2,731,194
2020	400,000	49	114	400,990	\$4.25	\$1,704,208
2021			No commercial fishery			
2022	1,100,000	88	128	1,252,699	\$8.29	\$10,384,875
2023	5,800,000	133	280	5,897,298	\$3.33	\$19,638,002
2024	3,000,000	134	233	3,135,523	NA	NA
Avg. 2000–2024	1,208,947	80	164	1,215,378	\$2.97	\$3,389,904

Note: GHL = guideline harvest level (lbs); NA = not available.

PROPOSAL 291 – 5 AAC 35.535. Closed waters in Registration Area J.
Formalize the closure of Bristol Bay waters east of 163°W longitude to directed Tanner crab fishing

PROPOSED BY: Alaska Department of Fish and Game.

WHAT WOULD THE PROPOSAL DO? Formalize the closure of Bristol Bay waters east of 163°W longitude to directed Tanner crab fishing.

WHAT ARE THE CURRENT REGULATIONS? The Eastern Bering Sea Tanner crab fishery (EBT) does not have an eastern boundary line specified in regulation due to an error. Current and historical Tanner crab management in the Bering Sea has precluded directed fishing for Tanner crab east of 163°W longitude due to high bycatch of female and sublegal male red king crab.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? In practice, there will be no change or effect on the directed EBT fishery. Given that 163°W longitude has been historically recognized across all stakeholders, EBT fishery participants will not be impacted by formalizing the closure.

BACKGROUND: The Bering Sea Tanner crab fisheries were rationalized prior to the 2005/06 season under the Crab Rationalization Program and the stock is comanaged by the department and National Marine Fisheries Service (NMFS). Tanner crab in the Bering Sea District (all Bering Sea waters north of 54°36'N latitude) are managed as a single stock but with a separate TACs established for the areas east of 166°W longitude. (Eastern Bering Sea Tanner [EBT]) and west of 166°W longitude (Western Bering Sea Tanner [WBT]).

Both EBT and Bristol Bay red king crab have overlapping distributions and are prosecuted in the overlapping areas of Bristol Bay. Tanner crab was first harvested in 1968 incidental to red king crab in Bristol Bay. In 1974, a directed Tanner crab fishery began. Tanner crab fishing boundaries have been modified several times since the first directed landing of Tanner crab. These changes generally reflected changes to management and fishing practices as the fishery matured over time.

The board specifically addressed the easternmost Tanner crab boundary line in 1993 and 1998. Prior to 1993, there was no eastern boundary line specified in regulation. During the 1993 board meeting, observer data from 1991 to 1993 showed a significant amount of female and sublegal male red king crab bycatch in the directed Tanner crab fishery east of 163°W longitude. At that time, the department advocated for placing the Tanner crab boundary at 163°W longitude to reduce bycatch of female and sublegal male red king crab during the Tanner crab fishery. The board subsequently adopted 163°W. longitude into regulation as the easternmost boundary for directed Tanner fishing. In 1998 the board again deliberated but did not adopt a proposal seeking to move the Tanner crab boundary further into Bristol Bay due to red king crab bycatch concerns.

In 2005, regulations specifying the 163°W longitude boundary were removed, likely inadvertently, with other regulations during the transition to rationalized fisheries management. However, since rationalization, the directed EBT fishery has only occurred between 166°W longitude and 163° W longitude consistent with past intent (Figure 291-1).

Closed waters are a Category 2 management measure under the federal *Fishery Management Plan for Bering Sea/Aleutian Islands King and Tanner Crabs* (FMP; Section 8.2.9). Changes to Category 2 management measures are part of the framework in the FMP and must be consistent with the criteria set out in the FMP and the Magnuson–Stevens Fishery Conservation and Management Act National Standards.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional direct cost for the department.

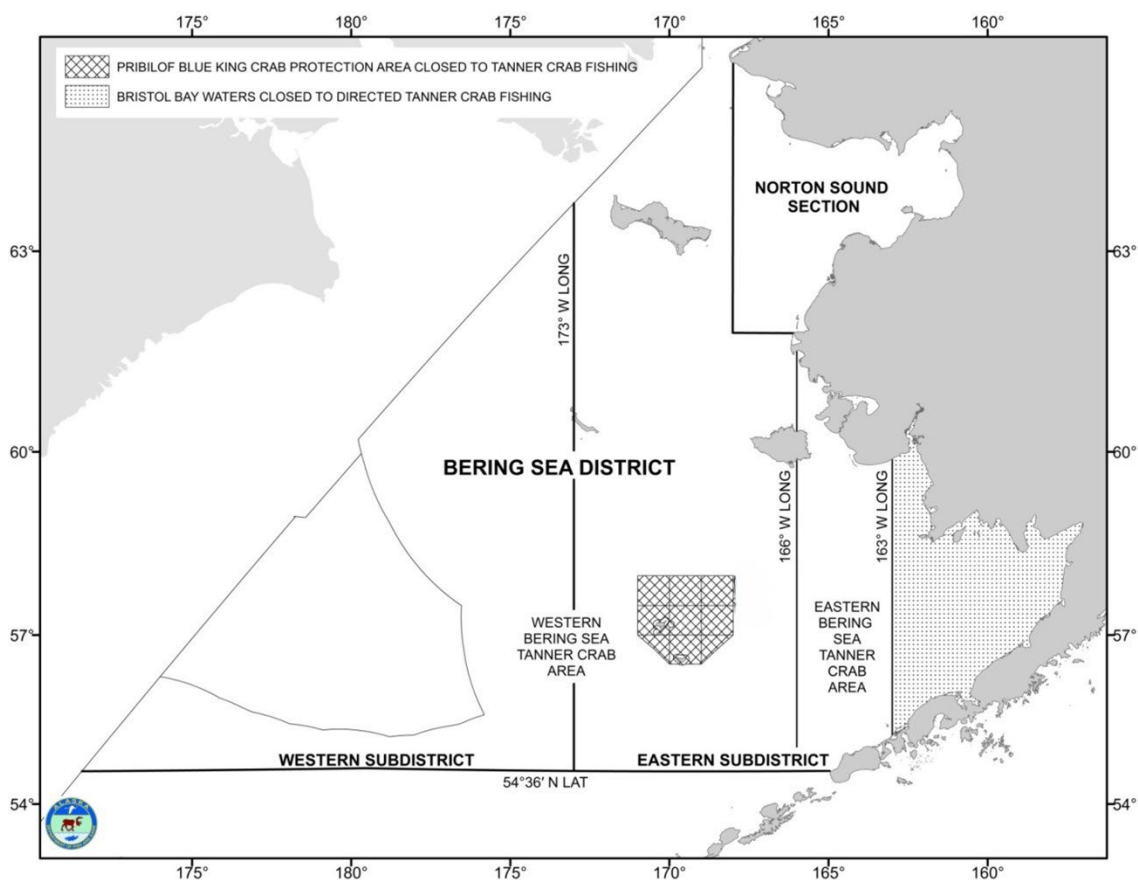


Figure 291-1.—Bering Sea District of Tanner crab Registration Area J.

PROPOSAL 292 – 5 AAC 35.556. Landing requirements for Registration Area J.
Amend Tanner crab landing requirements for Registration Area J

PROPOSED BY: Alaska Department of Fish and Game.

WHAT WOULD THE PROPOSAL DO? Amend Area J Tanner crab landing requirements by removing delivery timeline requirements while still specifying that vessels with Tanner crab on board may not be used for any purpose, except traveling to port to make a delivery.

WHAT ARE THE CURRENT REGULATIONS? Following the closure of a Tanner crab fishery, vessel operators must deliver all crab onboard within either 24 or 72 hours, depending on which district/subdistrict the vessel is fishing. If a vessel operator is unable to complete a delivery within the allotted time, they must contact the department to request an extension. Prior to making a delivery, a vessel may not be used for any purpose except traveling to port to make a delivery, including hauling, stacking, or storing pots.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Vessel operators would still be required to proceed directly to port and deliver crab following the closure of a Tanner fishery but without a strictly defined timeline. This would allow vessel operators more flexibility to travel when conditions are favorable (i.e., during good weather, daylight hours, etc.). Vessel operators would also not be accountable to the delivery timeline requirement in circumstances beyond their control such as processor offload schedules. The prohibition on vessel operators hauling, stacking, or storing pots after the closure, with Tanner crab still onboard the vessel, would remain.

BACKGROUND: Strict delivery timeline requirements were historically used to verify that vessels did not continue fishing after the closure of a commercial Tanner crab season. Advancements in at-sea communication, vessel location monitoring, and inseason harvest tracking have reduced the likelihood of a vessel fishing past to the season closure without being detected.

Area J Tanner crab fisheries are diverse, representing a broad range of geographic locations, fleet compositions, and management structures, including open access, limited entry, and rationalized fisheries. Despite the diversity of these fisheries and their participants, all will benefit from simplified landing requirements, as they would be easier to communicate and enforce without adversely affecting fishery management or catch accounting.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

PROPOSAL 293 – 5 AAC 32.410. Fishing seasons for Registration Area J.
Amend season dates for the Kodiak District commercial Dungeness crab fishery

PROPOSED BY: Garrett Kavanaugh.

WHAT WOULD THE PROPOSAL DO? This would change the Kodiak District of Area J commercial Dungeness crab fishery opening date from 12:00 noon May 1 to 12:00 noon June 1 north of the latitude of Boot Point and Cape Ikolik and from 12:00 noon June 15 to 12:00 noon June 1 south of the latitude of Boot Point and Cape Ikolik.

Additionally, this proposal would change the Kodiak District of Area J commercial Dungeness crab fishery closure date from 11:59 p.m. October 31 to 12:00 noon November 30.

WHAT ARE THE CURRENT REGULATIONS? Dungeness crab may be taken in the Kodiak District of Area J from 12:00 noon May 1 to 11:59 p.m. October 31, except that in the waters of the Kodiak District south of the latitude of Boot Point and Cape Ikolik Dungeness crab may be taken from 12:00 noon June 15 to 11:59 p.m. October 31 (Figure 293-1).

Dungeness crab may be taken in the Chignik, Alaska Peninsula, and Aleutian Districts of Area J from 12:00 noon May 1 to 11:59 p.m. October 31. Dungeness crab may be taken in the North Peninsula District of Area J from 12:00 noon May 1 to 11:59 p.m. October 18 (Figure 293-1).

The commercial fishery is managed by regulating sex, size, and season (3-S management). Under 3-S management, only male crab 6.5 inches carapace width or larger may be retained during the open fishing season. Kodiak District Dungeness crab vessels are restricted to operating no more than 700 pots per vessel.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would change the Kodiak District of Area J commercial Dungeness crab fishery opening date from a split opening date of May 1 and June 15 to a unified start date of June 1 for the entire district. A concurrent season opening may reduce gear conflicts by spreading out effort among the fleet. The unified start date would result in minimal loss of fishing opportunity based on fishery landing data. However, vessels that fish in the Dungeness crab and Kodiak Area salmon fishery concurrently often transport, bait, and set Dungeness pots during the month of May ahead of the regulatory June 1 salmon season opening. As such, landed catch during May may not fully represent the full range of effort early in the season.

This proposal would also extend the Kodiak commercial Dungeness season closure day by 30 days to November 30, increasing late season fishing opportunity. Closing the commercial Dungeness crab fishery on November 30 may also increase pot gear loss and potential for ghost fishing mortality due to deteriorating late season weather.

BACKGROUND: Dungeness crabs were first harvested commercially in Registration Area J in 1962, and the fishery was open year-round. Season closures were implemented in 1977 to reduce the amount of gear fishing with long soak times when fishermen were unable to operate effectively due to winter storms. Additionally, the later start date of June 15 in the south end of the Kodiak District was designed to reduce bycatch of juvenile red king crab and protect Dungeness crab

during their molt cycle that was historically thought to occur in late spring. More recently, the molt cycle of Dungeness crabs is recognized as more sporadic and less predictable with reports of soft crabs occurring as late as July and August.

The Registration Area J Dungeness crab season closure was changed in the mid-1980s from February 1 to 14 days prior to the Tanner crab season (effectively January 1). In the mid-1990s the season closure was changed from being defined in relation to the Tanner crab season opening to a fixed date of January 1. In 2012, the season closure date was amended to close on December 30 so that all fishing and landing activity was completed within the calendar year on one CFEC permit card. In 2015, the board amended the Dungeness crab closure date in Registration Area J from December 30 to October 31 to reduce pot loss and ghost fishing mortality during the fall months when severe storms prevent fishing vessels from retrieving their gear.

From 2015 to 2024, an average of 2.9% of the total Kodiak District Dungeness crab harvest was landed between May 1 and May 31 (Figure 293-2) indicating most boats have not started fishing yet in May or use the early portion of season to primarily transport and set historically large amounts of gear. From 2005 to 2014, when the regulatory season closure date occurred in December, an average of 2.4% of the total Kodiak District Dungeness crab landings occurred between November 1 and November 30 suggesting most boats had ceased fishing for the season by November (Figure 293-2). In more recent years, harvest patterns have changed. From 2015 to 2024, harvest and effort have increased in the month of October when compared to the 2005–2014 seasons (Figure 293-2).

Studies from Southeast Alaska and the Pacific Northwest indicate up to 11% of all Dungeness crab pots fished are lost each year, with the highest pot loss rates occurring along exposed coastlines common to the Kodiak fishery. Estimated Dungeness crab mortality due to ghost fishing in these areas ranged from 2.2% to 7.0% of the total annual harvest and lost pots were observed ghost fishing up to seven years beyond the initial loss. Published in 2012, a red king crab ghost fishing mortality study conducted by the National Marine Fisheries Service in Womens Bay near the City of Kodiak demonstrated over half of lost pots observed in the study area were Dungeness crab pots. Sixty-six percent of those pots were intact and capable of ghost fishing. Overall, mortality estimates indicated between 16% and 37% of larger sized red king crab (>60 mm) in Womens Bay were killed each year due to ghost fishing and may be an important contributor to the lack of stock recovery in the bay.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal but encourages ongoing stakeholder dialog regarding how to best balance late season fishing opportunity and the potential for higher gear loss. If the proposal is adopted, the board may wish to consider whether current regulations continue to provide reasonable opportunity for subsistence uses of Dungeness crab.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

SUBSISTENCE REGULATION REVIEW:

- 1. Is this stock in a nonsubsistence area? No**

2. **Is the stock customarily and traditionally taken or used for subsistence?** Yes. The board made a positive customary and traditional use finding for Tanner crab in the Alaska Peninsula-Aleutian Islands Area (5 AAC 02.466(a)).
3. **Can a portion of the stock be harvested consistent with sustained yield?** Yes.
4. **What amount is reasonably necessary for subsistence uses?** The board found that 1,200 – 2,800 Dungeness crab are reasonably necessary for subsistence uses in the Kodiak Area.
5. **Do the regulations provide a reasonable opportunity for subsistence uses?** This is a board determination.
6. **Is it necessary to reduce or eliminate other uses to provide a reasonable opportunity for subsistence use?** This is a board determination.

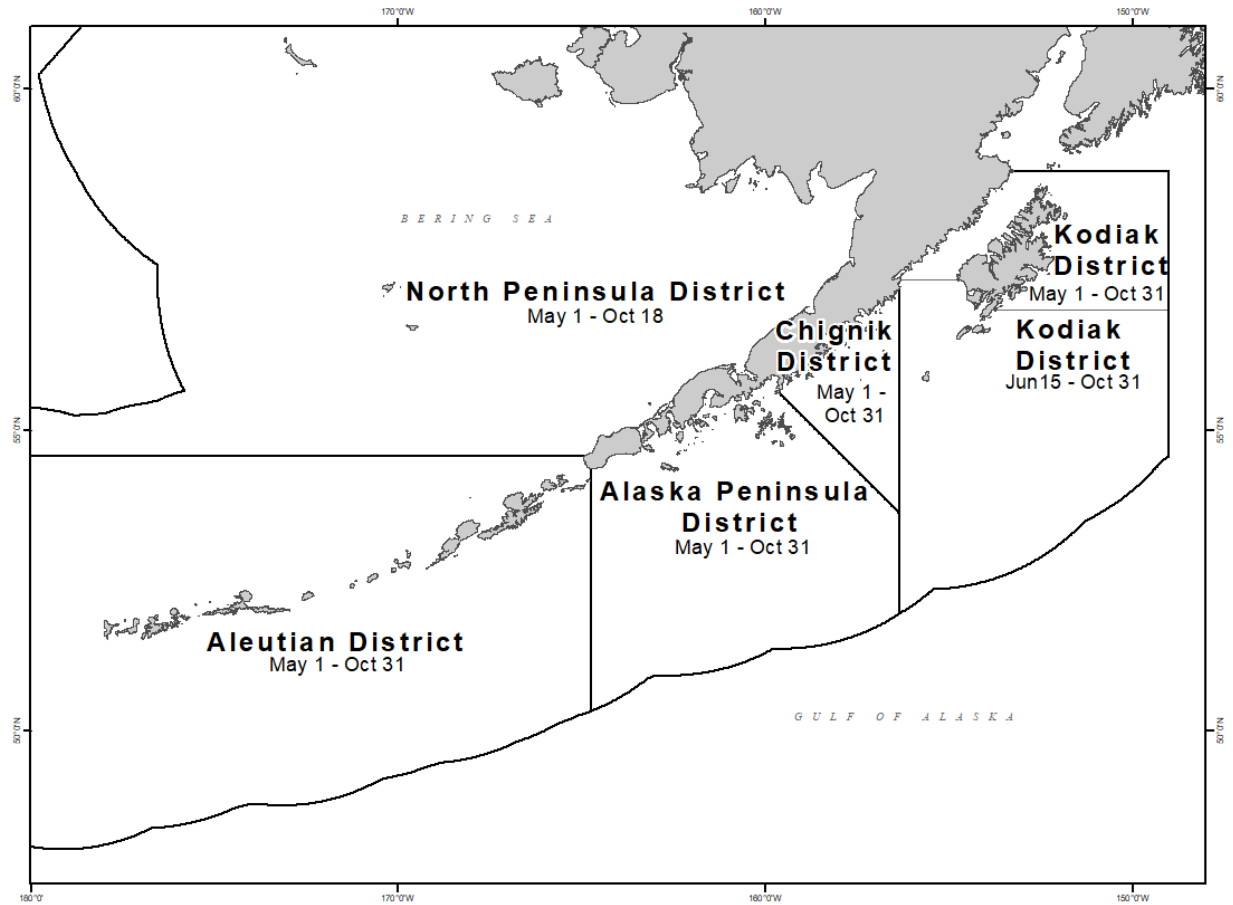


Figure 293-1.—Regulatory boundaries and season dates for all districts in the Area J commercial Dungeness crab fishery.

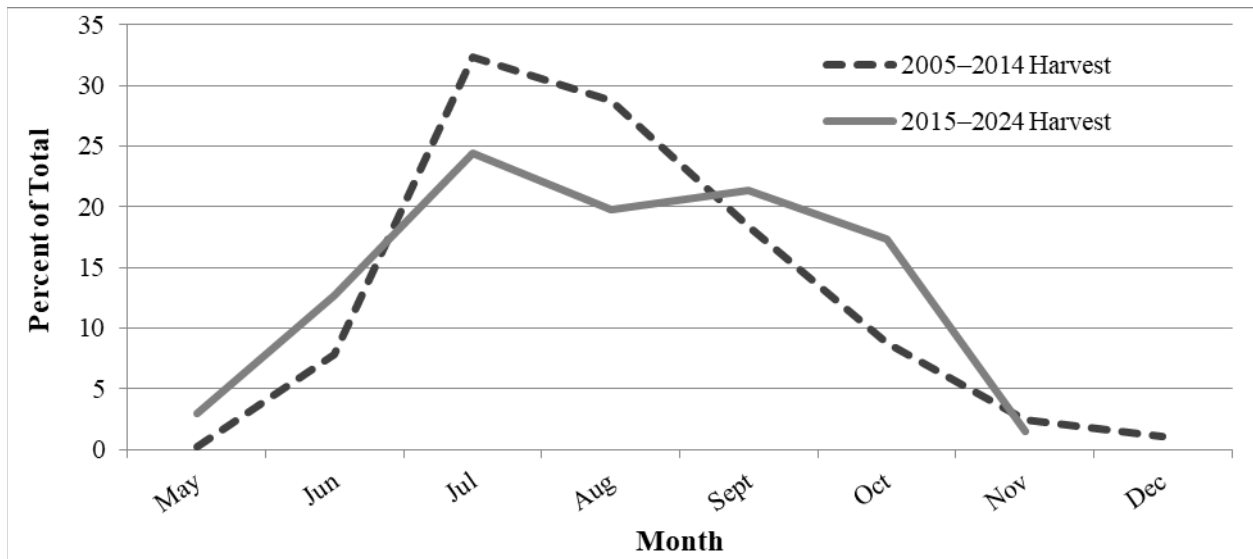


Figure 293-2—Kodiak District of Registration Area J commercial Dungeness crab harvest by month as a percent of total harvest, 2005–2014 and 2015–2024.

Note: The 2005–2011 seasons closed January 1, 2012–2014 seasons closed on December 30, and 2015–2024 seasons closed on October 31.

PROPOSAL 294 – 5 AAC 32.4XX. New section.

Establish 58-foot vessel length limit for Alaska Peninsula District

PROPOSED BY: Kenneth Mack.

WHAT WOULD THE PROPOSAL DO? Establish 58-foot vessel length limit for the Alaska Peninsula District commercial Dungeness crab fishery.

WHAT ARE THE CURRENT REGULATIONS? The Alaska Peninsula District is an open access fishery for Dungeness crab. No more than 500 pots may be operated by a vessel. Due to the lack of assessment and stock specific data for Area J Dungeness crab, there are no guideline harvest levels (GHL) or other control rules established to limit harvest. The fishery is managed by regulating sex, size, and season (3-S management). Only male crab with 6.5-inch carapace width or greater may be retained from May 1 through October 31.

There are no vessel length restrictions for the Alaska Peninsula District Dungeness crab fishery.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Historical participants with vessels greater than 58 feet in length would no longer be able to participate in the Alaska Peninsula Dungeness crab fishery; those vessels may choose to participate in other Dungeness crab fisheries without vessel length limits, increasing competition in those fisheries. Conversely, participants with vessels 58 feet or less in length could potentially benefit from the exclusion of vessels greater than 58 feet in length from the fishery through increased catch resulting from reduced competition and/or gear congestion on the fishing grounds.

BACKGROUND: Commercial harvest of Dungeness crab in the Alaska Peninsula District first occurred in 1968. Harvest has occurred annually since 1981. Beginning with the 2002 season, the board divided the Alaska Peninsula District into two separate management districts, the Alaska Peninsula and Chignik Districts.

Historically, the Alaska Peninsula District fishery generally has been characterized by low effort, high volumes of gear, and long soak times. From 2002 through 2019, on average four vessels landed 252,000 lb with a combined exvessel value of \$530,000 annually (Table 294-1). Beginning in 2020, effort and harvest began increasing, in part due to a large cohort of crab recruiting to legal size, resulting in improved fishery performance. From 2020 through 2024, an average of 19 vessels landed 1.1 million lb with a combined exvessel value of \$3.0 million annually (Table 294-1). In response to increased effort and harvest, the board adopted a 500-pot limit beginning with the 2022 season. Most harvest occurs between July and October. Alaska Peninsula District Dungeness crab fishery participants often participate in other Alaska Peninsula salmon or groundfish/halibut fisheries during the Dungeness crab season.

Since 2002, eight individual vessels greater than 58 feet in length have participated in the Alaska Peninsula Dungeness crab fishery, with no more than two of those vessels participating in any given year (Table 294-1). Annual harvest by vessels greater than 58 feet in length is confidential due to the limited number of participants.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

Table 294-1.—Alaska Peninsula District commercial Dungeness crab effort, harvest, value, and participation by vessel length, 2000–2024.

Year	Total number			Avg. price per pound	Exvessel value	Number of vessels	Number of vessels
	Vessels	Landings	Pounds			≤58 ft	>58 ft
2002	2	23	CF	CF	CF	2	0
2003	4	39	269,107	\$1.45	\$390,205	4	0
2004	4	44	215,632	\$1.38	\$297,572	4	0
2005	5	31	274,879	\$1.25	\$343,599	4	1
2006	2	18	CF	CF	CF	1	1
2007	2	17	CF	CF	CF	1	1
2008	4	31	462,989	\$2.11	\$976,907	3	1
2009	6	47	500,514	\$1.49	\$745,766	5	1
2010	4	27	247,221	\$1.79	\$442,526	3	1
2011	5	26	174,940	\$2.25	\$393,615	5	0
2012	5	26	126,630	\$2.25	\$284,918	4	1
2013	3	15	75,679	\$2.41	\$182,386	3	0
2014	4	20	77,243	\$2.70	\$208,556	3	1
2015	4	16	98,373	\$2.90	\$285,282	4	0
2016	4	24	118,107	\$3.00	\$354,321	3	1
2017	2	8	CF	CF	CF	2	0
2018	4	42	440,576	\$3.00	\$1,321,728	4	0
2019	6	60	450,712	\$2.65	\$1,194,387	6	0
2020	16	173	1,411,947	\$1.94	\$2,739,177	15	1
2021	27	276	1,756,106	\$3.97	\$6,971,741	25	2
2022	19	151	579,910	\$2.40	\$1,391,784	18	1
2023	14	81	546,433	\$1.77	\$967,186	14	0
2024	20	191	1,179,430	NA	NA	19	1
Avg. 2002–2024	7	60	474,023	\$2.26	\$1,082,870	7	<1

Note: CF = confidential; NA = not available.

**PROPOSAL 295 – 5 AAC 32.410. Fishing seasons for Registration Area J.
Amend Dungeness crab season dates for the North Peninsula District**

PROPOSED BY: Alaska Department of Fish and Game.

WHAT WOULD THE PROPOSAL DO? Align Dungeness crab commercial fishery season dates for the North Peninsula District of Registration Area J with all other Dungeness districts in Area J.

WHAT ARE THE CURRENT REGULATIONS? The North Peninsula District Dungeness crab commercial fishery season currently opens at 12:00 noon May 1 and closes at 12:00 noon October 18, whereas all other Dungeness crab commercial districts in Area J (Kodiak, Chignik, Alaska Peninsula, and Aleutian Islands) close at 11:59 p.m. October 31 (Table 295-1).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Fishery participants in the North Peninsula District Dungeness crab commercial fishery would have an additional 14 days to harvest Dungeness crab each season.

BACKGROUND: The North Peninsula District of Registration Area J (Figure 295-1) is a nonexclusive, open access fishery for Dungeness crab. Crab can be harvested with either pot gear or ring nets. There are no vessel length restrictions or pot limits. Due to the lack of assessment and stock specific data for Area J Dungeness crab, there are no guideline harvest levels or other control measures established to limit harvest. The fishery is managed by regulating sex, size, and season (3-S management). Only male crab with a 6.5-inch carapace width or greater may be retained from May 1 through October 18.

The first reported commercial harvest of Dungeness crab in the North Peninsula District occurred in 1992. Since 1992, harvest has occurred sporadically, and fishery participation has generally been limited to one to two vessels. Due to limited vessel participation, most of the historical harvest is confidential. North Peninsula Dungeness crab abundance is cyclical. Periods of increased abundance are generally followed by increases in commercial effort (Table 295-1). The fishery is generally characterized by low effort, high volumes of gear, and long soak times.

From 2012 to 2019, on average, a single vessel annually participated in the North Peninsula District Dungeness crab fishery with no participation occurring in 2013, 2018, and 2019. Beginning in 2020, vessel participation and landings increased significantly with 2022 participation and harvest the highest on record (16 vessels; 2.8 million lb). From 2020 to 2024, on average, nine vessels annually participated in the fishery with an average annual harvest of 1.4 million lb.

The current closure date of October 18 in the North Peninsula District is based on an earlier regulation specifying that Area J Dungeness crab seasons close 14 days prior to the November 1 opening of the Bering Sea Tanner crab season. The Bering Sea Tanner crab season last opened on November 1 in 1996 and has since transitioned to a rationalized fishery (2005) with a fixed season opening date of October 15. The intent of closing Area J Dungeness crab seasons 14 days prior to the opening of the Tanner crab season was to clear the fishing grounds for orderly Tanner crab openings. Current overlap between Bering Sea Tanner and North Peninsula Dungeness crab

fisheries is minimal and not expected to change if this proposal is adopted. All other Area J Dungeness crab districts have had a season closure date of October 31 since 2015.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional direct cost for the department.

Table 295-1.—Current regulatory season dates for Area J Dungeness, by district.

Dungeness District	Season Dates	
	Open	Close
Kodiak ^a	May-1	Oct-31
Chignik	May-1	Oct-31
Alaska Peninsula	May-1	Oct-31
Aleutian	May-1	Oct-31
North Peninsula	May-1	Oct-18

^a South end of Kodiak opens June 15.

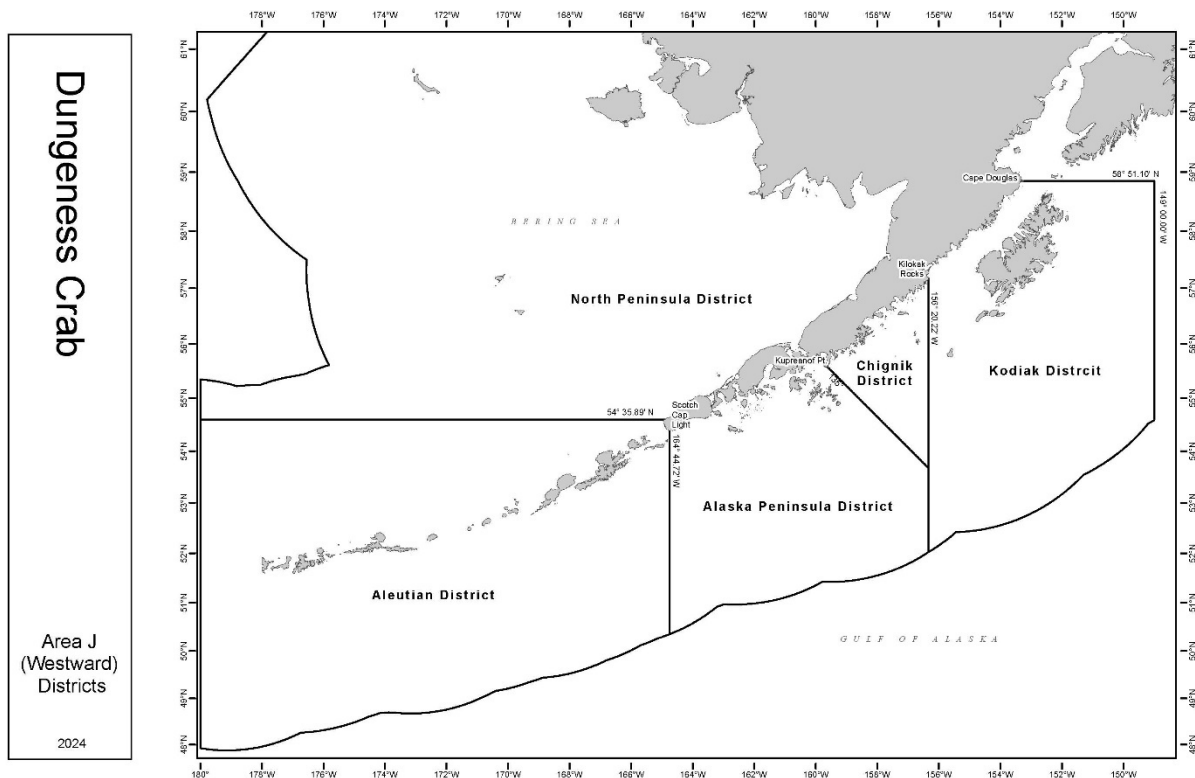


Figure 295-1.—Registration Area J Dungeness crab districts.

PROPOSAL 296 – 5 AAC 32.440 Registration Area J inspection points.
›Amend Registration Area J Dungeness crab vessel inspection requirements

PROPOSED BY: Alaska Department of Fish and Game.

WHAT WOULD THE PROPOSAL DO? Amend Registration Area J Dungeness crab vessel inspection requirements by clarifying that vessel inspections are not required in Area J unless the department specifically requires vessel inspections by emergency order.

WHAT ARE THE CURRENT REGULATIONS? Before a vessel may be used to take Dungeness crab, a department representative must perform a vessel inspection. However, the department typically waives vessel inspection requirements for Area J Dungeness crab fisheries due to staffing constraints. Registration Area J inspection points are Kodiak, Sand Point, and Dutch Harbor, or other locations as specified by the commissioner.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would align regulation with current management practice by formalizing that inspections are not required for Area J Dungeness crab vessels. Functionally, there would be no change for Area J Dungeness crab fishery participants because the department has been waiving the inspection requirement for some time.

BACKGROUND: Historically, Area J Dungeness crab fisheries have generally has been characterized by low effort, high volumes of gear, and long soak times. Beginning in 2020, effort and harvest began increasing, due to a large cohort of crab recruiting to legal size, resulting in improved fishery performance. In response to increased effort and harvest, the board adopted pot limits for the Kodiak, Alaska Peninsula, and North Alaska Peninsula Districts beginning with the 2022 season. Dungeness crab fishing effort in the Chignik and Aleutian Districts is sporadic, and no pot limits are established in these districts. Dungeness crab fishery participants often participate in other salmon or groundfish/halibut fisheries during the Dungeness crab season (May–October).

Preseason vessel inspections, commonly referred to as tank checks, were historically used to verify vessels did not have crab onboard prior to the opening of a commercial crab season. Advancements in at-sea communication, vessel location monitoring, enforcement presence, and inseason harvest tracking reduce the likelihood of a vessel fishing prior to the season opening without being detected. The board repealed vessel inspection requirements for nonrationalized Area J Tanner crab fisheries in 2014 based on similar rationale.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

PROPOSAL 297 – 5 AAC 32.053. Operation of other pot gear.

›Amend Dungeness crab pot gear operation requirements for Registration Area J

PROPOSED BY: Alaska Department of Fish and Game.

WHAT WOULD THE PROPOSAL DO? This would amend Dungeness crab pot gear operation requirements for Registration Area J to allow a person or vessel participating in a commercial Pacific cod pot gear fishery in Registration Area J to operate pot gear in the 14 days prior to the Dungeness crab season opening. This would also allow a vessel participating in a Dungeness crab fishery to simultaneously participate in directed sablefish fisheries using pot gear.

WHAT ARE THE CURRENT REGULATIONS? Commercial Dungeness crab regulations prohibit vessel operators from operating any pot gear in the 14 days prior to a Dungeness crab season opening; however, an exemption exists in regulation for a person or vessel participating in the commercial Pacific cod fisheries in the Kodiak Area, Chignik Area, and South Alaska Peninsula Area. Additionally, commercial Dungeness crab regulations prohibit vessel operators from operating any pot gear, other than Dungeness crab pots, during the Dungeness crab season.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would extend the pot gear operation exemption to all state-waters Pacific cod pot gear fisheries in Dungeness crab Registration Area J (Dutch Harbor and Aleutian Islands Subdistricts). This proposal would also create an exemption to allow a person or vessel participating in a commercial Dungeness crab fishery in Registration Area J to simultaneously participate in commercial sablefish fisheries using pot gear.

BACKGROUND: Commercial Dungeness crab regulations prohibit vessel operators from operating any pot gear in the 14 days prior to a Dungeness crab season opening to prevent grounds preemption and prospecting ahead of Dungeness crab seasons. In 1998, in recognition that Pacific cod pot gear and Dungeness crab fisheries both occur at the same time of year (spring) and that some vessels have historically participated in both fisheries, the board exempt Kodiak, Chignik, and South Alaska Peninsula Areas from the 14-day prohibition of operation of pot gear. The current exemption for Kodiak, Chignik, and South Alaska Peninsula Areas has not led to management or enforcement issues; therefore, the department believes that extending this exemption to all districts of Registration Area J would provide additional flexibility to vessel operators and consistency in regulation without adversely affecting fishery management or catch accounting.

Regulations prohibiting the operation of pot gear, other than Dungeness crab pots, by a vessel participating in a Dungeness crab fishery are intended to aid fishery management and catch accounting by allowing a vessel to participate in only one pot gear fishery at a time. These regulations were adopted prior to the advent of pot gear being used in directed sablefish fisheries. Some vessel operators who have historically participated in both Dungeness crab and directed sablefish fisheries concurrently are now unable to use sablefish pot gear due to these regulations. Little spatial overlap exists between Dungeness crab and sablefish habitat and the department believes allowing vessel operators to operate both types of pot gear concurrently in Registration Area J would provide additional flexibility to individual fishing operations without adversely affecting fishery management, bycatch, or catch accounting.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

SCALLOPS (1 PROPOSAL)

PROPOSAL 298 – 5 AAC 38.078. State-Waters Weathervane Scallop Management Plan.

›Amend the State-Waters Weathervane Management Plan

PROPOSED BY: Thomas J Gilmartin Jr.

WHAT WOULD THE PROPOSAL DO? This seeks to close state waters in the Yakutat, Prince William Sound, Kodiak, and Dutch Harbor Areas to commercial scallop fishing using dredge gear and allow commercial scallop fishing with other experimental gear types in these areas. It would also establish an 800-lb trip limit and remove the vessel monitoring system (VMS) and onboard observer requirement in state waters.

WHAT ARE THE CURRENT REGULATIONS? The weathervane scallop fishery is comanaged by ADF&G and the National Marine Fisheries Service. The *Fishery Management Plan for the Scallop Fishery off Alaska* (FMP) delegates most management measures in federal waters to the department. Most scallop harvest occurs in federal waters, although several commercially important scallop beds extend into state waters. Scallop registration areas under the *State-Waters Weathervane Scallop Management Plan* are Scallop Registration Area D (Yakutat), Area E (Prince William Sound), Area K (Kodiak), and Area O (Dutch Harbor; Figure 298-1).

Federal management establishes an overfishing limit for Alaska weathervane scallops. The department establishes guideline harvest levels (GHLs) from 0 to 200 nmi for all registration areas and districts (Table 298-1). The department also establishes crab bycatch limits (CBLs) for Tanner crab, snow crab, and red king crab. Weathervane scallops can be harvested commercially from July 1 through February 15. Areas may close by emergency order prior to the regulatory season closure if GHLs are achieved, fishery performance is low, or crab bycatch is high.

Scallop fisheries in state waters are open access fisheries. To participate in a state waters fishery, a vessel operator must show intent to participate by submitting a preseason registration by the deadline of 5:00 p.m. April 1. Based on the department's assessment of effort, manageability, and available harvest, the department may set separate GHLs for state waters. The department can also set trip limits if needed to promote an orderly fishery.

Dredge gear is the only legal gear type for the harvest of scallops; no more than two scallop dredges with a maximum width of 15 ft may be used by a vessel. Current state regulations prohibit dredge fishing in most areas that are also closed to bottom trawling to protect crab and other sensitive habitats. State waters open to scallop fishing include most of the Yakutat Area, waters east of 147°W longitude in the Outside District Eastern Section and south of 60°N latitude in the West Kayak and East Kayak Subsections of the Prince William Sound Area, and most of the Shelikof and Southwest Districts of the Kodiak Area (Figure 298-1). Except for scallop vessels operating in the Cook Inlet Area, all vessels participating in the scallop fishery must have an activated vessel monitoring system (VMS) and are required to carry an independent onboard observer while fishing.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Commercial fishing for scallops using fixed gear, such as pots, has been explored as an alternative to bottom contact gear in areas near the United Kingdom; however, the use of fixed gear for scallops is experimental and its effectiveness and economic feasibility is untested. No gear type has been proven to eliminate bycatch entirely. The effectiveness and impact of fixed gear scallop fishing remain unclear.

The proportion of harvest in state waters varies by area; however, in the last 10 years, 22% of scallop harvest has occurred in state waters (Table 298-2). Closing the remaining state waters to dredge fishing and establishing a trip limit would likely redirect scallop harvesting efforts into federal waters and could lead to localized depletion in certain areas of the scallop bed or reduce flexibility to avoid areas of higher bycatch. If the department attempts to mitigate this by establishing separate GHs in state and federal waters, there is a risk that the state-waters GH might not be fully harvested, resulting in foregone harvest.

Removing the onboard observer requirement would lower participation costs in the fishery but result in less reliable data collection. The scallop observer program monitors bycatch and collects biological and fishery data for the weathervane scallop fishery. This data supports inseason fishery management by the department and helps the NPFMC evaluate the long-term productivity of the resource, in line with the Magnuson-Stevens Fishery Conservation and Management Act (MSA). If observer coverage drops below 100%, scallop discard mortality and bycatch rates from observed trips would be applied to unobserved trips, regardless of gear type, due to the lack of data for fixed gear.

Removal of the VMS requirement would reduce participation costs. However, VMS could no longer be used as an enforcement tool for closed waters boundaries or Stellar sea lion protection measures.

BACKGROUND: An Alaska weathervane scallop fishery began near Kodiak Island and Yakutat in the 1960s. In the 1980s, the fishery expanded outward into other scallop beds across the state, and the fleet included both specialized scallop vessels from New England and local vessels converted from other fisheries. By the early 1990s, onboard freezing of shucked meats became common practice. From the 1980s to mid-2000s, four to 20 vessels participated annually in the Alaska scallop fishery, with an average vessel length of over 80 feet. In the past 10 years, only one or two catcher-processor vessels have participated, harvesting scallops from both state and federal waters (Table 298-2).

Alaska weathervane scallops are considered a single stock under the federal FMP though the department manages the stock as nine registration areas, each containing various management districts or subdistricts (Figure 298-1). In 1993, the department-initiated development of a management plan for the scallop fishery in response to overfishing concerns and established the current at-sea observer program. Scallop observers primarily collect data on retained catch, discard, and bycatch to meet MSA requirements and support enforcement. Data gathered through the observer program are the primary information source for the department in setting harvest limits.

A License Limitation Program (LLP) implemented by the National Marine Fisheries Service (NMFS) restricts fleet size in federal waters (3–200 nmi) to nine LLP licenses. Participation in the scallop fishery in state waters (0–3 nmi) had been limited by a vessel-based limited entry program until state limited entry expired in 2013. Following the sunset of the limited entry program, the *State-Waters Weathervane Scallop Management Plan* was created to establish criteria for vessels to participate in scallop fisheries inside state waters with or without a federal LLP. A registration deadline of 5:00 p.m. April 1 is to provide the department with an assessment of effort prior to establishing GHLS; the department may set a single GHLS for state and federal waters combined, or the department may set a separate state-waters GHLS within the same scallop bed if a vessel separately registers for the state-waters fishery. Since inception of the *State-Waters Weathervane Scallop Management Plan*, no vessels have participated solely in the state-waters fishery, and separate GHLS have not been set.

The Kamishak Bay District of the Cook Inlet Area was not included in the *State-Waters Weathervane Scallop Management Plan*, since the fishery has historically been prosecuted by smaller vessels using a single six ft dredge. Therefore, the Kamishak Bay District has a separate management plan defined in regulation and a preseason registration or a VMS is not required. An independent observer is not required, but a person must accommodate a department onboard observer upon request by the department.

Between December 2020 and February 2021, a feasibility study in Cornwall, England waters tested the addition of LED lights to various crustacean pot designs. The study found that the lighted pots retained scallops, with a maximum catch rate of 19 scallops per string (23–24 pots per string) and a maximum of 24 scallops in a single pot. While the results indicate that modified pot gear could be used to harvest scallops, the study highlighted the need for further refinement of both the pot designs and lighting to improve scallop and crustacean retention before establishing a commercially viable fishery. Additionally, no data is available to determine bycatch rates of crab and groundfish species in scallop pot gear.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on allocative aspects of this proposal. The department **OPPOSES** aspects that limit the department’s ability to manage the fishery based on the assessment of effort and available harvest. The department recommends interested stakeholders explore gaining authority to test the feasibility of pot gear for Alaska commercial scallop fishing before enacting formal regulation.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

Table 298-1.—Guideline harvest levels (GHLs) by season and management area.

Season	Yakutat	Prince William Sound ^a	Kodiak ^b	Dutch Harbor
2014/15	145,000	Closed	185,000	5,000
2015/16	145,000	Closed	155,000	10,000
2016/17	125,000	6,300	105,000	10,000
2017/18	145,000	6,300	105,000	10,000
2018/19	145,000	6,300	85,000	5,000
2019/20	145,000	Closed	85,000	5,000
2020/21	145,000	Closed	105,000	5,000
2021/22	145,000	8,000	160,000	5,000
2022/23	145,000	8,000	190,000	10,000
2023/24	145,000	7,200	190,000	10,000
2024/25	145,000	7,200	190,000	10,000

^a GHL applies only to West Kayak Subsection.

^b Area GHLs are further divided by district.

Table 298-2.—Average harvest and participation by area, 2014/15–2023/24.

Area	Vessels	Percent of total harvest	
		Federal waters	State waters
Yakutat	2	68%	32%
Prince William Sound	1	100%	0%
Kodiak	2	78%	22%
Dutch Harbor	1	<1%	100%
Statewide	2	78%	22%

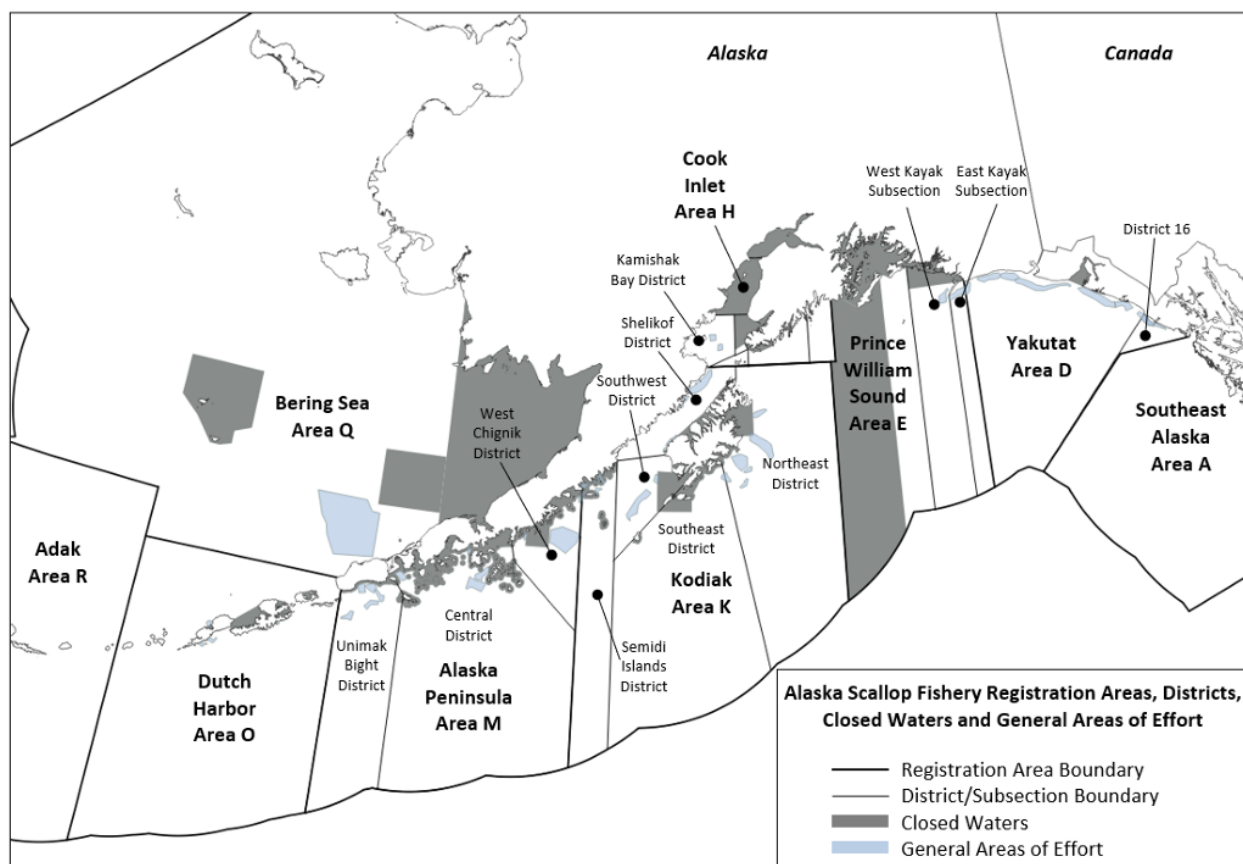


Figure 298-1.—Regulatory boundaries for all registration areas and closed waters with general areas of effort highlighted.

Source: The figure is from 2022 Stock Assessment and Fishery Evaluation Report for the Scallop Fishery off Alaska (SAFE) Report.

COMMITTEE OF THE WHOLE–GROUP 2: SHRIMP (13 PROPOSALS)

MANAGEMENT PLAN (6 PROPOSALS)

PROPOSAL 299 – 5 AAC 31.XXX. New Section and 5 AAC 55.055. Prince William Sound Noncommercial Shrimp Fishery Management Plan.

›Develop a Prince William Sound pot shrimp management plan

PROPOSED BY: PWS/Valdez and Whittier Advisory Committee.

WHAT WOULD THE PROPOSAL DO? This would direct the department to develop a comprehensive Prince William Sound (PWS) pot shrimp management plan in accordance with 5 AAC 39.200. It also directs the department to implement a shrimp task force and to reinstate the *Prince William Sound Pot Shrimp Fishery Management Plan* (5 AAC 31.260) if the board does not adopt a comprehensive management plan.

WHAT ARE THE CURRENT REGULATIONS? Currently, there is no management plan that regulates both commercial and noncommercial PWS pot shrimp fisheries. The noncommercial fishery is managed through a management plan (5 AAC 55.055), which establishes the noncommercial guideline harvest level (GHL) as 60% of the total allowable harvest (TAH), details harvest recording and reporting requirements, and describes the season (April 15–September 15), bag and possession limits, and gear allowances (no more than five pots per vessel used to take shrimp). Current regulations provide for a PWS commercial shrimp pot fishery if the estimated TAH in the PWS waters described in 5 AAC 31.210(a) is more than 110,000 lb of spot shrimp (5 AAC 31.214). The guideline harvest level (GHL) for the commercial pot fishery in these waters is 40% of the TAH. The commercial fishery is managed so that no more than 50% of the commercial GHL may be taken from any one statistical area and there is a triennial rotation of fishing area (5 AAC 31.210).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would require the department to develop a comprehensive management plan for shrimp in PWS. The board has adopted a number of different regulations for this fishery that constitute the framework of a management plan and provide the department direction in managing the fishery. While the Alaska Administrative Code sections governing this fishery are not compiled into a single section, a total allowable harvest would still be calculated by the department and divided by the board allocated GHLs of 60% noncommercial and 40% commercial.

BACKGROUND: The PWS commercial shrimp pot fishery was closed in 1989. The noncommercial fisheries continued, but harvest was low during the period when the commercial fishery was closed. Although a department damage assessment study following the *Exxon Valdez* oil spill concluded that PWS spot shrimp may have declined because of overfishing, environmental conditions may have also been instrumental in both the decline and slow recovery of spot shrimp in PWS and other shellfish populations throughout the Gulf of Alaska.

In March 2009, the board adopted the *Prince William Sound Noncommercial Shrimp Fishery Management Plan* (5 AAC 55.055) in response to user interest and increases in shrimp catch per

unit effort (CPUE) in the department PWS shrimp pot survey. Regulatory language in the management plan allocated 60% of the TAH to noncommercial users, and commercial users were allocated 40% of the TAH under 5 AAC 31.214. Under 5 AAC 31.214 (also adopted in March 2009), a commercial shrimp pot fishery could open if the total allowable harvest (TAH) exceeded 110,000 lb.

The TAH is estimated using a surplus production model. Model inputs include commercial harvest, noncommercial harvest, and catch per unit effort (CPUE) from the department shrimp pot survey, which has been conducted annually since 1992. Currently, 10 sites are surveyed in PWS (Figure 299-1). The shrimp pots used in the survey are designed to catch a wide range of sizes of shrimp to evaluate small shrimp and potential recruitment, along with larger more marketable shrimp. These survey pots do not fit the regulatory guidelines of commercial pot gear; therefore, survey CPUE cannot be directly compared with commercial fishery CPUE. Survey CPUE indicates that the relative abundance of shrimp in PWS has declined each year since 2020 (Figure 299-2). Since the management plan was adopted in 2009 and implemented in 2010, the TAH exceeded the 110,000 lb threshold to allow for a commercial shrimp pot fishery each year (Table 299-1). The TAH reached its highest level in 2021 at 175,000 pounds and declined to 157,750 pounds in 2023. Survey CPUE for all areas combined declined from a high of 1.77 lb per pot in 2020 to 0.41 lb per pot in 2023. This declining trend in survey CPUE data is also apparent when broken out by each commercial fishing area (Figure 299-3).

When the commercial fishery reopened in 2010, the season was aligned with the noncommercial fishery season dates of April 15 through September 15, unless closed earlier by EO and a triennial rotation of fishing areas was established (Figure 299-1). The length of the commercial season varies by area. Areas 1 and 2 have relatively high CPUE and shorter seasons when compared with Area 3 (Table 299-2). Commercial harvest has ranged from 35% to 103% of the GHL since the fishery reopened in 2010. Commercial harvest has been highest in Area 2, with an average harvest of 57,908 lb and 99–103% of the GHL harvested. Area 1 had an average harvest of 56,091 lb and 82–103% of the GHL harvested. Area 3 has the lowest average harvest at 43,470 lb and 35–100% of the GHL harvested. Average fishery CPUE from 2020 to 2023 in Areas 1, 2, and 3 was 2.0, 1.74, and 1.37 lb per pot, respectively.

Participation in the PWS commercial shrimp pot fishery ranged from 30 vessels in 2015 to 75 vessels in 2010. Participation averaged 69 vessels annually from 2021 to 2023. Participation is highest in Area 1 and lowest in Area 3. As the season progresses, especially in Area 3 where seasons have been longer, participation drops due to salmon fisheries opening and less successful participants curtailing their effort.

Before 1999, there were no regulatory restrictions on the noncommercial shrimp fishery in PWS. In March 2000, the board adopted regulations to restrict the noncommercial fishery (effective January 2001). The regulations required a shrimp permit for all users (sport, personal use, and subsistence, effective during the 2002–2005 seasons), established pot limits of no more than 5 pots per person, with a limit of 5 pots per vessel that may be used to take shrimp and established a fishing season from April 15 through September 15. With the adoption of the *Prince William Sound Noncommercial Shrimp Fishery Management Plan*, it became necessary to reinstate the noncommercial shrimp permit prior to the start of the 2009 shrimp pot fishery season. In 2012, the board revisited the shrimp pot fishery management plan and repealed the department's emergency

order authority to increase the pot limit. However, this did not limit the department's emergency order authority under AS 16.05.060 to restrict the fishery prior to the season and inseason as needed for conservation purposes. In 2016, personal use fishing regulations were repealed by the board to simplify regulations because they were redundant with sport fishing regulations. In 2022, the board granted the department authority to deny eligibility to participate in the Prince William Sound noncommercial shrimp fishery if a participant fails to comply with reporting requirements but allows for a participant to appeal their ineligibility.

Currently, the department manages the noncommercial fishery for the GHL by preseason EOs, primarily through pot limit reductions. The department has issued EOs reducing the number of pots per vessel in the noncommercial shrimp fishery every year since 2016. The noncommercial harvest peaked in 2020 with a harvest of 140,488 lb, but annual harvest has averaged 91,582 lb from 2010 to 2023 (Table 299-1). Since 2010, the noncommercial harvest has ranged from 73% to 138% of the GHL (Table 299-1). The noncommercial fishery harvest has been below the GHL in nine of the last 14 years and has exceeded the GHL in 2010, 2016, and 2018–2020 (Table 299-1).

The Prince William Sound shrimp pot fisheries are managed by the following regulations:

Sport

5AAC 55.022 (b) (5) General Provisions

5 AAC 55.055 Prince William Sound noncommercial shrimp fishery management plan

5 AAC 75.016 Shellfish harvest recording form provisions

Commercial

5 AAC 31.206 Area E registration

5 AAC 31.210 Shrimp pot fishing seasons for Registration Area E

5 AAC 31.214 Shrimp pot guideline harvest level for Registration Area E

5 AAC 31.223 Lawful shrimp pot gear for Registration Area E

5 AAC 31.226 Shrimp pot marking requirements for Registration Area E

5 AAC 31.051 Shrimp pot gear marking requirements

5 AAC 31.227 Operation of other pot gear

5 AAC 31.240 Registration Area E shrimp vessel inspection and inspection points

5 AAC 31.245 Reporting requirements for Registration Area E

5 AAC 31.250 Shrimp processing vessels.

Subsistence

5 AAC 02.210

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal. If the board wishes to adopt a new management plan for this fishery, then regulatory language will need to be drafted because the proposal does not contain regulatory language detailing how the fishery would be managed. Because the board does not have fiscal or administrative powers, the board cannot direct the department to staff a task force or hold task force meetings, however the department is open to working with a multi-user group task force to improve management of the PWS shrimp fishery.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal could result in an additional cost to the department.

SUBSISTENCE REGULATION REVIEW:

1. **Is this stock in a nonsubsistence area?** Yes. Portions of the stock are located in the Valdez Nonsubsistence Area described in 5 AAC 99.015(a)(5).
2. **Is this stock customarily and traditionally taken or used for subsistence?** Yes, shrimp have a positive customary and traditional use finding in the Prince William Sound Area outside the Valdez Nonsubsistence Area.
3. **Can a portion of the stock be harvested consistent with sustained yield?** Yes.
4. **What amount is necessary for subsistence uses?** The amount reasonably necessary for subsistence determined by the board is 9,000 – 15,000 pounds of usable weight of shrimp (5 AAC 02.208(b)).
5. **Do the regulations provide a reasonable opportunity for subsistence uses?** This is a board determination.
6. **Is it necessary to reduce or eliminate other uses to provide a reasonable opportunity for subsistence uses?** This is a board determination.

Table 299-1.—Prince William Sound total allowable harvest (TAH), guideline harvest level (GHL), and harvest in commercial and noncommercial shrimp pot fisheries, 2010–2023.

Year	Commercial area	TAH (lb)	% of TAH	Commercial			Noncommercial		
				GHL (lb)	Harvest (lb)	% of GHL	GHL (lb)	Harvest (lb)	% of GHL
2010	1	137,500	97%	55,000	45,349	82%	82,200	87,699	107%
2011	2	131,900	85%	52,760	52,550	100%	79,200	59,182	75%
2012	3	128,100	60%	51,240	21,561	42%	76,860	55,765	73%
2013	1	165,750	89%	66,300	61,644	93%	99,500	85,988	86%
2014	2	166,500	95%	66,600	68,464	103%	100,000	89,155	89%
2015	3	167,000	69%	67,000	23,138	35%	100,000	92,071	92%
2016	1	117,653	129%	47,061	48,423	103%	70,500	102,785	146%
2017	2	167,000	95%	67,000	67,421	101%	100,000	91,827	92%
2018	3	168,000	117%	67,200	67,375	100%	100,800	128,860	128%
2019	1	170,200	101%	68,100	68,947	101%	102,100	102,919	101%
2020	2	170,209	124%	68,100	69,898	103%	102,109	140,488	138%
2021	3	175,000	91%	70,000	70,169	100%	104,978	88,972	85%
2022	1	167,250	90%	66,900	65,177	97%	100,300	84,949	85%
2023	2	157,750	85%	63,100	62,260	99%	94,700	71,492	75%
Averages									
2010-2020		153,619	97%	61,487	54,070	87%	92,115	94,249	102%
2021-2023		166,667	89%	66,667	65,869	99%	99,993	81,804	82%

Note: Noncommercial harvest was calculated with a conversion of 2.40 pounds per gallon of shrimp between 2002 and 2012. Starting in 2013, it was updated and calculated as 3.89 pounds per gallon of shrimp.

Table 299-2.—Prince William Sound commercial shrimp pot fishery guideline harvest level (GHL), effort, pot limits, harvest, and catch per unit effort (CPUE) by Area, 2010–2023.

Year	Area	GHL (lb)	% GHL Harvested	Effort		Pot limits		Harvest (lb)				CPUE (lb/pot)	Season length (days)
				Vessels fished	Pot lifts	Open	Close	Spot shrimp	Coonstripe shrimp	Other shrimp	Total		
2010	1	55,000	82%	75	18,025	20	20	45,076	263	10	45,349	2.52	118
2011	2	52,760	100%	45	29,580	40	40	51,302	1,204	44	52,550	1.78	96
2012	3	51,240	42%	35	19,644	50	50	18,097	3,428	36	21,561	1.10	93
2013	1	66,300	93%	45	34,804	30	50	59,376	2,266	2	61,644	1.77	145
2014	2	66,600	103%	32	41,670	40	50	64,220	4,085	158	68,464	1.64	111
2015	3	67,000	35%	30	20,004	60	60	21,193	1,934	11	23,138	1.16	146
2016	1	47,061	103%	57	27,360	30	30	47,822	580	21	48,423	1.77	28
2017	2	67,000	101%	54	45,261	40	40	66,555	783	83	67,421	1.49	41
2018	3	68,000	99%	45	41,351	50	50	65,101	2,268	5	67,375	1.63	118
2019	1	68,100	101%	72	34,094	25	25	68,700	245	2	68,947	2.02	34
2020	2	68,100	103%	73	32,679	30	30	69,777	120	1	69,898	2.14	18
2021	3	70,000	100%	71	44,281	30	40	69,488	677	4	70,169	1.58	126
2022	1	66,900	97%	64	34,222	25	25	64,661	512	3	65,176	1.90	36
2023	2	63,100	99%	73	37,726	25	25	61,950	308	2	62,260	1.65	37
Averages													
2010–2020		61,560	88%	51	31,316	38	40	52,474	1,561	34	54,070	1.73	86
2021–2023		66,667	99%	69	38,743	27	30	65,366	499	3	65,868	1.71	66
Area averages 2010–2023													
Area 1		60,672	95%	63	29,701	26	30	57,127	773	8	57,908	2.00	72
Area 2		63,512	101%	55	37,383	35	37	62,761	1,300	58	64,119	1.74	61
Area 3		64,060	71%	45	31,320	49	50	43,470	2,077	14	45,561	1.37	121

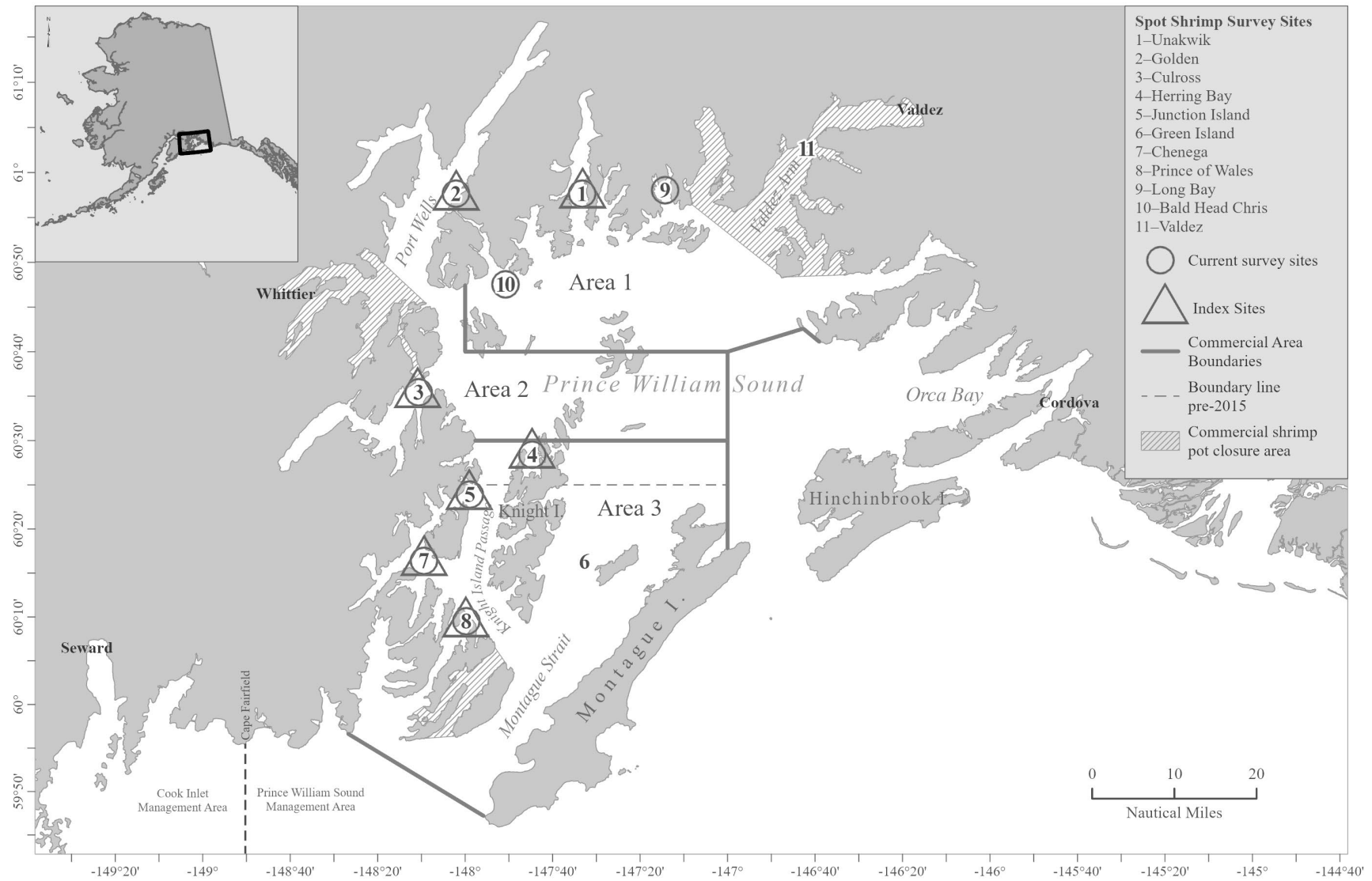


Figure 299-1.—Prince William Sound Area spot shrimp pot survey sites and shrimp pot commercial fishery area boundaries.

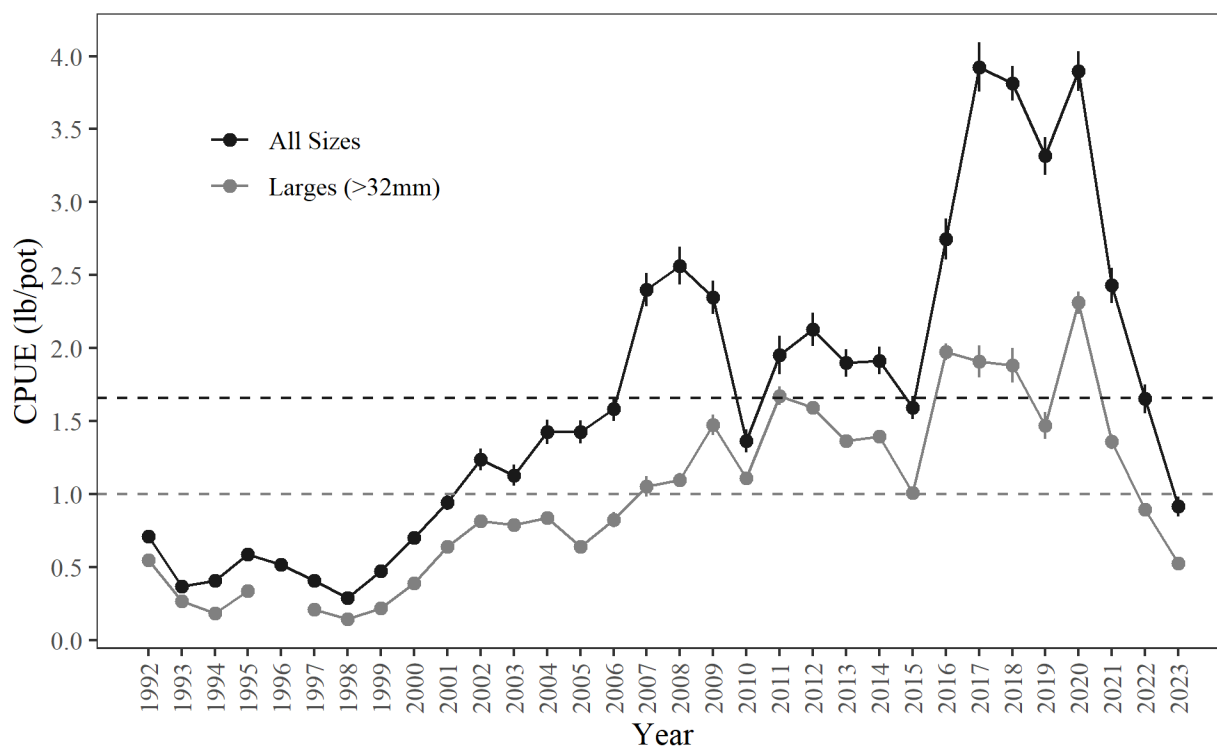


Figure 299-2.—Catch per unit effort (CPUE) of spot shrimp from all sites and stations in the Prince William Sound Area spot shrimp pot survey, 1992-2023.

Note: Dashed lines are long-term averages and vertical lines are annual variance.

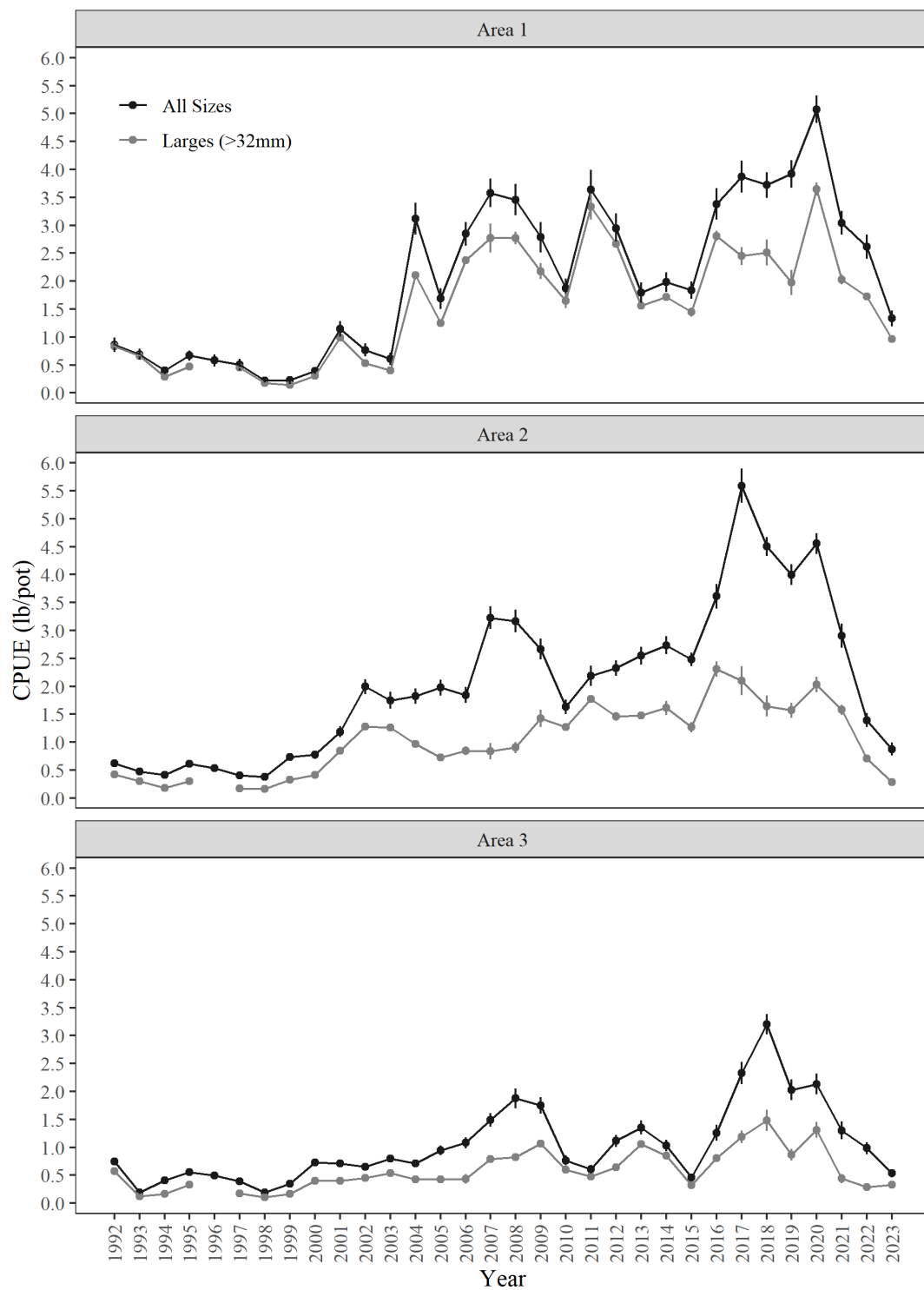


Figure 299-3.—Catch per unit effort (CPUE) of spot shrimp from Area 1, Area 2, and Area 3 in the Prince William Sounds Area spot shrimp pot survey, 1992-2023.

Note: Vertical lines are annual variance.

PROPOSAL 300 – 5 AAC 55.055. Prince William Sound noncommercial shrimp fishery management plan.

Modify the Prince William Sound noncommercial shrimp fishery management plan

PROPOSED BY: Cordova District Fishermen United (CDFU).

WHAT WOULD THE PROPOSAL DO? This would divide the guideline harvest level (GHL) for Prince William Sound (PWS) noncommercial shrimp fishery between the three areas defined for the commercial shrimp fishery under 5 AAC 31.210(a).

WHAT ARE THE CURRENT REGULATIONS? The GHL for the noncommercial (sport and subsistence) shrimp pot fishery is 60% of the total allowable harvest (TAH) and the noncommercial harvest of shrimp may occur throughout the Prince William Sound Management Area (PWSMA) with the exception that shrimp may not be taken under a subsistence permit in the Valdez nonsubsistence area as defined under 5 AAC 99.015(a)(5) (Figure 300-1). By regulation, shrimp may only be taken with no more than five pots in the noncommercial fishery. However, the department has the authority to reduce the number of pots used by emergency order, including area-specific pot limits.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would reduce the noncommercial shrimp fishery area and divide the noncommercial shrimp fishery GHL into three existing management units defined in commercial fishing regulations (Figure 300-1). There would be no permitted noncommercial effort or harvest of shrimp outside of these three areas, such as the southeast portions of PWS near Cordova (Figure 300-1). It may increase gear conflict within the noncommercial shrimp fishery as it will concentrate noncommercial shrimp effort. It may also increase gear conflict between the noncommercial and commercial fishery in the commercial area that is open on any given year.

BACKGROUND: Before 1999, there were no regulatory restrictions on the noncommercial shrimp fishery in PWS. In March 2000, the board adopted regulations to restrict the noncommercial fishery (effective January 2001). The regulations required a shrimp permit for all noncommercial users (sport, personal use, and subsistence), established pot limits of no more than 5 pots per person, with a limit of 5 pots per vessel that may be used to take shrimp with a fishing season from April 15 through September 15. In March 2009, the board adopted the *PWS Noncommercial Shrimp Fishery Management Plan* (5 AAC 55.055) that included an allocation of 60% of the TAH to noncommercial users. The commercial shrimp pot fishery GHL is 40% of the TAH and is managed so that no more than 50% of the commercial GHL may be taken from any one statistical area. In addition, there is a triennial rotation of fishing area (Areas 1, 2, and 3; Figure 299-1). In 2012, the board revisited the noncommercial shrimp fishery management plan and repealed the department's emergency order authority under 5 AAC 75.003 to increase the pot limit. However, the department's emergency order authority under AS 16.05.060 to restrict the fishery prior to the season and inseason as needed for conservation purposes was maintained. In 2016, the personal use shrimp fishery regulations were repealed by the board to simplify regulations because they were redundant with sport fishing regulations.

Since 1992, the department has conducted an annual fishery independent shrimp pot survey in Prince William Sound and the sites are located throughout Commercial Areas 1–3 (Figure 299-1).

The catch per unit of effort (CPUE) from the survey are used in concert with noncommercial and commercial harvest in a surplus production model to estimate the TAH for the entire PWSMA and not individual areas. Trends in the survey CPUE data by commercial area can be found in Figure 299-2. Areas closed to the commercial shrimp fishery (Figure 299-1), such as the Whittier vicinity and Port Valdez, are not surveyed and only a fishery-independent index of abundance, based on noncommercial CPUE, exists for these areas. Since 2010, the noncommercial CPUE in the Whittier vicinity has ranged from 1.69 lb per pot-day in 2012 to 3.91 lb per pot-day in 2020 (Figure 300-2). Although CPUE in the Whittier vicinity has declined since its 2020 peak, the five highest annual CPUE in the Whittier Vicinity were observed between 2019 and 2023. The noncommercial CPUE in the Port Valdez area has ranged from 0.83 lb per pot-day in 2017 to 1.92 lb per pot-day in 2023 (Figure 300-2). Similar to the Whittier area, five of the highest annual CPUE in Port Valdez were observed in the most recent 5 years.

The PWS statistical areas that support most of the noncommercial effort and harvest are the waters near the largest ports, Port Valdez (466100) located in Area 1 and Whittier vicinity in Area 2 (486033; Figure 300-1). The noncommercial shrimp fishery expends an average annual effort of 17,637 pot-days each year with an annual average harvest of 29,041 lb in Area 1, which is 41% of the total effort and 34% of the total harvest (Table 300-2 and 300-3). Outside of Valdez, Area 1 also includes the highly productive statistical areas 476101 and 476036 in Unakwik Inlet (Figure 300-1). Port Wells (486034) and Port Nellie Juan (486031, 486032) are also located in Area 2 and are easily accessed by boats from Whittier (Figure 300-1). Area 2 contributes 20,339 pot-days (49%) to the total annual effort and approximately 48,869 lb (57%) to the total noncommercial shrimp harvest (Table 300-2 and 300-3). Area 3 in Southwest PWS is the area farthest from any of the major ports in PWS. In Area 3 since 2010, the noncommercial fishery expended 1,800 pot-days of effort and harvested 3,582 lb of shrimp on average each year (Table 300-2 and 300-3). The remaining statistical areas contribute to relatively little effort and harvest by the noncommercial fishery with an average of 2,181 pot-days and 4,045 lb harvest annually; equating to approximately 5% of each respective total (Table 300-2 and 300-3).

The department has issued preseason emergency orders reducing the number of pots per vessel in the noncommercial shrimp fishery every year since 2016. From 2016 to 2018, the pot limits per person and vessel were reduced to four pots and in 2019 and 2020, the pot limit was further reduced to three pots in order not to exceed the GHL. In 2021, the pot limit was reduced to two pots. In the emergency orders from 2016 to 2021, the number of pots allowed was the same throughout the entire PWSMA. From 2022 to 2024, pot limits were reduced to three pots with a requirement that only two pots may be used near the port of Valdez, near the port of Whittier, and in portions of Port Wells and Culross Passage.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal. The department already has and utilizes emergency order authority to reduce effort and harvest by reducing pot limits in areas in order to manage for the GHL and can do so to address localized depletion. Dividing the GHL into three areas could increase regulatory complexity, effort, and harvest in low productivity areas, which may not be sustainable. To meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity to harvest shrimp in the Prince William Sound Management Area if the proposal is adopted.

COST ANALYSIS: Approval of this proposal is expected to result in an additional direct cost for a private person to participate in this fishery as the noncommercial fishery would be restricted near the ports, requiring the private person to travel farther to participate. Approval of this proposal is not expected to result in an additional cost to the department.

SUBSISTENCE REGULATION REVIEW:

1. **Is this stock in a nonsubsistence area?** Yes. Portions of the stock are located in the Valdez Nonsubsistence Area described in 5 AAC 99.015(a)(5).
2. **Is this stock customarily and traditionally taken or used for subsistence?** Yes, shrimp have a positive customary and traditional use finding in the Prince William Sound Area outside the Valdez Nonsubsistence Area.
3. **Can a portion of the stock be harvested consistent with sustained yield?** Yes.
4. **What amount is necessary for subsistence uses?** The amount reasonably necessary for subsistence determined by the board is 9,000 – 15,000 lb of usable weight of shrimp (5 AAC 02.208(b)).
5. **Do the regulations provide a reasonable opportunity for subsistence uses?** This is a board determination.
6. **Is it necessary to reduce or eliminate other uses to provide a reasonable opportunity for subsistence uses?** This is a board determination.

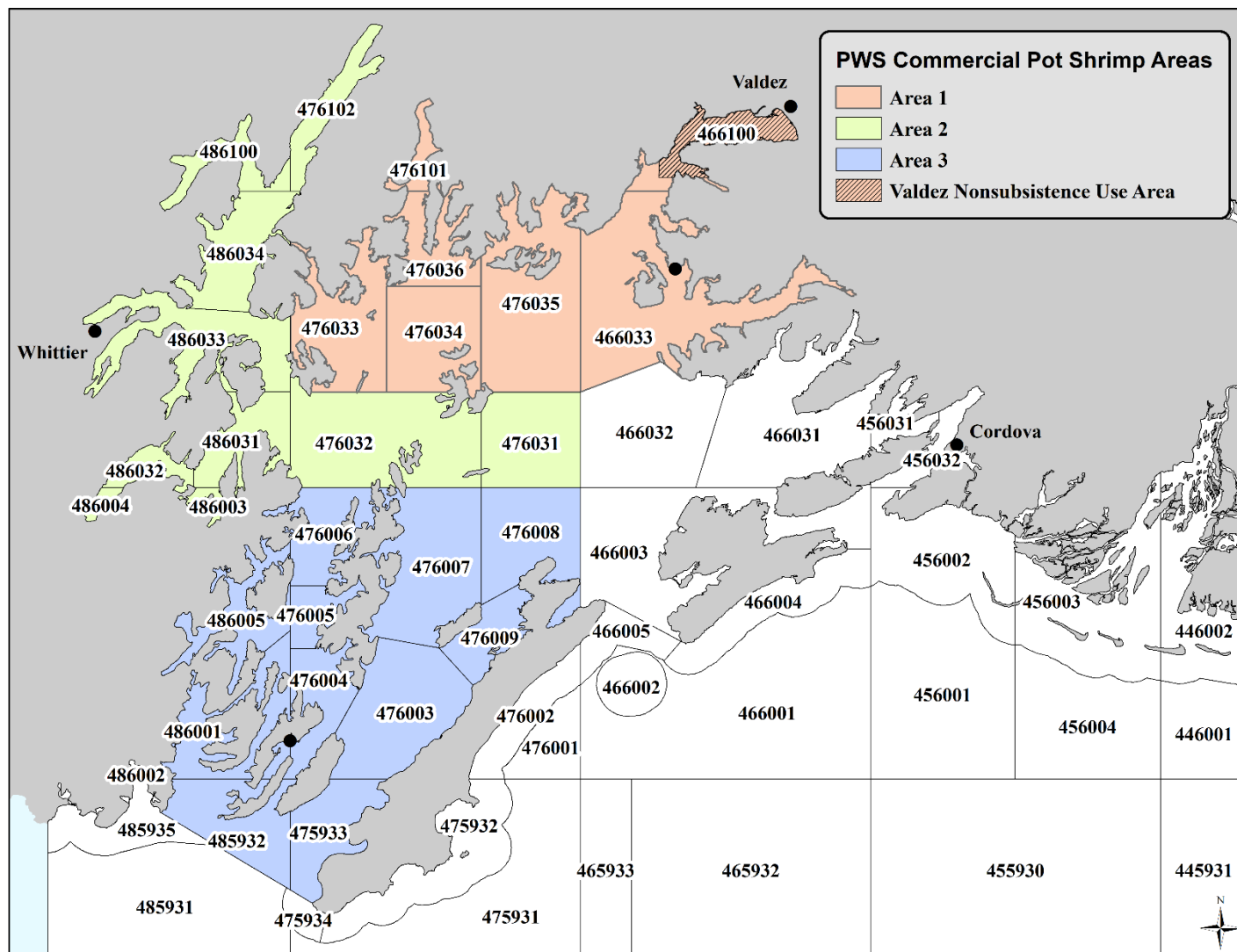


Figure 300-1.—Map of Prince William Sound statistical areas for shellfish, the Valdez nonsubsistence area, and Areas 1–3.

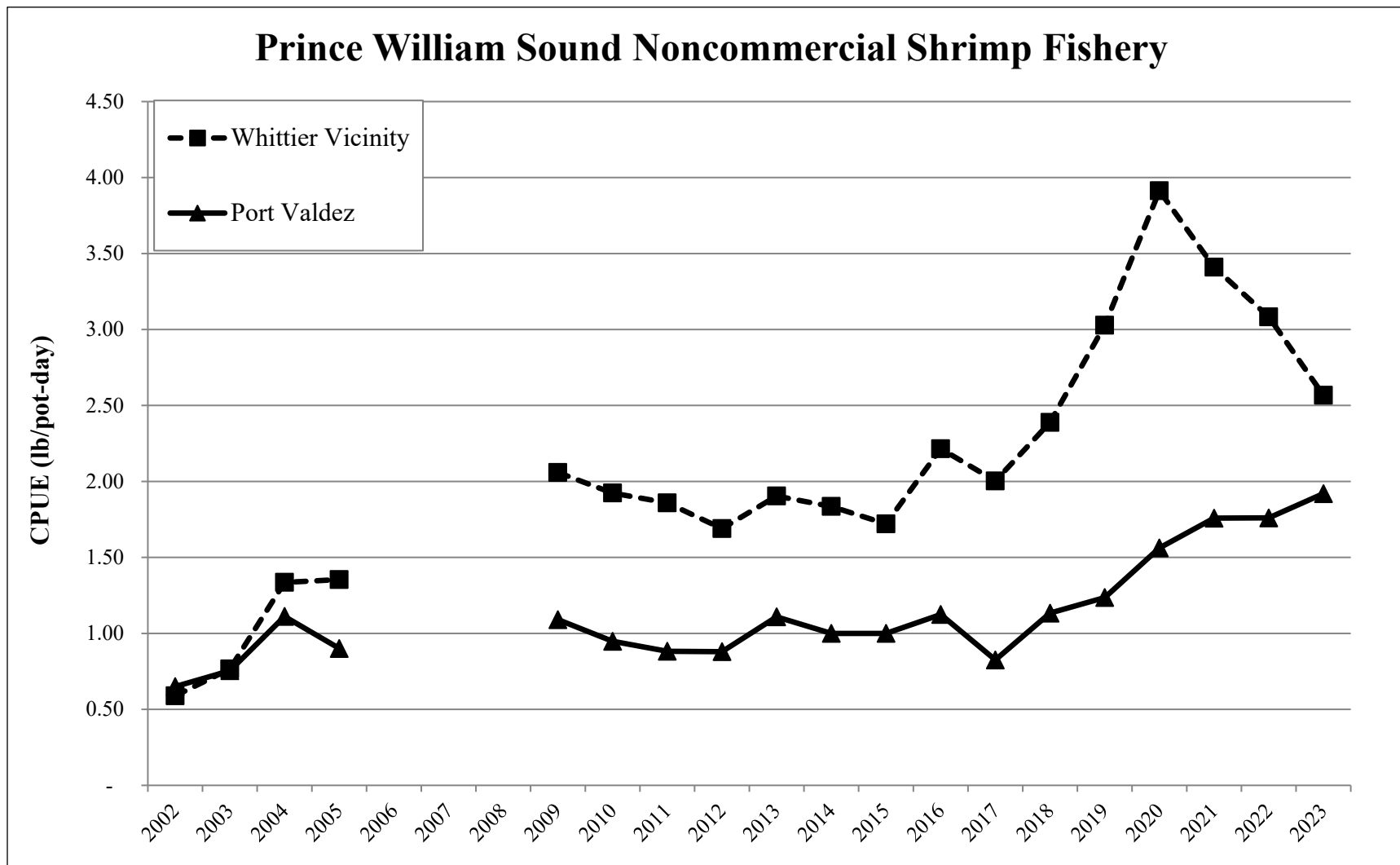


Figure 300-2.—Catch per unit effort (pounds of whole shrimp caught in one pot soaked for 24 hours; CPUE) for the two major statistical areas (Whittier vicinity and Port Valdez) in the noncommercial pot shrimp fishery of Prince William Sound, 2002–2005, 2009–2023.

Note: Noncommercial permits were not required from 2006 to 2008.

Table 300-1.—Number of noncommercial permits issued, permit response rate, pot-days of effort, catch per unit effort (CPUE), pounds of whole shrimp harvested, and guideline harvest level (GHL) in the Prince William Sound noncommercial shrimp pot fishery, 2010–2023.

Year	Permits issued	Response rate	Effort (pot-days)	Catch per unit effort	Harvest (lb)	GHL
2010	3,181	90.0%	78,083	1.82	87,699	82,200
2011	3,309	88.0%	56,543	1.70	59,182	79,200
2012	3,098	87.0%	52,620	1.72	55,765	76,860
2013	3,101	89.0%	48,967	1.76	85,988	99,500
2014	3,134	86.0%	48,283	1.85	89,155	100,000
2015	3,033	86.7%	48,521	1.90	92,072	100,000
2016	3,592	90.7%	45,012	2.28	102,785	70,500
2017	3,441	92.0%	45,606	2.01	91,827	100,000
2018	3,810	89.9%	51,704	2.49	128,860	100,700
2019	4,211	88.0%	39,816	2.58	102,919	102,100
2020	4,501	88.7%	40,685	3.45	140,488	102,109
2021	4,412	92.0%	25,671	3.47	88,972	104,978
2022	4,475	84.6%	27,716	3.07	84,949	100,300
2023	4,372	87.8%	18,378	2.67	71,492	94,700
Average						
2010–2020	3,492	88.7%	50,531	2.14	94,249	92,106
2021–2023	4,420	88.1%	23,922	3.07	81,804	99,993

Note: Sport and subsistence permits were first offered online in 2016. Between 2002 and 2012, the conversion factor for a gallon of shrimp was 2.4 lb. In 2013, this was reevaluated and updated to a conversion factor of 3.89 lb per gallon of shrimp.

Table 300-2.—Annual contribution of proposed areas and all other areas to estimated total effort (reported) in the noncommercial shrimp fishery in Prince William Sound, 2010–2023.

Year	Proposed Areas							
	Area 1 ^a		Area 2 ^b		Area 3 ^c		All other areas ^d	
	Pot-days	%	Pot-days	%	Pot-days	%	Pot-days	%
2010	35,291	49%	32,329	45%	3,373	5%	1,525	2%
2011	25,362	50%	22,446	44%	2,419	5%	247	0%
2012	23,481	49%	19,268	40%	1,360	3%	4,243	9%
2013	15,951	36%	22,780	52%	1,650	4%	3,766	9%
2014	16,328	37%	21,255	49%	2,064	5%	3,999	9%
2015	17,191	40%	20,849	48%	1,399	3%	3,797	9%
2016	17,408	41%	22,392	52%	1,902	4%	1,076	3%
2017	18,089	42%	21,604	50%	1,902	4%	2,033	5%
2018	21,095	43%	23,278	48%	1,775	4%	2,421	5%
2019	14,647	39%	19,567	53%	1,929	5%	1,050	3%
2020	13,380	35%	20,626	54%	1,883	5%	2,099	6%
2021	8,564	35%	13,001	53%	1,196	5%	1,665	7%
2022	9,237	36%	14,240	56%	1,482	6%	441	2%
2023	10,894	43%	11,115	44%	994	4%	2,171	9%
Average 2010–2023	17,637	41%	20,339	49%	1,800	4%	2,181	5%

^a Proposed Area 1 consists of seven statistical areas: 466033, 466100 (Port Valdez), 476033, 476034, 476035, 476036, 476101.

^b Proposed Area 2 consists of 10 statistical areas: 476031, 476032, 476102, 486003, 486004, 486031, 486032, 486033 (Whittier vicinity), 486034.

^c Proposed Area 3 consists of 11 statistical area: 475933, 476003–476009, 485932, 486001, 486005.

^d All other areas consists of the remaining statistical areas.

Table 300-3.—Annual contribution of proposed areas and all other areas to estimated total harvest (reported) in the noncommercial shrimp fishery in Prince William Sound, 2010–2023.

Year	Proposed Areas						All other areas ^d	
	Area 1 ^a		Area 2 ^b		Area 3 ^c			
	Pounds	%	Pounds	%	Pounds	%	Pounds	%
2010	27,298	33%	49,786	61%	1,738	5%	958	1%
2011	21,487	40%	29,681	56%	1,939	4%	202	0%
2012	18,612	36%	25,433	49%	1,356	3%	6,139	12%
2013	23,542	29%	46,221	58%	4,571	6%	5,648	7%
2014	27,444	34%	42,245	52%	4,162	5%	6,621	8%
2015	34,535	42%	39,989	49%	2,175	3%	5,294	6%
2016	33,866	34%	57,986	59%	3,949	4%	2,366	2%
2017	33,405	38%	47,582	55%	3,321	4%	2,663	3%
2018	47,393	39%	65,003	53%	3,660	3%	5,635	5%
2019	26,513	26%	66,824	66%	5,719	6%	2,320	2%
2020	35,856	27%	81,343	62%	6,913	5%	6,950	5%
2021	24,227	29%	49,394	60%	2,689	3%	5,920	7%
2022	22,584	29%	51,968	66%	2,856	4%	780	1%
2023	29,812	44%	30,713	45%	2,669	4%	5,134	8%
Average 2010–2023	29,041	34%	48,869	57%	3,582	4%	4,045	5%

Note: The conversion factor for a gallon of shrimp was 2.4 lb until 2012. In 2013, this was reevaluated and updated to a conversion factor of 3.89 lb per gallon of shrimp for 2013 and following years.

^a Proposed Area 1 consists of seven statistical areas: 466033, 466100 (Port Valdez), 476033, 476034, 476035, 476036, 476101.

^b Proposed Area 2 consists of 10 statistical areas: 476031, 476032, 476102, 486003, 486004, 486031, 486032, 486033 (Whittier vicinity), 486034.

^c Proposed Area 3 consists of 11 statistical area: 475933, 476003–476009, 485932, 486001, 486005.

^d All other areas consists of the remaining statistical areas.

PROPOSAL 301 – 5 AAC 55.055. Prince William Sound noncommercial shrimp fishery management plan.

Modify the Prince William Sound noncommercial shrimp fishery management plan

PROPOSED BY: Cordova District Fishermen United (CDFU).

WHAT WOULD THE PROPOSAL DO? This would create a minimum threshold of 110,000 lb total allowable harvest (TAH) for the sport shrimp fishery in Prince William Sound (PWS) to open.

WHAT ARE THE CURRENT REGULATIONS? Currently there is no minimum TAH threshold for the noncommercial shrimp fishery, which includes sport and subsistence, to open. The noncommercial shrimp fishery is open to harvest from April 15–September 15 with no bag, possession, or size limits. No more than five pots per vessel may be used to take shrimp, which has been reduced by emergency order annually since 2016. The guideline harvest level (GHL) for shrimp harvested by the noncommercial shrimp fisheries is calculated as 60% of the TAH.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the TAH is less than 110,000 lb then the sport fishery would be closed. This proposal would have no effect when the TAH is estimated at or over 110,000 lb. If shrimp biomass decreases and the TAH drops below 110,000 lb, closing the sport fishery may or may not allow the biomass level to rebuild to a TAH of 110,000 lb, but the department does not have sufficient information to quantify this or estimate rate of stock recovery. In years that the TAH is below 110,000 lb, only a subsistence shrimp fishery will be prosecuted. Subsistence shrimp permits and harvest will increase since a majority of the users of this fishery are Alaska residents and qualify for the subsistence fishery. During these years, harvest would not be allowed by individuals who do not qualify for subsistence due to residency or would fish in the Valdez nonsubsistence area as defined under 5 AAC 99.015(a)(5).

BACKGROUND: In March 2009, the board adopted a *Prince William Sound Noncommercial Shrimp Fishery Management Plan* (5 AAC 55.055). Historically, the noncommercial shrimp fishery consisted of sport, personal use, and subsistence fisheries. In 2016, personal use fishing regulations were repealed by the board to simplify regulations because they were redundant with sport fishing regulations. The noncommercial shrimp fishery, including sport and subsistence, can be executed at all biomass and TAH levels. When the *Prince William Sound Noncommercial Shrimp Fishery Management Plan* was adopted, the board implemented 5 AAC 31.214, allowing for a commercial shrimp pot fishery if the TAH exceeds 110,000 lb.

Data collected during the annual fishery-independent shrimp pot survey and both the commercial and noncommercial harvest information are used in a surplus production model to estimate the TAH and GHLs. This is a biomass removal model that uses survey catch-per-unit-effort (CPUE) in concert with harvested amounts from the previous year's commercial and noncommercial fisheries to estimate what biomass of spot shrimp can be harvested in the upcoming year's fisheries. The maximum sustainable yield (MSY) of a fishery is theoretically achieved when the population is maintained at a level that allows the largest long-term average harvest without compromising future productivity, often near 50% of its unexploited biomass. The lower 90% confidence interval of MSY is used from the surplus production model to provide a conservative

but sustainable harvest level in the PWS shrimp fisheries. As part of the management plan, 60% of the TAH is allocated to noncommercial users and the remaining 40% to commercial users. If the TAH is below 110,000 lb then the commercial shrimp fishery would not open and noncommercial shrimp fishery would open to harvest 60% of the TAH although since 2010, the TAH has never been less than 110,000 lb (Table 299-1). The TAH has been on average over 156,000 lb each year with a range between 117,653 lb in 2016 and 175,000 lb in 2021 (Table 299-1).

In the recent five years (2019–2023), approximately 4,390 permits are issued in the noncommercial shrimp fishery annually and of those permits, approximately 588 (13%) are subsistence permits and 3,802 (87%) are sport permits. Alaskan residents qualify for the PWS subsistence shrimp permit or can obtain a PWS sport shrimp permit if they have a sport fishing license. On average, 3,244 permit holders (86%) of all PWS sport shrimp permits issued each year have an Alaska address and therefore, most likely qualify for a subsistence shrimp permit during years that the sport shrimp fishery was closed.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

SUBSISTENCE REGULATION REVIEW:

1. **Is this stock in a nonsubsistence area?** Yes, Portions of the stock are located within the Valdez Nonsubsistence Area as defined in 5 AAC 99.015(a)(5).
2. **Is this stock customarily and traditionally taken or used for subsistence?** Yes, shrimp have a positive customary and traditional use finding in the Prince William Sound Area outside the Valdez Nonsubsistence Area.
3. **Can a portion of the stock be harvested consistent with sustained yield?** Yes.
4. **What amount is necessary for subsistence uses?** The amount reasonably necessary for subsistence determined by the board is 9,000–15,000 lb of usable weight of shrimp (5 AAC 02.208(b)).
5. **Do the regulations provide a reasonable opportunity for subsistence uses?** This is a board determination.
6. **Is it necessary to reduce or eliminate other uses to provide a reasonable opportunity for subsistence uses?** This is a board determination.

PROPOSAL 302 – 5 AAC 31.214. Shrimp pot guideline harvest level for Registration Area E.

›Modify the Prince William Sound shrimp pot fishery guideline harvest level

PROPOSED BY: Joseph Person.

WHAT WOULD THE PROPOSAL DO? This would remove the minimum total allowable harvest (TAH) requirement for the Prince William Sound (PWS) commercial shrimp pot fishery to open and set the TAH at a static 150,000 lb instead of at a value determined by the department.

WHAT ARE THE CURRENT REGULATIONS? Current regulations provide for a PWS commercial shrimp pot fishery if the estimated TAH in the PWS waters described in 5 AAC 31.210(a) is more than 110,000 lb of spot shrimp (5 AAC 31.214). The guideline harvest level (GHL) for the commercial pot fishery in these waters is 40% of the TAH, and the GHL for the noncommercial (sport and subsistence) pot fishery is 60% of the TAH (5 AAC 55.055). The commercial fishery is managed so that no more than 50% of the commercial GHL may be taken from any one statistical area and there is a triennial rotation of fishing area (5 AAC 31.210).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would eliminate the TAH trigger of 110,000 lb to open the commercial shrimp pot fishery and create a static TAH of 150,000 lb, which would be allocated 40% to the commercial and 60% to the noncommercial fishery. Allowable harvest of shrimp in PWS would increase relative to the most recent fishery in 2024, when TAH was set at 117,000 lb, but decrease compared with previous years. The commercial fishery would open annually, and the department would no longer have the authority to set TAH.

BACKGROUND: Please refer to comments on Proposal 299 for background information on PWS shrimp fisheries.

DEPARTMENT COMMENTS: The department **OPPOSES** setting the TAH at a static 150,000 lb. The authority to set the TAH based on survey and fishery performance is an important management tool and in years of low shrimp abundance a TAH of 150,000 lb may result in overharvest. To meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity to harvest shrimp in the Prince William Sound Management Area if the proposal is adopted.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

PROPOSAL 303 – 5 AAC 31.214. Shrimp pot guideline harvest level for Registration Area E.

)Modify the Prince William Sound shrimp pot fishery guideline harvest level

PROPOSED BY: Joseph Person.

WHAT WOULD THE PROPOSAL DO? This would eliminate the total allowable harvest (TAH) threshold of 110,000 lb to open a commercial fishery.

WHAT ARE THE CURRENT REGULATIONS? Current regulations provide for a PWS commercial shrimp pot fishery if the estimated TAH in the PWS waters described in 5 AAC 31.210(a) is more than 110,000 lb of spot shrimp (5 AAC 31.214). The guideline harvest level (GHL) for the commercial pot fishery in these waters is 40% of the TAH, and the GHL for the noncommercial (sport, personal use, and subsistence) pot fishery is 60% of the TAH (5 AAC 55.055). The commercial fishery is managed so that no more than 50% of the commercial GHL may be taken from any one statistical area and there is a triennial rotation of fishing area (5 AAC 31.210).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would eliminate the TAH trigger of 110,000 lb to open the commercial shrimp pot fishery and allow the fishery to open without meeting a minimum threshold abundance. The TAH allocation between user groups would remain 40% to the commercial and 60% to the noncommercial fishery. Harvest of shrimp in PWS during years when the TAH is below 110,000 lb could increase by an unknown amount relative to the current management structure, depending on the magnitude of shrimp harvest and effort.

BACKGROUND: Please refer to comments on Proposal 299 for background information on PWS shrimp fisheries.

DEPARTMENT COMMENTS: The department **OPPOSES** opening a fishery at low levels of abundance. To meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity to harvest shrimp in the Prince William Sound Management Area if the proposal is adopted.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

SUBSISTENCE REGULATION REVIEW:

1. **Is this stock in a nonsubsistence area?** Yes. Portions of the stock are located in the Valdez Nonsubsistence Area described in 5 AAC 99.015(a)(5).
2. **Is this stock customarily and traditionally taken or used for subsistence?** Yes, shrimp have a positive customary and traditional use finding in the Prince William Sound Area outside the Valdez Nonsubsistence Area.
3. **Can a portion of the stock be harvested consistent with sustained yield?** Yes.
4. **What amount is necessary for subsistence uses?** The amount reasonably necessary for subsistence determined by the board is 9,000–15,000 pounds of usable weight of shrimp (5 AAC 02.208(b)).

5. **Do the regulations provide a reasonable opportunity for subsistence uses?** This is a board determination.
6. **Is it necessary to reduce or eliminate other uses to provide a reasonable opportunity for subsistence uses?** This is a board determination.

PROPOSAL 304 – 5 AAC 55.055 Prince William Sound Noncommercial Shrimp Fishery Management Plan. 5 AAC 55.022. General Provisions for Seasons, Bag, Possession, and Size Limits, and Methods and Means for the Prince William Sound Area and 5 AAC 31.210. Shrimp Pot Fishing Seasons for Registration Area E.

Delay the season opening by two weeks in the noncommercial and commercial shrimp fisheries

PROPOSED BY: ShrimpPros Association.

WHAT WOULD THE PROPOSAL DO? This would delay Prince William Sound (PWS) noncommercial and commercial shrimp pot fisheries by two weeks. The opening date for these fisheries would change from April 15 to May 1.

WHAT ARE THE CURRENT REGULATIONS? Current regulations for noncommercial and commercial shrimp fisheries in the PWS Area include season dates of April 15 through September 15 (5 AAC 55.055 and 5 AAC 31.210).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would open the noncommercial and commercial shrimp pot season two weeks later, resulting in a shorter fishing season. Participants in the commercial shrimp fishery that also participate in other commercial fisheries might not participate if the shrimp fishery opening date shifts to May 1. Harvest in the noncommercial fishery may be reduced by 9%.

BACKGROUND: When the commercial fishery reopened in 2010, the season was aligned with the noncommercial fishery season dates of April 15 through September 15, unless closed earlier by EO and a triennial rotation of fishing areas was established (Figure 299-1). The length of the commercial season varies by area. Areas 1 and 2 have relatively high CPUE and shorter seasons when compared with Area 3 (Table 299-2). Commercial harvest has ranged from 35% to 103% of the GHL since the fishery reopened in 2010. Commercial harvest has been highest in Area 2 with an average harvest of 57,908 lb and 99–103% of the GHL harvested. Area 1 had an average harvest of 56,091 lb and 82–103% of the GHL harvested. Area 3 has the lowest average harvest at 43,470 lb and 35–100% of the GHL harvested. Average fishery CPUE from 2020 to 2023 in Areas 1, 2, and 3 was 2.0, 1.74, and 1.37 lb per pot, respectively.

Participation in the PWS commercial shrimp pot fishery ranged from 30 vessels in 2015 to 75 vessels in 2010. Participation averaged 69 vessels annually from 2021 to 2023. Participation is highest in Area 1 and lowest in Area 3. As the season progresses, especially in Area 3 where seasons have been longer, participation drops due to salmon fisheries opening and less successful participants curtailing their effort.

During the 2024 PWS commercial shrimp pot fishery, prosecuted in Area 3 (Figure 299-1), the department sampled shrimp landings in April in Whittier and Seward. The average proportion of egg bearing shrimp was 7%.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. Data collected during the early PWS shrimp season do not indicate that egg bearing females are present in the

harvest at a rate that would cause concern. To meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity to harvest shrimp in the Prince William Sound Management Area if the proposal is adopted.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

SUBSISTENCE REGULATION REVIEW:

1. **Is this stock in a nonsubsistence area?** Yes. Portions of the stock are located in the Valdez Nonsubsistence Area described in 5 AAC 99.015(a)(5).
2. **Is this stock customarily and traditionally taken or used for subsistence?** Yes, shrimp have a positive customary and traditional use finding in the Prince William Sound Area outside the Valdez Nonsubsistence Area.
3. **Can a portion of the stock be harvested consistent with sustained yield?** Yes.
4. **What amount is necessary for subsistence uses?** The amount reasonably necessary for subsistence determined by the board is 9,000–15,000 pounds of usable weight of shrimp (5 AAC 02.208(b)).
5. **Do the regulations provide a reasonable opportunity for subsistence uses?** This is a board determination.
6. **Is it necessary to reduce or eliminate other uses to provide a reasonable opportunity for subsistence uses?** This is a board determination.

NONCOMMERCIAL (2 PROPOSALS)

PROPOSAL 305 – 5 AAC 55.055. Prince William Sound noncommercial shrimp fishery management plan.

)Prohibit noncommercial shrimp participants from carrying additional shrimp

PROPOSED BY: Cordova District Fishermen United (CDFU).

WHAT WOULD THE PROPOSAL DO? This would prohibit participants in the Prince William Sound (PWS) noncommercial shrimp fishery from carrying additional shrimp pots beyond what is permitted to be used in regulation (five pots or fewer pots by emergency order).

WHAT ARE THE CURRENT REGULATIONS? Currently, in the PWS noncommercial shrimp fishery no more than five pots can be used to take shrimp; however, an unlimited number of additional pots may be carried onboard the vessel.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

This could result in reduced harvest and opportunity as participants in the noncommercial shrimp fishery would not have an extra pot available to them if they lost or damaged a pot. This would make the noncommercial fishery regulations consistent with commercial fishery regulations where a vessel may not have more than the legal limit of pot gear onboard the vessel during fishing operations.

BACKGROUND: Before 1999, there were no regulatory restrictions on the noncommercial shrimp fishery in PWS. In March 2000, the board adopted regulations to restrict the noncommercial fishery (effective January 2001). The regulations required a shrimp permit for all users (sport, personal use, and subsistence), established pot limits of no more than five pots per person, with a limit of five pots per vessel that may be used to take shrimp, and established a fishing season from April 15 through September 15. In March 2009, the board adopted the *PWS Noncommercial Shrimp Fishery Management Plan* (5 AAC 55.055) that included an allocation of 60% of the total allowable harvest (TAH) to noncommercial users. In 2012, the board revisited the shrimp pot fishery management plan and repealed the department's emergency order authority under 5 AAC 75.003 to increase the pot limit. However, this did not limit the department's emergency order authority under AS 16.05.060 to restrict the fishery prior to the season and inseason as needed for conservation purposes.

Prior to the repeal of the department's authority to increase pot limits, only one emergency order was issued (2010) increasing the pot limit from five pots to eight pots. The department has issued preseason emergency orders reducing the number of pots per vessel in the noncommercial shrimp fishery every year since 2016. From 2016 to 2018, the pot limits per person and vessel were reduced to four pots and in 2019 and 2020, the pot limit was further reduced to three pots to manage for the guideline harvest level (GHL). In 2021, the pot limit was reduced to two pots due to anticipated high effort. From 2022 to 2024, pot limits were reduced to three pots with a requirement that only two pots may be used near the port of Valdez, near the port of Whittier, and in portions of Port Wells and Culross Passage.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. There is no conservation concern with noncommercial shrimp participants carrying additional pots. By prohibiting additional pots on a vessel in the noncommercial shrimp fishery, enforcement may be challenging on years when differential pot limits are applied to different areas through emergency order, such as in 2022–2024. There are no other sport or state subsistence fisheries that prohibit carrying additional gear as long as the amount of gear in use for the taking of finfish or shellfish does not exceed what is allowed by methods and means; however, in commercial fisheries a vessel may not have more than the legal limit of pot gear onboard during fishing operations. To meet the board’s statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity to harvest shrimp in the Prince William Sound Management Area if the proposal is adopted.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

SUBSISTENCE REGULATION REVIEW:

1. **Is this stock in a nonsubsistence area?** Yes, portions of the stock are located in the Valdez Nonsubsistence Area as defined in 5 AAC 99.015(a)(5).
2. **Is this stock customarily and traditionally taken or used for subsistence?** Yes, shrimp have a positive customary and traditional use finding in the Prince William Sound Area outside the Valdez Nonsubsistence Area.
3. **Can a portion of the stock be harvested consistent with sustained yield?** Yes.
4. **What amount is necessary for subsistence uses?** The amount reasonably necessary for subsistence determined by the board is 9,000–15,000 lb of usable weight of shrimp (5 AAC 02.208(b)).
5. **Do the regulations provide a reasonable opportunity for subsistence uses?** This is a board determination.
6. **Is it necessary to reduce or eliminate other uses to provide a reasonable opportunity for subsistence uses?** This is a board determination.

PROPOSAL 307 – 5 AAC 55.055. Prince William Sound noncommercial shrimp fishery management plan.

>Align the season start time of the Prince William Sound noncommercial and commercial shrimp fisheries

PROPOSED BY: PWS/Valdez and Whittier Advisory Committee.

WHAT WOULD THE PROPOSAL DO? This would change the season opening time for the Prince William Sound noncommercial shrimp fishery to 8:00 a.m. on April 15.

WHAT ARE THE CURRENT REGULATIONS? The Prince William Sound noncommercial shrimp fishery opens at 12:01 a.m. on April 15.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? It would delay the beginning of the noncommercial shrimp season by eight hours and noncommercial shrimp harvest would be reduced by an unknown, yet likely small amount. Gear conflict could increase as the start time for both the noncommercial and commercial shrimp fisheries would align, and congestion at harbor boat launches may increase.

BACKGROUND: The noncommercial shrimp fishery has opened at 12:01 a.m. on April 15 by regulation since 2001, and before that, the fishery was open year-round. Time-specific harvest data is not collected through permits in the PWS noncommercial shrimp fishery. However, the date of harvest is recorded on the noncommercial shrimp permit with each pot pulled. Since 2010, less than 1% of the total season harvest occurs on April 15, on average (Figure 307-1), and it is unlikely that much of that occurs before 8:00 a.m.

See proposals 299, 300, 301, 304, and 305 for more background information regarding the PWS noncommercial shrimp fishery.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal and does not have conservation concerns with the current or proposed start time for the noncommercial shrimp fishery. To meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity to harvest shrimp in the Prince William Sound Management Area if the proposal is adopted.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

SUBSISTENCE REGULATION REVIEW:

1. **Is this stock in a nonsubsistence area?** Yes, portions of the stock are located in the Valdez Nonsubsistence Area as defined in 5 AAC 99.015(a)(5).

2. **Is this stock customarily and traditionally taken or used for subsistence?** Yes, shrimp have a positive customary and traditional use finding in the Prince William Sound Area outside the Valdez Nonsubsistence Area.
3. **Can a portion of the stock be harvested consistent with sustained yield?** Yes.
4. **What amount is necessary for subsistence uses?** The amount reasonably necessary for subsistence determined by the board is 9,000–15,000 lb of usable weight of shrimp (5 AAC 02.208(b)).
5. **Do the regulations provide a reasonable opportunity for subsistence uses?** This is a board determination.
6. **Is it necessary to reduce or eliminate other uses to provide a reasonable opportunity for subsistence uses?** This is a board determination.

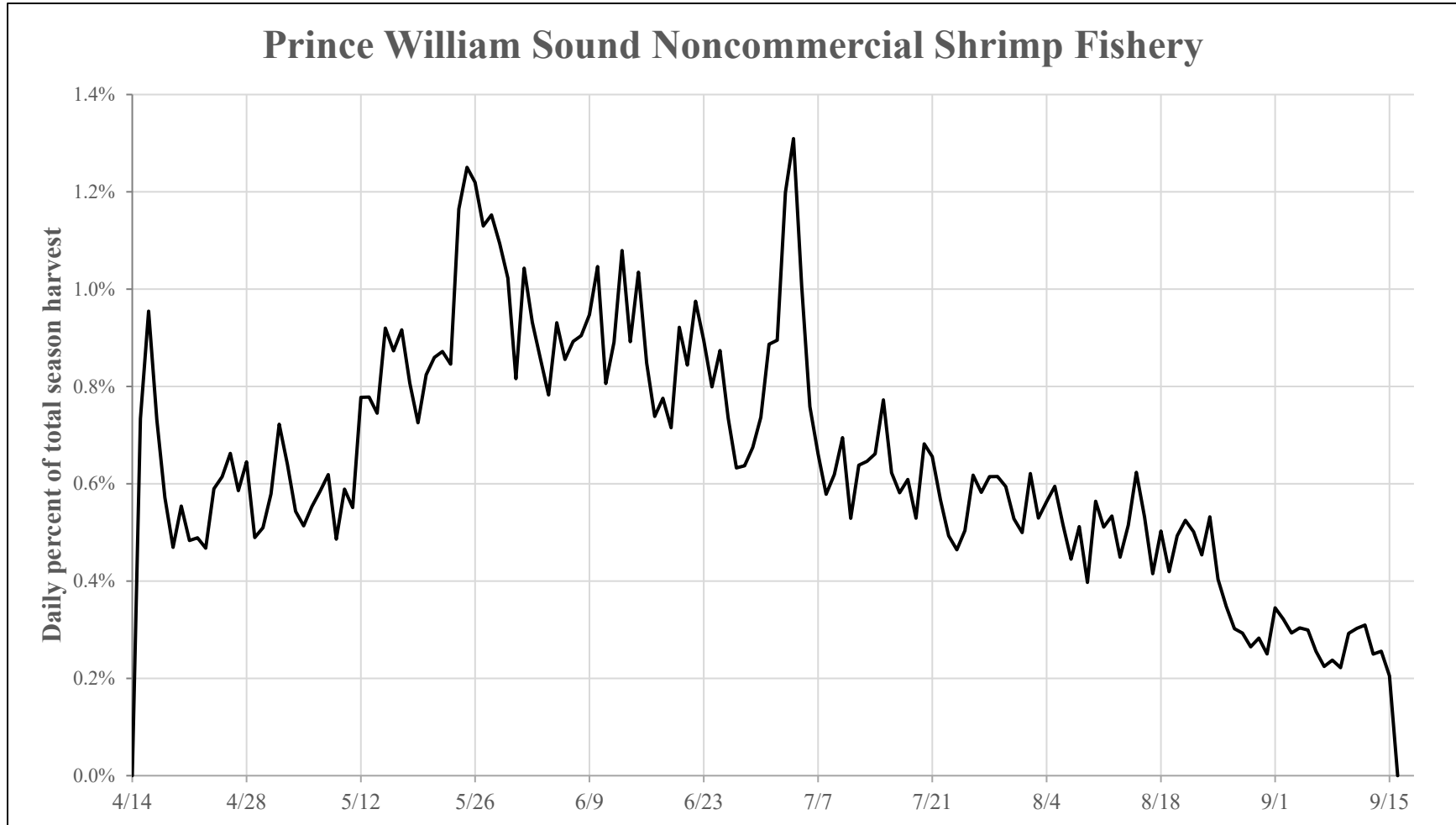


Figure 307-1.—Average daily harvest contribution (%) of the season total harvest by date in the Prince William Sound noncommercial pot shrimp fishery, 2010–2023

COMMERCIAL (5 PROPOSALS)

PROPOSAL 306 – 5 AAC 31.245. Reporting requirements for Registration Area E. Modify the Prince William Sound shrimp pot reporting requirements

PROPOSED BY: Cordova District Fisherman United (CDFU).

WHAT WOULD THE PROPOSAL DO? This would require participants in the commercial shrimp pot fishery to provide daily reports by statistical area on shrimp harvest and effort.

WHAT ARE THE CURRENT REGULATIONS? Reporting requirements for the Prince William Sound (PWS) commercial shrimp pot fishery include mandatory call ins no earlier than 24 hours before beginning a fishing trip, mandatory call ins before landing shrimp, and logbooks (5 AAC 31.245).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would provide the department with daily harvest and effort information as opposed to the mandatory call ins that are currently required before landing shrimp.

BACKGROUND: Pot limits in the PWS commercial shrimp fishery averaged 38 pots from 2010 to 2020 and 29 pots from 2021 to 2023. Please refer to comments on Proposal 299 for additional background information on PWS shrimp fisheries.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. Department staff can manage to the GHL at all levels of effort under the current regulations. Catcher–processor vessels are required by emergency order (EO) to report their harvest daily and catcher vessels could also be required to report daily if the department has concerns about the GHL being exceeded.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is expected to result in an additional cost to the department due to more staff time devoted to compiling daily call in information.

PROPOSAL 308 – 5 AAC 31.223. Lawful shrimp pot gear for Registration Area E.
Reduce the total number of shrimp pots allowed in the Prince William Sound
shrimp pot fishery

PROPOSED BY: Joseph Person.

WHAT WOULD THE PROPOSAL DO? This would reduce the maximum pot limit in Prince William Sound (PWS) commercial shrimp pot fishery from 100 pots to 25 pots.

WHAT ARE THE CURRENT REGULATIONS? The department will announce annually, before the opening of the commercial shrimp pot fishery, the number of pots that may be operated from a vessel in that season, not to exceed 100 shrimp pots per vessel (5 AAC 31.223). When deciding the pot limit, the department will consider the total number of registered vessels, estimated catch per unit of effort (CPUE), and the magnitude of the GHL.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the maximum pot limit were reduced to 25 pots the length of the fishery could increase during times of high shrimp abundance when the pot limit would be set higher under current regulations.

BACKGROUND: In March 2009, the board adopted the *Prince William Sound Noncommercial Shrimp Fishery Management Plan* (5 AAC 55.055) in response to user interest and increases in shrimp catch per unit effort (CPUE) in the department PWS shrimp pot survey. Regulatory language in the management plan allocated 60% of the TAH to noncommercial users, and commercial users were allocated 40% of the TAH under 5 AAC 31.214. Under 5 AAC 31.214 (also adopted in March 2009), a commercial shrimp pot fishery could open if the total allowable harvest (TAH) exceeded 110,000 lb.

When the commercial fishery reopened in 2010 the season was aligned with the noncommercial fishery season dates of April 15 through September 15, unless closed earlier by EO and a triennial rotation of fishing areas was established (Figure 299-1). The length of the commercial season varies by area. Areas 1 and 2 have relatively high CPUE and shorter seasons when compared with Area 3 (Table 299-2). Commercial harvest has ranged from 35% to 103% of the GHL since the fishery reopened in 2010. Commercial harvest has been highest in Area 2 with an average harvest of 57,908 lb and 99–103% of the GHL harvested. Area 1 had an average harvest of 56,091 lb and 82–103% of the GHL harvested. Area 3 has the lowest average harvest at 43,470 lb and 35–100% of the GHL harvested. Average fishery CPUE from 2020 to 2023 in Areas 1, 2, and 3 was 2.0, 1.74, and 1.37 lbs per pot, respectively.

Participation in the PWS commercial shrimp pot fishery ranged from 30 vessels in 2015 to 75 vessels in 2010. Participation averaged 69 vessels annually from 2021 to 2023. Participation is highest in Area 1 and lowest in Area 3. As the season progresses, especially in Area 3 where seasons have been longer, participation drops due to salmon fisheries opening and less successful participants curtailing their effort.

Before 1999, there were no regulatory restrictions on the noncommercial shrimp fishery in PWS. In March 2000, the board adopted regulations to restrict the noncommercial fishery (effective January 2001). The regulations required a shrimp permit for all users (sport, personal use, and

subsistence, effective during the 2002–2005 seasons), established pot limits of no more than 5 pots per person, with a limit of 5 pots per vessel that may be used to take shrimp and established a fishing season from April 15 through September 15. With the adoption of the *Prince William Sound Noncommercial Shrimp Fishery Management Plan*, it became necessary to reinstate the noncommercial shrimp permit prior to the start of the 2009 shrimp pot fishery season. In 2012, the board revisited the shrimp pot fishery management plan and repealed the department’s emergency order authority to increase the pot limit. However, this did not limit the department’s emergency order authority under AS 16.05.060 to restrict the fishery prior to the season and inseason as needed for conservation purposes. In 2016, personal use fishing regulations were repealed by the board to simplify regulations because they were redundant with sport fishing regulations. In 2022, the board granted the department authority to deny eligibility to participate in the Prince William Sound noncommercial shrimp fishery if a participant fails to comply with reporting requirements but allows for a participant to appeal their ineligibility.

Currently, the department manages the noncommercial fishery for the GHL by preseason EOs, primarily through pot limit reductions. The department has issued EOs reducing the number of pots per vessel in the noncommercial shrimp fishery every year since 2016. The noncommercial harvest peaked in 2020 with a harvest of 140,488 lb, but annual harvest has averaged 91,582 lb from 2010 to 2023 (Table 299-1). Since 2010, the noncommercial harvest has ranged from 73% to 138% of the GHL (Table 299-1). The noncommercial fishery harvest has been below the GHL in nine of the last 14 years and has exceeded the GHL in 2010, 2016, and 2018–2020 (Table 299-1).

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. Pot limits have ranged from 20 to 60 pots per vessel during the PWS commercial shrimp fishery. The department has the authority to set the pot limit at low levels if increased effort is expected.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

PROPOSAL 309 – 5 AAC 31.510. Fishing Seasons for Registration Area J.
>Change season dates for Registration Area J commercial shrimp fishery

PROPOSED BY: Christopher Johnson.

WHAT WOULD THE PROPOSAL DO? Change season dates for Registration Area J commercial shrimp fishery from June 1–February 28 to April 1–December 31.

WHAT ARE THE CURRENT REGULATIONS? Registration Area J shrimp may only be taken under the authority of a commissioner permit. Shrimp may be taken with either pot or trawl gear. Trawl gear may be configured as beam or otter trawl and must be equipped with a finfish excluder device (5 AAC 31.525). Shrimp trawl gear is subject to Registration Area J non-pelagic trawl closures, which close most state waters (0–3 nmi) to bottom trawling (5 AAC 39.164). The commercial shrimp season is June 1 through February 28. Registration Area J shrimp commissioner permits may specify areas open to fishing, logbook requirements, biological sampling requirements, reporting requirements, and trips limits.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The current season dates (June 1–Feb 28) have been in place since the early 1970s and are designed to ensure maximum egg release by protecting egg-bearing females immediately before and during egg hatch, at which time they are often highly aggregated. Shifting the commercial shrimp season to open on April 1 could have adverse biological effects for Area J shrimp stocks by allowing harvest during a sensitive time in the reproductive cycle.

BACKGROUND: Registration Area J shrimp fisheries developed through the 1960s, peaked in the mid-1970s, then declined rapidly. No commercial harvest has occurred in the Chignik or South Peninsula District since the early 1980s; commercial harvest in the Kodiak District continued but has been generally low and sporadic (Table 309-1).

Beginning in 1971, the department began conducting shrimp trawl surveys to assess shrimp abundance in the Kodiak, Chignik, and South Peninsula Districts. Survey abundance estimates were compared to regulatory minimum abundance thresholds to determine if commercial openings were appropriate. The comprehensive survey was discontinued in 2015 due to lack of funding. Since 2015, the department has continued to survey a small subset of historically important survey stations allowing for some annual index monitoring of shrimp abundance. Recent survey results show shrimp abundance has been relatively stable since the fisheries collapsed in the 1980s. With sporadic survey availability and abundance estimates far below historical abundance thresholds, a new harvest strategy is needed to allow commercial shrimp fishing opportunity consistent with current, low stock status. In response, the board repealed the Area J shrimp management plans in March 2022 and replaced them with commissioner permit authority. No commercial shrimp harvest has occurred in the Kodiak District since the 2019/2020 season (Table 309-1).

Historically, most shrimp in the Kodiak District were harvested using trawl gear (97%), although some pot gear effort has occurred. Pink shrimp were the primary target and represented approximately 95% of historical catch, but in recent years, sidestripe shrimp have accounted for a more significant portion of harvest. All recent harvest has been sold direct to consumers from catcher vessels.

The department annually sets conservative GHGs targeting 1–3% of the most recent survey abundance estimates, or exploratory GHGs if no survey data is available. Since 2000, annual harvest has been well below GHGs and the fishery remained open for the entire regulatory season; no harvest has occurred in the Kodiak District since the 2019/2020 season (Table 309-1).

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. Area J shrimp stocks continue to be at low abundance relative to historical levels, despite decades of little to no commercial harvest. There is no evidence to suggest that the reproductive biology of Area J shrimp stocks has changed in such a way that the current March–May closure is no longer appropriate or warranted. The current 9-month long season provides opportunity for commercial shrimp harvest, while still protecting shrimp stocks during a time of known vulnerability.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

Table 309-1.—Kodiak District commercial shrimp trawl gear effort, harvest in lbs, by year, 1958–2023/24.

Season	Number			Season	Number		
	Vessels	Landings	Lbs		Vessels	Landings	Lbs
1958	NA	NA	31,886	1984/85	13	59	2,942,922
1959	NA	NA	2,861,900	1985/86	6	26	1,145,980
1960	11	94	3,197,985	1986/87	2	10	455,468
1961	12	203	11,083,500	1987/88	1	2	CF
1962	11	204	12,654,027	1988/89–1992/93	No commercial fishing effort		
1963	NA	NA	10,118,472	1993/94	3	3	1,704
1964	6	NA	4,339,114	1994/95–1995/96	No commercial fishing effort		
1965	11	320	13,823,061	1996/97	1	1	CF
1966	17	551	24,097,141	1997/98	1	1	CF
1967	23	NA	38,267,856	1998/99	5	8	12,724
1968	16	NA	34,468,713	1999/00	3	4	4,325
1969	26	935	41,353,461	2000/01	1	5	CF
1970	18	1,024	62,181,204	2001/02	1	2	CF
1971	49	1,746	82,153,724	2002/03	1	10	CF
1972	63	1,398	58,352,319	2003/04	2	3	CF
1973	50	1,283	70,511,477	2004/05	No commercial fishing effort		
1973/74	63	1,029	56,203,992	2005/06	1	2	CF
1974/75	75	1,100	58,235,982	2006/07–2012/13	No commercial fishing effort		
1975/76	58	884	49,086,591	2013/14	1	13	CF
1976/77	62	762	46,712,083	2014/15	1	18	CF
1977/78	58	653	26,409,366	2015/16	1	4	CF
1978/79	50	328	20,506,021	2016/17	2	12	CF
1979/80	37	242	12,863,536	2017/18	No commercial fishing effort		
1980/81	67	462	27,101,218	2018/19	1	2	CF
1981/82	55	298	19,112,367	2019/20	1	9	CF
1982/83	40	224	10,391,207	2020/21–2023/24	No commercial fishing effort		
1983/84	14	63	2,779,030				

Note: CF = confidential; NA = not available

PROPOSAL 310 – 5 AAC 31.210 Shrimp pot fishing seasons for Registration Area E.

Remove the Prince William Sound shrimp pot fishing area rotation

PROPOSED BY: Cordova District Fisherman United (CDFU).

WHAT WOULD THE PROPOSAL DO? This would remove the triennial area rotation in the Prince William Sound (PWS) commercial shrimp fishery and instead open all areas annually with separate guideline harvest levels (GHLs) based on shrimp pot survey catch per unit effort (CPUE).

WHAT ARE THE CURRENT REGULATIONS? Current regulations provide for a PWS commercial shrimp pot fishery if the estimated total annual harvest (TAH) in the PWS waters described in 5 AAC 31.210(a) is more than 110,000 lb of spot shrimp (5 AAC 31.214). The guideline harvest level (GHL) for the commercial pot fishery in these waters is 40% of the TAH, and the GHL for the noncommercial (sport and subsistence) pot fishery is 60% of the TAH (5 AAC 55.055). The commercial fishery is managed so that no more than 50% of the commercial GHL may be taken from any one statistical area and there is a triennial rotation of fishing area (5 AAC 31.210).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would result in harvest occurring in all commercial areas on an annual basis. Areas of high shrimp abundance would likely have increased effort early in the season, resulting in a faster-paced fishery and early closures for those areas. Overlap between commercial and noncommercial users could increase, particularly in areas of high shrimp abundance, resulting in increased gear conflict between user groups.

BACKGROUND: The triennial rotation was established to provide time for the shrimp stock in each area to recover from commercial harvest pressure between fishing seasons and also serves to minimize overlap between user groups in some years, when the commercial fishery takes place further away from the main access points to PWS in Whittier and Valdez.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. The PWS shrimp survey is prosecuted in each of the three commercial areas. However, the number of stations per area varies and the survey would need to be restructured to provide abundance estimates for each area individually. To meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity to harvest shrimp in the Prince William Sound Management Area if the proposal is adopted.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal would result in an additional cost to the department to restructure the PWS shrimp survey to provide annual GHLs in each individual area.

SUBSISTENCE REGULATION REVIEW:

1. **Is this stock in a nonsubsistence area?** Yes. Portions of the stock are in the Valdez Nonsubsistence Area described in 5 AAC 99.015(a)(5).
2. **Is this stock customarily and traditionally taken or used for subsistence?** Yes, shrimp have a positive customary and traditional use finding in the Prince William

Sound Area outside the Valdez Nonsubsistence Area.

3. **Can a portion of the stock be harvested consistent with sustained yield?** Yes.
4. **What amount is necessary for subsistence uses?** The amount reasonably necessary for subsistence determined by the board is 9,000–15,000 pounds of usable weight of shrimp (5 AAC 02.208(b)).
5. **Do the regulations provide a reasonable opportunity for subsistence uses?** This is a board determination.
6. **Is it necessary to reduce or eliminate other uses to provide a reasonable opportunity for subsistence uses?** This is a board determination.

PROPOSAL 311 – 5 AAC 31.210 Shrimp pot fishing seasons for Registration Area E.

›Allow vessels participating in shrimp pot fishery to operate as tenders

PROPOSED BY: Cordova District Fisherman United (CDFU).

WHAT WOULD THE PROPOSAL DO? This would allow vessels registered to commercially fish in the Prince William Sound (PWS) shrimp pot fishery to also operate as tenders in the PWS shrimp pot fishery.

WHAT ARE THE CURRENT REGULATIONS? Under statewide regulations a vessel used to tender shrimp may not have shrimp gear or equipment on board and may not be used to fish for shrimp (5 AAC 31.033). Vessels operating as tenders must also register with the department.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The pace of the PWS shrimp pot fishery could increase, resulting in a shorter season with lower pot limits. This change could also have enforcement issues associated with the mixing of shrimp from multiple vessels on a vessel that is currently participating in the fishery and could also increase participation by allowing smaller vessels to prosecute the fishery.

BACKGROUND: Please refer to comments on Proposal 299 for additional background information on PWS shrimp fisheries.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

**COMMITTEE OF THE WHOLE—GROUP 3: MISCELLANEOUS
SUBSISTENCE, SPORT, PERSONAL USE SHELLFISH
(14 PROPOSALS)**

DUNGENESS CRAB (3 PROPOSALS)

PROPOSAL 263 – 5 AAC 02.315. Subsistence Dungeness Crab Fishery and 5 AAC 02.3xx Lawful Gear for Subsistence Dungeness Crab Fisheries.

›Open the Cook Inlet subsistence Dungeness crab fishery

PROPOSED BY: Chugach Regional Resources Commission.

WHAT WOULD THE PROPOSAL DO? This would open a subsistence Dungeness crab fishery in the Cook Inlet Area, outside the Anchorage–Matsu–Kenai Nonsubsistence Area. It would create a season from July 1 through September 30, require a permit, establish a bag and possession limit of five legal-sized (6.0 inch or greater) male Dungeness crab, and an annual limit of 40 crab. It would also establish a maximum of one pot or ring net per person and a maximum of three pots or ring nets per vessel.

WHAT ARE THE CURRENT REGULATIONS? There is currently no open season for subsistence, sport, or commercial Dungeness crab harvest in Cook Inlet. The board made a positive customary and traditional use finding for shellfish stocks in Cook Inlet outside the nonsubsistence area (5 AAC 02.311(a)) but has not made an ANS finding for Dungeness crab.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would allow a small but unknown amount of subsistence harvest on a currently unassessed stock of Dungeness crab in the Cook Inlet Area.

BACKGROUND: Historically, Dungeness crab in Cook Inlet supported both commercial and noncommercial fisheries. The commercial fishery peaked in the late 1970s and early 1980s with annual harvests up to one million crab and then steadily declined through the 1980s. The noncommercial harvest of Dungeness crab averaged approximately 21,000 crab from 1981 through 1994. With the declining commercial harvest rate in the 1980s, the department initiated a 90-pot survey east of the Homer Spit to index abundance and assess molt timing in 1990 and continued it through 1998. The department closed the commercial fishery in 1991 due to declining harvest rates. In the following years the pot survey indicated a continued decline in Dungeness crab abundance, which led to the board closing the commercial fishery by regulation in 1997. The board also required the development of a management plan that considered 14 criteria (including maximum allowable exploitation rates, a regular schedule and mechanism for stock assessment, and fishing seasons that avoid the biologically sensitive periods and areas) before the board would reconsider opening the Cook Inlet Dungeness commercial fishery. Noncommercial fisheries were closed by emergency order in 1998 and 1999 and closed by the board in 2000. The department was not able to present a management plan at the 2000, 2003, or 2006 board meetings. The Cook Inlet Area Dungeness crab fisheries management plan included a sunset clause for 2006; since no management plan was adopted, the regulation has been repealed since 2006. Cook Inlet personal use crab fisheries were repealed through the Administrative Procedures Act in 2016 to eliminate redundancies in existing regulations.

In 2007, the board made a positive customary and traditional use finding for shellfish in the Cook Inlet Area outside the Anchorage–Matsu–Kenai Nonsubsistence Area (5 AAC 02.311) but no ANS finding occurred for Dungeness crab due to a lack of harvest data and because the fishery was closed. There is limited information on the historical subsistence harvest of Dungeness crab. Primary data is from subsistence household harvest surveys (Table 263-1) and include harvests from throughout the state by Nanwalek, Port Graham, and Seldovia households.

Since the board closures of the commercial and noncommercial fisheries, there has been limited assessment of the Dungeness crab stock in Cook Inlet. In 2009, the department conducted the pot survey east of the Homer Spit and did not catch any legal male crab. Additionally in 2009, the department explored an area west of the Homer Spit with a 30-pot survey and also did not find any legal male crab. Dungeness crab have also been incidentally captured in the department's Kachemak Bay Tanner crab trawl survey, but the catch may not reflect changes in abundances since the trawl survey primarily occurs in depths greater than where Dungeness crab are typically found. Similar to the historical harvests, the index of Dungeness crab from the trawl survey had large fluctuations from year to year. Dungeness crab are also caught incidentally in the Cook Inlet Tanner crab sport fishery, which occurs at deeper depths than traditional Dungeness crab fisheries. Predation by sea otters, which are common in Cook Inlet, may influence the distribution of Dungeness crab. Overall, the current status of Dungeness crab in Cook Inlet is unknown but they have persisted and are observed throughout Kachemak Bay.

Throughout Alaska, commercial and noncommercial Dungeness crab fisheries are only open to harvest of male crab 6.5 inches or greater in carapace width. In areas that are open to noncommercial harvest of Dungeness crab, harvest is generally allowed year-round with bag limits ranging from 3 to 20 Dungeness crab and no annual limit.

At the December 2024 board meeting in Cordova, a subsistence fishery for Dungeness crab in the neighboring Prince William Sound Area was adopted into regulation. The subsistence fishery includes a season from March 20–May 20 and from August 25–December 31. The bag and possession limit is 12 male Dungeness crab of 6.5 inches or greater in carapace width. A commercial fishery was also adopted into regulation to open by emergency order authority only.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. The department is supportive of providing sustainable subsistence harvest opportunities but recommends a precautionary management approach on a stock with very limited information that has been closed to all harvest for over 25 years. Requiring a permit to participate in this fishery may provide the department with a better understanding of the status of Dungeness crab stocks in the area. If a subsistence fishery were opened, opportunity for Dungeness crab would be limited to state waters excluded from the Anchorage Nonsubsistence Area (Tyonek and area near Seldovia, Port Graham, and Nanwalik).

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal would result in an additional cost to the department to collect permit information.

SUBSISTENCE REGULATION REVIEW:

- 1. Is this stock in a nonsubsistence area?** Yes. Portions of the stocks are in the Anchorage–Matsu–Kenai Nonsubsistence Area as described at 5 AAC 99.015(a)(3).
- 2. Is the stock customarily and traditionally taken or used for subsistence?** Yes. In 2007, the board made positive customary and traditional use findings for shellfish in the Cook Inlet Area outside the Anchorage–Matsu–Kenai Nonsubsistence Area (5 AAC 02.311(a)).
- 3. Can a portion of the stock be harvested consistent with sustained yield?** Yes.
- 4. What amount is reasonably necessary for subsistence uses?** The board has not yet determined an amount of Dungeness crab reasonably necessary for subsistence uses (ANS) in the Cook Inlet Area.
- 5. Do the regulations provide a reasonable opportunity for subsistence uses?** This is a board determination.
- 6. Is it necessary to reduce or eliminate other uses to provide a reasonable opportunity for subsistence use?** This is a board determination.

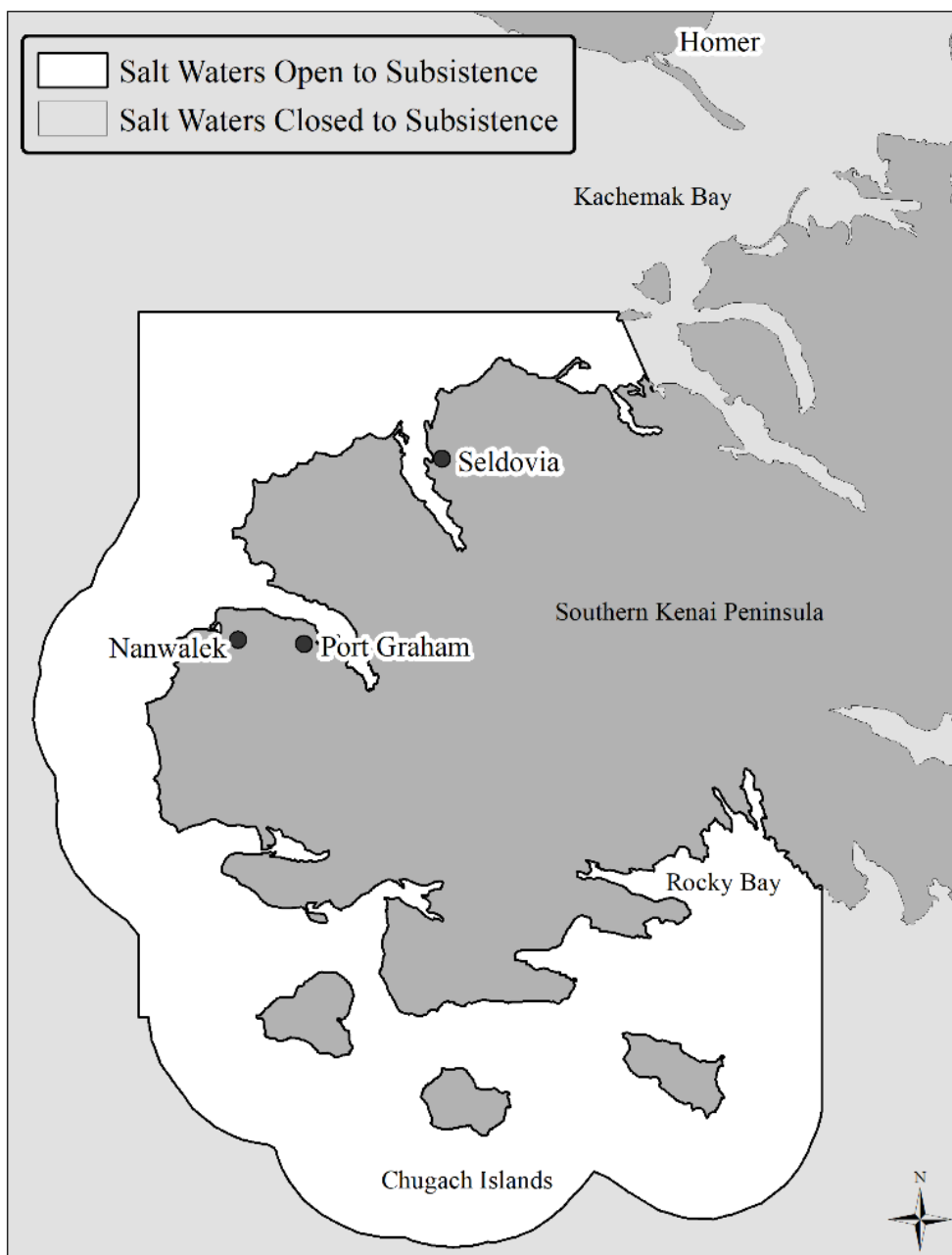


Figure 263-1.—Subsistence area in the Cook Inlet Management Area.

Table 263-1.—Total estimated number of Dungeness crab harvested by Nanwalek, Port Graham, and Seldovia households, 1987–2014.

Year	Nanwalek	Port Graham	Seldovia	Total
1987	0	55	-	55
1989	25	0	-	25
1990	6	0	-	6
1991	0	117	40	157
1992	32	15	0	47
1993	25	5	132	162
1997	0	6	-	6
2003	19	0	-	19
2014	0	0	0	0

Source: Division of subsistence household harvest surveys. Estimates include all harvest in Alaska by households in Nanwalek, Port Graham, and Seldovia.

Note: The Alaska Board of Fisheries closed the noncommercial Dungeness crab fisheries in Lower Cook Inlet in 2000.

PROPOSAL 264 – 5 AAC 58.022. Waters; seasons; bag, possession, annual, and size limits; and special provisions for Cook Inlet–Resurrection Bay Saltwater Area.
>Allow harvest of Dungeness crab in the Cook Inlet sport Tanner crab fishery

PROPOSED BY: Thomas Hagberg.

WHAT WOULD THE PROPOSAL DO? This would open a Dungeness crab sport fishery in the Cook Inlet–Resurrection Bay Saltwater Area that opens concurrently with the limited Tanner crab sport fishery. The bag and possession limit would be one male Dungeness crab with a carapace width of 7 inches or greater and an annual limit of five.

WHAT ARE THE CURRENT REGULATIONS? There is currently no open season for subsistence, sport, personal use, or commercial Dungeness crab in Cook Inlet. Please see the Subsistence Regulation Review for subsistence information about this resource. The Tanner crab sport fishery in the Cook Inlet–Resurrection Bay Saltwater Area is open either for the limited fishery (October 1 through the last day of February) or the standard fishery (September 1 to March 15), depending on trawl survey abundance estimates. The Tanner crab sport fishery is open to anyone with a valid Alaska sport fishing license. Additionally, a Cook Inlet Tanner crab permit and online harvest reporting is required.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would allow a harvest of Dungeness crab on a currently unassessed stock in the Cook Inlet–Resurrection Bay Saltwater Area. Since the Cook Inlet Tanner crab sport fishery requires a permit and harvest reporting, allowing the harvest of Dungeness crab in the fishery may provide the department with a better understanding of Dungeness crab stocks in the area, but may also result in overfishing the Dungeness crab stock because stock status is unknown. This would increase regulatory complexity by having a legal size that differs from all other Dungeness crab fisheries in Alaska. If Dungeness crab sport harvest is allowed concurrently with the Tanner crab sport fishery, there are approximately 1,700 participants each season based on the recent number of Tanner crab permits fished and may result in an annual harvest of up to 8,500 Dungeness crab. This would increase regulatory complexity by only allowing harvest of Dungeness crab in the sport Tanner crab fishery, and not in the concurrent subsistence Tanner crab fishery. This proposal also only allows Dungeness crab harvest during the limited Tanner crab fishery and not the standard fishery.

BACKGROUND: Refer to proposal 263 for background information.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. The department is supportive of providing sustainable harvest opportunities but recommends a precautionary approach on a stock with no stock assessment or stock status information that has been closed to all harvest for over 25 years. Currently, there are no Dungeness crab stock assessments anywhere in Alaska including areas with robust fisheries. Additionally, at the Prince William Sound board meeting, the board opened the area to subsistence Dungeness crab fishing and structured an opportunity to open the commercial Dungeness crab fishery by emergency order despite being closed since the 1980s. To meet the board’s statutory responsibility to the subsistence law, it should consider whether to provide subsistence opportunity for Dungeness crab in the Cook Inlet Area or both subsistence and sport opportunity.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

SUBSISTENCE REGULATION REVIEW:

1. **Is this stock in a nonsubsistence area?** Yes. Portions of the stocks are located in the Anchorage–Matsu–Kenai Nonsubsistence Area as described at 5 AAC 99.015(a)(3).
2. **Is the stock customarily and traditionally taken or used for subsistence?** Yes. The board made a positive customary and traditional use finding for shellfish stocks in that portion of the Cook Inlet Area outside of the nonsubsistence area (5 AAC 02.311).
3. **Can a portion of the stock be harvested consistent with sustained yield?** Yes.
4. **What amount is reasonably necessary for subsistence uses?** The board has not yet set an ANS for Dungeness crab in the Cook Inlet Area.
5. **Do the regulations provide a reasonable opportunity for subsistence uses?** This is a board determination.
6. **Is it necessary to reduce or eliminate other uses to provide a reasonable opportunity for subsistence use?** This is a board determination.

PROPOSAL 265 – 5 AAC 58.022. Waters; seasons; bag, possession, annual, and size limits; and special provisions for Cook Inlet–Resurrection Bay Saltwater Area.
Establish season, bag, possession, annual, and size limits, and methods and means for Dungeness crab in Cook Inlet–Resurrection Bay

PROPOSED BY: Josh Wickboldt.

WHAT WOULD THE PROPOSAL DO? This would open a Dungeness crab sport fishery in the Cook Inlet–Resurrection Bay Saltwater Area with a season October 1 through February 28; bag and possession limits of one male Dungeness crab with a carapace width of 6.5 inches or greater; and an annual limit of five. Gear will be limited to one pot or ring net per vessel.

WHAT ARE THE CURRENT REGULATIONS? There is currently no open season for subsistence, sport, personal use, or commercial Dungeness crab harvest in Cook Inlet. Please see the Subsistence Regulation Review for subsistence information about this resource. The Tanner crab sport fishery in the Cook Inlet–Resurrection Bay Saltwater Area is open either for the limited fishery (October 1 through the last day of February) or the standard fishery (September 1 to March 15), depending on trawl survey abundance estimates. The Tanner crab sport fishery is open to anyone with a valid Alaska sport fishing license. Additionally, a Cook Inlet Tanner crab permit and online harvest reporting is required.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would allow a harvest of Dungeness crab on a currently unassessed stock in the Cook Inlet–Resurrection Bay Saltwater Area. Since the Cook Inlet Tanner crab sport fishery requires a permit and harvest reporting, allowing the harvest of Dungeness crab in the fishery may provide the department with a better understanding of Dungeness crab stocks in the area, but may also result in overfishing the Dungeness crab stock because stock status is unknown. If Dungeness crab harvest is allowed concurrently with the Tanner crab sport fishery, there are approximately 1,700 participants each season based on the recent number of Tanner crab permits fished and may result in a harvest of up to 8,500 Dungeness crab. This would increase regulatory complexity by only allowing harvest of Dungeness crab in the sport Tanner crab fishery, and not in the concurrent subsistence Tanner crab fishery. This proposal also only allows Dungeness crab harvest during the limited Tanner crab fishery and not the standard fishery.

BACKGROUND: Refer to Proposal 263 for background information.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. The department is supportive of providing sustainable harvest opportunities but recommends a precautionary approach on a stock with no stock assessment or stock status information that has been closed to all harvest for over 25 years. Currently, there are no Dungeness crab stock assessments anywhere in Alaska including areas with robust fisheries. Additionally, at the Prince William Sound board meeting, the board opened the area to subsistence Dungeness crab fishing and structured an opportunity to open the commercial Dungeness crab fishery by emergency order despite being closed since the 1980s. To meet the board’s statutory responsibility to the subsistence law, it should consider whether to provide subsistence opportunity for Dungeness crab in the Cook Inlet Area or both subsistence and sport opportunity.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department to collect permit information.

SUBSISTENCE REGULATION REVIEW:

1. **Is this stock in a nonsubsistence area?** Yes. Portions of the stocks are located in the Anchorage–Matsu–Kenai Nonsubsistence Area as described at 5 AAC 99.015(a)(3).
2. **Is the stock customarily and traditionally taken or used for subsistence?** Yes. The board made a positive customary and traditional use finding for shellfish stocks in that portion of the Cook Inlet Area outside of the nonsubsistence area (5 AAC 02.311).
3. **Can a portion of the stock be harvested consistent with sustained yield?** Yes.
4. **What amount is reasonably necessary for subsistence uses?** The board has not yet set an ANS for Dungeness crab in the Cook Inlet Area.
5. **Do the regulations provide a reasonable opportunity for subsistence uses?** This is a board determination.
6. **Is it necessary to reduce or eliminate other uses to provide a reasonable opportunity for subsistence use?** This is a board determination.

TANNER CRAB (3 PROPOSALS)

PROPOSAL 266 – 5 AAC 77.010. Methods, means, and general restrictions.

›Add loop traps and foldable nets as legal gear

PROPOSED BY: Zach Taylor.

WHAT WOULD THE PROPOSAL DO? This would add loop traps (snare) and foldable nets to legal gear for personal use crab. It would allow casting or reeling crab gear using a line attached to a pole or rod and would repeal the provision in regulation that only allows a line attached to a pole or rod to be used in the Bering Sea when fishing through the ice for crab.

WHAT ARE THE CURRENT REGULATIONS? In personal use fisheries, crab may be taken only with pots, ring nets, diving gear, dip nets, hooked or hookless handlines, or by hand. A line attached to a pole or rod is lawful gear in the Bering Sea only when fishing a line through the ice, but there are no personal use crab fisheries in the Bering Sea. Sport fishery regulations allow crab to be taken with the same gear as personal use and includes a line attached to a pole or rod. Subsistence regulations allow crab to be taken with gear specified in 5 AAC 39.105 operated in a manner conforming to its basic design, jigging gear operated through the ice by hand, a spear (except for Dungeness crab in Southeast Alaska), or a lead; subsistence fishing by the use of a line attached to a rod or pole is prohibited except when fishing through the ice in the Bering Sea area. Crab pots in all fisheries must comply with escape mechanism requirements, have marking requirements, and have specific gear definitions by species (king, Tanner, and Dungeness).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would allow additional harvest opportunity using methods that are likely less efficient than those already allowed in regulation. It would likely increase harvest by a small but unknown amount. It would add some regulation complexity by allowing these gears in personal use fisheries and not all noncommercial fisheries. Snare traps may cause leg loss in crabs during capture if operated during male and female molt periods. Snare traps would also target all size/sex classes of crab and cause damage during vulnerable life stages. Lost gear with snares would pose the threat of continued ghost fishing as there is no biodegradable component to this method of capture.

BACKGROUND: Both crab loop traps (snare; Figure 1) and foldable crab nets are legal gear for harvesting crab in other states and are commercially available. These gear types are primarily used by shore-based harvesters for blue crab in East Coast states and Dungeness crab in West Coast states. They are considered less effective than standard crab pots.

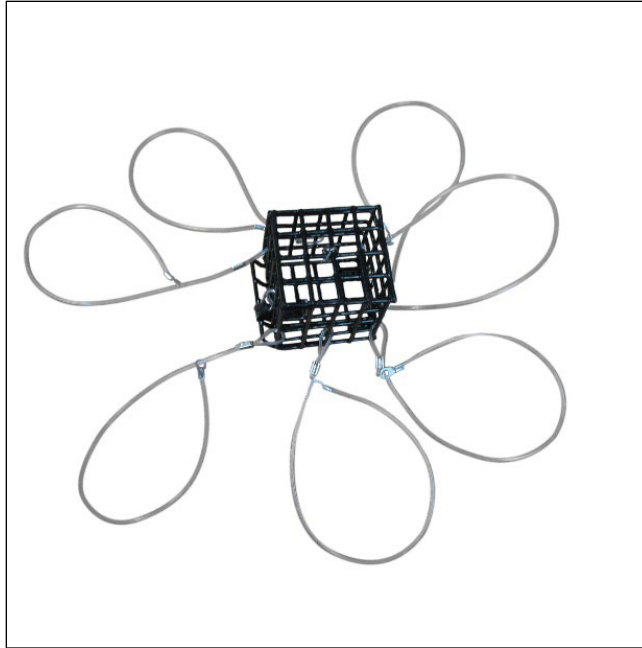


Figure 266-1.—Example of crab loop trap gear type.

During the March 2015 board meeting, the department and the board developed and approved a delegation of authority to repeal/amend redundant personal use regulations. The criteria used to determine which personal use regulations needed to be repealed or amended included whether the personal use regulations were identical to subsistence and sport regulations for that species and area. As a result, some personal use crab fisheries were repealed in 2016. However, there are still personal use crab fisheries in the Yakutat Area (for king crab and Tanner crab) and Southeastern Alaska Area (for Dungeness crab, king crab, and Tanner crab). Other than the personal use king crab fishery in Southeast Alaska, which fell under a permit system for all areas beginning in 2018, personal use crab harvest data are not available, and the magnitude of the catch is unknown.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal but has concerns about leg loss in crabs targeted with snares during molting periods. Allowing these gears with the use of rod and reel would provide shore-based anglers a way to harvest Dungeness crab. If the board chooses to adopt this proposal, the department will develop a definition of these new gear types.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

PROPOSAL 267 – 5 AAC 35.408. Registration Area H Tanner crab harvest strategy.

>Allow additional gear types in the personal use crab fishery

PROPOSED BY: Alaska Department of Fish and Game.

WHAT WOULD THE PROPOSAL DO? This would modify the abundance thresholds for the noncommercial Tanner crab standard and limited fisheries in the Cook Inlet Area to use the most recent abundance estimate from the Kachemak Bay trawl survey, rather than the most recent consecutive 3-year average. The standard fishery would open when the most recent legal male abundance estimate was greater than or equal to 200,000 crab, and the limited fishery would open if the most recent legal male abundance estimate was less than 200,000.

This would also rectify an incorrect regulation reference for the standard and limited fishery season, annual, size limits and special provisions.

WHAT ARE THE CURRENT REGULATIONS? Consistent with 5 AAC 35.408. *Registration Area H Tanner crab harvest strategy* the noncommercial Tanner crab fisheries in the Cook Inlet Area are as follows:

- standard fishery (September 1–March 15, bag and possession limits of five legal male crab, annual limit of 40 male crab, and gear limited to two pots or ring nets) when the most recent consecutive 3-year average of legal male stock abundance estimated from the Kachemak Bay trawl survey is greater than or equal to 200,000 crab and the annual estimate for the most recent year is at least 100,000 crab.
- limited fishery (October 1 to the last day of February, bag and possession limit of three legal male crab, annual limit of 20 male crab, gear is limited to one pot or ring net) in the absence of a trawl survey, or if the threshold for the standard fishery is not met.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would result in more timely management based on the most recent abundance estimates. It would provide additional sport and subsistence Tanner crab harvest opportunity when the Kachemak Bay trawl survey results indicate the threshold for the standard fishery is met, and it would transition to the limited fishery structure after a single year of trawl survey results below the threshold for the standard fishery. It may increase the harvest of Tanner crab by an unknown amount.

BACKGROUND: Tanner crab in the Cook Inlet Area historically supported both commercial and noncommercial (sport, personal use, and subsistence) fisheries. Due to low stock abundances, all commercial fisheries have been closed since 1995, and noncommercial fisheries have experienced periodic closures since 1989. Currently, there are two concurrent noncommercial fisheries: the sport fishery (in the Cook Inlet–Resurrection Bay Saltwater Area) and the subsistence fishery (in the Cook Inlet Area, excluding the Anchorage–Matsu–Kenai Nonsubsistence Area; Figure 267-1).

Tanner crab abundance has been assessed with trawl surveys in Kachemak Bay from 1990 to 2007, and in 2009, 2011–2013, and 2017–2019 (Table 267-1). The legal male abundance in the most recent surveys ranged from approximately 125,000 in 2017 to 273,511 in 2019. In 2017, the board adopted a department proposal to allow a more restrictive, limited noncommercial fishery in the

absence of trawl survey data or when abundance estimates were below the thresholds required for the standard (unrestricted) noncommercial fishery. This allowed the noncommercial fishery to open for the first time since 2012. The limited noncommercial fisheries have opened annually since 2017/18, except for the 2019/20 season, when the standard sport and subsistence fisheries were opened following the 2019 Kachemak Bay trawl survey results. Funding for the Kachemak Bay trawl survey was lost in 2020, which resulted in the fishery transitioning back to the limited structure for the 2020/21 season through present.

The Cook Inlet Area noncommercial fisheries require a permit for harvest and mandatory harvest reporting by area. Since the 2017/18 season, separate online permits have been available for the sport and subsistence fisheries, and harvest has been estimated for both the sport and subsistence fisheries. When the noncommercial fisheries reopened in 2017, the harvest averaged approximately 8,300 Tanner crab in the first three years (Table 267-1). Since the implementation of the annual limit in 2021, the annual harvest has averaged approximately 6,800 crab. From 2017 through 2019, the harvest rate averaged 4.5%.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal. A trawl survey has not been conducted in the past five years due to a loss of funding and loss of the department research vessel in Homer.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

SUBSISTENCE REGULATION REVIEW:

1. **Is this stock in a nonsubsistence area?** Yes. Portions of the stocks are located in the Anchorage–Matsu–Kenai Nonsubsistence Area as described at 5 AAC 99.015(a)(3).
2. **Is the stock customarily and traditionally taken or used for subsistence?** Yes. The board made a positive customary and traditional use finding for shellfish stocks in that portion of the Cook Inlet Area outside of the nonsubsistence area (5 AAC 02.311).
3. **Can a portion of the stock be harvested consistent with sustained yield?** Yes.
4. **What amount is reasonably necessary for subsistence uses?** 275–1,400 Tanner crab are reasonably necessary for subsistence in the Cook Inlet Area (5 AAC 02.311(b)(4)).
5. **Do the regulations provide a reasonable opportunity for subsistence uses?** This is a board determination.
6. **Is it necessary to reduce or eliminate other uses to provide a reasonable opportunity for subsistence use?** This is a board determination.

Table 267-1.–Cook Inlet Tanner crab noncommercial fishery harvest data, 2017–2024.

Sport and Subsistence Tanner Crab Fisheries					
Season	Fishery	Permits fished	Harvest	Legal male abundance	Harvest rate
2017–2018	Limited	1,029	8,545	124,965	6.8
2018–2019	Limited	1,081	8,769	222,852	3.9
2019–2020	Standard	757	7,515	273,511	2.7
2020–2021	Limited +Annual Limit	1,339	6,311	No survey	–
2021–2022	Limited +Annual Limit	1,263	6,708	No survey	–
2022–2023	Limited +Annual Limit	1,721	7,739	No survey	–
2023–2024	Limited +Annual Limit	1,718	6,437	No survey	–
Averages					
2017–2020		956	8,276	207,109	4.5
2021–2024		1,510	6,799	No survey	–

Note: En dash means harvest rate could not be calculated because legal male abundance was not estimated.

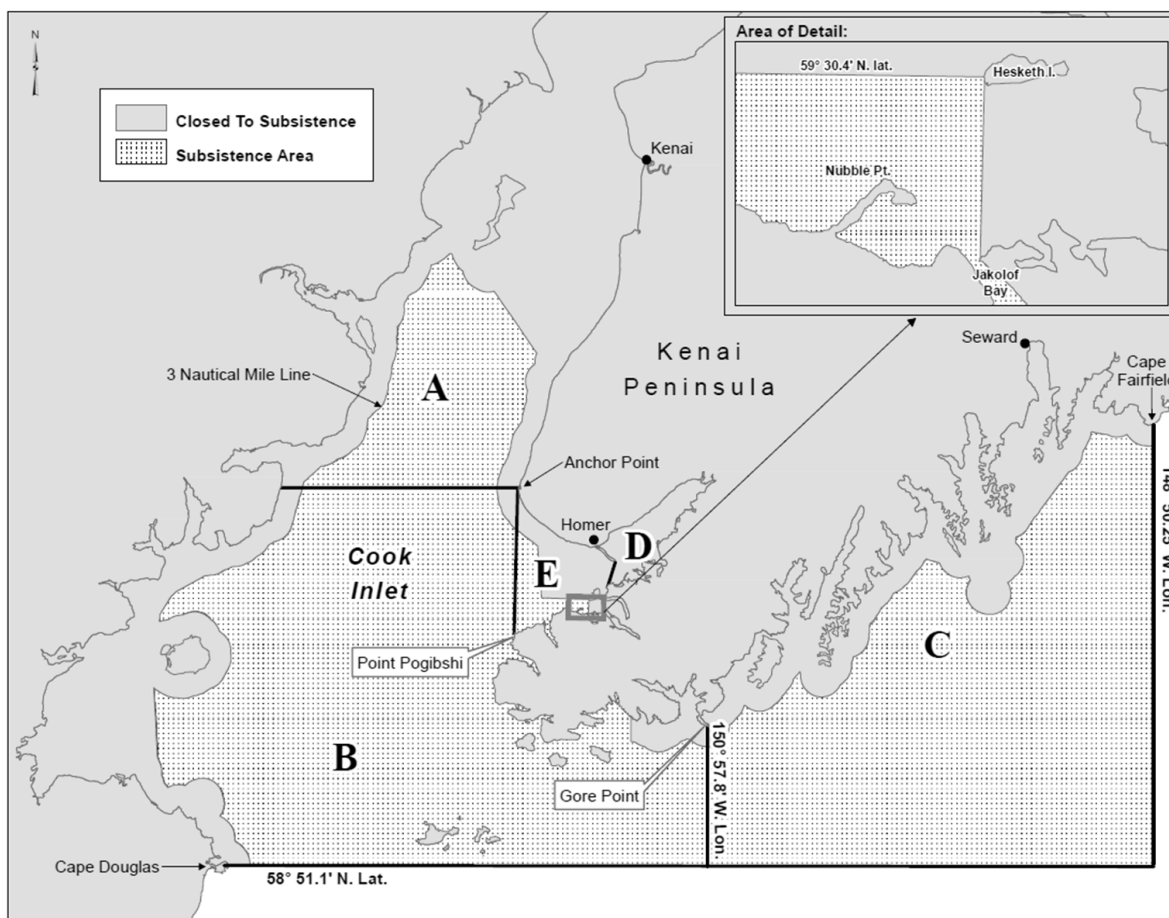


Figure 267-1.–Map of Cook Inlet and North Gulf Coast salt waters associated with Tanner crab harvest.

PROPOSAL 268 – 5 AAC 58.035. Methods, means, and general provisions – Shellfish.

Prohibit harvest of Tanner crab from a charter vessel

PROPOSED BY: Dan Green.

WHAT WOULD THE PROPOSAL DO? This would prohibit guides from providing clients gear to harvest Tanner crab in the Cook Inlet–Resurrection Bay Saltwater Area Tanner crab sport fishery.

WHAT ARE THE CURRENT REGULATIONS? Statewide regulations stipulate that guide services may not provide noncommercially harvested shellfish to clients unless the shellfish has been taken with gear deployed and retrieved by the client, the gear was marked with the client's name and address, and the shellfish is to be consumed by or with the client.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would limit access to the Cook Inlet Tanner crab fishery for anglers who don't have boats. Tanner crab harvest would likely decrease by an unknown yet small amount. This proposal only impacts sport regulations. Guides would still be permitted to provide clients access to Tanner crab in the Cook Inlet subsistence Tanner crab fishery.

BACKGROUND: Tanner crab in the Cook Inlet Area historically supported both commercial and noncommercial (sport, personal use, and subsistence) fisheries. Due to low stock abundance, commercial fisheries have been closed since 1995 and the noncommercial fisheries have experienced periodic closures since 1989. Currently, there are two concurrent noncommercial fisheries: the sport fishery (in the Cook Inlet–Resurrection Bay Saltwater Area) and the subsistence fishery (in the Cook Inlet Area, excluding the Anchorage–Matsu–Kenai Nonsubsistence Area; Figure 267-1). In 2011, statewide regulations were adopted to prohibit commercial operations (including lodges and charter boat operators) from furnishing shellfish to clients unless the gear is deployed and retrieved by the client, labeled with the client's name and address, and the shellfish is consumed by or with the client.

All participants in these sport and subsistence Tanner crab fisheries are required to obtain a permit and are required to report regardless of whether they harvested crab or not. The permits provide harvest data for each participant by date and area. Permit harvest data provide harvest and effort by residency. When the noncommercial fisheries reopened in 2017, the harvest averaged approximately 8,300 Tanner crab in the first three years (Table 267-1). Since the implementation of the annual limit in 2021, the annual harvest has averaged approximately 6,800 crab.

Through the 2023/24 season there are no data on the number of participants in these fisheries that use guides. Because charter clients harvesting Tanner crab do so unassisted, all harvest is considered unguided and charter operators are not required to complete a logbook for the trip. Most charter operators offering Tanner crab harvest opportunities to their clients do so in combination with trolling for king salmon in the Cook Inlet winter king salmon sport fishery. Although it fluctuates annually, the number of guided anglers taking guided salmon trips during the Tanner crab fishery (October through February) has generally increased in the last 15 years. Prior to 2017, an average of 170 anglers went on guided salmon trips during the Tanner crab

season, since then the average has increased to 390. Since 2017, according to charter logbook data, 64% of guided anglers in the Cook Inlet winter king salmon sport fishery are nonresidents. Based on Tanner crab sport permit data, most Tanner crab sport permits are issued to Alaska residents, but the nonresident component has increased from an average of 6% to 12% in recent years. In 2024/25, permit reporting includes an option to report whether guide services were used. The question was added following the addition to the Upper Cook Inlet Personal Use Salmon Fishery permit based on board comments at the 2024 Upper Cook Inlet Board of Fisheries meeting.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal. Based on the historical and most recent trawl survey estimates of abundance, the current harvest level is likely less than 10% of the legal male abundance which, consistent with the Tanner crab harvest strategy for Cook Inlet (5 AAC 35.408) should be sustainable for this stock.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

SUBSISTENCE REGULATION REVIEW:

1. **Is this stock in a nonsubsistence area?** Yes. Portions of the stocks are located in the Anchorage–Matsu–Kenai Nonsubsistence Area as described at 5 AAC 99.015(a)(3).
2. **Is the stock customarily and traditionally taken or used for subsistence?** Yes. The board made a positive customary and traditional use finding for shellfish stocks in that portion of the Cook Inlet Area outside of the nonsubsistence area (5 AAC 02.311).
3. **Can a portion of the stock be harvested consistent with sustained yield?** Yes.
4. **What amount is reasonably necessary for subsistence uses?** 275–1,400 Tanner crab are reasonably necessary for subsistence in the Cook Inlet Area (5 AAC 02.311(b)(4)).
5. **Do the regulations provide a reasonable opportunity for subsistence uses?** This is a board determination.
6. **Is it necessary to reduce or eliminate other uses to provide a reasonable opportunity for subsistence use?** This is a board determination.

RAZOR CLAM (3 PROPOSALS)

PROPOSAL 269 – 5 AAC 58.026. Shellfish harvest recording form required. and 5 AAC 77.507. Shellfish harvest recording form required.

Implement a permit for harvesting razor clams in Cook Inlet sport and personal use fisheries

PROPOSED BY: Alaska Department of Fish and Game.

WHAT WOULD THE PROPOSAL DO? This would require a harvest recording form and harvest reporting for Cook Inlet–Resurrection Bay Saltwater Area razor clam sport and personal use fisheries. This proposal would also establish a failure to report penalty and an appeals process for permit holders.

WHAT ARE THE CURRENT REGULATIONS? A valid sport fishing license is required for participation in the sport and personal use fisheries but a permit is not required. The sport and personal use razor clam fisheries have the same season, bag and method and means except that only Alaska residents can participate in the personal use fishery. East Cook Inlet is closed to the taking of razor clams year-round unless abundance survey estimates trigger the fishery to open. In the remaining nonroad-accessible parts of Cook Inlet–Resurrection Bay Saltwater Area, the fisheries are open year-round, and bag and possession limits are the first 10 gallons of razor clams taken or possessed. The Cook Inlet–Resurrection Bay Saltwater Area razor clam sport and personal use fisheries occur wholly within the Anchorage–Matsu–Kenai Nonsubsistence Area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Requiring a permit process would provide the department accurate and cost-effective harvest and effort data that would allow for better stock assessment. This requirement would be an added burden to the user to obtain a permit and report their harvest.

BACKGROUND: Razor clams occur throughout east and west Cook Inlet and are not well documented in the North Gulf Coast (Figure 269-1). In east Cook Inlet, razor clams are primarily found in an approximately 50-mile stretch of sandy intertidal beach between the Anchor and Kasilof Rivers. East Cook Inlet razor clams have historically supported sport and personal use fisheries that constituted one of the largest noncommercial shellfish fisheries in Alaska, due largely to road accessibility. Razor clams are also interspersed through west Cook Inlet, with fishery participants accessing the beaches by landing small planes at low tide, or boating across Cook Inlet from Kenai, Deep Creek, Anchor Point, and Homer boat launches. Clammers access the Polly Creek and Crescent River Bar areas in west Cook Inlet on sport fish charter vessels from Deep Creek. Because clam diggers harvest clams unassisted, all harvest is considered unguided and the charter operators are not required to complete a logbook for the trip.

The east Cook Inlet sport and personal use razor clam fisheries have experienced a substantial decline since the mid-2000s (Table 269-1). The department restricted fisheries by emergency order in 2013 and 2014 and closed the fisheries by emergency order annually from 2015 to 2022. Prior to the fisheries closure, harvest monitoring included the Statewide Harvest Survey (SWHS), aerial surveys to apportion effort to specific beaches, and success surveys to compare the harvest between beaches.

West Cook Inlet razor clam SWHS data indicate low levels of effort and harvest in recent years, but these estimates are based on low survey response rates. Current assessment of west Cook Inlet razor clams, including department size and age sampling and abundance sampling conducted by Lake Clark National Park, suggests this stock is robust and not experiencing the same declines as east Cook Inlet razor clams. In March 2022, the Alaska Board of Fisheries adopted a bag and possession limit of 10 gallons of razor clams in the Cook Inlet–Resurrection Bay Saltwater Area outside the east Cook Inlet razor clam area.

In March 2022, the board adopted a management plan for east Cook Inlet razor clams that outlines abundance thresholds for two management areas that must be met for the fisheries to open. Razor clam abundance met the threshold to open the limited fishery in the Ninilchik area in 2023. Since the anticipated effort was unknown, the season and bag limits were reduced by emergency order to ensure a conservative harvest that remained below 10% of the total adult abundance as outlined in the plan. Intensive creel surveys were conducted at all major beaches and access points during the 4-day fishery to count the number of diggers and interview diggers to assess their success. The majority of clam diggers were interviewed, and the digger counts were considered a census for the beaches surveyed. The creel surveys resulted in an estimate of 5,420 days of effort and 22,609 razor clams harvested. The SWHS also produced estimates of digger days (1,996 days of effort) and harvest (1,305 razor clams). This discrepancy is likely due to the low number of SWHS responses received and used to produce the SWHS estimates.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal. Future east Cook Inlet fishery openings would require time-intensive creel surveys to obtain high-quality harvest data in the absence of requiring a permit for participation. Requiring a razor clam harvest reporting form would be consistent with other sport shellfish fisheries such as Prince William Sound shrimp and Cook Inlet Tanner crab.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal would result in an additional cost to the department to collect permit information.

Table 269-1.—Cook Inlet razor clam harvest and effort in the sport and personal use fisheries, 2000–2023.

Razor Clam Harvest and Effort				
Year	East CI		West CI	
	Harvest	Digger days	Harvest	Digger days
2000	842,270	37,755	28,276	1,904
2001	643,811	32,789	14,900	1,218
2002	767,780	34,406	9,128	550
2003	568,662	25,361	13,213	566
2004	519,217	30,211	24,276	873
2005	427,016	32,835	19,751	2,318
2006	447,963	25,482	24,023	1,963
2007	350,224	25,170	33,279	1,135
2008	536,537	28,806	42,053	1,617
2009	493,176	26,982	48,035	1,703
2010	327,150	19,412	21,627	1,488
2011	406,430	23,021	27,554	3,095
2012	260,857	21,872	52,375	1,278
2013	174,305	23,875	108,465	3,523
2014	32,196	7,844	55,331	2,108
2015	Closed	Closed	38,307	1,423
2016	Closed	Closed	75,059	1,480
2017	Closed	Closed	14,863	1,142
2018	Closed	Closed	21,608	1,338
2019	Closed	Closed	11,825	1,378
2020	Closed	Closed	18,792	1,599
2021	Closed	Closed	11,345	948
2022	Closed	Closed	7,651	743
2023	1,305	1,996	17,212	961
Averages				
1969–1999	867,573	28,897	7,721	352
2000–2020	453,173	26,388	33,464	1,605
2021–2023	1,305	1,996	12,069	884

Note: SWHS estimates for West Cook Inlet begin in 1986.

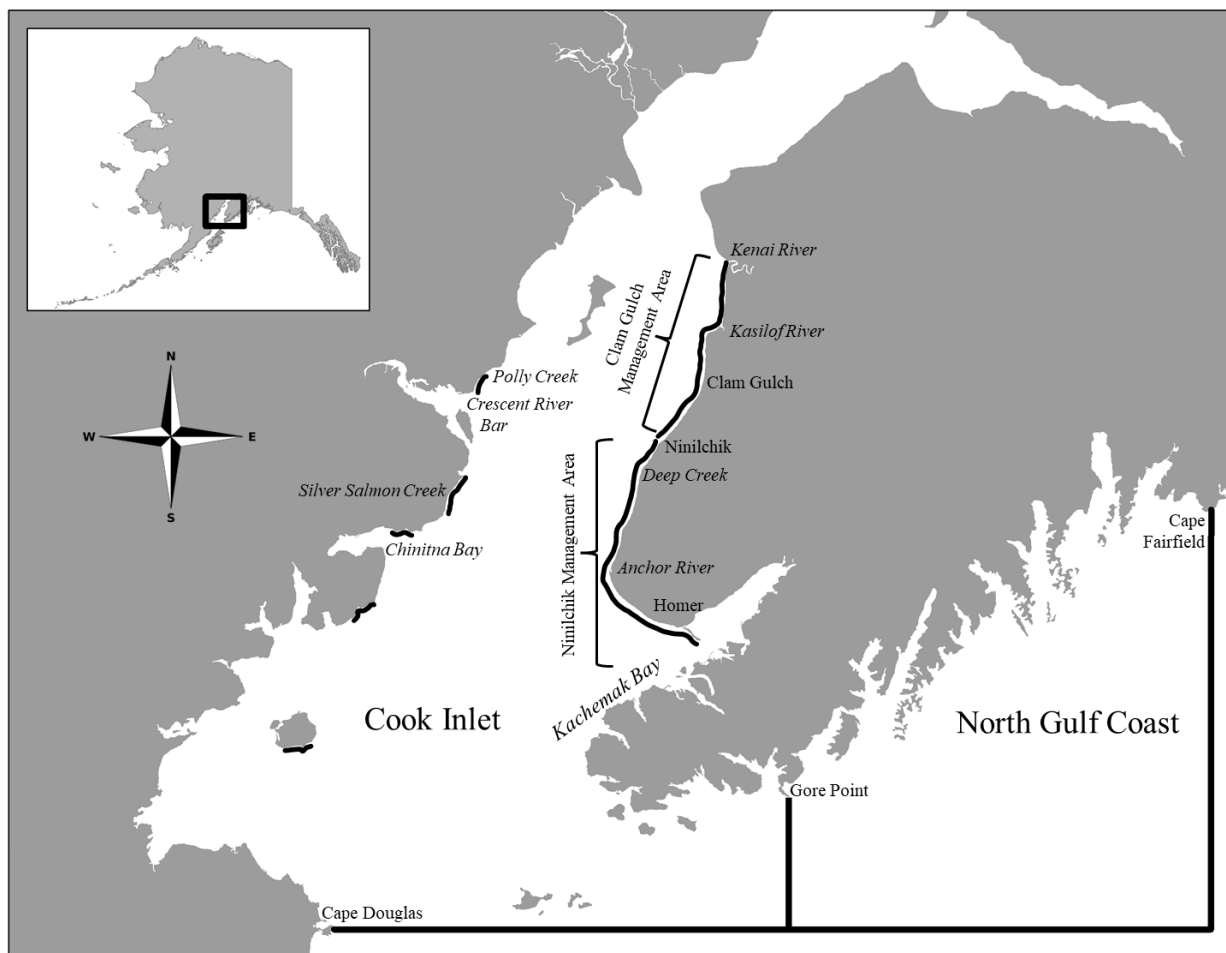


Figure 269-1.—Map of east and west Cook Inlet areas associated with razor clam harvest (outlined in black).

PROPOSAL 270 – 5 AAC 58.040. East Cook Inlet Razor Clam Sport Fishery Management Plan. and 5 AAC 77.519. East Cook Inlet Razor Clam Personal Use Fishery Management Plan.

›Modify the East Cook Inlet Razor Clam Sport and Personal Use Fishery Management Plan

PROPOSED BY: Alaska Department of Fish and Game.

WHAT WOULD THE PROPOSAL DO? This would shorten the season for east Cook Inlet sport and personal use razor clam limited fisheries to a single month (either July or August). It would also reduce the bag and possession limits to the first 15 razor clams taken or possessed.

WHAT ARE THE CURRENT REGULATIONS? The *East Cook Inlet Razor Clam Sport Fishery and Personal Use Fishery Management Plans* (5 AAC 58.040 and 5 AAC 77.519) define adult razor clam abundance thresholds to open a limited or standard (historical) fishery. The limited fishery allows harvest from May 1 through September 30 and the bag and possession limits are the first 30 razor clams taken or possessed. To open the limited fishery, the abundance estimate must be greater than or equal to 50 percent of the average 1989–2012 abundance but below the threshold for the standard fishery. The harvest rate of the limited fishery is not expected to exceed 10% of the adult razor clam abundance. The Cook Inlet–Resurrection Bay Saltwater Area razor clam sport and personal use fisheries occur wholly within the Anchorage–Matsu–Kenai Nonsubsistence Area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would restructure east Cook Inlet sport and personal use limited razor clam fisheries to keep the total harvest within 10% of the total adult clam abundance. Given the effort and harvest observed during the 2023 season, the current bag limit and season would likely result in harvest of over 10% of the adult razor clam abundance. Delaying the season until July or August would provide the department more opportunity to complete the annual abundance surveys prior to the start of the fishery, resulting in fewer inseason actions for the public. A one-month season would typically provide 12–13 tides of -1.0 foot or smaller on which clam diggers could access the sandy intertidal part of the beaches.

BACKGROUND: In east Cook Inlet, razor clams are primarily found in an approximate 50-mile stretch of sandy intertidal beach between the Anchor and Kasilof Rivers (Figure 269-1). East Cook Inlet razor clams have historically supported sport and personal use fisheries that constituted one of the largest noncommercial shellfish fisheries in Alaska, due largely to road accessibility.

In March 2022, the Alaska Board of Fisheries adopted a management plan for east Cook Inlet razor clams that outlines abundance thresholds that must be met for the fisheries to open. Razor clam abundance met the threshold to open the limited fishery in the Ninilchik area in 2023. Since the anticipated effort was unknown after nearly a decade of the fishery being closed, a preseason emergency order was issued to reduce the season to four days and the bag limit from 30 to 15 razor clams to ensure a conservative harvest that remained below 10% of the adult abundance as outlined in the management plan. Intensive creel surveys were conducted at all major beaches and access points during the 4-day fishery and resulted in an estimate of 5,420 days of effort and 22,609 razor

clams harvested. Based on the harvest estimate in the Ninilchik index beach, the harvest rate remained low, at 2.3% of the adult razor clam abundance.

Razor clam abundance is estimated annually based on surveys conducted in April–June for index beaches in the Ninilchik and Clam Gulch management areas, with final abundance estimates available in June. Razor clam growth occurs only in the summer months with peak growth in June and July. Razor clam spawning in east Cook Inlet typically starts in July and can continue to mid-September. Post-spawn clams are generally considered to be of lower food quality, as they tend to have reduced body condition, often characterized by a lower fat content.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal. These proposed modifications provide a harvest opportunity that is better aligned with a harvest of less than 10% of adult razor clam abundance and gives the public and board the opportunity to decide a preference for season.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

PROPOSAL 271 – 5 AAC 58.040. East Cook Inlet Razor Clam Sport Fishery Management Plan. and 5 AAC 77.519. East Cook Inlet Razor Clam Personal Use Fishery Management Plan.

›Reduce the East side razor clam bag limit

PROPOSED BY: Thomas Hagberg.

WHAT WOULD THE PROPOSAL DO? Reduce the bag limit in the east Cook Inlet sport and personal use limited razor clam fisheries from 30 to 15 razor clams.

WHAT ARE THE CURRENT REGULATIONS? The *East Cook Inlet Razor Clam Sport Fishery and Personal Use Fishery Management Plans* (5 AAC 58.040 and 5 AAC 77.519) define adult razor clam abundance thresholds to open a limited or standard (historical) fishery. The limited fishery allows harvest from May 1 through September 30, and the bag and possession limits are the first 30 razor clams taken or possessed. To open the limited fishery, the abundance estimate must be greater than or equal to 50 percent of the average 1989–2012 abundance but below the threshold for the standard fishery. The harvest rate of the limited fishery is not expected to exceed 10% of the adult razor clam abundance. The Cook Inlet–Resurrection Bay Saltwater Area razor clam sport and personal use fisheries occur wholly within the Anchorage–Matsu–Kenai Nonsubsistence Area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would reduce the razor clam harvest in the limited fishery.

BACKGROUND: Refer to Proposal 270 for background information.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal. A reduced bag limit of 15 razor clams is better aligned with a harvest of less than 10% of adult razor clams.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

MISCELLANEOUS (5 PROPOSALS)

PROPOSAL 312 – 5 AAC 21.382. Kenai River Late-Run King Salmon Stock of Concern Management Plan.

›Extend season of the commercial dip net fishery

PROPOSED BY: Joseph Person.

WHAT WOULD THE PROPOSAL DO? This would extend the season dates of the commercial dip net fishery until August 16 and increase the frequency of periods to be Monday through Sunday from 7:00 a.m. until 7:00 p.m. unless closed by emergency order.

WHAT ARE THE CURRENT REGULATIONS? The Upper Subdistrict set gillnet (ESSN) fishery is managed by the *Kenai River late-run king salmon stock of concern management plan* (5 AAC 21.382), which provides the commercial dip net opportunity as follows:

- Dip net is added as an additional gear type to S04H permits.
- Dip nets may be used only when set gillnet fishing is closed and commercial periods are based on abundance of sockeye salmon.
- The department may utilize up to three 12-hour commercial dip net periods per week from June 20 to July 31.
- Each permit holder may operate up to four dip nets at a time, each dipnet must be operated by the permit holder or a licensed crew member.
- The area allowed for both shore- and vessel-based fishing is the current set gillnet areas excluding the Kasilof River Special Harvest Area. Shore-based fishing may only occur from DNR shore lease sites.
- Retention of king and coho salmon is prohibited. A king salmon that is caught must be delivered to a floating or shore-based processor. “Caught” means brought on board the vessel or removed from the water if fishing from shore.
- A legal dipnet is defined in 5AAC 39.105(d)(24) as:
 - A dip net is a bag-shaped net supported on all sides by a rigid frame; the maximum straight-line distance between any two points on the net frame, as measured through the net opening, may not exceed five feet; the depth of the bag must be at least one-half of the greatest straight-line distance, as measured through the net opening; no portion of the bag may be constructed of webbing that exceeds a stretched measurement of 4.5 inches; the frame must be attached to a single rigid handle and be operated by hand.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This could increase the harvest of salmon in the Upper Subdistrict commercial dip net fishery by an unknown amount and allow for the live release of king salmon. This will provide additional harvest opportunity for sockeye salmon in the Kenai and Kasilof Rivers dependent upon abundance. Additionally, this proposal could increase the participation level of permit holders in the fishery while decreasing the possibility of commercial dip net opportunity being missed due to

unfavorable environmental conditions. There may be an unknown amount of additional king and coho salmon mortality due to catch and handling in dipnets.

BACKGROUND: The ESSN fishery (Figure 1) was historically managed primarily under provisions found in *Kenai River Late-Run Sockeye Salmon Management Plan (KRLRSSMP)* and *Kasilof River Salmon Management Plan (KRSMP)*. However, the Alaska Board of Fisheries (board) listed the Kenai River late-run king salmon as a stock of concern in the spring of 2024. Under the stock of concern management plan the ESSN fishery is managed to meet a recovery goal of 14,250 large late-run king salmon.

Kenai River king salmon abundance remains low with the 2024 estimated escapement of 6,906 large fish failing to meet the recovery goal of 14,250–30,000 large fish (Table 312-1). The Kenai River late-run sockeye salmon preliminary sonar passage estimate of 1,926,350 fish exceeded the inriver run goal of 1.1 million–1.4 million fish and will likely exceed the Sustainable Escapement Goal (SEG) of 750,000–1,300,000 sockeye salmon once the estimated upriver sport harvest is subtracted from the sonar estimate (Table 312-2). The preliminary Kasilof River sockeye salmon sonar passage was 1,048,092 fish, which exceeded the sustainable escapement goal of 140,000–320,000 fish (Table 312-3).

The board added dip nets as an additional gear type to the S04H permits under the stock of concern management plan in the spring of 2024. The additional gear type is intended to give ESSN commercial fishing opportunity for the more abundant salmon species while king salmon abundance is below the recovery goal and set gillnet fishing is closed.

Preliminary review of the 2024 dip net season yielded mixed success and exposed several limitations to participation and success. The dip net fishery harvested 27,907 salmon, which consisted of 1 king, 27,730 sockeye, 21 coho, 134 pink, and 21 chum salmon. Approximately 101 separate permits delivered fish in the dip net fishery for a total of 279 deliveries. The preliminary exvessel value of the dip net fishery was \$248,541.82. The fishery was opened 19 times between June 20 and July 31. Harvest was largely concentrated during the peak of the Kenai River sockeye salmon run from July 16 to July 25, and the highest success was seen on beaches near the mouth of the Kenai River (Tables 312-4 and 312-5).

The gear type is sensitive to weather and water conditions that prevent permit holders from participating. The gear type is low efficiency and requires high density of fish to be near the beach for commercially viable harvest to occur with the current regulations. The department prosecuted the commercial dip net periods based on abundance of sockeye and weather conditions, which resulted in variability of short notice periods.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal. The department does encourage the development of methods and gear types that would allow harvest of more abundant species during times of conservation for weak stocks.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

Table 312-1.–Kenai River late-run king salmon escapement goal history, 1998–2024.

Year		Escapement	SEG/BEG	OEG	Recovery goal
1998		39,000	15,500–22,300	-	
1999		30,563	17,800–35,700	-	
2000		32,550	17,800–35,700	-	
2001		37,641	17,800–35,700	-	
2002		45,457	17,800–35,700	-	
2003		67,187	17,800–35,700	-	
2004		63,683	17,800–35,700	-	
2005		60,246	17,800–35,700	-	
2006		48,950	17,800–35,700	-	
2007	All Sizes of Fish	37,010	17,800–35,700	-	
2008		32,342	17,800–35,700	-	
2009		21,410	17,800–35,700	-	
2010		11,375	17,800–35,700	-	
2011		16,340	17,800–35,700	-	
2012		21,417	17,800–35,700	-	
2013		19,342	15,000–30,000	-	
2014		17,451	15,000–30,000	-	
2015		22,642	15,000–30,000	≥ 22,500	
2016		22,535	15,000–30,000	≥ 22,500	
2017		20,583	13,500–27,000	-	
2018		17,405	13,500–27,000	-	
2019		11,709	13,500–27,000	-	
2020	Large Fish	11,854	13,500–27,000	15,000–30,000	
2021		12,238	13,500–27,000	15,000–30,000	
2022		13,911	13,500–27,000	15,000–30,000	
2023 ^a		14,502	13,500–27,000	15,000–30,000	
2024		6,906	13,500–27,000	15,000–30,000	14,250–30,000

Note: Large fish are king salmon that are 75 cm from mideye to tail fork length or longer. Shaded areas indicate that the goal was achieved for that year. **Bold font** indicates the management objective goal.

Table 312-2.—History of Kenai River sockeye salmon personal use, educational, and sport harvest and escapement goals, 2004–2024.

Year	Personal use and educational harvest ^a	Sport harvest below sonar ^b	Kenai River sonar count ^c	Sport harvest above sonar	Total Sport Harvest	Total Inriver Harvest	Spawning escapement	Actual run size (millions)	Inriver goal (thousands)	BEG/SEG (thousands)	OEG (thousands)
2004	266,937	62,397	1,385,981	254,836	317,233	584,170	1,131,145	5	850-1,100	500-800	500-1,000
2005	300,105	58,017	1,376,452	254,818	312,835	612,940	1,121,634	5.6	850-1,100	500-800	500-1,000
2006	130,486	30,964	1,499,692	172,638	203,602	334,088	1,327,054	2.5	750-950	500-800	500-1,000
2007	293,941	60,623	867,572	265,718	326,341	620,282	601,854	3.4	750-950	500-800	500-1,000
2008	236,355	46,053	614,946	208,526	254,579	490,934	406,420	2.3	650-850	500-800	500-1,000
2009	343,302	45,868	745,170	241,999	287,867	631,169	503,171	2.4	650-850	500-800	500-1,000
2010	393,317	59,651	970,662	256,624	316,275	709,592	714,038	3.3	750-950	500-800	500-1,000
2011	543,043	92,225	1,599,217	318,542	410,767	953,810	1,280,675	6.2	1,100-1,350	700-1,200	700-1,400
2012	530,128	102,376	1,581,555	368,720	471,096	1,001,224	1,212,835	4.7	1,100-1,350	700-1,200	700-1,400
2013	350,302	78,837	1,359,893	379,685	458,522	808,824	980,208	3.5	1,000-1,200	700-1,200	700-1,400
2014	384,018	78,057	1,520,340	301,998	380,055	764,073	1,218,342	3.3	1,000-1,200	700-1,200	700-1,400
2015	384,095	83,112	1,709,051	309,004	392,116	776,211	1,400,047	3.9	1,000-1,200	700-1,200	700-1,400
2016	266,506	79,465	1,383,692	263,704	343,169	609,675	1,119,988	3.5	1,000-1,350	700-1,200	700-1,400
2017	308,017	67,233	1,308,498	237,434	304,667	612,684	1,071,064	4.6	1,000-1,300	700-1,200	Repealed
2018	173,609	41,122	1,035,761	149,000	190,122	363,731	886,761	1.6	900-1,100	700-1,200	
2019	338,952	103,700	1,849,054	392,023	495,723	834,675	1,457,031	3.9	1,000-1,300	700-1,200	
2020	259,282	62,665	1,814,252	208,625	271,290	530,572	1,605,627	2.5	1,000-1,200	750-1,300	
2021	335,396	138,740	2,441,825	435,535	574,275	909,671	2,006,290	3.8	1,000-1,200	750-1,300	
2022	288,453	100,802	1,570,395	364,392	465,194	753,647	1,206,003	2.5	1,000-1,400	750-1,300	
2023	334,051	127,425	2,343,976	458,560	585,985	920,036	1,885,416	3.8	1,000-1,400	750-1,300	
2024	ND	ND	<i>1,926,350</i>	ND	ND	ND	ND	4.0	1,000-1,400	750-1,300	
10-Year AVG											
2014-2023	307,238	88,232	1,697,684	312,028	400,260	707,498	1,385,657	3			

Note: ND = no data available. Bold font indicates the escapement goal for management, and shading indicates that the goal was achieved.

^a From 1999 to present, personal use harvest is from Kenai River dipnet fishery and the educational harvest is from the Kenaitze Educational fishery after July 1.

^b In 1994 and 1995 a creel survey was conducted to estimate harvest below the sonar. In 1994, 49.7% of the below Soldotna Bridge harvest was taken below the sonar. In 1995, 68.6 % was taken below the sonar. The average of these two percentages is applied to all other year's below-bridge harvest to estimate the harvest below the sonar.

^c Bendix sonar counts for 1999-2010; DIDSON counts beginning in 2011.

Table 312-3.–Kasilof River sockeye salmon escapement goal history, 2002 –2024.

Year ^a	Escapement	BEG	OEG
2002	226,682	BEG	150,000–250,000
2003	359,633	BEG	150,000–250,000
2004	577,581	BEG	150,000–250,000
2005	348,012	BEG	150,000–250,000
2006	368,092	OEG	150,000–300,000
2007	336,866	BEG	150,000–250,000
2008	301,469	OEG	150,000–300,000
2009	297,125	OEG	150,000–300,000
2010	267,013	BEG	150,000–250,000
2011	245,721	160,000–340,000	160,000–390,000
2012	374,523	160,000–340,000	160,000–390,000
2013	489,654	160,000–340,000	160,000–390,000
2014	440,192	160,000–340,000	160,000–390,000
2015	470,677	160,000–340,000	160,000–390,000
2016	239,981	160,000–340,000	160,000–390,000
2017	358,724	160,000–340,000	160,000–390,000
2018	394,309	160,000–340,000	160,000–390,000
2019	378,416	160,000–340,000	160,000–390,000
2020	545,654	140,000–320,000	140,000–370,000
2021	521,859	140,000–320,000	140,000–370,000
2022	968,148	140,000–320,000	140,000–370,000
2023	932,896	140,000–320,000	140,000–370,000
2024	1,048,092	140,000–320,000	140,000–370,000
Average			
2011–2024	529,203		

Note: Shaded areas indicate that the goal that year was achieved.

^a 2002-2010 are Bendix sonar estimates; 2011–2023 are DIDSON estimates

Table 312-4.–Upper Subdistrict dip net commercial fishery commercial harvest and exvessel value, 2024.

Species	Average price per pound	Estimated number of fish	Estimated pounds of fish	Estimated exvessel value
King	\$4.14	1	4	\$16.56
Sockeye	\$1.70	27,730	146,033	\$248,255.34
Coho	\$0.54	21	114	\$61.56
Pink	\$0.20	134	542	\$108.40
Chum	\$0.68	21	147	\$99.96
Totals		27,907	146,840	\$248,541.82

Table 312-5.—Upper Subdistrict dip net commercial fishery commercial harvest, 2024.

Year	Date	King	Sockeye	Coho	Pink	Chum
2024	06/20		38			
	06/22	*	*	*	*	*
	06/24		30			
	06/27		29			
	06/29		165			
	07/02		150			
	07/09		579		1	1
	07/11		1,134			
	07/13		48			
	07/16		4,563	2	5	3
	07/18		3,348	1	19	1
	07/20	1	3,111	1	14	
	07/23		3,022	3	24	1
	07/25		3,281	1	13	1
	07/27		1,720		3	1
	07/28		2,809	2	8	
	07/29	*	*	*	*	*
	07/30		1,662	8	28	11
	07/31		2,030	3	18	2
Totals	19 days	1	27,730	21	134	21

Note: *= Confidential harvest information

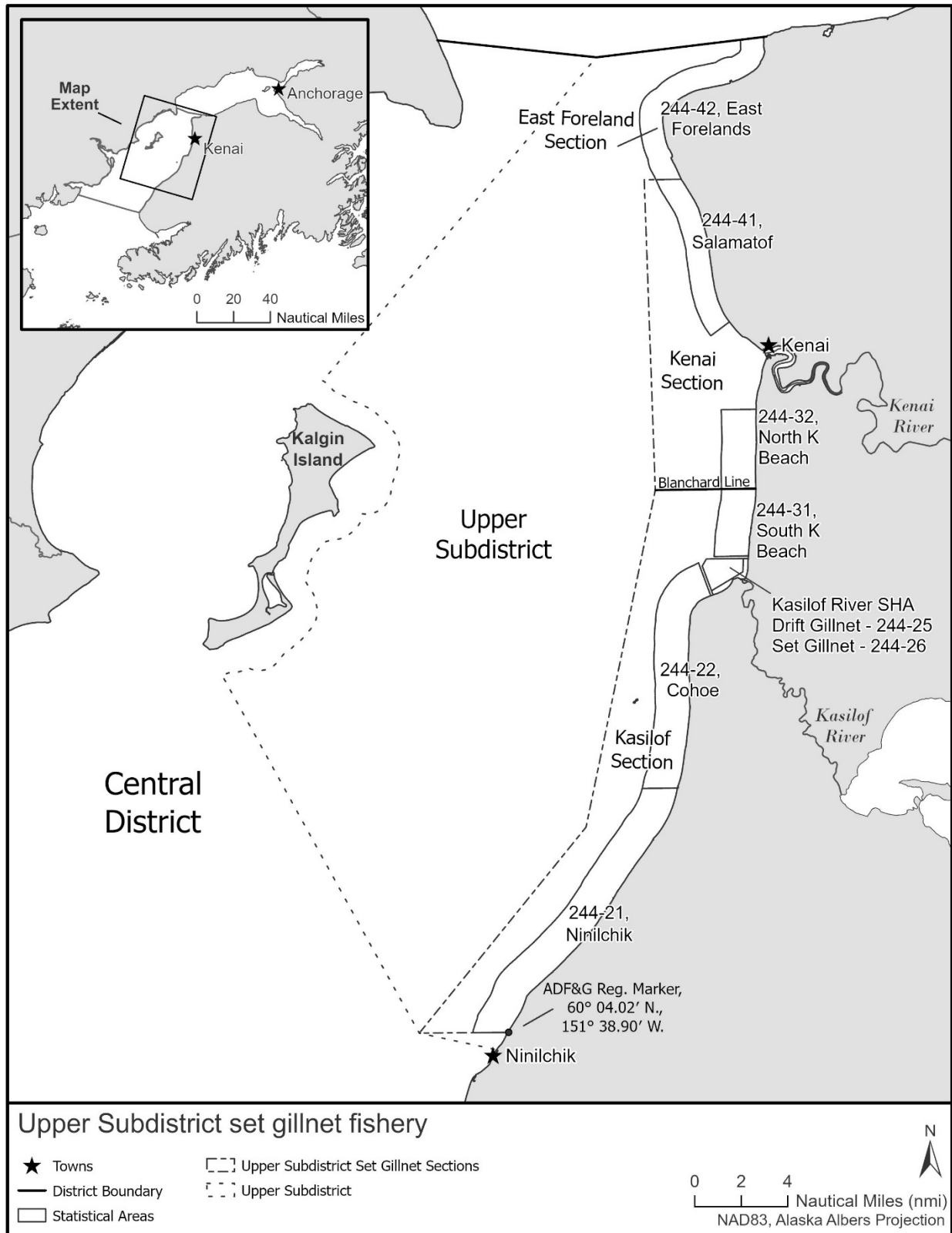


Figure 312-1.—Upper Subdistrict set gillnet fishery (ESSN) statistical areas.

PROPOSAL 313 – 5 AAC 21.382. Kenai River Late-Run King Salmon Stock of Concern Management Plan.

>Add beach seine nets as legal gear

PROPOSED BY: Brian G. Gabriel Sr. and Lisa Gabriel.

WHAT WOULD THE PROPOSAL DO? Add set beach seine nets as legal gear under the *Kenai River late-run king salmon stock of concern management plan* (5AAC 21.382) from June 20 through August 15 for S04H commercial fishery permits and implement time, area, method, and gear restrictions.

WHAT ARE THE CURRENT REGULATIONS? Set beach seine is not a defined gear type nor an allowable gear type in the Upper Subdistrict. The ESSN fishery is managed by the *Kenai River late-run king salmon stock of concern management plan* (5 AAC 21.382), which provides the commercial dip net fishery based on sockeye salmon abundance and directs the department to allow set gillnet opportunity only when the Kenai River late-run king salmon recovery goal of 14,250 large fish (METF >75cm) is projected to be met.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This could increase the harvest of salmon in the Upper Subdistrict by S04H permit holders by an unknown amount and allow for the live release of king salmon. This will provide additional harvest for sockeye salmon in the Kenai and Kasilof Rivers dependent upon abundance. There may be some additional king salmon mortality related to handling and release.

BACKGROUND: The ESSN fishery was historically managed primarily under provisions found in *Kenai River Late-Run Sockeye Salmon Management Plan* and *Kasilof River Salmon Management Plan*. However, the board listed the Kenai River late-run king salmon as a stock of concern in the spring of 2024. Under the stock of concern management plan the ESSN fishery is managed to meet a recovery goal of 14,250 large late-run king salmon. The board added dip nets as an additional gear type to the S04H permits under the stock of concern management plan to give ESSN commercial fishing opportunity for more abundant salmon species while king salmon abundance is below the recovery goal and set gillnet fishing is closed. There was no set gillnet commercial fishing in the ESSN fishery in 2024 due to low abundance of Kenai River late-run king salmon.

Kenai River king salmon abundance remains low with the 2024 estimated escapement of 6,906 large fish failing to meet the recovery goal of 14,250–30,000 large fish (Table 312-1). The Kenai River late-run sockeye salmon preliminary sonar passage estimate of 1,926,350 fish, exceeded the inriver run goal of 1.1 million–1.4 million fish and will likely exceed the sustainable escapement goal (SEG) of 750,000–1,300,000 sockeye salmon once the estimated upriver sport harvest is subtracted from the sonar estimate (Table 312-2). The preliminary Kasilof River sockeye salmon sonar passage was 1,048,092 fish, which exceeded the sustainable escapement goal of 140,000–320,000 fish (Table 312-3).

The department issued three commissioners permits to test beach seines as a new gear type to be utilized in the ESSN fishery to harvest abundant sockeye salmon and release king salmon. Of the three permits, two were fished in the 2024 season. Both permits utilized a similar gear and

operational procedure by deploying and retrieving a beach seine on set gillnet running lines. The permits stipulated third party observers be on site and data was collected on deployment time, stage of tide, environmental conditions, by species catch, and harvest. Harvest of salmon except king salmon was allowed to be sold for cost recovery if the Upper Subdistrict was open for commercial fishing.

Preliminary review of the commissioner's permits operations showed this could be a potentially viable method to commercially harvest salmon in the ESSN fishery. The combined total of salmon caught was 20,981 fish, which consisted of 16 king, 20,563 sockeye, 46 coho, 266 pink, and zero chum salmon (Table 313-1). All king salmon were released. The experimental operations both took place primarily within the North K-Beach statistical area (244-32) with 22 days of effort, and an additional four days of fishing effort took place within the Salamatof statistical area (244-41) (Figure 312-1). The highest catches were largely concentrated during the peak of the Kenai River sockeye salmon run from July 16 to July 25. For more detailed information on the experimental fishery performance and process please see commissioner's permits summary report that has been submitted as an RC.

The gear type is sensitive to weather, stage of tide, and water conditions that limit the duration and length of gear that can be fished. Site profiles along the beach may also greatly influence the availability of this gear type for use across the ESSN fishery. For example, the presence of obstructions, steep vs. shallow beaches, and extended shallow tidal flats may all determine the viability of this gear type for individual operations.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal. The department does encourage the development of methods and gear types that would allow harvest of more abundant species during times of conservation for weak stocks. While not specifically stated in the proposal, we believe the intent of the new gear type was to not retain king salmon. If adopted, the Board would need to define seine gear in the context of the ESSN fishery and establish operational specifications for this gear as the proposal does not define these.

COST ANALYSIS: Approval of this proposal is expected to result in an additional direct cost for a private person to participate in this fishery by requiring the acquisition of seine gear. Approval of this proposal is not expected to result in an additional cost to the department.

Table 313-1.—Salmon catch summary, Upper Subdistrict beach seine commissioners permits, 2024.

Permit	Date Range	# Sets		King small	King large ^a	Sockeye	Coho	Pink	Chum
UCI-2024-01	June 30–July 31	249	Harvested	0	0	15,294	15	58	0
			Released	12	1	131	0	2	0
UCI-2024-02	July 20–July 31	115	Harvested	0	0	5,228	0	205	0
			Released	3	0	0	31	1	0
Total		364		15	1	20,653	46	266	0

^a Large fish are king salmon that are 75 cm from mid-eye to tail fork in length or longer.

PROPOSAL 314 – 5 AAC 06.XXX. New section; 5 AAC 06.200. Fishing districts and sections; 5 AAC 06.320. Fishing periods; 5 AAC 06.350. Closed waters; 5 AAC 06.370. Registration and reregistration; and 5 AAC 01.320. Lawful gear and gear specifications.

›Create a Kvichak River Special Harvest Area

PROPOSED BY: Kyle Lints.

WHAT WOULD THE PROPOSAL DO? This would create a Kvichak River Special Harvest Area (KRSHA) to allow harvest of Kvichak River sockeye salmon while conserving Naknek River sockeye salmon.

WHAT ARE THE CURRENT REGULATIONS? There is not a Kvichak River Special Harvest Area in the current regulations. When the Naknek River is projected to be below the escapement goal, the Naknek–Kvichak District is closed to fishing. Current regulations allow for additional opportunities in the Alagnak River Special Harvest Area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would provide the department with a management tool to control large sockeye salmon escapements in the Kvichak and Alagnak Rivers when the Naknek–Kvichak District is closed to conserve Naknek River sockeye salmon. This would likely result in increased harvest of Kvichak River sockeye salmon and improved Naknek River sockeye salmon escapement in years when KRSHA openings occur. This may result in increased harvest of Alagnak River king salmon, although KRSHA openings would likely occur later in the season when most Alagnak River king salmon have migrated past KRSHA. Elements of the *Naknek-Kvichak District Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan* to conserve king salmon (mesh-size restrictions and avoiding fishing at low tide stages) would be in effect during KRSHA openings.

BACKGROUND: In 2024 the Naknek River had a small sockeye salmon return of 3.1 million fish. The Naknek–Kvichak District was closed for three days to conserve Naknek River fish. During this time, sockeye salmon escapement goals in the Kvichak and Alagnak Rivers had already been met. This action resulted in approximately 2 million fish escaping into these rivers that could have been available for harvest. The 2025 Naknek River salmon forecast is 3.0 million fish so there is potential for a similar situation to occur again.

The Naknek River Special Harvest Area Management Plan has been used many times to harvest Naknek River sockeye salmon while conserving Kvichak River sockeye salmon. A similar management tool does not exist for harvesting Kvichak River sockeye salmon while conserving Naknek River sockeye salmon.

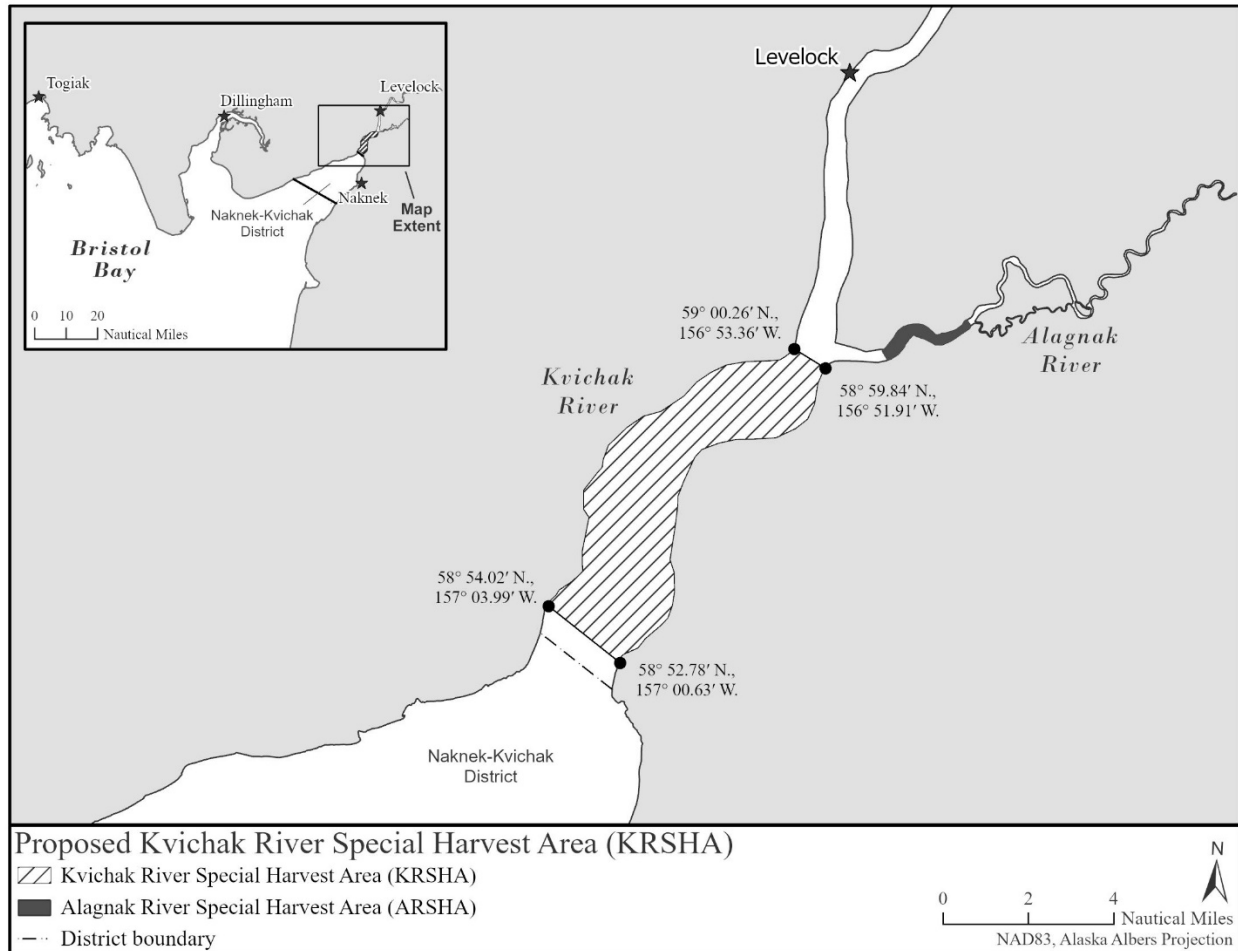


Figure 1. Proposed Kvichak River Special Harvest Area.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal because it would provide management alternatives when substantial differences in sockeye salmon run strengths occur. The department is **NEUTRAL** on the allocative aspect of this proposal.

To create a KRSHA the board will need to adopt and amend several regulations. The department has drafted the substitute language below for the board and public to consider.

(a) The goal of this plan is to achieve the Naknek River sockeye salmon escapement goal, while providing opportunities to harvest Kvichak and Alagnak River salmon stocks that are in excess of escapement goals. It is the intent of the Board of Fisheries that salmon in the Naknek-Kvichak District should be harvested in the fisheries that have historically harvested them, including the methods, means, times, and locations of those fisheries, using the best biological management techniques and practices. This plan has been adopted to provide management alternatives that can be used by the department when differences in salmon run strengths would preclude the achievement of the goal of this plan using only the fisheries that have historically harvested those salmon.

(b) The Kvichak River Special Harvest Area (KRSHA) consists of the waters of the Kvichak River upstream of a line from 58° 52.78' N. lat., 157° 00.63' W. long. to 58° 54.02' N. lat., 157° 03.99' W. long. to a line located below the mouth of the Alagnak River at 58° 59.84' N. lat., 156° 51.91' W. long. to 59° 00.26' N. lat., 156° 53.36' W. long.

(c) When the department projects that the sockeye salmon escapement into the Kvichak River will exceed 4 million fish and the Naknek River escapement projection is one or more days behind schedule for reaching the lower bound of the escapement goal, the commissioner may open, by emergency order, the KRSHA to the drift gillnet and set gillnet fisheries. The drift gillnet and set gillnet fisheries will open separately, with a seasonal ratio of three drift gillnet fishing periods to every one set gillnet fishing period.

(d) The following provisions apply to set gillnet fishing in the KRSHA:

(1) no more than 37.5 fathoms of set gillnet may be used to take salmon;

(2) a set gillnet may not be set or operated within 150 feet of another set gillnet;

(3) all gear associated with set gillnet fishing must be removed when it is not being used to fish in the KRSHA;

(4) 5 AAC 06.331(i), (m), (o), and (p) do not apply except that the anchoring device may not be more than 50 feet from the web of the net;

(5) a set gillnet may be set and operated seaward of another set gillnet.

(e) The following provisions apply to drift gillnet fishing in the KRSHA:

(1) no more than 75 fathoms of drift gillnet gear may be operated as defined in 5AAC.39.975(22),

(2) a vessel may not have more than 200 fathoms of drift gillnet onboard. Notwithstanding 5 AAC 39.240, a person operating a commercial salmon fishing vessel in the KRSHA may carry additional drift gillnet gear on board the fishing vessel if the gear that is additional to 75 fathoms is stored in a net bag or in a brailer bag; for the purposes of this paragraph, "brailer bag" means a bag-shaped net on board a drift gillnet vessel used to lift fish from the hold of the vessel into a tender vessel, processing vessel, or processing facility;

(g) After July 17, when the Naknek-Kvichak District is open to commercial fishing in the KRSHA, the commissioner may establish, by emergency order, new fishing periods other than the periods specified in 5 AAC 06.320(c), during which the requirements for reregistration and the 48-hour transfer notification period specified in 5 AAC 06.370 will apply.

5 AAC 06.200. Fishing districts and sections.

(b) Naknek-Kvichak District: all waters of Kvichak Bay north and east of a line from 58° 43.73' N. lat., 157° 42.71' W. long., to 58° 36.77' N. lat., 157° 15.82' W. long., and the Naknek River Special Harvest Area, **Kvichak River Special Harvest Area**, and the Alagnak River Special Harvest Area,

5 AAC 06.320. Fishing periods.

(c) In the Naknek-Kvichak, Egegik, and Ugashik Districts,

(1) from June 1 through 9:00 a.m. July 17, salmon may be taken only during fishing periods established by emergency order;

(2) after 9:00 a.m. July 17, salmon may be taken only from 9:00 a.m. Monday to

9:00 a.m. Sunday, or during fishing periods established by emergency order, except as specified for the

- (A) Egegik District in 5 AAC 06.359;
- (B) Naknek-Kvichak District in 5 AAC 06.360(g); and **5 AAC 06.XXX(g)** (*new regulation*);
- (C) Ugashik District in 5 AAC 06.366(d)(4).

5 AAC 06.350. Closed waters.

(b) The following locations in the Naknek-Kvichak District are closed to the taking of salmon:

(1) those waters northeast of a line from a point near Graveyard Point at 58° 52.10' N. lat., 157° 00.80' W. long., to a point on the northwest shore of Kvichak Bay at 58° 53.37' N. lat., 157° 04.26' W. long., except that the commissioner may, by emergency order, open the Alagnak River Special Harvest Area as provided in 5 AAC 06.373 **and the Kvichak River Special Harvest Area as provided in 5 AAC 06.XXX** (*new regulation*);

5 AAC 06.370. Registration and reregistration.

b) Except when fishing as a crewmember, a CFEC salmon drift gillnet permit holder intending to transfer to and fish in a new district for which the permit holder is not registered shall register the permit holder and the vessel that the permit holder will use to take salmon for the new district at least 48 hours before fishing in the new district. Reregistration is accomplished by the permit holder or the permit holder's authorized agent completing a form provided by the department and submitting the completed form, in person, to a local representative of the department or electronically on the department's website. The 48-hour district transfer notification period starts when the reregistration form is signed by the local representative of the department or when the permit holder receives the computerized acceptance notification. The drift gillnet permit holder and the drift gillnet vessel may not fish in the original district during the 48-hour notification period. The notification period may be reduced by commissioner's announcement. District reregistration is not required after 9:00 a.m. July 17, except in the Ugashik District, as specified in 5 AAC 06.366(d)(4), the Naknek-Kvichak District, as specified in 5 AAC 06.360(g) **and 5 AAC 06.XXX(g)** (*new regulation*), and the Egegik District, as specified in 5 AAC 06.359(f).

5 AAC 01.320. Lawful gear and gear specifications.

(b) Outside the boundaries of any district and within the Naknek, Alagnak, **Kvichak**, and Wood River special harvest areas, salmon may only be taken by set gillnet,

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

PROPOSAL 315 – 5 AAC 18.331 Gillnet specifications and operations.

>Allow set gillnet permit holders operating as a joint venture fish 350 fathoms of gear

PROPOSED BY: Northwest Setnetters Association, Adelia Myrick.

WHAT WOULD THE PROPOSAL DO? This would allow two CFEC set gillnet permit holders, operating together as a joint venture in the Central Section of the Northwest Kodiak District, to operate an aggregate of 350 fathoms of set gillnet gear with no single set gillnet longer than 175 fathoms in length.

WHAT ARE THE CURRENT REGULATIONS? In the Kodiak Management Area CFEC set gillnet permit holders may operate up to two set gillnets with a combined length of no more than 150 fathoms, except in the Central Section of the Northwest Kodiak District CFEC set gillnet permit holders may operate up to two set gillnets with a combined length of no more than 175 fathoms. In the Kodiak Management Area, two CFEC set gillnet permit holders may operate as a joint venture. A set gillnet joint venture may operate a total of 300 fathoms of set gillnet gear, with no more than three total set gillnets and no single set gillnet exceeding 150 fathoms in length.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would allow set gillnet joint ventures in the Central Section of the Northwest Kodiak District to operate more set gillnet gear than joint ventures in other parts of the Kodiak Management Area. This would increase the harvest of all species of salmon by an unknown amount and increase the harvest of salmon by set gillnet permit holders. This would not impact the department's ability to manage for established escapement objectives but could result in restrictive actions being taken to meet escapement goals if the proposed gear increase results in significantly greater catches than currently allowed gear.

BACKGROUND: Set gillnet joint ventures have been allowed in the Kodiak Management Area since 1985. In 2024 the Alaska Board of Fisheries increased the amount of gear that a set gillnet permit holder could operate in the Central Section of the Northwest Kodiak District from 150 fathoms to 175 fathoms. The board did not discuss making a concomitant adjustment to set gillnet joint venture lawful gear in the same area. During 2014–2023, an average of 12 joint ventures were permitted. In 2024, four joint ventures were permitted (Table 315-1).

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in additional cost for the department.

Table 315-1.-Set gillnet joint ventures permitted in the Kodiak Management Area, 2014–2024.

Year	Joint ventures permitted
2014	9
2015	11
2016	11
2017	10
2018	12
2019	13
2020	11
2021	13
2022	15
2023	10
2024	4
Average 2013–2023	12

PROPOSAL 316 – 5 AAC 27.510. Fishing seasons and periods for Kodiak Area; 5 AAC 27.525. Seine specifications and operations for Kodiak Area; and 5 AAC 27.535. Harvest strategies for Kodiak Area.

Change regulatory language for Kodiak commercial sac roe fishery

PROPOSED BY: Alaska Board of Fisheries.

WHAT WOULD THE PROPOSAL DO? This would replace regulatory language in the Kodiak Management Area (KMA) commercial herring sac roe fishery by removing the term “sac roe.” The new “herring” season would allow sac roe herring permit holders to take herring during a newly established “A season” occurring from April 1 through October 25 and a “B season” occurring from December 1 through January 31 with a shared guideline harvest level (GHL). The food and bait herring regulations would remain in effect; however, the fishery season dates would be changed to October 26 through November 30 with the same stipulations for the establishment of a GHL and time and area.

WHAT ARE THE CURRENT REGULATIONS? Current regulations for the harvest of herring in the Kodiak Management Area allow for a sac roe fishery from April 1 through June 30 and a food and bait fishery occurring from September 1 through February 28 (5 AAC 27.510). Legal gear types for the sac roe fishery are purse seines and gillnets, while legal gear types for the food and bait fishery are seines, gillnets, and trawls (5 AAC 27.515). Purse seines used in the fishery may not be more than 1,625 meshes in depth, including chafing gear, or more than 150 fathoms in length (5 AAC 27.525).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would change the current herring sac roe fishery to be split into “A” and “B” seasons with a combined GHL. It would also set the GHL for the “B” season (fall season) at 1,000 tons, unless there is unharvested GHL available from the “A” season (spring season), which would then be added to the GHL for the “B” season unless the available biomass in the “A” season is not large enough to support an exploitation rate of at least 10%. However, if the department determines the combined GHL to be less than 2,500 tons, the GHL would be split evenly between the two seasons, thus making the GHL of the proposed “B” season 1,250 tons instead of the 1,000 tons stated in the proposal. The proposal does not change the structure of the Kodiak Area food and bait fishery but does change the fishery season dates to October 26 through December 1. If a large unharvested GHL is rolled over from the “A” season into the “B” season and there is considerable interest from the fleet, the department may not have the resources to monitor the “B” season fishery on the fishing grounds at that time of year. Adoption of this proposal would also increase harvest of herring of unknown origin due to the mixing of stocks during the winter months.

BACKGROUND: Due to declining markets and prices, participation in the sac roe herring fishery has declined in the last 20 years, from a high of 44 permits fished in 2005 to a low of one permit fished in 2019 (Table 57-1). Legal gear types for the sac roe fishery are purse seines and gillnets (5 AAC 27.515 (1)).

The herring food and bait season currently runs from September 1 through February 28 (5 AAC 27.510(b)). GHLs for the fishery are established by district and are based upon 10% of the GHLs established for the preceding sac roe fishery by section (5 AAC 27.535(b)). In 2001, the

Commercial Fisheries Entry Commission (CFEC) designated the KMA herring food and bait fishery a limited entry fishery and issued 13 interim use permits to those fishermen who made landings between 1994 and 1998. In July 2002, the CFEC made a final determination on these limited entry permits. Nine permanent limited entry permits were issued consisting of five purse seine/gillnet permits and four trawl permits. Combine fisheries have been conducted under similar conditions each season since 2002. Generally, one purse seine vessel is used to harvest herring that are then loaded onto a tender for transport. Only purse seine vessels have been used to harvest herring for the combine. Since 2004, the food and bait herring fishery has harvested just over half of its GHL allocation on average, with only two seasons where the food and bait harvest exceeded its 10% allocation of the sac roe GHL, and one season where no food and bait herring were harvested (Table 57-2).

There are currently 60 active CFEC sac roe herring purse seine permits, and 72 active CFEC gillnet permits. There are five active food and bait CFEC seine/gillnet, and four active trawl food and bait herring permits.

The current sac roe preseason GHLs are established for all sections that have produced consistent herring harvests in previous seasons. These GHLs reflect the status of a particular herring stock by section but are conservative in nature due to the uncertainty in assessing the biomass in the KMA. Methods used to establish the sac roe herring GHL are based on the preceding seasons' aerial surveys, hydroacoustic surveys, observations of spawn, trends in age composition, and fishery performance. The current food and bait GHL is established based on 10% of the prior season's sac roe herring GHL with restrictions on fishing outside the bays.

Currently, the department does not have the resources to prosecute a competitive food and bait fishery. From 2002 through 2023, the department would only allow a food and bait fishery to proceed if fishermen formed a combine and generally one purse seine vessel was used to harvest herring. In 2024, all food and bait permit holders were allowed to fish. However, due to market considerations and permit consolidation, only one permit holder harvested herring in 2024.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. This said, the department is concerned with the potential for increasing harvest on multiple mixed stocks of herring present in the KMA during a food and bait fishery. Also, depending on how many new "B" season herring fishermen decide to take part in the fishery, the department would need to institute new registration and reporting requirements, as well as scheduled fishing times by EO to ensure the GHL is not exceeded. Furthermore, if too many fishermen decided to take part in the new "B" season fishery, the department may need to close the fishery due to manageability and conservation concerns.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. There may be additional costs to the department associated with the new registration and reporting requirements.

Table 316-1.—KMA sac roe herring price per ton, harvest, and participation by gear type, 2005–2024.

Year	GHL (tons)	Total harvest (tons)	Seine harvest (tons)	Gillnet harvest (tons)	Price per ton (\$)	Seine % of harvest	Gillnet % of harvest	Seine permits fished	Gillnet permits fished
2005	3,475	3,463	2,932	531	\$363	85%	15%	32	12
2006	3,705	2,643	2,617	^a	\$169	99%	1%	21	2
2007	4,000	2,546	2,510	36	\$240	99%	1%	21	3
2008	4,290	3,099	3,086	^a	\$336	100%	0%	22	1
2009	4,765	4,759	4,549	210	\$378	96%	4%	31	6
2010	6,075	5,701	5,538	163	\$224	97%	3%	36	7
2011	6,135	2,957	2,937	20	\$212	99%	1%	14	3
2012	5,355	4,260	4,252	^a	\$308	100%	0%	23	1
2013	5,410	4,456	4,307	149	\$234	97%	3%	33	5
2014	5,830	2,463	2,463	0	\$100	100%	0%	21	0
2015	3,190	357	357	0	\$111	100%	0%	9	0
2016	1,670	365	365	0	\$129	100%	0%	3	0
2017	1,645	125	124	^a	\$158	99%	1%	3	1
2018	1,185	226	226	0	\$204	100%	0%	3	0
2019	1,405	^a	^a	0	ND	100%	0%	1	0
2020	3,150	4,127	4,127	0	\$145	100%	0%	9	0
2021	7,895	7,965	7,965	0	\$163	100%	0%	13	0
2022	8,075	8,913	8,913	0	\$158	100%	0%	11	0
2023	8,650	3,430	3,430	0	\$120	100%	0%	9	0
2024	8,200	^a	^a	0	\$300	100%	0%	2	0
20-yr avg	4,705	3,127	3,070	58	\$213	98%	2%	16	2
10-yr avg	4,507	2,620	2,620	0	\$165	100%	0%	6	0
5-yr avg	7,194	5,023	5,023	0	\$177	100%	0%	9	0

^a Confidential.

Table 316-2.-KMA food and bait herring fishery GHLS, harvest, and exploitation rates, 2004–2024.

Year	Sac roe GHL	Food and bait GHL	Food and bait harvest (tons)	Food and bait harvest rate
2004–2005	2,850	285	190	7%
2005–2006	3,475	348	167	5%
2006–2007	3,705	371	169	5%
2007–2008	4,000	400	154	4%
2008–2009	4,290	429	202	5%
2009–2010	4,765	477	263	6%
2010–2011	6,075	608	191	3%
2011–2012	6,135	614	212	3%
2012–2013	5,355	536	300	6%
2013–2014	5,410	541	291	5%
2014–2015	5,830	583	124	2%
2015–2016	3,190	319	106	3%
2016–2017	1,670	167	0	0%
2017–2018	1,645	165	77	5%
2018–2019	1,185	119	59	5%
2019–2020	1,405	141	121	9%
2020–2021	3,150	315	339	11%
2021–2022	7,895	790	685	9%
2022–2023	8,075	808	988	12%
2023–2024	8,200	780	664	8%
20-yr avg	4,498	448	269	5%
10-yr avg	4,046	400	338	7%
5-yr avg	6,830	673	669	10%