

PROPOSAL 251

5 AAC 32.110. Fishing seasons for Registration Area A.

Change the start date of the Registration Area A Dungeness crab commercial fishery's summer season from June 15 to July 1.

5 AAC 32.110 Fishing seasons for Registration Area A

In Registration Area A, male Dungeness crab may be taken or possessed only as follows: (1) From 8:00 a.m. **July 1** [June 15] through 11:59 p.m. August 15 and from 8:00 a.m. October 1 through 11 :59 p.m. November 30, in all waters of Registration Area A other than those waters specified in (2) and (3) of this section;

What is the issue you would like the board to address and why? Change the start of the Dungeness crab season from 8:00 a.m. June 15 to 8:00 a.m. July 1.

The problem is that crabs are often still in a soft-shell condition at the beginning of the season. Moving the season opening to July 1 will give them more time to fill out into a much more marketable condition and will greatly reduce handling mortality in this vulnerable state.

ADF&G is not allowed to delay the start of the season, only to close it early if certain catch thresholds are not met. It takes 10 to 14 days for ADF&G to gather information on the fishery to determine if the season will be shortened. The minimum threshold policy is for a gauge of abundance, not shell condition. There is no mechanism to close the season based on shell condition. **If the shell condition is soft, we continue to fish regardless to the detriment of the resource.**

An example of this was the 2021 season, the crabs were very soft on opening day and for a large portion of the summer season. The summer season saw record high prices and increased effort from the fleet. Gear was being hauled and turned over as quickly as possible with the high market conditions. The crabs were abundant and soft. The catch rates were good and thresholds were met. We fished a full season and pounded the resource due to the high dollar value. Fishermen and processors understood we were fishing and selling a poor-quality product. Many processors were willing to risk buying "lite" crab from fishermen as the market demand was high. This practice is not healthy for the resource nor to the fishermen in the long run. Unfortunately, this came back to bite us in the butt.

It is well documented that soft crab experience much greater handling mortality than "hard" crab. (ADF&G; Handling Increases Mortality of Soft-Shell Dungeness Crabs, 1993 Gordon H. Kruse) Soft, unmarketable crabs that crawl into the pots are tossed back into the water and are repeatedly caught. The consequences of this was a high mortality of soft crab due to handling. Not just legal, but sub-legal as well.

The summer 21 season resulted in a great number of recruits and sub-legal recruits being killed due to high handling mortality. This showed up in the fall '21 season and in the 2022-23 season. The '22-23 season harvest was 2 million lbs., 45% lower than the 3.7 million lbs. in the '21-22 season. Also, the market value dropped almost 2/3rds, from \$15. 7 to \$5.4 M. This was the result of fishing on soft crab the previous year and a sub-standard product making it to the market. Processors were stuck with a bunch of "lite" crab, ie soft, in storage and the market responded with

rejecting the high prices that processors sought, after paying top dollar for soft, "lite" crab. This resulted in the dock price being cut from \$4.25/lb in '21, to \$2.60/lb. in the summer and \$2.00 in the fall of the '22/23 season. Further, the summer '22/23 season was also closed two and a half weeks early due to lack of abundance (the recruits that did not survive handling from the fishery from the 2021 season). These poor market conditions held through the year and the 2023-24 season dock price for fishermen was \$2.00/lb. By fishing on soft crab in summer 2021 we basically sacrificed the next two seasons at least.

As I recall, back in the late '70s or early '80s, the BOF changed and reduced the Dungeness season from a year-round fishery to June 1 through February 28. In the mid '80s, BOF again changed the season to July 1 through February 28. On the next cycle, the BOF once again changed the season and split it to the current June 15- August 15, October 1- November 30. All these changes and reduced seasons were met with opposition from the crab fleet and processors.

In summary, moving the start of the season to July 1 will greatly help the condition of the crab and reduce the high mortality rate due to handling. Thus, resulting in a higher quality product and much less chance of devastating the stock for future seasons. The boom-and-bust cycle will be greatly reduced and healthier for the resource.

Many will oppose this, but I think it is more important to manage the resource and not the fishermen. With every change to a given fishery, fishermen always seem to adjust. Statistics are from ADF&G website.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. My proposal developed with talking to other Dungeness crabbers.

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