

Tanner Crab (5 proposals)

PROPOSAL 34

5 AAC 35.308. Registration Area E Tanner crab harvest strategy.

Repeal the Registration Area E Tanner crab harvest strategy, as follows:

When the board adopted this harvest strategy in 2021 it chose to leave 5 AAC 35.311 "Commissioner's permits for Tanner Crab in Registration Area E" in regulation in case this new harvest strategy was not effective. We ask you to repeal 5 AAC 35.308 Registration Area E Tanner Crab harvest strategy in its entirety. A separate proposal we are submitting lays out a new harvest strategy that we hope the board will adopt, or otherwise simply revert this fishery back to a Commissioner's permit fishery.

What is the issue you would like the board to address and why? The Area E Tanner Crab management plan adopted in 2021 does not follow the Board's "Policy on King and Tanner Crab resource management" and should be repealed. Specifically management measure #5 which states: "A preseason estimate of the level of allowable King and Tanner Crab harvest is established for each fishery. In those fisheries with accurate population estimates the appropriate harvest rate is applied to the best point estimate to determine the GHL. For those fisheries without surveys or historical catch information adequate for estimating the population size, the GHL will be set based on historical fishery performance, catch, and population trend."

The adopted plan removes historic crab districts and instead splits Prince William Sound into five (5) non-traditional districts. Three of these non-traditional districts, according to the Department "...were aligned with historical statistical areas to develop a more accurate time series of statistical area-specific historical harvest and closely aligned to current statistical areas for management purposes". These areas are drawn with disregard to crab habitat. Currently they are arbitrary boundaries applied to a north-south and east-west grid that do not account for crab population, depth, migration or habitats.

Separate districts with distinct GHLs should be created only for distinct populations of crab. Instead, said plan creates a baseline estimate of abundance from 1983-1988 using imprecise and ill reported harvest data, by stat area, from the 1980's. It then extrapolates from those estimates for the next 25 years using trawl surveys, which do not occur in the newly drawn southwestern district. From these incomplete abundance estimates the GHLs are created for three of the new districts.

Unlike Kodiak or the Bering Sea, trawl surveys are ineffective for much of PWS. PWS more closely resembles Southeast Alaska, where said methods are not employed for Tanner crab population estimates. The variability of PWS seabed composition and geography, including glacial moraines, cause inaccuracy and inaccessibility via trawl. During the Commissioner's Permit Fishery of 2018-2021, as well as test fisheries conducted in 2016 and 2020-2022, biomass was discovered throughout PWS that was previously undetected by trawl surveys, including areas that were once devoid of crab. The densest crab populations were found in northwest PWS. The adopted plan closes that area indefinitely, claiming to "...not have sufficient trawlable habitat to develop an assessment". Furthermore, the adopted plan expanded the scope of these surveys creating unrealistic cost and management goals for the department. As it stands, ADFG can survey only one area per year.

Current harvest data clearly shows the crab population of this era bears little resemblance to the fishery of the 1980's. However, this data was not considered in the creation of the current

management plan. It was instead built on trawl surveys of inadequate proportion, and fishery performance of more than 35 years ago. Because it was the only option for a tanner fishery, CDFU supported this plan, albeit modified, at the 2021 board cycle. After further evaluation it is deemed an unworkable model. We contend that this fishery is without an accurate population estimate, and therefore the GHL should be set based on fishery performance, catch, and population trend.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Cordova District Fishermen United (CDFU) (EF-F24-120)

PROPOSAL 35

5 AAC 35.308. Registration Area E Tanner crab harvest strategy.

Modify the harvest strategy for Prince William Sound Tanner crab, as follows:

5 AAC 35.308 Registration Area E Tanner Crab harvest strategy

(a) Fishery performance based on logbook and inseason reported CPUE of legal male crab will be used to manage fishery area in season and postseason to set GHL. The following reference points will be used to make these management decisions

- 1. Target CPUE of 15.25 legal male Tanner Crab
Trigger CPUE of 11.5 legal male Tanner Crab
Limit CPUE of 7.5 legal male Tanner Crab

(b) In Registration Area E, the GHL will be set at 100,000 lbs but will be adjusted based on fishery performance determined from commercial fishermen logbook CPUE of legal male crab as follows:

- 1. The GHL will be increased for the following season for any of the following reasons:
 - 1. If the most recent season CPUE is $>$ than the most recent previous season and is $>$ Target CPUE the GHL will increase by 20% the following season.
 - 2. If the most recent logbook CPUE is $>$ than the most recent previous season and \leq Target CPUE legal male crab and $>$ Trigger the GHL will increase by 10% the following season.
 - 3. If the most recent logbook CPUE is $>$ than the most recent previous season and is \leq Trigger and $>$ Limit the GHL may increase up to a maximum of 5% the following season
- 2. The GHL will be decreased for the following season for any of the following reasons:
 - 1. If CPUE is $<$ than the most recent previous season and is $>$ Limit CPUE and \leq Trigger CPUE GHL may be reduced up to a maximum of 40% the following season
 - 2. If CPUE is $<$ than the most recent previous season and is $>$ Trigger Cpue and \leq Target CPUE the GHL may be reduced up to a maximum of 20% the following season

(c) Fishery performance by statistical area will be assessed inseason with a minimum requirement of 300 pot lifts per statistical area before taking management action under the following guidelines:

1. If logbook CPUE is \geq Target manage to GHL.
2. If logbook CPUE is \geq Trigger but $<$ Target manage to GHL and monitor closely
3. If logbook CPUE is \geq Limit and $<$ Trigger close statistical area for remainder of season.
4. If logbook CPUE is $<$ Limit close fishery statistical area remainder of season and subsequent closure of statistical area of 1 year for commercial fisheries the following season, depending upon a postseason review.

What is the issue you would like the board to address and why? Create an Area E Tanner Crab harvest strategy with a conservative GHL that incorporates fishery performance to allow a fishery for the coming years much like the Commissioner's permit fisheries that occurred from 2018-2021. This harvest strategy is very similar to the one presented by the department for Southeast Golden King Crab in "Recommended Harvest Strategy for Southeast Alaska Golden King Crab". The Commissioner's permit fisheries in southwest PWS conducted from 2018-2021 and the test fisheries in 2020, 2021 and 2022 were successful in discovering new Tanner Crab populations and a much needed winter fishery for the boats of Prince William Sound. Those fisheries, although limited in area and harvest allowance, resulted in an average harvest of 103,234 lbs per year with an average CPUE of 13 for the Commissioner's permit fishery and 15.25 for the test fisheries. These CPUE's compare well with the historic fisheries' catch rates. For the 1987 and 1988 years, the CPUE for the commercial fleet was 16 and 17 respectively for the western district and 11 and 17 for the northern district. With the larger 75 pot limit that was being fished in the 1980's, we can assume longer soak time is most of the contributing factor to the slightly higher CPUE seen then. These are also very similar to the CPUE seen in the southeast Tanner Crab fishery which over the last 10 years has had an average CPUE range of 12-16.

We believe that CPUE is the only consistent data point the department has at this time to estimate population size and therefore must incorporate it into the harvest strategy. This proposed harvest strategy recommends a very conservative GHL of 100,000 lbs based on the average harvest during the Commissioner's permit fishery and test fisheries. It also incorporates a CPUE target level based on the average CPUE for the PWS test fisheries that occurred in 2020, 2021, and 2022 of 15.25 and the Trigger and limit levels were set at 75% and 50% of the target rounded to the nearest quarter.

This low GHL combined with the CPUE trigger results in extremely low risk of harm to the stock but will allow a fishery to continue to be executed to the coming years and grow or shrink as we develop a better understanding of Tanner Crab populations in PWS.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Cordova District Fishermen United (CDFU) (EF-F24-121)

PROPOSAL 36

5 AAC 35.325. Lawful gear for Registration Area E.

Increase the pot limit in the Prince William Sound Tanner crab fishery, as follows:

Reinstate the historic pot limit of 75. This pot limit is reasonable for the size of area and density of crab found in PWS and comparable to southeast Alaska's pot limit of 80.

5 AAC 35.325(d) is amended to read:

(d) The number of Tanner Crab pots that may be operated from a vessel will be established by emergency order before the opening of each commercial Tanner Crab season, not to exceed [30] **75** Tanner Crab pots per vessel

What is the issue you would like the board to address and why? The current pot limit was put into place in 2017 as part of the department's new Tanner Crab harvest strategy. In 2017 the department also created regulation allowing a Commissioner's permit fishery with a limit of 50 pots. The historic pot limit for this fishery before 2017 was 75 pots. A larger pot limit combined with reduced hauling hours will result in less handling of female and undersized crab because each pot is hauled less in any given time period. These longer soak times give small crab time to escape out of the pots on their own. When the department reopened this fishery, it did not enforce the daylight hauling hours regulation and drastically lowered the pot limit. This lower pot limit resulted in participants running their pots 2-3 times a day, which increased the handling of juvenile and female crab and lowered the economic viability of the fishery. The biomass of Tanner Crab in PWS is very spread out. It requires a lot of prospecting, which is extremely costly and time consuming with a small pot limit. In the 2022 commercial fishery the fleet was unable to harvest the GHF because it was not economically viable to prospect large areas in central PWS during small weather windows with only 25 pots.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Cordova District Fishermen United (CDFU) (EF-F24-122)

PROPOSAL 37

5 AAC 35.325. Lawful gear for Registration Area E.

Establish a pot limit of 30 pots per vessel in the Prince William Sound Tanner crab fishery, as follows:

5 AAC 35.325(d) is amended to read:

d) The number of Tanner Crab pots that may be operated from a vessel will be [ESTABLISHED BY EMERGENCY ORDER BEFORE THE OPENING OF EACH COMMERCIAL TANNER CRAB SEASON, NOT TO EXCEED] 30 Tanner Crab pots per vessel. [IN DETERMINING THE ANNUAL POT LIMIT, THE DEPARTMENT WILL CONSIDER THE

- (1) TOTAL NUMBER OF REGISTERED VESSELS;
- (2) ESTIMATED CATCH PER UNIT EFFORT; AND
- (3) THE GUIDELINE HARVEST LEVEL.]

What is the issue you would like the board to address and why? Remove language allowing for an annual adjustment to pot limits that was put into place in 2017.

Adjusting gear limits based on registered participants is not a common practice in other Alaska commercial fisheries and there is no reason to do so in Area E. A known number of pots gives some consistency to the daily harvest a fisherman can expect to achieve each year they participate in the fishery. By lowering pot limits, the department decreases the daily harvest potential of participants, therefore increasing the cost to participate in the fishery. Pots are also expensive and sold in matching sets. If the pot limit increases from one year to the next, it can be extremely difficult to find more pots that stack well with the ones a operator already owns. This results in an unsafe and inefficient load. We do not believe that changing pot limits on an annual basis is a necessary tool for the department because it currently manages all other Alaska crab fisheries without this regulation.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Cordova District Fishermen United (CDFU) (EF-F24-123)

PROPOSAL 38

5 AAC 35.XXX. New section. Tenders for Tanner Crab.

Allow vessels participating in the Prince William Sound Tanner crab fishery to also tender Tanner crab, as follows:

Create new regulatory language to allow boats to act as tenders while also participating in the fishery. That way at the end of the season, fishermen could put all of their catch on one boat to take to a processor. Regulation like this is currently in place for the Kodiak District Dungeness fishery.

New text as follows:

Notwithstanding 5 AAC 35.033, in the Prince William Sound Area, a vessel registered to fish for Tanner Crab may tender Tanner Crab from other registered Tanner Crab vessels. A tender operator must be an authorized agent of a processor. Before using a vessel as a tender under this section, the tender operator shall register as a tender with the department at the department office. A tender operator shall complete an ADF&G fish ticket at the first point of delivery from the catcher vessel.

What is the issue you would like the board to address and why? Finding a market for a small-scale fishery such as Area E’s can be difficult and may require the crab be run far from the fishing grounds to Kodiak, Seward, or elsewhere. On a small quota year with a low price, it may not be economically viable for the few participants to hire a separate tender or for each participant to individually run a small load of crab across the Gulf of Alaska in the winter.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Cordova District Fishermen United (CDFU)

(EF-F24-125)
