



Southeast Alaska Fishermen's Alliance

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Alaska Department of Fish and Game

Attn: Andrew Olson

PO Box 110024

Juneau, AK 99811-0024

Via email: dfg.dcf.southeastgkc@alaska.gov

Dear Andrew Olson,

Thank you for the opportunity to comment on the draft golden king crab harvest strategy document. We have several questions regarding the draft. Does ADF&G plan to use this harvest strategy document as an internal guidance document or is the intent to have it become regulatory in the future? We appreciate that under the purpose section of the document that the SE AK Golden King Crab Harvest Strategy is described as a guideline and not a prescriptive framework while providing some consistency in the decision-making process.

Management goals and objectives: Under management goals and objectives are the “additional goals and objectives” listed in the first paragraph meant to be a synopsis of the Board of Fish King and Tanner Crab policy (90-04-FB, March 1990)? If so then it should read: “Additional goals and objectives as per the Board of Fish King and Tanner Crab policy include . . . “. If this section isn’t from the Board of Fish policy, we request ADF&G take out the portion of the sentence referencing “reducing dependency on annual recruitment”. This is not necessary to mention under size, sex, and season (3S) management.

Board of Fisheries proposal: We are concerned about the ADF&G submitted Board of Fish proposal to reduce the number of pots from 100 to 80 while simultaneously developing a policy that uses the current metrics of the fishery for the target and trigger reference points. What are the implications on the strategy harvest policy and the triggers identified if the number of pots is reduced?

Performance indicators: In evaluating the Performance Indicators, how was and where did the $\geq 60\%$ factor for concurrent GKC and Tanner crab fishing be decided? It does not appear that the logbook data is sufficient to provide the data necessary for decision making. The logbooks have a check box asking if fishermen are targeting GKC, has ADF&G considered also asking how many of the pots being fished are targeting GKC? An alternative logbook question might be to request fishermen to log their daily trip on two lines if they are concurrently fishing GKC and Tanner; one line for the number of pots lifted targeting GKC and number of crab and a second line for the tanner crab within the same day so more accurate data can be collected and used in the modeling.

Reference points: In determining the reference points why were the baseline years of 2000-2017 used and not a longer time period? What was the scientific basis for choosing a 75% for the Trigger Reference Point and 50% for the Limit Reference Point? Why is the baseline data end at 2017 and doesn't use up to the most current time frame data is available? It appears under these management rules significant lost opportunity would have occurred.

Decision rules: The decision rules do not provide for a mechanism to increase a GHL in-season when CPUE's are unexpectedly high. It appears that a fast down, slow up strategy is built into the decision rules. However, it appears the policy as written that a GHL once reduced or the season is closed, the GHL will never get back to the upper limits of the range.

Please further explain the Re-opening decision rule following a closure. Is ADF&G trying to say that in the districts with smaller GHR the minimum you would use for a GHL is 7,500 lbs and in the larger districts it might be a minimum 7,500 lb or at the level of the harvest at the time of closure? Under this harvest management strategy, can the Dept close the fishery for more than one year at a time (possibly following an early closure)?

Management strategy evaluation: Why do you think a management strategy evaluation (MSE) process would be helpful moving forward and would the group tasked with the evaluation be just Dept staff or would fishermen be involved such as the KTF? We look forward to additional information to determine if we support or oppose an MSE process.

Management Area Reports: The Management Area Reports would be more helpful if the GHR is inserted in the graph. Also showing the years that the GHR was different in the time series would be beneficial.

In summary, we would like to discuss the following items at the KTF meeting or see in a future draft of this harvest strategy for Southeast Golden King Crab:

- Matching post season and decision rules when increasing/decreasing the GHL by setting GHLs based on the previous season's GHL rather than the past season's harvest when decreasing the GHL.
- Looking at a longer time series of fish ticket CPUE for determining reference points for the years 1995-2019 with the same rates for the Trigger (75%) and Limit (50%) reference points.
- Providing a comparison using the currently proposed 2000-2017 timeframe using logbook CPUE only with reference points computed at lower rates to adjust for variances in the fishery performance that is not captured without the inclusion of the years 1995-1999. We suggest looking at 75% of the average for CPUE for the Target and 60% and 40% of the Target for the Trigger and Limit Reference points.
- A mechanism to increase the GHL in-season possibly providing a couple of scenarios for industry to evaluate.

We look forward to a further discussion on this policy at the King and Tanner Task Force meeting in December and appreciate the effort to develop a harvest policy that will be transparent and consistent.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Hansen", followed by a long horizontal line extending to the right.

Kathy Hansen
Executive Director