

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plan adopted in 2021 does not follow the Board's "Policy on King and Tanner Crab resource management" and should be repealed.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)

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