

Subsistence Shellfish

PROPOSAL 30

5 AAC 02.207. Lawful gear for subsistence king and Tanner crab fisheries.

Increase subsistence Tanner crab pot limit in portions of Prince William Sound, as follows:

Increase current subsistence pot limits from two pots per vessel to eight pots per vessel in zones 466033, 466032, 466003, 466005, 466002, 466031, 456031, 456032, 456002, 4566003, 466001, 456001, 456004, and 446001.

What is the issue you would like the board to address and why? The Subsistence Tanner crab fishery's two pot limits across the sound does not allow a reasonably diligent person to acquire an adequate number of crab to meet their needs due to lower densities and longer distances to travel. Because crab densities are lower, but still harvestable in southeast PWS we do not believe a vessel pot limit is necessary in this area.

We propose to modify and increase Tanner Crab subsistence pot limits in southeast Prince William Sound. Currently, a vessel may only use two pots, even when multiple permit holders fish together. Allowing each permit holder their own two pot limit, up to eight total pots per vessel, would provide the opportunity to economically harvest crab whereas it is cost-prohibitive and impractical now. We do not believe individuals from northern and western PWS communities would travel to the southeastern crab fisheries to take advantage of this larger pot limit because they would be passing better crabbing grounds enroute where they could efficiently harvest their limits with only two pots per vessel.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal was developed by the Native Village of Eyak Cultural Department in collaboration with the Department of the Environment and Natural Resources. It was vetted through the Tribe's Natural Resources Advisory Council and recommended it to Tribal Council who unanimously approved this submission.

PROPOSED BY: Native Village of Eyak

(HQ-F24-097)

PROPOSAL 31

5 AAC 02.236. Closed waters and 5 AAC 35.312. Closed waters in Registration Area E.

Repeal closed waters for the Prince William Sound subsistence and commercial Tanner crab fisheries, as follows:

Remove the closed waters regulation for both the subsistence and commercial fishery.

5 AAC 02.236. Closed waters.

(a) Shellfish may not be taken in the nonsubsistence area of Prince William Sound as described in 5 AAC 99.015(a)(5).

[(B) THE FOLLOWING WATERS ARE CLOSED TO THE TAKING OF KING AND TANNER CRAB FOR SUBSISTENCE PURPOSES:

(1) PORT VALDEZ: NORTH OF 61° 01.00' N. LAT.;

(2) GALENA BAY: EAST OF A LINE FROM 60° 57.63' N. LAT., 146° 45.17' W. LONG. TO 60° 58.41' N. LAT., 146° 43.34' W. LONG;

(3) PORT FIDALGO: NORTH OF A LINE FROM PORCUPINE POINT AT 60° 44.62' N. LAT., 146° 42.08' W. LONG. TO BIDARKA POINT AT 60° 49.14' N. LAT., 146° 38.45' W. LONG.;

(4) PORT GRAVINA: NORTH OF A LINE FROM GRAVINA POINT AT 60° 37.37' N. LAT., 146° 15.22' W. LONG. TO RED HEAD AT 60° 40.25' N. LAT., 146° 30.22' W. LONG.]

[5 AAC 35.312. CLOSED WATERS IN REGISTRATION AREA E. THE FOLLOWING WATERS ARE CLOSED TO THE TAKING OF TANNER CRAB:

(1) PORT VALDEZ: NORTH OF 61° 01.00' N. LAT.;

(2) GALENA BAY: EAST OF A LINE FROM 60° 57.63' N. LAT., 146° 45.17' W. LONG., TO 60°

58.41' N. LAT., 146° 43.34' W. LONG.;

(3) PORT FIDALGO: NORTH OF A LINE FROM PORCUPINE POINT AT 60° 44.62' N. LAT., 146°

42.08' W. LONG., TO BIDARKA POINT AT 60° 49.14' N. LAT., 146° 38.45' W. LONG.;

(4) PORT GRAVINA: NORTH OF A LINE FROM GRAVINA POINT AT 60° 37.37' N. LAT., 146° 15.22'

W. LONG., TO RED HEAD AT 60° 40.25' N. LAT., 146° 30.22' W. LONG.]

What is the issue you would like the board to address and why? Current closed water regulations were passed at the 2017 and 2021 board cycles and were not properly vetted at that time. A large amount of changes occurred in the Tanner Crab fishery during those board meetings. CDFU does not feel the public had ample time to digest and comment on the proposals.

Closed waters for Tanner Crab fisheries do not exist elsewhere in the state and should not exist here. In Kodiak and Southeast, both highly productive Tanner Crab fisheries, there are no closed waters for Tanner Crab fishing.

The department's justification for these closure areas was that they are "Tanner Crab nursery grounds". For many reasons, it does not make sense to close areas based on where juvenile crab might live. Tanner Crab populations do not stay in the same geographic location from month to month, or year to year. Areas where the department identifies as having high concentrations of female or juvenile crab during their summer trawl survey may look completely different by the time the winter fishery occurs. Additionally, where PWS juvenile crabs congregate can change from one board cycle to the next. It does not make sense for the department to examine and close PWS areas every time a new biomass of juveniles is found. It also does not make sense to reassess nursery closures each board cycle.

Finally, we should not create nursery closures because there is minimal potential harm to juveniles and females by crab pots. Undersized crab either escape out of the escape rings or are returned to the water unharmed. The department also does trawl surveys through these "nursery areas" and uses their catch to develop the GHL for the eastern district. This mismatch of using survey data to set a GHL from an area closed to harvest the GHL could be part of the reason the GHL was unattained in 2022.

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

PROPOSAL 32

5 AAC 02.215. Subsistence Dungeness Crab fishery, 5 AAC 32.210. Fishing seasons for Registration Area, and 5 AAC 32.290. Prince William Sound Dungeness Crab Fishery Management Plan.

Reopen the subsistence and commercial Dungeness crab fisheries in Prince William Sound, as follows:

In the subsistence taking of Dungeness crab in the Prince William Sound Area: [IS CLOSED UNTIL THE DUNGENESS CRAB STOCKS RECOVER ENOUGH TO PROVIDE A HARVESTABLE SURPLUS AND REGULATIONS ARE ADOPTED BY THE BOARD OF FISHERIES THAT REOPEN THE FISHERY.]

1. **Dungeness Crab may be taken from March 20 through May 20 and from August 25 through December 31**
2. **the daily bag and possession limit is 5 crab per person**
3. **only male Dungeness Crab six and one-half inches or greater in shoulder width may be taken or possessed; male Dungeness Crab less than the minimum legal size and female Dungeness Crab that have been taken must be immediately returned to the water unharmed; for the purposes of this paragraph, the shoulder width measurement of Dungeness Crab is the straight-line distance across the carapace immediately anterior to the tenth anterolateral spine, not including the spines;**
4. **a pot used to take Dungeness Crab under this section must have at least two escape rings that each are not less than four and three-eighths inches, inside diameter; the escape rings must be located on opposite sides of the pot and the upper half of the vertical pane of the pot**
5. **no more than 10 ring nets or pots per person, with a maximum of 20 ring nets or pots per vessel, may be used to take Dungeness Crab.**

What is the issue you would like the board to address and why? The Dungeness fishery in Area E closed in 1992 for reasons stated by the department as "low crab abundance". However, no other Dungeness Crab fishery in Alaska is managed based on abundance. Dungeness Crab fisheries from California to the Aleutian islands are managed by regulating size, sex, and season (3-S management) with no crab abundance estimates or GHs. 3-S management has proven to be extremely effective as it restricts harvest to large Dungeness males that have already had a chance to reproduce.

Incidental capture on the Copper River and by subsistence Tanner crabbers in Orca Inlet shows evidence of growing Dungeness populations in Area E; which is consistent with the recent statewide boom from Southeast to Area M. ADFG has not shared data to support their assertion of low crab abundance. The last survey conducted by ADFG was in 2013 with only 13 pot lifts - not enough data to draw population conclusions.

We ask the board to open the commercial and subsistence Dungeness fisheries using the successful 3-S management employed elsewhere in Alaska.

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-F24-127)

PROPOSAL 33

5 AAC 02.XXX. New Section.

Adopt community-based subsistence harvest permits and reporting requirements for shellfish in the Prince William Sound Area, as follows:

- (a) The commissioner or the commissioner's designee may, under this section and 5 AAC 92.052, issue community-based subsistence harvest permits and harvest reports for big game species AND SHELLFISH IN PRINCE WILLIAM SOUND ZONES in zones 466033, 466032, 466003, 466005, 466002, 466031, 456031, 456032, 456002, 4566003, 466001, 456001, 456004, and 446001 where the Board of Game (board) has established a community harvest hunt area under (b) of this section and 5 AAC 92.074

What is the issue you would like the board to address and why? Community Subsistence Harvest Permit to Include Shellfish

- (a) The commissioner or the commissioner's designee may, under this section and 5 AAC 92.052, issue community-based subsistence harvest permits and harvest reports for big game species where the Board of Game (board) has established a community harvest hunt area under (b) of this section and 5 AAC 92.074.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal was developed by the Native Village of Eyak Cultural Dept. and Dept. of the Environment & Natural Resources, recommended by the Tribe's Natural Resources Advisory Council and unanimously approved by its Tribal Council.

PROPOSED BY: Native Village of Eyak (HQ-F24-096)
