From:	Nicholas Orr
To:	Richard Yamada; Bartholomew, Annie S (DFG); cc: Kristine Trott; Thatcher Brouwer; Ed Buyarski; Kevin Maier; Atlin Daughtery; Mike Cole; terry white; Forest Wagner; Chris Miller; Peter Robertson; Jason Kohlhase; Walker, Jesse; michaelgcole@mac.com; Mike Bethers; Jesse Ross
Subject:	Re: Board of Fisheries Proposal for Consideration Tomorrow -- king crab proposal
Date:	Monday, April 8, 2024 8:23:24 AM

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I just received this proposal regarding king crab in 11-A from Grey Mitchell. I am submitting it for consideration by the AC. Sorry for the last minute nature of this.

Thanks
Nick

1. Alaska Administrative Code Number 5 AAC (if known):
5 AAC 34.111

* **2.** What is the issue you would like the board to address and why?
I would like the Board of Fish to provide enhanced protection of red and blue king crab stocks in Section 11A of Southeastern Alaska by prohibiting commercial fishing in Section 11A. Section 11A is the area immediately surrounding the community of Juneau and is subject to limited personal use seasons of just a few days with extremely limited daily and seasonal bag limits. Based on data presented in the Alaska Department of Fish and Game in Fishery Management Report No. 21-08, "Management Report for Southeast Alaska and Yakutat Red and Blue King Crab Fisheries, 2017/18 - 2019/20" (copy attached), commercial red/blue king crab openings in Southeastern Alaska have historically (starting with the 1984/85 season) led to closures in the year(s) immediately following the commercial opening (see Table 1.1, p. 13). The impact of commercial red/blue king crab fisheries has become even more clear over the past two decades, as commercial openings were followed by multi-year closures following the 2005/06, 2011/12 and 2017/18 seasons. In fact, the commercial red/blue king crab fishery has not opened since 2017/18 season and personal use red/blue king crabbing has also been closed or severely restricted in areas throughout Southeastern Alaska since that season. Shortly after the 2005/06 commercial red/blue king crab season, personal use limits were reduced from 40 per household for the summer and winter seasons to 26 in 2006/07, to 10 in 2007/08, to 10 in 2008/09, to zero until 2010/11 when the season was reopened with a 4 crab per year household limit (see Table 1.4, p. 16). The personal use annual limit for red/blue king crab was reduced to zero for four seasons following the 2011/12 commercial red/blue king crab season. The annual household personal use limit for red/blue king crab has remained dismally low to the present date. This data illustrates the devastating impact of commercial reb/blue king crabbing in Southeastern Alaska. It is also noteworthy that the economic impact of the commercial red/blue king crab fishery has been significantly reduced since the 2011/12 commercial season. Only 7 commercial

permits were fished in 2011/12 with a catch representing about 6% of the total harvest and just 13 permits were fished in 2017/18 with a catch representing about 19% of the total harvest. Nearly all of the harvestable brown king crab stocks in Southeastern Alaska are allocated to commercial interests and it is unlikely that this will change due to limitations in sport gear/vessels to effectively participate in brown king crab fisheries. With the increased personal use demand in Section 11A, the waning economic value of the red/blue king crab commercial fishery in Section 11A, and the need to provide improved protection for red/blue king crab stocks, it makes sense to restrict commercial king crabbing in section 11A and manage it solely for personal use.

Additionally, it does not make sense to restrict the number of pots under the personal use red/blue king crab fishery based on the vessel. It should be based on the permit holder. Restricting the number of pots based on the vessel restricts a few friends who each have a household permit from coordinating their resources on a single vessel. This causes personal users to spend more in fuel, etc. and take more chances by running their own boat out to check a single pot. If the pot gets flipped on its side, as many light weight sport pots do, the trip is wasted. With the high cost of fuel, etc, and the inherent risks of king crabbing for each vessel it doesn't make sense to restrict the fishery to one pot per vessel. It would make sense to allow each permit holder to fish a pot with a 3-pot limit per vessel.

* **3.** What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say? (Please provide draft regulatory language, if possible.)

I propose that the Board of Fish repeal and readopt 8 AAC 34.111 as follows:

5 AAC 34.111

(a) The Board of Fisheries (Board) finds that red and blue king crab in Section 11A of the Southeastern Alaska Area shall be allocated at 100% to personal use. The Board finds that commercial red/blue king crab harvest in Southeastern Alaska has led to severe reductions in red/blue king crab stocks since the 2005/06 season, such that personal use and commercial seasons for red/blue king crab have been closed or significantly restricted for multiple seasons following a commercial season. The Board finds that commercial red/blue king crab seasons in 2005/06 resulted in a 4-year commercial closure, in 2011/12 resulted in a 4-year commercial closure, and in 2017/2018 resulted in a 4-year commercial closure as of 2023/24. The Board finds that commercial red/blue king crab season in 2005/06 led to personal use red/blue king crab season closures in Section 11A for 2007/08 Winter, 2008/09 Summer/Winter, and 2009/10 Summer/Winter and that the commercial red/blue king crab season in 2011/12 led to personal use red/blue king crab season closures in Section 11A for the 2012/12 through 2016/17 seasons. The Board finds that 13 of the red/blue king crab commercial permit holders fished for 24 hours in Section 11A in 2017/18 and that the commercial harvest reduced crab stocks such that there

has been zero economic benefit from red/blue king crab harvest in Section 11A or anywhere else in Southeastern Alaska through the 2023/24 season. The Board finds that, particularly when measured over the years of closure following the last two openings, that the commercial red/blue king crab fishery in Section 11A is not economically significant and that due to the demand for personal use harvest in Section 11A, the section can no longer support both a personal use and commercial red/blue king crab fishery. The Board finds that significant portions of Section 11A have been completely closed to commercial red/blue king crab harvest (i.e. Auke Bay, Gastineau Channel, etc.) with little to no economic impact. The Board finds that many personal users residing in the vicinity of Section 11A do not have capabilities to safely fish for king crab outside of Section 11A (particularly in winter) and that commercial vessels and gear allow safer king crab fishing outside Section 11A in any season. The Board finds that nearly 100% of brown king crab in Southeastern Alaska are allocated to commercial permit holders and that other species of king crab should be prioritized for personal users over commercial permit holders. The Board finds that protecting red/blue king crab stocks from commercial harvest in Section 11A will help to simplify management and ensure a more sustainable resource for personal users.

(b) When managing red/blue king crab in Section 11A, the Board authorizes the department to conduct the personal use fishery as follows:

1. July 1 through September 30 (Summer Season) - 70% of the red/blue king crab guideline harvest level
2. October 1 through March 31 - 30% of the red/blue king crab guideline harvest level

(c) The personal use red/blue king crab fishery should be conducted so that the established seasons last as long as possible within the allocation plan described in (b) of this section. To accomplish this, the commissioner may close, by emergency order, a personal use red/blue king crab season, an immediately reopen a personal use red/blue king crab season, during which any of the following restrictions, selected at the discretion of the commissioner, are in effect:

1. The daily bag and possession limit is between one and three male king crab per person
2. No more than one pot per personal use permit holder may be used to take king crab
3. No more than two pots per personal use permit holder may be used to take king crab
4. No more than three pots per vessel may be used to take king crab
5. A seasonal per household limit for king crab is established by the commissioner

6.

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

The proposal was discussed with the Territorial Sportsman Inc. board for passage to the Fish and Game Advisory Committee.

On Sunday, April 7, 2024 at 06:43:06 PM AKDT, Thatcher Brouwer <thatcher.brouwer@gmail.com> wrote:

Hello all,

Attached and below is a Board of Fisheries proposal I would like the AC to consider submitting. I am sorry I did not send it out sooner.

Thanks,

Thatcher

ALASKA BOARD OF FISHERIES
Regulation Proposal Form 2023-2024
Proposals must be received Tuesday, April 11, 2023
PO BOX 115526, JUNEAU, ALASKA 99811-5526 or FAX (907) 465-6094 or online at:
https://arcg.is/1LDOCO0

BOARD OF FISHERIES REGULATIONS Subsistence Personal Use Sport Commercial
***Which meeting would you like to submit your proposal to?** Southeast and Yakutat Finfish and Shellfish Prince William Sound Finfish and Shellfish All Other Shellfish Statewide
Please answer all questions to the best of your ability. All answers will be printed in the proposal book along with the proposer's name (address and phone numbers will not be published). Use separate forms for each proposal. Address only one issue per proposal. State the issue clearly and concisely. The board will reject multiple or confusing items.
1. Alaska Administrative Code Number: 5 AAC ____47. 055_____
***2. What is the issue you would like the board to address and why?** Prohibit handling of king salmon in catch and release fisheries.
***3. What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say? (Please provide draft regulatory language, if possible.)** In areas and times where catch and release fishing is the only method for capturing king salmon, prohibit netting or handling the fish. This will reduce incidental mortality, especially for stocks of concern.

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

***Submitted By:**

***Address**	***City, State**	***ZIP Code**

Home Phone	***Work Phone**	***Email**