

November 5, 2020

ADF&G Attn: Andrew Olson
PO Box 110024
Juneau, AK 99811-0024
via email: dfg.dcf.southeastgkc@alaska.gov

Dear Mr. Olson,

Thank you for the draft golden king crab harvest strategy and opportunity to comment. We are supportive of a descriptive and transparent policy prescribing decision rules to increase/decrease Guideline Harvest Levels (GHLs) or close an area. Our comments will follow the document section by section.

Background

The background section states the current Guideline Harvest Ranges by area. Some of these GHR's have been lowered since the reference timeframe 2000-2017. You'll see that in these reference years, there are several areas where harvest exceeded the current GHR in regulation. Looking at the harvest graphs, this includes 2003-2004 and 2007-2012 in the Northern area, 2000 and 2005-2007 in the Icy Strait area, 2003 and 2008 in the Northern Stephens Passage area, and 2000 and 2002-20013 in the East Central area. If we are to adopt this suggested timeframe for computing reference points, GHR's need to be raised to coincide with these historical harvests. As an example, the redline shows the current GHR in regulation for the Northern area compared to

the 2000-2017 reference timeframe.

NORTHERN

Season Overview

The Northern management area was closed for the 2019 and 2020 seasons.

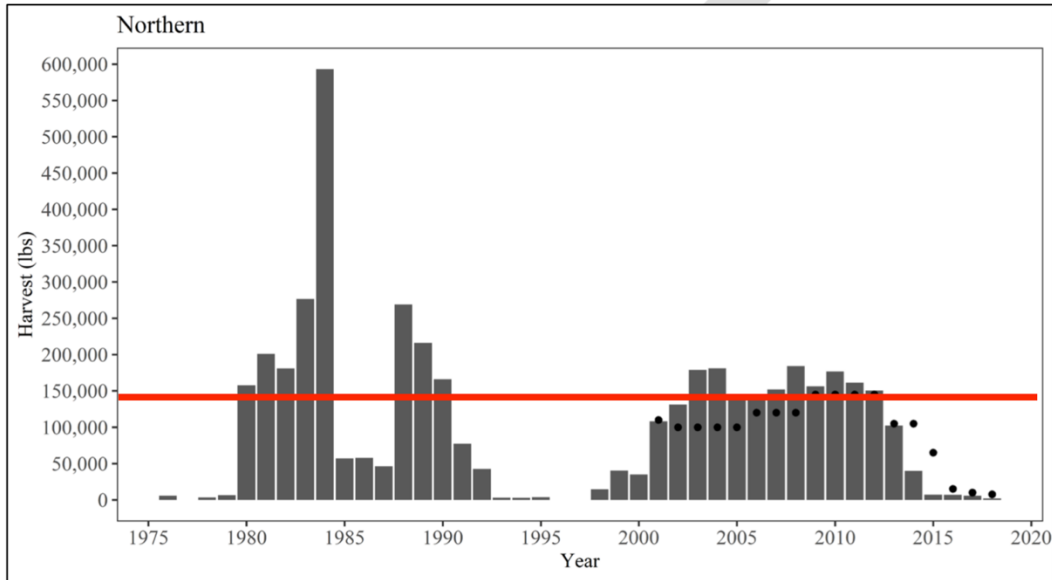


Figure 1.—Commercial GKC fishery harvest from the Northern management area. Dots represent the GHL in a given year (2001–present).

Purpose

We are supportive of the purpose statement as drafted.

Management Goals and Objective

We ask the phrase ‘*reducing dependency on annual recruitment,*’ be removed from this section. GKC are managed under the 3-S management system ensuring adequate numbers of sexually mature male crab remain in the water. We do not support additional measures be built into the harvest strategy to protect large male crab from harvest. The size element of 3-S management ensure only the larger and likely less sexually viable crab are being removed from the resource. We believe any low reproductive benefit from large old crab near the end of their life is outweighed by the economic value of these crab.

Performance Indicators

We are supportive of the computations for logbook and fish ticket CPUEs as well as an inclusion to decipher between directed and bycatch harvest of GKC in the Icy Strait and Northern Stephens Passage areas. However, we want to note that in recent seasons, there has only been one processor willing to buy GKC via tender. Fishermen selling to the other processors are selling partial loads i.e. tanner crab to one company and GKC to another.

Reference Points

We support the effort to choose a set of years that ‘represents the contrasting data (highs and lows)’ of the most recent cycle of crab in the fishery. While we understand the 2000-2017 timeframe begins with the implementation of logbook data, we ask the time frame for computing the reference points be expanded to 1995-2017. For many areas, beginning the timeframe in 2000 misses the important previous lull and increase in the fishery performance for many areas. For these years prior to 2000, we ask fish ticket CPUEs be used in computing the reference points.

We are supportive of the decision to exempt the outlier years of 2000 in Northern Stephens Passage and 2013 in Lower Chatham that would otherwise substantially inflated the reference points.

Under the 2000-2017 timeframe, the Limit reference point (50%) and Trigger reference point (75%) rates are too high, looking back on recent CPUEs and the suggested Decision Rules.

Just one example, in Northern Stephens Passage area, under the proposed 50%, the Limit reference point would be 0.8 crab/pot. From 2018-2020, the biomass and harvest has increased substantial in this area to the point the GHL was caught in under three days in 2020. Yet, under the proposed Limit reference point and Inseason Decision Rules the CPUE in the 2017/2018 season (0.82) would have prescribed a closure before the GHL was reached and a 1-year closure the following season. Data from the following seasons shows us those would have been unwarranted closures and a significant loss of economic opportunity in the fishery.

NORTH STEPHENS PASSAGE

Season Overview

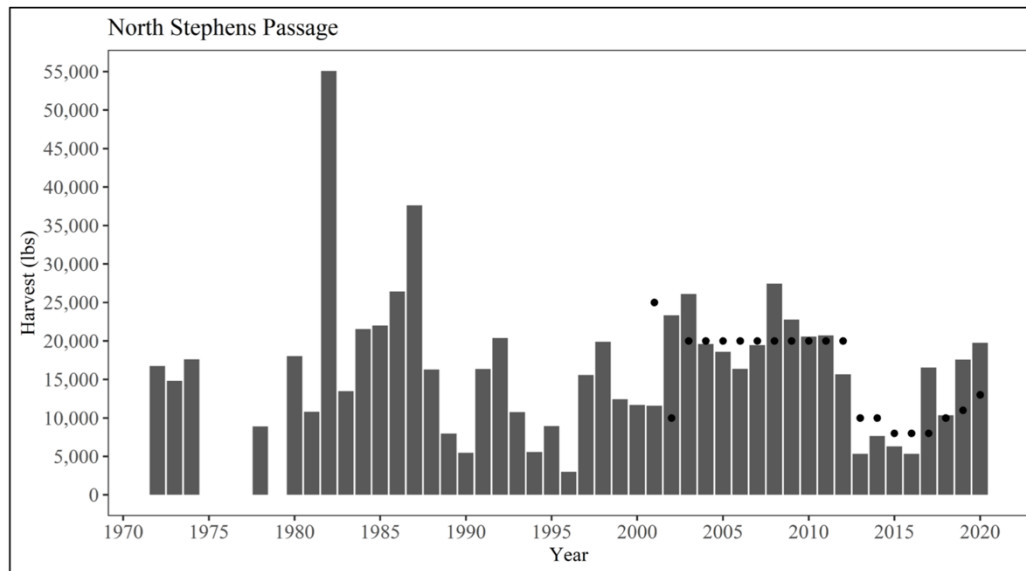


Figure 6.—Commercial GKC fishery harvest from the North Stephens Passage management area. Dots represent the GHL in a given year (2001–Present).

We ask lower rates be analyzed for the Trigger and Limit reference points in the next version of this harvest strategy.

Inseason Decision Rules

This section only includes decision rules to shut an area down short of the GHL and none to allow a GHL to be increased inseason during years of unexpectedly high CPUEs. The inability to capitalize on increases in stock abundance is further hindered by the post season decision rules that allow a GHL to decrease at double the rate a GHL can increase from year to year. We ask a rule be added to the inseason section to allow for an increase in the GHL during very high CPUEs. For example, if the CPUE after two weeks or 500 pot lifts is double the Target reference point, the GHL should increase inseason by 10%.

Postseason Decision Rules

If the proposed rule prescribing 'new GHLS may not exceed respective management area GHRs,' is to remain in the harvest strategy, we again ask the GHRs for several areas be raised to match the historical harvests during the reference timeframe.

For transparency and less of a bias towards reducing a GHL at a faster rate than one can increase, we ask that post season decisions to increase/decrease a GHL both be based off of the previous season's GHL and not the previous seasons harvest in cases of decreases. There are many factors that can affect the harvest in a year, low price and participation, bad weather, etc that could compound the amount a GHL is decreased from one year to the next under the proposed rules.

The gap between increasing a GHL no more than 20% postseason and lowering it no more than 40% needs to be narrowed. For example, if East Central reopens in 2021 at the suggested 7,500 GHL and the stock in this area is in an upcycle, even if CPUEs remain above the Target reference point consecutively, after 36 years the GHL (210,700) would still not have increased to the average historical harvest from 2000-2017. As king crab don't live this long, it's clear that the economic opportunity to harvest surplus crab when the next upcycle occurs, will be missed.

Northern Stephens Passage is another example that a 20% maximum increase in GHL from year to year is too slow during an upcycle. In 2020, the entire GHL was caught in under three days as a mainly bycatch fishery during the tanners season.

Below the red line shows the approximate GHL with 36 consecutive years of a 20% increase in GHL beginning at 7,500 pounds as an example.

EAST CENTRAL

Season Overview

The East Central management area was closed for the 2018 and 2020 seasons.

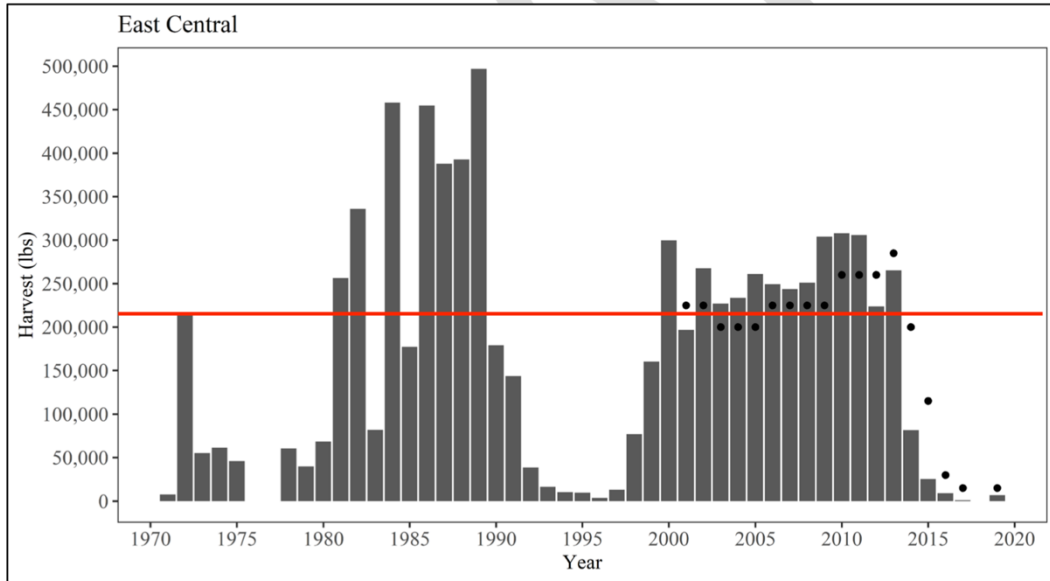


Figure 11.—Commercial GKC fishery harvest from the East Central management area. Dots represent the GHL in a given year (2001–Present).

Closure and Reopening

We also ask the 7,500 pound minimum GHL for an area to reopen be removed. For some of the smaller areas with consistently low participation, this threshold is too high. For example, if the Southern Area were to close, 7,500 pounds is a bar of 30% of the GHR that must be available for the fishery to reopen. A GHL of even 2,000 pounds of legal male crab for areas of low participation (Icy Strait, Mid Chatham, Lower Chatham, Southern Area) is extremely important to the 1-3 fishing operations in the area.

In summary, below are our specific asks for analysis in the next draft of this harvest strategy:

- Increasing the GHR's to match historical harvests during a reference timeframe of 1995-2017.
- Including fish ticket CPUE when computing the reference points for the years 1995-1999 for a timeframe of 1995-2017 with the same rates for the Trigger (75%) and Limit (50%) reference points.
- **And comparing** the currently proposed 2000-2017 timeframe using logbook CPUE only with reference points computed at lower rates to adjust for the lull and increase in fishery performance that is not captured without the inclusion of the years 1995-1999. We suggest

looking at 75% of the average CPUE for the Target, and 60% and 40% of the Target for the Trigger and Limit reference points.

- A mechanism to increase the GHLL inseason such as a CPUE of double the Target reference point allowing for a 10% inseason increase in the GHLL.
- Matching postseason decision rules when increasing/decreasing the GHLL by setting GHLLs based on the previous season's GHLL rather than the past seasons harvest when decreasing a GHLL.
- Removing the 7,500 GHLL minimum in decision rules to decrease GHLL and reopen an area.

Related to this harvest strategy, we want to note our serious concern about the ADF&G proposal for the Board of Fisheries to reduce the pot limit in the GKC fishery. This harvest strategy relies on the comparison of current CPUEs to historical harvest CPUEs under a 100 pot limit. If ADF&G and the industry continue to move forward in implementing a past to present CPUE based harvest strategy, we genuinely hope ADF&G pulls their proposal. We feel reducing the pot limit at this time would undermine the work on this harvest strategy.

A new pot limit would make future CPUEs incomparable to the past ones this strategy is reliant on. With less pots, fishermen adapt and change their practices. They will haul through a larger portion of their string a day, reducing soak times. And some may not fish multiple areas simultaneously, increasing the fishing pressure in one area while decreasing it in another. We also have concerns that lower soak times increase the handling of undersized and recruit crab, contradicting the goal of 'minimizing handling and unnecessary mortality of non-legal GKC and non-target species,' in the harvest strategy.

Thank you again for your work and commitment to creating a transparent harvest strategy for GKC with the industry. We are excited to review the next draft.

Sincerely,



Megan O'Neil
Executive Director