

PROPOSAL 251 - 5 AAC 35.510. Fishing seasons for Registration Area J. Change season closure date from March 31 to April 15 for *C. bairdi* Tanner crab in waters west of 166° W long., as follows:

5 AAC 35.510(f)(1) should be amended to read: “male *C. bairdi* Tanner crab **east of 166° W long.** may be taken from 12:00 noon October 15 until 11:59 p.m. March 31. **Male *C. bairdi* Tanner crab west of 166° W long. may be taken from 12:00 noon October 15 until 11:59 p.m. April 15;**”

What is the issue you would like the board to address and why? As it is currently written in regulation, the season closure date for *C. bairdi* Tanner crab in the Bering Sea District is March 31. This date was originally established as a way to protect molting and mating *C. bairdi* crab throughout the Eastern Subdistrict during the spring. Unfortunately, this date is based upon limited information and data for *C. bairdi* crab as determined in the Gulf of Alaska and not the Bering Sea. Applying the March 31 season closure date to both the eastern (EBT) and western (WBT) populations of *C. bairdi* Tanner crab in the Eastern Subdistrict unnecessarily restricts commercial harvesters targeting western *C. bairdi* Tanner crab. Regulations that incentivize full and efficient use of the crab resource will work to diminish wasteful discarding and unnecessary mortality. In order to allow commercial crab harvesters the opportunity to target western *C. bairdi* in the best and most efficient manner possible, while also minimizing potential negative impacts during a biologically sensitive life history period, the season ending date for *C. bairdi* Tanner crab (west of 166° W long.) should be extended to April 15.

While the western *C. bairdi* Tanner crab fishery had been closed since the 2008/2009 fishing season, commercial harvesters targeting this stock over the past several seasons (2013/2014, 2014/2015, 2015/2016) have now been encountering significant co-mingled populations of clean, legal-size *C. bairdi* and *C. opilio* during the course of their normal fishing operations for either species. With an increasing *C. bairdi* population (and increasing TAC) and a continued healthy population of *C. opilio*, vessels targeting western *C. bairdi* encounter high numbers of *C. opilio*. And when these same vessels make the conversion to target *C. opilio* after March 31, they continue to encounter high numbers of *C. bairdi* because of the geographic overlap and the biological similarity of these two species. Because the current western *C. bairdi* season closes six weeks sooner than the *C. opilio* season, early months of each season that had previously been spent targeting *C. opilio* crab are now spent targeting *C. bairdi* crab. However, a shorter season length in conjunction with currently restrictive incidental harvest limit regulations is causing vessels to unnecessarily discard incidental catch of legal male *C. opilio* crab during the early months of the season, which results in wasteful handling and discard mortality for this population. Such data is incorporated into annual species stock assessments and can negatively impact population estimates, future population projections, and future total allowable catch (TAC) amounts.

Commercial harvesters recognize and appreciate that the protection of sensitive mating and molting periods is one of the most basic and fundamental ways to conservatively manage crab stocks. As such, they actively avoid these periods during the course of their fishing operations (i.e., fishing at greater depths to avoid shallower areas where molting and mating is thought to occur). The federal King and Tanner Crab FMP states that fishing seasons are used to protect crabs during the molting and mating portions of their life cycle and that closed seasons are set to maximize the

reproductive potential of crab populations; however, the FMP also states that king and Tanner crab seasons may be combined to minimize handling mortality, to maximize efficiency, and to reduce unnecessary administrative and enforcement burdens. The FMP states that seasons may also be combined when a given species is taken primarily as an incidental catch and it acknowledges that the specification of fishing seasons is important in achieving biological conservation, economic and social, vessel safety, and gear conflict objectives. For commercial harvesters, there is a need to strike a balance between unnecessary and wasteful mortality to one crab population with the minimal potential for fishery impacts to the sensitive life history period of another population.

If the current season closure date for *C. bairdi* crab is retained, discards and their associated mortality will likely increase as the overlap and species interaction between *C. bairdi* crab and *C. opilio* crab increases. One of the many benefits outlined and achieved with implementation of the Crab Rationalization program was improved resource conservation such that previously depleted stocks have been able to recover to healthy and sustainable levels. However, healthy populations of multiple, overlapping crab stocks now necessitate more flexibility for harvesters targeting those stocks so that unnecessary discards and mortality are not incentivized in direct opposition to the conservation benefits achieved. This flexibility will provide for increased efficiency in operations for harvesters by reducing the need for operators to focus solely on *C. bairdi* earlier in the season and by allowing the greatest maximum retention of all legal male crab species harvested. This will result in fewer pots being hauled throughout the season, which not only lessens the amount of time spent on the water while increasing CPUE, but it has the added benefit of increasing crew safety by decreasing the amount of time spent handling pot gear. Further, this flexibility will work to increase the efficiency of deliveries of crab to coastal communities, especially to the community of St. Paul. This will result in increased fish taxes, business taxes, and other fees (i.e., fuel sales and supplies), which are a critical source of revenue not only for coastal communities, but for the State of Alaska.

PROPOSED BY: Alaska Bering Sea Crabbers; Central Bering Sea Fishermen’s Association;
and the City of St. Paul (HQ-F16-018)
