

**PACIFIC NORTHWEST CRAB INDUSTRY ADVISORY  
COMMITTEE (PNCIAC)**

Lance Farr, Chair  
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Mr. Glenn Haight, Executive Director  
Alaska Board of Fisheries  
P.O. Box 115526  
Juneau, AK 9981  
Fax: 907 465 6094

Re: Proposal 278

Dear Mr. Haight

The Pacific Northwest Crab Industry Advisory Committee (PNCIAC) is the Alaska Board of Fisheries (AKBOF) and North Pacific Fishery Management Council (NPFMC) designated non-resident industry advisory committee, representing industry participants from Washington and Oregon. It was established in 1990 at the time that the Bering Sea and Aleutian Islands King and Tanner Crab Fishery Management Plan was approved by the Governor of the State of Alaska, followed by the Secretary of Commerce. PNCIAC has balanced representation of harvesters and processors. PNCIAC since its beginnings, has worked with the Board of Fisheries, ADF&G, the NMFS, and the NPFMC. Together, the PNCIAC and the agencies have worked together to improve resource management.

PNCIAC supports Proposal 278 to have a conservative harvest of *C. baridi* in the Western district. Proposal 278 is not a long-term fix but will allow a harvest this year and expire in 120 days. PNCIAC feels that *C. bairdi* is not depressed with the mature male biomass the 5<sup>th</sup> highest throughout the survey time series, with a mature male biomass of 99.95million lbs.

Survey methods have changed across the early portion of the reference period, 1975-2010. Modification of the trawl net used by NMFS annual surveys starting in 1982 changed the selectivity of the survey for crab. The existing mature female *bairdi* biomass threshold is biased by higher survey selectivity in the early period (1975-1981) and lower survey selectivity in the later years (1982-2010). Information relative to the NMFS survey and the definition of mature females that the Board should consider that may indicate that mature female biomass is underestimated in 2016. The Bering Sea Research Foundation survey results adjusted to the NMFS survey estimates of mature female *bairdi* would reflect a mature female biomass of 9.94 million lb., exceeding the 9.832 mil lb. threshold by about 1%. Mature male *bairdi* abundance in 2016 is higher than any closed season year, and mature female *bairdi* abundance is the third highest in closed season years.

According to observer data and PNCIAC-members who have harvested *Bairdi* since the 1970's, the fishery targets males with little incidental catch of females. You just don't see females in our pots. There was a small decrease in female and an increase in male crab abundance suggesting a fishery is possible in the west without threatening sustainability of the stock. PNCIAC feels the current harvest strategy information relative to the NMFS survey and the definition of mature females that the Board should consider may indicate that mature female biomass is underestimated in 2016.

PNCIAC also is worried about having incidental retained bycatch of bairdi on board when fishing Opilio, which having a conservative harvest would alleviate the problem of violations for having any bairdi on board.

PNCIAC feels that the harvest strategy for C. baridi is antiquated and needs to be updated. PNCIAC would support long term changes to the harvest strategy in time for the 2017/2018 season.

Thank you in advance for your consideration,

Regards,



Lance Farr, Chairman  
PNCIAC