May 10, 2017

Mr. Glenn Haight, Executive Director
Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 9981

Re: PNCIAC recommendations to Board of Fisheries Bairdi Harvest Strategy Revisions

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, PNCIAC and the agencies have worked together to improve resource management.

PNCIAC appreciates the Alaska Department of Fish and Game and the Board of Fish having a special meeting to address the bairdi crab harvest strategy in time for an updated harvest strategy to be ready for next year’s TAC setting.

PNCIAC considered a list of considerations in RC 35 from the March 20-24 Board of Fisheries meeting as well as the Board Generated Proposal 281 submitted by the Alaska Department of Fish and Game.

PNCIAC members found unanimous agreement for the following recommendations to the Alaska Board of Fisheries:

- a) improve the definition of female maturity determination to include actual maturity rather than only carapace measurement.
- b) include crab west of 173° and/or other areas not currently included in the biomass estimate but for which survey data are consistently available
- c) using the same reference years as in the federal stock assessment (1982-2016)
- d) PNCIAC does not support the 50% TAC penalty following a closed year
- e) support alternatives to a single open/close threshold such as alternatives to the on/off switch based solely on a female threshold being met.
f) Male threshold – in years with low female abundance and high male abundance, PNCIAC supports a mechanism in the harvest strategy to allow for a harvest the excess male crab.

PNCIAC also supports continued assessment of the following issues, recognizing that these are part of a longer-term effort.

a) Consider using selectivity data from the stock assessment
b) Consider using stock assessment model outputs as the basis for the harvest strategy
c) Evaluate existing additional conservation buffers (new shell/old shell selectivity)
d) Evaluate alternative measures for the female abundance threshold (e.g., fertilization rate; egg production index; effective spawning biomass; total mature biomass)

Thank you in advance for your consideration,

Regards,

Lance E. Farr, Chairman
PNClAC