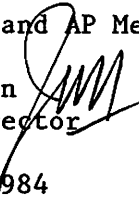


M E M O R A N D U M

TO: Council, SSC and AP Members

FROM: Jim H. Branson 
Executive Director

DATE: January 24, 1984

SUBJECT: King and Tanner Crab Fishery Management Plans

ACTION REQUIRED

Schedule joint Council/Board public hearing in Seattle prior to the March meeting. Discuss level of Council involvement in Board deliberations.

BACKGROUND

As outlined in the Joint Statement of Principles and the Bering Sea/Aleutian Islands King Crab FMP adopted by the Council and the Board in September 1981, both bodies have agreed to host one joint public hearing in Seattle in order to provide all interested persons and agencies the opportunity to comment on the management of the fisheries. During the last two years, the public hearing has been scheduled in early March. The staff of the Council and Board have reviewed their respective schedules and have suggested that the hearing be held on Friday, March 9, 1984, at the Northwest and Alaska Fisheries Center.

Since the September 1983 meeting, the Council and Board staffs have met twice to discuss working procedures between the two groups. Some of the improvements, such as a streamlined agenda and summarized staff reports, are being tested at this meeting. For the March joint meeting, these improvements will be accompanied by management proposal summaries and identification of proposals which may present problems to the Council and NMFS. Proposals will be reviewed for applicability under federal law with any problems discovered being communicated to the Board during their public comment period. This exercise should provide valuable information to both the Council and the Board on questionable regulatory proposals.

At the December meeting, the Council discussed increasing their involvement at the joint shellfish meeting. It was felt that given more active participation with the Board, there would be a reduction in regulatory inconsistencies and a trend toward a more cooperative and uniform shellfish management program. The Council in the past has met with the Board to receive staff reports and public testimony. Following this part of the meeting, there has been a general discussion of the issues prior to the Board and Council separating and continuing their respective meetings on their own. The Board usually discusses the individual proposals further before acting on them. The Council has suggested that Council involvement at this point in the decision-making process (for example by a Council subgroup) may be helpful to the Board. The Council may want to discuss this idea further.

Upcoming events for king and Tanner crab management are provided for your information, as Item D-3(a).

Amendment 9 to the Tanner Crab FMP, which established a framework procedure for setting fishing seasons and updates MSY and ABC values, was approved by the Council for Secretarial review at the July 1983 meeting. The amendment package was submitted to Washington, DC on December 22. We have learned that although the amendment package is structurally complete, NMFS will not begin Secretarial review because they have concerns about the adequacy of the RIR/RIA they discovered in a "pre-review" of the package. The "concerns" by the Central office are included in your notebooks as Item D-3(b).

With the precipitous decline in Alaskan king crab stocks, there has been some question as to what research is being done on the species. Included with your meeting materials is a summary of ongoing and proposed king crab research. The report is listed as Item D-3(c).

Upcoming Events for King and Tanner Crab Management

- December 1983 A call for shellfish regulatory proposals.
- Announcements are made via mailing lists and press releases.
 - Proposals are submitted to ABOF.
- January 6, 1984 Proposal deadline; preparation begins on proposal packet.
- January 27 Proposal packet distributed via ABOF mailing list for public comment; packet available to Council staff for review. Review will include: identification of those proposals which may be difficult to justify, implement, etc. (i.e., lack of objectives, failure to meet federal requirements).
- Proposal packet is available approximately 60 days prior to annual meeting.
- March 7 Written comments on proposals from public and Council staff due to ABOF.
- March 19 Joint Council/ABOF public hearing in Seattle on shellfish proposals.
- March 28-29 Annual Council/ABOF shellfish meeting in Anchorage.
- staff reports
 - public comment
 - joint discussion of proposals
 - Council recommendation to ABOF
 - ABOF action on proposed regulations
- April 25 ABOF distributes written statement explaining the basis for any new regulations adopted at the annual meeting.
- May 30 Council reviews ABOF action.
- June 15 New State king and Tanner crab regulations go into effect.
- Aug. - Nov. Bering Sea/Aleutian Islands king crab fisheries begin.
- Nov. - Feb. 1985 Alaska Tanner crab fishery begins.

ABOF = Alaska Board of Fisheries
NMFS = National Marine Fisheries Service



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Washington, D.C. 20235

F/M11:WPJ

JAN 19 1984

TO: F/AKR - Ron Berg
FROM: F/M11 - W.P. Jensen
SUBJECT: Tanner Crab Amendment #9

Our initial review of the Tanner Crab Amendment #9 indicated that the package was not structurally complete. There is no Regulatory Flexibility Act analysis and the analysis in the Regulatory Impact Review does not meet the requirements of E.O. 12291. The analysis of the changes in Maximum Sustainable Yield and Acceptable Biological Catch is extremely brief and as a consequence cannot be evaluated in terms of impact on income of processors or shoreside employment. After reviewing the draft supplemental language you submitted, at our suggestion, which would defer the detailed analysis of the impact of the season changes until such time as specific dates are proposed, and reviewing the pros and cons of the various approaches to satisfying the structurally complete test, we have concluded that the preferable approach is to include the analysis in the RIR now.

Several substantive issues are involved; the precedent-setting nature of deferring the analysis and the impact on other framework plans; compliance with E.O. 12291; the basis on which OMB exempted rule-related notices from review; current delegation of authority; and the clear need for Councils to do the analyses prior to sending actions forward for Secretarial action and public comment.

We believe Tanner Crab #9 should be returned to the Council by the Regional Director to remedy the following problems, in accordance with the guidelines (Pages 20-27).

- (1) Regulatory Flexibility Analysis The current combined RIR/RFA does not include any estimate of number of entities involved or affected, nor does it include any analyses or statement regarding compliance costs, recordkeeping, effect on competitive position, etc.
- (2) Extend the projection of ex-vessel crab prices based on OY/ABC levels to an analysis of the impact on the crabbers and processors. This is required by E.O. 12291 and Regulatory Flexibility Act.
- (3) The RIR must analyze some range of impacts which may result; either beginning or ending dates, number of days in the season, effect of changes triggered by CPUE, meat yield, or other definable criteria.

We are cognizant of the difficulties of managing the Tanner crab fishery and the problem of separating the impacts of resource declines and regulation, however that should not be reason for Councils to explain away the need for detailed analysis.

The framework concept in Tanner Crab #9 is similar to the framework plan for California, Oregon, Washington (COW) Salmon and several other plans. We have a meeting scheduled with Department of Commerce and Office of Management and Budget representatives on January 24 to discuss the framework COW Salmon plan. The response we get on salmon will likely be applicable to Tanner Crab #9 and set the stage for how we handle these framework measures in the future.

The salmon and tanner crab amendment are indicative of the increasing conflict between flexible management regimes and the difficulty of analyzing the impacts. It may be that new procedures will be required to permit the adoption of broad framework FMP's and some expedited rulemaking procedures to implement specifics (such as seasons or other harvest controls) or change them.

For example, in the Tanner crab amendment, Council may want to consider setting up the framework as proposed with a full rulemaking procedure, associated analyses, and public review to establish the season dates prior to the season, but use rule-related notices for adjustments or closure in-season.

Attached is a suggested outline of analyses which we believe will satisfy the requirements of E.O. 12291.

Attachment

Suggested Outline for the Tanner Crab Amendment #9 RIR/RFA*

1. Introduction - Discuss the background of the fishery as well as previous management actions.
2. Statement of the Problem
 - a. Season Adjustment Framework Measure - Discuss problems with the process as it relates to changes in the State regulations as well as problems caused by the changing character of the fishery, including
 - Environmental factors which impact meat recovery rates, deadloss or the reproductive potential of the crab population.
 - Weather conditions.
 - Conflicts with other fisheries or alternate tanner crab seasons.

The discussion should relate specific problems in the above factors during the recent past which require changes in the existing system.

- b. Changes in MSY and ABC/OY - Discuss any new information received which necessitates changing these factors. What problems have occurred which necessitate the development of ranges?
 - c. Changes in Field Order Authority - Discuss problems which require and expansion of the field order authority.
3. Objectives - The objectives should discuss the overall goals to be achieved. There should be a restatement, change or addition to the objectives in the FMP. The objectives should not be a reiteration of the proposed management measures.
4. Analysis of Alternatives: It is not sufficient to consider only the qualitative benefits of alternatives to the process of establishing seasons. An analysis of impacts should be conducted within a benefit/cost framework through a series of scenarios. Incremental changes from the status quo or some normal situation should be considered. By authorizing changes to be made from the status quo, what benefits will be obtained or what costs will be incurred? A summary of the benefits and costs should be developed to arrive at an estimate of net benefits under different situations.

a. Adjustment of Seasons

Because this is a framework measure we must analyze the impacts of the reasonable range of regulatory measures. In this case we would, at a minimum, analyze the impacts of the earliest reasonable opening or a delayed opening relative to the status quo or some other normal date. A similar analysis should be conducted for closing dates.

* This outline is meant to represent a guide for a standardized approach to this RIR/RFA which would make it more acceptable to reviewers at DOC, OMB and SBA. In some instances, the requirements are already satisfied or in others could be met by some reformatting/shifting of existing analysis.

Generally we should consider any impacts on the revenue or cost of harvesters, processors or consumers. The factors which have been proposed as a basis for setting seasons would also seem to provide the basis for analyzing the impacts of the action. Possibly several of the factors could be combined in the analysis. Also, it should be noted that the analysis need not be tied to specific calendar dates, i.e., impacts result from the timing of resource conditions which are not necessarily calendar dependent. Some ideas for the analysis of specific factors are:

- Changes in environmental factors which affect population reproduction, meat recovery rates, and handling mortality/deadloss. The earlier the season opening the more we could impinge on the reproductive period, incur lower meat recovery, and cause higher handling mortality. While these factors may have only a minor impact we need to provide an analysis of the impacts on poundage landed/recovered, prices received, and total revenue received in order to specify the degree of impact.

- Costs associated with weather conditions. As noted, weather conditions can affect loss of fishing time or equipment if the season is significantly delayed. On the other hand, benefits from reduced fishing time or gear loss could be realized if the season were to begin earlier. Again, an analysis would permit us to determine the degree to which this would impact the fleets and processors.

- Costs or benefits associated with conflicts among tanner crab seasons or conflicts with other fisheries. The current configuration of seasons allows for a spreading of fishing effort, prevention of gear saturation and an allowance for participation by all elements of the fleet. What costs would be imposed if these goals were not achieved? Possibly some measure of productivity could be utilized to estimate potential losses. Also, losses in revenue or lower prices from an overburdening of processing or transportation systems could be considered. Would there be an impact on any other fishery with consequent impacts on revenues or prices? Any impacts on processors in terms of startup costs, or the costs of diminished supply because of season changes should also be considered. Employment impacts should also be analyzed.

- Enforcement and management costs. We need to analyze the costs of enforcement or management as they relate to changes in seasons. Will costs be higher if the season is delayed or if the configuration of seasons by district are changed? If conflicts occur with other fisheries the costs of enforcement should also be analyzed.

b. Updating the Values of ABC and Establish New OY Levels.

Because values for optimum yield are derived from the amended ABC's we need to analyze the impacts of potential changes in ABC levels on both harvesters and processors. We should consider any changes by area and attempt to estimate what impact those changes will have in total and on local fleets or processors. Specific areas of concern include:

- Changes in poundage landed

- Price impacts
- Revenue impacts
- Employment impacts

5. Rationale for Selection of the Proposed Alternative: Provide a discussion of the reasons why the proposed alternative provides the best solution to the problem as well as providing the greatest net benefits to society.

6. Regulatory Flexibility Analysis: The classification section indicates that the action is "Significant" under the RFA. However, there does not seem to be an analysis which supports this determination. Specific areas of analysis which could serve as a basis for the finding include:

- Determine the total number of tanner crab vessels compared with the number of small vessels in the fleet.
- Determine the number of small vessels that may be affected.
- Determine the costs of compliance, such as lost revenue or higher operating costs, as a percentage of average revenue.
- Determine the impacts of allocations which may result from the establishment of seasons. While this may be difficult to quantify, a qualitative analysis should be prepared which discusses the consequences of alternate seasons on small vessels. For example, if "grazing" is allowed what would be the impact on small vessels.

King Crab Research Summary

by Steve Davis

During the late 1970s, Alaskan king crab fisheries produced record harvests. In 1980, Alaska harvests totaled 186 million pounds of king crab with 130 million pounds being harvested from Bristol Bay. Since 1980, king crab harvests have experienced a dramatic decline. In 1982, Bristol Bay produced only 3 million pounds of king crab and in 1983, the area was closed to fishing because the level of sexually mature crabs was the lowest on record.

Why has the king crab population declined so dramatically? Is the decline due to a normal fluctuation in population size? What contributed to the decline? Will the king crab resource recover? These questions have been asked since 1981 and remain unanswered due to a general lack of scientific information on king crab. However, shellfish biologists familiar with Alaskan king crab have identified nine possible causes of the decline. They are (not necessarily in order of possibility): (1) disease; (2) predation by cod and halibut; (3) mortality from derelict commercial fishing gear of all types; (4) loss of king crab to trawls and Tanner crab pots; (5) loss of reproductive potential; (6) ecological and environmental factors; (7) commercial fishing activity; (8) tagging mortality; and (9) while not a cause of significant mortality, survey techniques could be improved for greater accuracy.

There are several ongoing stock assessment and research programs being conducted on Alaskan king crab. The programs are being run by state, federal and academic organizations. There is no coordinating body monitoring these programs and identifying new areas for investigation. Proposals for additional research projects have been submitted to funding agencies. Still, there are areas of king crab research that have been identified that will probably receive no funding. The following is a brief review of ongoing and proposed research and suggestions for possible future investigations. This summary is being provided for your general information.

Stock-Assessment Surveys

NWAFC - Summer Trawl Survey in the Bering Sea/Aleutians; provides information pertaining to population size, size frequency, sex ratio and overall condition of king and Tanner crabs. Also supplies data on other fish species including possible crab predators.

ADF&G - Summer Pot Survey in the Dutch Harbor, Kodiak, Cook Inlet, Chignik and South Peninsula areas; provides information on relative abundance of localized crab stocks based on CPUE. During the survey, the general condition of egg clutches is noted.

On-going Research

NWAFC (Seattle) - Dr. Al Sparks is conducting an intensive pathological investigation into the fecundity problem with king crab. Specifically he is examining Bering Sea red king crab for a possible viral disease and a microsporidian (Family Protozoa) where he has already found some evidence. He believes that both diseases could be strong factors contributing to the king crab decline. In king crab where such diseases have been found, the crab have been sterile.

University of California (Bodega Bay Lab) - Dr. Dan Wickham is currently working with ADF&G in Kodiak investigating the apparent outbreak of worm infestation in egg clutches. It has been identified as a Nemertine worm, similar to one found off California in Dungeness crab eggs. This worm is thought to be an egg predator and has become very abundant in Cook Inlet and some Kodiak crab stocks.

A proposal is currently being prepared by University of Alaska - Sea Grant to expand this investigation here in Alaska.

NWAFC (Auke Bay) - Dave Clauson is studying brown king crab biology on a part-time basis.

IPHC - The halibut commission is continuing its study of crab pot inserts, designed to reduce the incidental take of halibut in crab pots.

Proposed Research

University of Alaska

- Size at maturity study for Pribilof blue king crab. Proposal submitted to U.A. Sea Grant; scheduled to start in 1985, will probably take several years to complete.
- Effect of low male abundance to king crab molting, mating and egg extrusion. Proposal submitted to the U.A. Sea Grant; scheduled to begin in 1985.

*ADF&G

- Identification and evaluation of fishery conflicts; evaluate the incidental catch of king crab, Tanner crab and other prohibited species in trawl fisheries and non-target pot fisheries.
- Adak king crab stock assessment; assess Adak red king crab stocks, determine optimum harvest levels and forecast future abundance.
- Norton Sound king crab studies; provide in-season monitoring of the summer commercial fishery and investigate migrational patterns of stock and impact on winter subsistence fisheries.

- Population assessment equipment for shellfish, groundfish and herring; provide two new state-of-the-art tag recovery devices for non-visible king and Tanner crabs in order to improve the estimation of commercial fishery exploitation rates associated with the problem of non-reporting of visible tags.
- Northeastern Bering Sea king crab research; provide essential population assessment information on blue king crab stocks in the St. Matthew and Pribilof Island regions.
- Assessment feasibility of Aleutian brown king crab stocks; determine the feasibility of assessing deep water brown crab stocks using conventional pot indexing methods developed for red king crab.

Additional Ideas for Future Crab Research (developed by King Crab PDT)

- Monitor Foreign Incidental Catch of Crabs More Precisely
 - a. 100% observer coverage
 - b. More detail on crab size and condition
 - c. Program paid for by industry or state
- Develop Disease Study Capability
 - a. Fund or support (State) Grischkowsky, Sparks (NMFS) or both
 - b. Possible new state pathologist positions
 - c. Collect tissue or live crab samples for other investigators to use
 - d. Fund nemertean egg predator studies
- Determine Major King Crab Predators, Particularly Predation on Crabs 3 Years and Older
 - a. Study feeding habits of cod at key times in key areas
 - b. Study predation on juvenile and larval crab
 - c. Determine other major predators (Sculpins, yellowfin sole, etc.)
- Study Reproductive Condition of Females
 - a. Progressive egg loss evaluation through multiple surveys
 - b. Determination of cause through sample analysis
 - c. Support existing and promote new studies in nemertean egg predation
- Improve Crab Assessment Surveys
 - a. Increase funding so surveys can be conducted for all major stocks
 - b. Charter funds for re-examination of key problem areas
 - c. Develop position on whether surveys can be reduced during low abundance periods

*Note: The above ADF&G proposals have been submitted for inclusion in the 1984 fiscal year budget request. The research programs total over one million dollars and have been submitted as part of ADF&G's budget request the last two years. They have not been funded.

- Handling and Gear Mortality
 - a. Evaluate pot and trawl on-bottom mortality
 - b. Evaluate pot and trawl off-bottom mortality
- Study on Rehabilitation of Crab Stocks
 - a. Investigate hatcheries or aquaculture systems (of immediate importance regarding future planning of facilities for Kodiak Technological Center)
 - b. Reintroduce crabs into depleted areas (requires disease-free crabs)
- Improve Recovery of Unreported Tagged King Crab
 - a. Public education
 - b. Improve reward system
 - c. Improve recovery effort
 - d. Perform quantitative in-season evaluation of recovery program success
- Development of Non-visible Permanent Crab Tag
 - a. Macro or micro-wire tag and coding development
 - b. detecting equipment funds
- Research Facilities and Equipment Upgrades
 - a. Marine lab facility - ADF&G or Kodiak Technological Center
 - b. Underwater video, 2-person submersible, diving gear, aquariums and/or holding pens for field or laboratory
- Reduce Predation Through Increased Groundfish Utilization
 - a. promote marketing
 - b. Support for Alaska Seafood Marketing Institute
 - c. Impose few restrictions on groundfish fishery
- Examine Correlation of Environmental Parameters With King Crab Recruitment
 - a. Effects of environmental change on early life history and larval survival
 - b. Effects of temperature on reproduction

Other

- International King Crab Symposium; to be held during January 1985; will draw together worldwide experience concerning the research and management of king crab. To be jointly funded by NPFMC, ADF&G and U.A. Sea Grant.
- Dr. Jerry Reeves (NWAFC) plans to prepare a report outlining all the various hypotheses for the king crab decline and summarizing what is currently known about king crab biology. He hopes to be able to weigh the many possible causes, based on our scientific knowledge, and list them in order of likelihood. For example, in 1982 the hypotheses that handling mortality was a primary factor was put forward because of the large number of pots being lifted in recent years. In the 1982 trawl survey, there appeared a larger number of juvenile crabs about 3-4 years away from the fishery. Following a shortened Bering Sea king crab fishery which resulted in a reduction in pot lifts from 500,000 to 150,000, the 1983 survey showed that this age-group of crab suffered heavy mortality between 1982-83. It appears that something besides handling mortality is affecting the crab stocks.

Important Synonyms

NWAFIC - Northwest and Alaska Fisheries Center
ADF&G - Alaska Department of Fish and Game
U.A. - University of Alaska
IPHC - International Pacific Halibut Commission
NPFMC - North Pacific Fishery Management Council

PRESS RELEASE

There had been speculation that the State of Alaska would not enforce the State Board of Fisheries regulations, regulations that are intended to protect our fishery resources. Colonel Robert Henderson, Director of the Division of Fish and Wildlife Protection, with the concurrence of Governor Bill Sheffield, and the Commissioner of Public Safety state that the Department of Public Safety, Division of Fish & Wildlife Protection, will be enforcing all of the regulations passed by the Alaska Board of Fisheries, including 5 AAC 35.525 (b) - which establishes a 200 pot limit for vessels registered to fish in the Kodiak District - and 5 AAC 35.020 (a)(1) and (b) - which establish super-exclusive registration in the Southeastern-Yakutat area, Prince William Sound area, Cook Inlet area, and the combined South Peninsula and Chignik Districts. This latter regulation prohibits any vessel or gear registered for a super-exclusive registration area from being used to take Tanner Crab in any other registration area during the same registration year. Since the registration year runs from August 1 through July 31, any vessel or gear which was used in a super-exclusive area during the early Tanner Crab seasons may not be used in any other registration area during the Tanner Crab seasons beginning in February.



AGENDA D-3
**UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration**

National Marine Fisheries Service

P.O. Box 1668

Juneau, Alaska 99802

January 30, 1984

James D. Campbell, Chairman
North Pacific Fishery Management Council
P.O. Box 103136
Anchorage, AK 99510

Dear Jim:

The National Marine Fisheries Service has determined that the amendment package for Amendment 9 to the fishery management plan for the Commercial Tanner Crab Fishery Off the Coast of Alaska is structurally incomplete and, therefore, formal Secretarial review is not being initiated at this time. Amendment 9 was approved by the Council at its July 1983 meeting and submitted to the Washington Office on December 21, 1983. It was received on December 23, 1983. Amendment 9 is intended to accomplish the following:

- establish a framework provision for setting Tanner crab fishing seasons;
- broaden the Secretary's field order authority to adjust seasons and/or fishing areas for socioeconomic reasons; and
- establish new optimum yields for Tanner crab stocks based on the best available scientific information.

The package is determined structurally incomplete because the Regulatory Impact Review/Initial Regulatory Flexibility Analysis (RIR/IRFA) prepared on the proposed rules that accompanied the amendment does not contain sufficient information to satisfy requirements of Executive Order 12291 and the Regulatory Flexibility Act. According to the Operational Guidelines--Fishery Management Plan Process, 1983, the RIR must contain:

- sufficient information to understand the problems that need to be solved;
- economic and social consequences of the preferred regulatory change and alternatives considered but rejected;
- sufficient information to determine whether the benefits outweigh the costs;
- description and estimate of the number of small entities (vessels) and total number of entities in a particular affected sector; and





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Page 1

The following information was obtained from the records of the Department of Education concerning the activities of the [redacted] in the [redacted] area. The information was obtained from the files of the [redacted] and is being furnished to you for your information.

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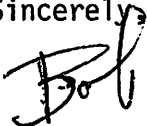
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- ° analysis of economic impacts on small entities that addresses such factors as direct and indirect compliance costs, effects on the competitive position of small entities, small entities' cash flow and liquidity, and ability of small entities to remain in the market.

Framework management measures are relatively new concepts, especially to the Office of Management and Budget (OMB) which must determine whether the rule-related notices, by which management measures would be implemented, fall within the categories exempted from OMB review. We stress, therefore, the necessity of preparing RIRs for framework measures that are sufficiently broad in scope such that OMB may judge the possible impacts of annual regulatory actions under all reasonable scenarios. We request, therefore, that the Council amend and resubmit the RIR for Amendment 9 with the objective in mind that OMB shall judge the merits of the implementing rule only once through its review of the RIR and thus, by doing so, will exempt future regulatory actions from additional review as envisioned for the framework process.

We have sent to the Council staff a copy of a memorandum from the Washington office that details certain deficiencies in the RIR and recommendations on how to resolve them. Our Regional staff has offered to help in this endeavor and could prepare an initial draft for Council staff consideration.

Sincerely,



Robert W. McVey
Director, Alaska Region

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