

September 8, 1981

Alaska Board of Fisheries  
Support Building  
Juneau, Alaska 99801

Gentlemen:

The Alaska Crab Institute, the Alaska Marketing Association, and the North Pacific Fishing Vessel Owners' Association, which represent the harvesters and processors of king crab in Bristol Bay, have serious doubts about the accuracy of the 1981 National Marine Fisheries Service (NMFS) trawl survey for king crab. If the trawl survey's estimate of legal male king crab in Bristol Bay proves correct, then a harvest of less than 40 million pounds (assuming a .6 exploitation rate is selected) will cause massive and far-reaching economic hardships for the fishermen, processors, buyers and communities dependent on the king crab resource of Bristol Bay. All of us are concerned the trawl survey will be the controlling factor in determining how long the Bristol Bay fishery will run and the actual condition of the resource, as evidenced by fishing efforts, will be discounted. Based on facts available to us, we ask that the Board of Fisheries allow the Bristol Bay king crab fishery to continue until fishing becomes uneconomical for the fleet.

Many fisheries biologists believe that if the exploitation rate on all male crab 6-1/2 inches and larger were increased to nearly 100 percent, there would be no detrimental effects on future king crab spawning stocks. This conclusion was reached after analyzing the available data and assuming that fishermen inflicted a mortality rate as high as 50 percent in handling pre-recruit crab. However, no matter how long a season lasts, none of us believe that the handling mortality on these crab would approach 50 percent.

The NMFS trawl survey, as presently conducted, does not cover all areas of Bristol Bay and knowledge of the status of the entire Bristol Bay resource is incomplete. If the season is to be short, vessels-out of necessity-will venture only to those areas charted by the survey; during a short season skippers cannot risk fishing those areas untouched by the survey. Consequently, large concentrations of crab which may be found in these unsurveyed waters and whose presence is not reflected in the trawl survey would remain unharvested by the fleet.

We also would be remiss if we did not point out the 1981 halibut survey conducted by the International Pacific Halibut Commission (IPHC) indicates there is a greater abundance of male red king crab 6-1/2 inches and larger in Bristol Bay than shown by the NMFS trawl survey. The IPHC survey, as assessed by Dr. Jerry Reeves of NMFS, shows 15 million legal crab in this area; the NMFS trawl survey places the figure at 10 million crab.

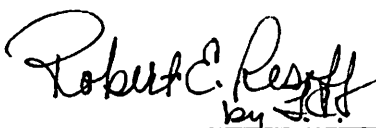
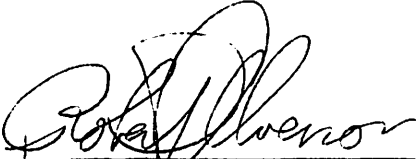
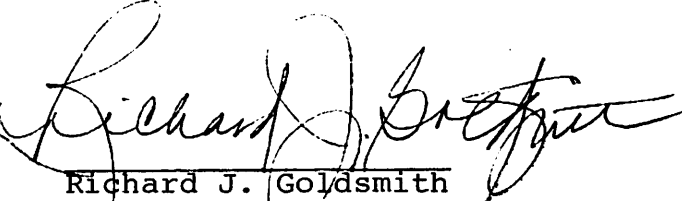
To encourage exploration, expand our knowledge of the resource, and avert possible economic disaster, we request a season for the 1981 Bristol Bay king crab fishery which extends 60 days beyond the time when biological indices such as catch per unit of effort and total catch would, in the past, have indicated that the fishery should be closed. This extension should encourage the fleet to harvest crab in lightly fished or previously unfished areas; it would also enable the fleet to harvest many of the large number of skip molts indicated by the NMFS trawl survey. These skip molts are crab which due to high natural mortalities would otherwise be lost to future fisheries.

We further request that the Board require its staff to place qualified biologists, throughout the season, on selected vessels to sample and analyze the catch. This data should enable fisheries scientists to more accurately ascertain age and sex compositions, and the abundance of skip molts, as well as catch rates and the condition of the crab. This data, coupled with the NMFS trawl survey data and information collected from the fish tickets, will increase the knowledge available for making future management decisions for this fishery.

If State funds are insufficient to pay for the observer program that we have proposed, the harvesters and processors agree to reimburse the State for the actual costs incurred in carrying out such a program. Our economic well-being depends on a healthy resource and we are willing to assist in any way possible to ensure that complete data is available for making the best management decisions for both the resource and the fishery.

For a fishery of 130 million pounds to be possibly reduced to less than 40 million pounds in just one year is a situation far worse than anyone envisioned under any management strategy. As evidenced by this letter, the industry is unified in its request for an extended season. We urge that you respond affirmatively to our petition.

Respectfully,

		
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