

**Joint Meeting  
Alaska Board of Fisheries  
and  
North Pacific Fishery Management Council  
February 4, 1997**

**TAB 9: PUBLIC COMMENT ON CRAB ISSUES**

# *Alaska Fisheries Conservation Group*

*Bering Sea Crab Vessel Owners from Washington, Oregon & Alaska*

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Box 910 Woodinville, WA 98072 (206) 488-7708 Fax (206) 823-3964

January 16, 1997

Rick Lauber, Chairman  
North Pacific Fishery Management Council  
Anchorage, AK

Dear Rick,

We seek your help in getting the Alaska Board of Fisheries' Opilio Season Committee back on track so we can complete our recommendations to the Board as soon as possible.

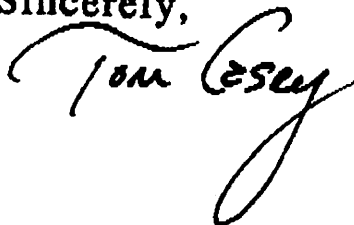
The Opilio Season Committee was established by the Board in March 1996 to determine if the current January-February season opening is the best time of year to conduct the fishery in terms of

1. product quality
2. crab vessel and crew safety
3. minimum handling mortality.

Despite the consistent efforts of ADFG's Al Spalinger, the Chairman, our group has never been able to meet formally, more than once, and do our work, which needs to be completed by March 9, 1997.

We request that the Council discuss the Opilio Committee with the Board during the Joint Meeting in early February and urge them to reconvene the Committee to consider the timing of the Opilio season as soon as possible. A list of Opilio Committee members is attached.

Sincerely,



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**C. *Opilio* Season and Subdistrict Workgroup** BOARD OF FISHERIES

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The goal of the C. *Opilio* Season and Subdistrict workgroup is to give an industry recommendation to the Alaska Board of Fisheries regarding:

1. *Chionoecetes opilio* fishing seasons.
2. Subdistrict boundaries for the Bering Sea Management Area for the C. *Opilio* fishery.

This group will be concerned solely with these goals and will work with the assistance of the Alaska Department of Fish and Game. It will report back to the Board of Fisheries before the Spring 1997 Board of Fisheries meeting. Members of the group will include:

1. Jerry Bongen
2. John Klemzak
3. Dave Benson
4. Gordon Blue
5. Clyde Sterling
6. Rob Rogers
7. Jeff Stephan
8. Gary Painter
9. Tom Casey
10. Arni Thompson



# ALASKA CRAB COALITION

3901 Leary Way (Bldg.) N.W., Suite #6 • Seattle, WA 98107 • (206) 547-7560 • FAX (206) 547-0130

DATE: January 24, 1997

( 10 PAGES )

MEMO TO: Clarence Pautzke, Executive Director

FROM: Arni Thomson

*Arni Thomson*

RE: CHANGE OF OPILIO SEASON OPENING DATE & BOARD OF FISHERIES COMMITTEE

I understand that an industry party is requesting that you intervene with the Chairman of the Board of Fisheries to have the Council and the Board of Fisheries discuss the opilio season issue.

ACC President, Gordon Blue intended to hand deliver the attached background correspondence on this issue to you, however he was unable to do that. Therefore, he asked me to send it to you.

As the attached correspondence shows, the issue has been thoroughly discussed throughout the industry and it is fraught with substantial allocative implications which are being concealed under the guise of safety considerations.

If I can provide any further information on this, don't hesitate to give the ACC office a call.

Alaskan crab fishery

Times should bill Coalition

for 'propaganda' in story

It's been years since we've seen a well-intentioned news reporter used so mercifully to spread one special-interest group's propaganda in a metropolitan daily newspaper. Normally, special-interest groups have to buy space to advertise their spin on public policy issues. But not this time.

You really should bill The Alaska Crab Coalition (ACC) by the square inch for its propaganda they convinced Mary Ann Gwin to write for them in her article "Mining Crabs in a Merciless Sea," Jan. 12.

ACC has consistently lobbied to create monopoly in the Bering Sea crab fisheries at a cost of hundreds of millions of dollars to the American public. Congress recently shored down ACC's scheme with the reauthorization of the Magnuson-Stevens Fishery Management Act of 1996. In fact, Sen. Slade Gorton said in your paper last fall that ACC's scheme, called individual transfer quotas (ITQs), is "dead" under the new legislation.

But ACC probably didn't tell Mary Ann that, instead they told her that their monopoly scheme (ITQs) was the only real remedy for the clear and present dangers of fishing Bering Sea opilio Tanner crab during the coldest months of the year.

But if ACC is so concerned about the vessel safety in the Bering Sea, why did it ask the Alaska Board of Fisheries last March to move the Bristol Bay red king crab season and the baited Tanner crab season (not conducted in November when at-sea fishing conditions are less likely) into January and February when at-sea fishing conditions are the worst of the year?

That sounds like a reckless fishing vessel safety policy to us. But that's exactly what ACC advocates. Our crab vessel owners group has been trying for two years now to move the opilio fishery out of January and February because the risk to life and limb is so high. No one from ACC has helped us; they have opposed us from the start.

But I'll bet they never told Mary Ann that. If they had, we don't believe she would have published their ITQ-propaganda for them. We don't blame Mary Ann for the propaganda, but we wish she'd realize that some special-interest groups will tell a well-intentioned reporter anything for a chance to monopolize for themselves hundreds of millions of dollars of federal property.

How many more mid-winter opilio crab seasons does the crab fleet need to struggle through before we all smarten up and fish earlier or later when the odds of survival are better for everyone?

TOM CASBY  
Executive Director  
Alaska Fisheries Conservation Group  
Woodward

DEATLE Times

1/19/97



# ALASKA CRAB COALITION

3901 Leary Way (Bldg.) N.W., Suite #8 • Seattle, WA 98107 • (206) 547-7560 • FAX (206) 547-0130

DATE: August 16, 1996

TO: Larry J. Engel, Chairman  
Alaska Board of Fisheries  
P.O. Box 3-2000  
Juneau, Alaska 99802

FROM: Arni Thomson  
Executive Director *Arni Thomson*

RE: OPPOSITION TO CHANGE OF BERING SEA OPILIO  
SEASON DATE

On behalf of the members of the ACC, I wish to thank you and the Board of Fisheries for your careful consideration of numerous shellfish proposals at the March 1996 Shellfish Meeting and overall, for the actions taken on those proposals.

I also wish to thank you for your willingness to set up a work group to look at alternative solutions to an opening date for the c. opilio fishery. As a follow-up to establishment of the work group, you have been informed that ADF&G scheduled a discussion of this topic at the June 17th meeting of the PNCIAC in Portland, Oregon.

At the request of Mr. Garry Loncon, Chairman of the PNCIAC, I am sending you two memorandums on the subject developed by the ACC office and Mr. Loncon. These memorandums discuss the issues and problems encountered in considering a change of season to the fall or spring, seasons when there is seldom an icing problem. Some in the industry are using icing conditions as a rationale for changing the season, while concealing their allocative agendas. However, as the enclosed press article illustrates the winds and seas are not necessarily less severe in the fall, thus the hazards of capsizing are not diminished. The most recent vessel loss, the Pacesetter, was lost in January --when icing conditions were not in effect.

As the ACC memo points out, changing the season has significant allocative impacts and there are 43 potential beneficiaries within the pollock fleet who could benefit from a change of season at the expense of revenue lost to the full-time crab fleet. Increasing the fleet size will also intensify the race for fish and exacerbate the safety

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problems, as the boats fish harder to maintain their normal share of the catch.

Although the ACC shares the Board of Fisheries concerns about safety in the Bering Sea crab fisheries, the association does not view changing the season as a solution to safety issues.

In closing, Mr. Loncon also wished to convey to you that following the distribution of his memo to PNCIAC members and in soliciting their comments, he received no opposition to his recommendations.

ACC has also circulated both the PNCIAC and the ACC memo widely and the office has received no comments supporting a change in the opening date of the opilio season.

Thank you for your consideration on this issue.

# Pacific Northwest Crab Industry Advisory Committee

27 June, 1996

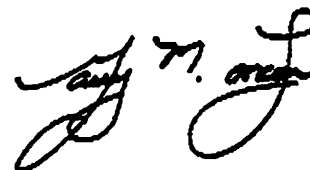
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## Memorandum

Garry M. Lanson  
Chairman

Distribution List: PNCIAC Committee Members

RE: Changing The Opening Date Of The Opilio Fishery



During the most recent PNCIAC meeting in Portland a discussion was initiated regarding the above referenced. This memorandum is intended to inform you of my opinion on the matter.

With respect to conducting some form of sampling an Opilio test fishery in September, I am strongly opposed to such an activity.

### Crab Quality Concerns

Opilio molting period is known to be the summer months. Prosecuting the Opilio fishery in September or October will result in harvesting crab that is not at its optimum meat infill. Our experience at Royal Aleutian Seafoods is optimum meat infill occurs in February and March. Why is meat infill important? Low meat infill crab causes insurmountable marketing problems. Acceptance problems in the market place will result in lower value for the commodity. The harvesting and the processing sectors both need to maximize the value of the crab. We at RAS have contacted several of our Japanese buyers to discuss Opilio caught in September. The response has been overwhelmingly negative. The dubious notion of marketing crab at a time when the crab quality has not been maximized is inconceivable to our Japanese customers.

I am aware that some have said what is the harm in conducting a test fishery to simply confirm the crab quality in September. The harm is engaging in any form of sampling in September defies the obvious, and that is crab quality is not optimized.

### Vessel Cross-Over Issue

Prosecuting the Opilio fishery following the pollock "B" season (ending 9/23 in 1995) and either prior to or just following the pollock "A" season (beginning 1/20 and ending 3/1 in 1995) will invite trawlers to participate in the fishery. Currently, there are 39 trawler vessels with cross-over Opilio fishing rights. An approximate 20% increase in the harvesting fleet size will serve to dilute the existing fishing effort.



# Pacific Northwest Crab Industry Advisory Committee

27 June, 1996

## **Season Consolidation Will Result in Lower Operating Costs**

Certain industry participants, mostly shorebased processors, have indicated the need to consolidate crab seasons into the October to December period to lower operating costs. This would allow the shorebased pollock fleet to participate in the Opilio fishery. An alternative solution would be to move the opening dates of the King and Bairdi fisheries. Moving the King and Bairdi season to January, with a minor adjustment or no change in the Opilio opening date, would improve the economics for shorebased processors and harvesters while not increasing the fishing effort.

## **Air Temperature Concerns**

The scientific staff of ADF&G have raised concerns regarding the air temperature during January and February and the possible negative effects cold air has on discarded Opilio. The limited scientific studies conducted by ADF&G regarding cold air exposure have concluded that mortality increased below -3 C-hour. The negative 3 Celsius hour represents a degree-hour temperature combination. The negative 3 degrees Celsius represents approximate exposure of 15 minutes at 5 degrees Fahrenheit (-15 C). These extremely cold temperatures generally occur in the Bering Sea from December to April. There is no real solution to avoiding cold temperatures without sacrificing crab quality. Although, vessels with efficient sorting tables tend to minimize the time crab is exposed to the elements before returning to the ocean.

The industry needs to be reminded that from 1987 to 1994 Opilio harvests exceeded 100 million pounds. The fishery has been prosecuted during the cold winter months, when water temperatures are the coldest, finfish predation for discards is at a minimum and the results have been record resource abundance and harvests. Why change "the formula" that has yielded success?

## **Summary Comments**

Prosecuting the Opilio fishery at a time when crab quality is not optimized is an unacceptable option. For this reason alone, I am opposed to conducting any form of "sampling" in September or October. Consolidating crab seasons merits consideration, however cost containment on behalf of processors and harvesting can be accomplished through moving the King and Bairdi seasons to January. Also, the industry needs to consider the cross-over issue, the impact of potentially adding at least 39 groundfish vessels to the Opilio fleet.

If you have any comments please contact me at Royal Aleutian Seafoods, 206-283-6605.



# ALASKA CRAB COALITION

3901 Leary Way (Bldg.) N.W., Suite #6 • Seattle, WA 98107 • (206) 547-7560 • FAX (206) 547-0130

DATE: June 19, 1996 (TOTAL 3 PAGES)

MEMO TO: Garry Loncon, Chairman  
Pacific Northwest Crab Industry Advisory  
Committee

FROM: Arni Thomson, Executive Director  
Alaska Crab Coalition

RE: CONSIDERATION OF CHANGE OF SEASON DATE FOR  
WESTERN DISTRICT OPILIO FISHERY TO OCTOBER FIRST,  
OR LATER IN THE FALL

The Alaska Board of Fisheries has requested a proposal to entertain options for changing the opening date of the opilio fishery that will be reviewed at the March 1997 Board of Fisheries meeting.

Following this request, at the June 17th meeting of the PNCIAC in Portland, Oregon there was considerable discussion between the crab industry representatives and ADF&G concerning design, funding and approval of an industry funded survey of opilio immediately following the St. Matthew king crab fishery. Testing crab quality at that time of year would be the major focus of the test fishery.

There are a number of underlying agendas driving the survey. The first one is justification of an additional quota in the Northwestern sub-area. However, ADF&G and NMFS have repeatedly told the industry at PNCIAC meetings that the annual NMFS survey is the guideline for determining crab CHLs. The experience from the 1995 Bristol Bay industry funded king crab survey demonstrated that.

There are also obvious cost savings to shorebased processors who could keep their labor force busy following the pollock B season. They would be able to move right into opilio, then king and bairdi crab seasons, when they are open.

If the quality from the test fishery proves satisfactory, then the idea is to propose a change of season to sometime in October or December to the Board of Fisheries for action review in March 1997 (for 1998 season).

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Gary Painter, Tom Casey and Trident Seafoods were the major advocates of this initiative at the meeting.

Although a number of considerations were discussed at length regarding the impacts of such a move, the crossover impacts of 39 Bering Sea pollock/groundfish shorebased trawlers was not raised at the time. However, ACC members are well aware of this potential impact and they have opposed changing the season to the fall for this and crab quality/market considerations. An increase of possibly 39 vessels (and more from the Gulf) would mean at least a 16% revenue impact to the fleet of 250 boats. This is double the impact of the proposed 7.5% CDQ program.

NPFMC records estimate there are a total of 323 vessels qualified for combined bairdi/opilio endorsements in the upcoming License "Invitation" Program scheduled to begin January 1998. Changing the season date of opilio to October 1st or 15th, or December 1st, will entice more than just the idle pollock trawlers.

The same can be said for another alternative being considered for the Eastern District opilio season, that is March 15th or April 1st. The pollock A season ends the first week in March. It is also worth noting that the pollock industry has been able without much difficulty, to adjust either the inshore or offshore season dates to accommodate either fleet's needs.

At your suggestion Gary, I am enclosing a list of the vessels that qualified for the Bering Sea king and tanner crab fisheries in 1993 and 1994. This list is derived from the CFEC/ADF&G BSAI crab vessel registration lists. I am also enclosing NPFMC information on pollock season dates and the estimates of vessels qualified for BSAI crab fisheries under the LLP.

If I can be of any further assistance on this important issue, please let me know.

Revised: 7/22/96

**BERING SEA POLLOCK AND GROUND FISH TRAWLERS  
MORATORIUM AND LLP QUALIFIED TO FISH BERING SEA CRAB**

ALDEBARAN (TRIDENT)  
ALSEA  
ALYESKA  
AMERICAN EAGLE  
ANITA J  
ARCTIC WIND  
ARCTURUS (TRIDENT)  
ARGOSY  
COMMODORE  
DONA MARTITA (TRIDENT) \*  
ELIZABETH F  
ENDURANCE  
FIERCE ALLEGIANCE  
FLYING CLOUD (TRIDENT)  
GOLDEN DAWN (TRIDENT)  
GUN-MAR  
HALF MOON BAY  
MAJESTY (TRIDENT) \*  
MAR DEL SUD  
MAR-GUN  
MARCY J  
MARGARET LYN

MARK I  
MUIR MILACH  
NORDIC FURY  
NORDIC STAR (NESS)  
OCEAN HARVESTER (NESS)  
OCEAN HUNTER  
OCEANIC  
PACIFIC FURY .  
PROGRESS  
ROYAL AMERICAN  
SEA STORM  
SEA WOLF  
SEADAWN  
STAR FISH  
STARLITE  
STARWARD  
STORM PETRAL  
SUNSET BAY  
U S DOMINATOR (TRIDENT)  
VESTERAALLEN  
VIKING EXPLORER (TRIDENT)

TOTAL VESSELS: 43

\* Revised total cross-over boats owned by Trident (& partners): 10



Groundfish Forum, Inc.  
4215 21st Avenue West, Suite 201  
Seattle, Washington 98199  
Phone (206) 301-9504 Fax (206) 301-9508

January 28, 1997

Mr. Ron Berg  
Chief, Fisheries Management Division  
NMFS- F/AKR  
P.O. Box 21668  
Juneau, AK 99802

RE: NMFS Management of 10 minute strip for rocksole fishery

Dear Ron:

Amendment 37 to the BS/AI Groundfish Fishery allows the rocksole fishery to fish within the lower ten minutes of latitude in the area now defined as the Red King Crab Savings Area. As you know, the H&C sector fought hard to retain entry to this area. We were finally able to convince the Council to allow entry in years following a harvest guideline for Bristol Bay red king crab. This area has been of major importance to the rocksole fishery and the ten minute strip has historically had manageable red king crab bycatch rates. Given the harvest guideline for red king crab last year, the rocksole fishery is scheduled to gain access to the ten minute strip this year via the (not yet finalized) annual groundfish specifications. A separate cap of approximately 26,000 RKC applies to the area in question.

We pushed hard for this privilege and we do not regard lightly the responsibility of stay within the cap afforded to the area. We also appreciate the cooperation we have received from NMFS in working with us over the last several weeks to craft an opening so as to maximize control over the fishery yet allow an opportunity to take advantage of the high rocksole catch rates that the area has traditionally provided. Up until a few days ago, our plan for a short test fishery and then a fishery of scheduled duration based on the rates during the test fishery seemed the best possible scenario from all perspectives. With the red king crab bycatch rates that the rocksole boats have experienced just south of the ten minute strip over a two day period this year, however, we have had to reconsider our desire to fish within the ten minute strip this year.

When rocksole opened on the 20th of January, approximately 10 vessels began their season just south of the ten minute strip. Many of these vessels experienced RKC rates on some tows that were too high for an orderly fishery in that area. After a day and a half, our Sea State system which plots everyone's rates each day was indicating that rates in this area were high as a rule. The word was quickly sent out to the fleet and all rocksole vessels quickly moved to other areas. Rates are now approximately 300 RKC per day fleet-wide, which is exceptionally low.

The crux of the matter, Ron, is that if RKC rates this year are high just south of the RKC Savings Area, then we anticipate even higher rates in the ten minute strip. Thus an opening of the ten minute strip at this time is not desirable at this time. Although in the absence of a NMFS action we could very likely restrict all rocksole vessels currently fishing from the area on a voluntary basis (they are all Groundfish Forum vessels), we cannot guarantee that a non-Groundfish Forum vessel, for instance, might not leave another fishery to take advantage of the ten minute strip opening scheduled to take place via the approval of the final specifications. Although that even is somewhat unlikely (because as you know, peer pressure is strong in this business), if it did occur it would be very unfortunate. It would also be unfair to those vessels that are

very much trying to "do the right thing" and work constructively with the crab industry given the RKC situation this year.

Given this set of circumstances, the Groundfish Forum hereby requests that NMFS file a closure notice for the ten minute strip this year prior to the filing of the final specifications. The reason should simply be exceptionally high expected RKC abundance in the ten minute strip. We very much appreciate your willingness (and that of Sue Salveson and Andy Smoker) to work with us to craft a reasonable plan for fishing within the strip this year. In retrospect, no one could have anticipated the RKC situation this year given how manageable bycatch rates have generally been just south of the ten minute strip over the last two years. Vicissitudes of this business I guess.

Thanks in advance for your help. Please call me if you anticipate any problems putting through the system the request we have made.

Yours Sincerely,



John R. Gauvin  
Director

cc: Chairman Lauber, Groundfish Forum membership