

CITY OF UNALASKA

P.O. BOX 610
UNALASKA, ALASKA 99685-0610
(907) 581-1251 FAX (907) 581-1417

January 6, 2017



John Jensen, Chairman
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811-5526

**Re: City of Unalaska Comments
Supporting Proposal 278**

Dear Chairman Jensen:

The City of Unalaska submits to you the following comments in support of Board Fisheries Proposal 278.

We view Proposal 278 as a temporary measure that would allow a small guideline harvest amount in the area West 166°W longitude, to be harvested based on parameters laid out by the Alaska Department of Fish and Game. This is not permanent change to the Bering Sea Tanner Crab harvest strategy. In our estimation, Proposal 278 is basically going to be in effect for 120 days until the *C. bairdi* Tanner fishery in the Western District closes on March 31 by regulation.

We don't feel this proposal causes a conservation concern because this fishery is not in a rebuilding mode and only the mature male legal crabs are going to be harvested. Levels of female bycatch in the *C. bairdi* Tanner crab fishery are very low and stock of mature male crab are at some of the highest levels seen in the past five years. It is estimated that mature male biomass in the western district alone is at 70 million pounds.

We strongly support the Board of Fisheries and ADFG staff meeting as soon as possible to address much needed changes to *C. bairdi* Tanner Crab harvest strategy. We feel this of utmost importance so that this very important crab fishery can move forward unimpeded in future years.

We think it is also very important for the Board of Fisheries to review the information on survey comparisons presented by Scott Goodman, the Bering Sea Fisheries Research Foundation Executive Director. This information has been shared with the staff of ADFG. The information presented indicates that high water temperatures and large biomass events may lead to mature female *bairdi* responding in unknown ways, such as moving out of the traditional survey area.

During the past three years of warm water temperatures, the NOAA summer survey showed some high female bairdi biomass stations west of 173°W longitude, which are not included in ADFG's overall female biomass calculations. As Mr. Goodwin states in his survey document, the information presented may warrant further consideration of the current C. bairdi Tanner stock status issues, and we concur.

We must also remember that the Crab industry is facing major stock allocation reductions across the board for the 2016-2017 crab seasons: (a) Opilio Tanner was decreased 60%, from 51 million pounds to 21 million pounds; (b) Bering Sea Tanner crab is facing a total closure due to female threshold levels not being met; (c) Bristol Bay Red King crab was decreased 16%, from 10 million pounds to 8.4 million pounds; and (d) St. Matthew and Pribilof Blue King Crab fisheries are closed. These declines have caused economic hardship for all sectors of the crab industry. Ex-vessel values to the harvesting sector for Tanner Crab is in the \$40-50 million range, based on the 2015 harvest level. A complete closure of the Bering Sea Tanner crab fishery will have major negative economic impacts on harvesters, processors, coastal communities, and the State of Alaska. The City of Unalaska, the state's largest crab processing community, faces losses in the millions of dollars from sales tax on fuel sales and fish taxes (both local and state shared). Unalaska support sector businesses working with the crab fleet will also face revenue declines.

In conclusion, the City of Unalaska requests that the Board of Fisheries support Proposal 278 as a onetime measure allowing a fishery to proceed, with harvest levels laid out by the Alaska Department of Fish and Game. We also encourage the Board of Fisheries and the Department of Fish and Game to meet as soon as possible to address potential changes to the C. bairdi Tanner harvest strategy.

Thank you for your consideration of our comments on this important issue.

Sincerely,

CITY OF UNALASKA



Frank Kelty
Mayor

cc: Unalaska City Council Members
Glenn Haight, Director ADFG Board Support