

In 2022 Kodiak Tanner crab fisherman harvested 1,100,000 pounds of crab at \$8.30 ex-vessel, in 2023 we harvested 5,800,000 pounds at \$3.35, and in 2024 we harvested 3,000,000 pounds at \$3.70. Of the 9,900,000 pounds harvested from 2022-2024, 6,935,000 came from Kodiak's Eastside Section. That is 70% of the Kodiak Tanner crab harvest coming from one of three sections open in that three-year period. That is also \$39,660,000.00 in ex-vessel value to the harvesters.

Looking at the attached ADFG abundance map (Page 5), you can see that a significant portion of that Eastside Section biomass is in stat areas 525702 and 525630. The crab population in these stat areas is diverse. They range from areas of dense legal males to areas massed with females, juvenile male, and legal male tanner crab. The habitat in these diverse areas is and has been crab rearing grounds since before the ADFG started surveying the archipelago for abundance. The biomass in these two stat areas is the breeding stock for the Eastside and Southeast Sections in the Kodiak District. This stock provides the overflow of legal males that spread into our state water bays creating 135 vessel Kodiak Tanner fisheries like the recently administered season in January 2024.

Attached is a chart photo showing the crab grounds (Page 3), circled in black, that hold massive amounts of mixed-sex tanner crab as recently observed by myself and others who participated in the 2024 Kodiak Tanner fishery. Next to this, page four shows a photo of trawl intensity by one Kodiak trawl vessel from 2015 to 2024 in the two stat areas under discussion, as well as surrounding stat areas. Page five shows the same trawl vessel's intensity from the same time-period around the entire Kodiak archipelago. Multiply that trawl intensity by 20-30 vessels in a given year and you begin to see how much pressure is focused on stat areas 525702 and 525630.

As shown above, trawl fisheries are executed in all waters around Kodiak Island. And yes, depending on the time of year, temperature, weather, and bycatch "Hot-Spots," you may see focus in one area on a given year higher than another. But, the relatively small area that the density of our Eastside Kodiak Tanner population thrives in does not move. These crab particularly flourish in stat areas 525702 and 525630 and this is proven by ADFG abundance surveys since the inception of the surveys.

Time and area closures for trawl bottom contact gear are needed to protect the largest biomass of Bairdi Tanner crab in the Gulf of Alaska and potentially the entire state. These are not just harvestable male crab, this is an ecosystem of mixed sex and sized crab that feed the entire Eastside tanner fisheries. Pelagic gear, non-pelagic gear, there should be no differentiation when it comes to bottom contact.

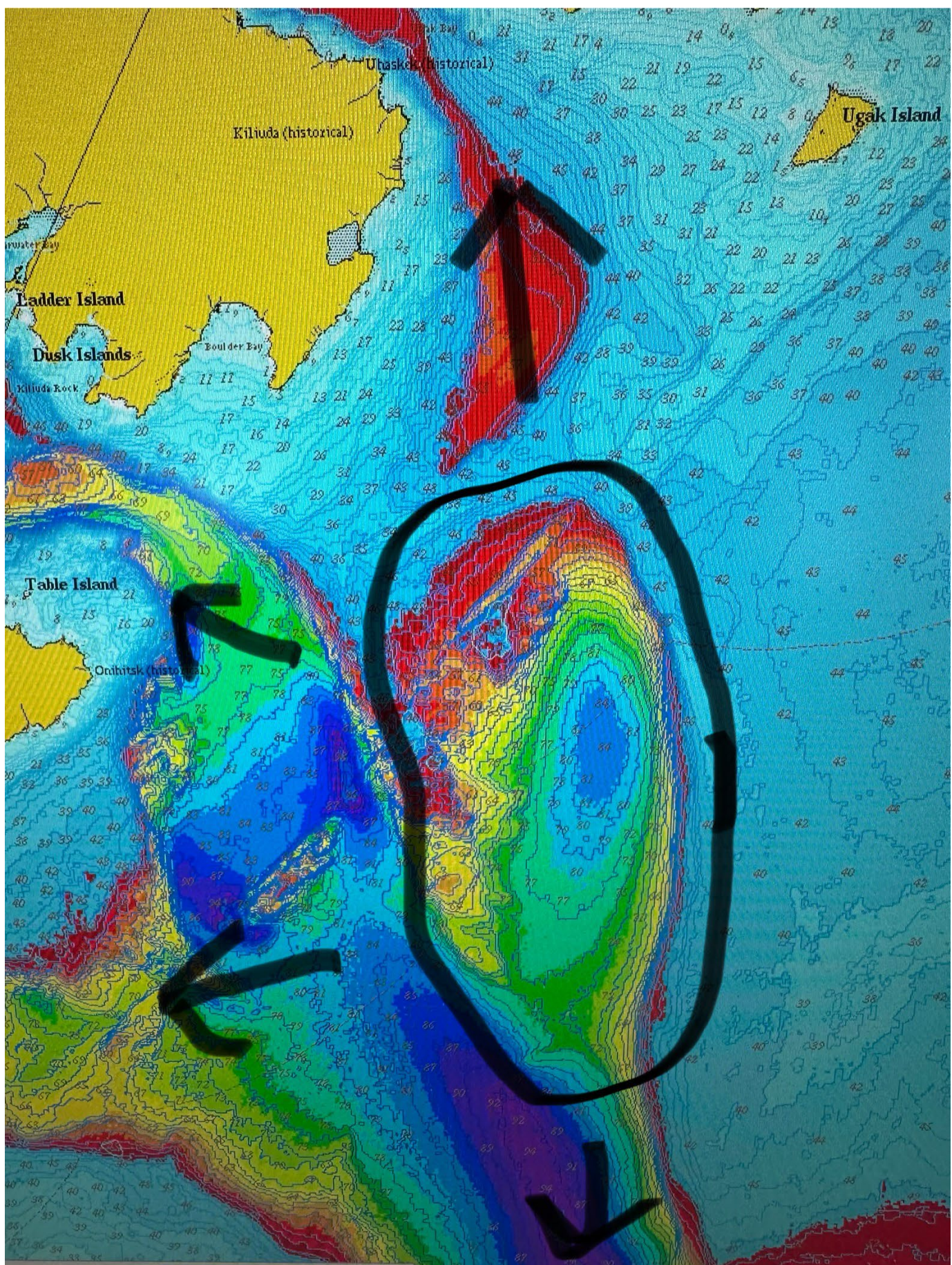
I look at the recent failures of the Bering Sea stocks versus the thriving Aleutian Island Brown King crab fishery, Kodiak Island Bairdi Tanner crab, Southeast Alaska Brown King crab, Southeast Alaska Bairdi Tanner crab, and the recent years' Dungeness crab fisheries across the state. I cannot draw a comparison between the healthy stocks and failing stocks concerning climate change, warming water, ocean acidification, or any non-controllable factor, except, all of those species have had minimal to no interaction with trawl gear in the last five to ten years. Trawl intensity, specifically non-pelagic, on Kodiak's eastside has been nearly non-existent in recent years due to poor market conditions and our Bairdi Tanner populations are thriving.

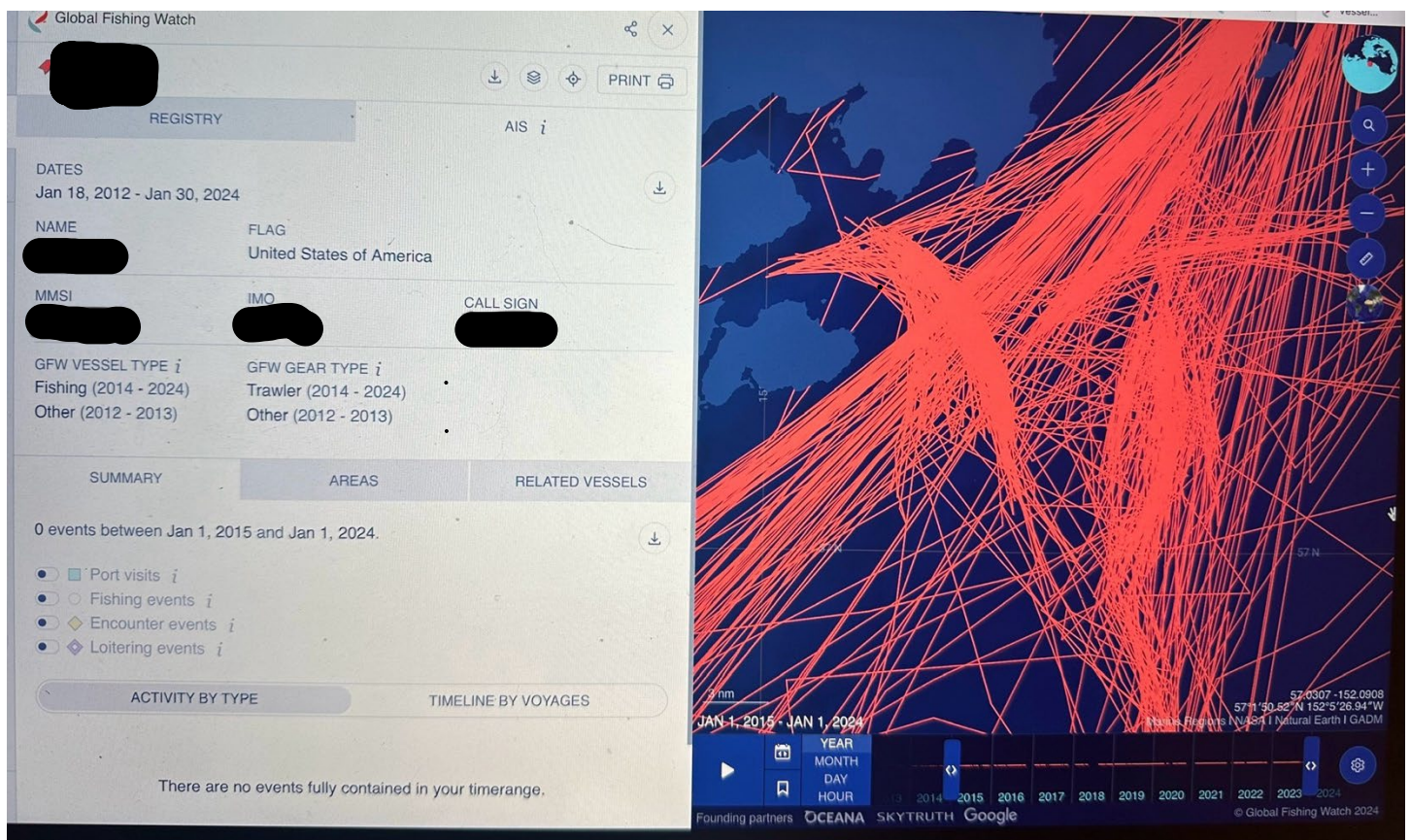
We have a biomass of Bairdi Tanner Crab around Kodiak Island that is thriving, measurable, and proven over time to be in one area. The current economic impact of the fishery is immense, and looking forward, based off ADFG surveys and upward market trends, could be larger and more dependable in years ahead. The Alaska Department of Fish and Game has guiding principles that instruct them to protect Tanner crab. The State of Alaska needs the North Pacific Fishery Management Council to take action and give Alaska the tools to protect these crab.

Regards,

A handwritten signature in black ink, appearing to read 'Kevin Abena', with a long horizontal stroke extending to the right.

Kevin Abena





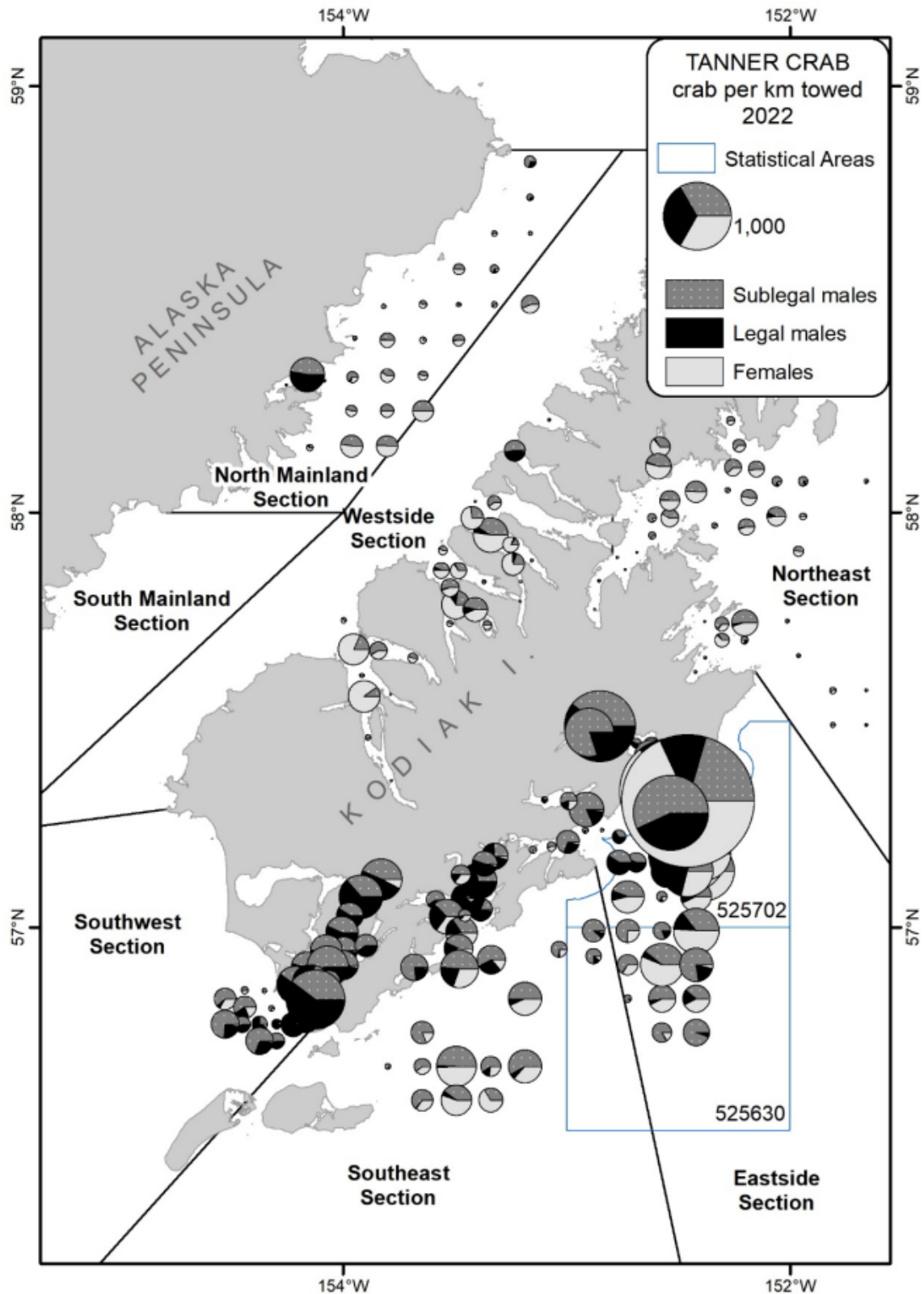


Figure 5: Number of Tanner crab per kilometer towed in the 2022 Kodiak District large-mesh bottom trawl survey. Note: Statistical areas 525630 and 525702 are outlined in blue. Detailed information can be found in the Large-mesh bottom trawl survey of crab and groundfish [report](https://www.adfg.alaska.gov/FedAidPDFs/FMR23-07.pdf) (Spalinger and Silva 2023, <https://www.adfg.alaska.gov/FedAidPDFs/FMR23-07.pdf>).