



North Pacific Fisheries Association
P.O. Box 796 Homer, AK 99603
npfahomer@gmail.com // www.npfahomer.com

March 28, 2025

North Pacific Fishery Management Council

RE: D2 – GOA Tanner Crab Protections

Chair Drobnica and Members of the Council,

North Pacific Fisheries Association (NPFA) represents more than 60 independent commercial fishermen, their families, and crewmembers. Our organization has a long history of involvement in Alaska crab fisheries as the organization was originally formed as a marketing association for price negotiations with processors for the king crab fishery in Kachemak Bay in 1955. NPFA has members involved in the BSAI crab fisheries as well as the state waters crab fisheries in PWS, Chignik, Kodiak and the South Peninsula. NPFA believes the protection of critical crab habitat is essential for all healthy and viable crab fisheries around the state.

NPFA urges the Council to move the GOA Tanner Crab Protections discussion paper to an Initial Review.

The Kodiak Tanner crab fishery has become an important source of winter income for many NPFA members in a time when cod stocks and prices in the GOA are at historic lows, and poor salmon prices and market conditions have challenged Alaska community-based fleets. Fishermen from all over the state have benefitted from the recent cyclical increase in Tanner abundance in the GOA.

The discussion paper highlights the importance of statistical areas 525702 and 525630 as areas of high Tanner crab abundance. Over the ten-year time cycle from 2013-2023 an average of 41% of legal male Tanner crab were found in these two statistical areas (Page 25). Protection of these two areas is paramount to the health and longevity of the Tanner crab stock around Kodiak Island.

The Council has grappled with addressing the bycatch impacts by other sectors for decades, and the discussion paper identifies the largest users of PSC which will make it easier for the action to be streamlined. The discussion paper makes it abundantly clear that Non-Pelagic Trawl (NPT) is the largest bycatch user of Tanner crab in statistical areas 525630 and 525702, and POT is the smallest. NPFA members would support some form of time and area closures to the highest PSC users to protect molting and mating crab in an Initial Review. The Council could also broaden the action and include statistical area 535632 in the Southeast Section of the Kodiak District which also holds significant value to the Kodiak Tanner stock. Our members feel that there is sufficient data compiled to move this action forward to initial review which will entail the Council crafting a purpose and need statement with options and alternatives for review.

NPFA also requests that the timeframe for the action be increased to a ten-year period instead of the five-year period that the discussion paper analyzed for PSC. Our members believe that the Covid-19 pandemic falls directly within the five-year time series contained in the analysis, and data was



North Pacific Fisheries Association

P.O. Box 796 Homer, AK 99603

npfahomer@gmail.com // www.npfahomer.com

sparse and skewed during these times. Furthermore, there was a significant reduction in NPT effort as the flatfish markets eroded in the middle of this latter time series. Broadening out the time series will help capture the cyclical nature of the fishery and fill other data gaps that are apparent in the shorter time-series and without higher observer coverage rates throughout NPT.

NPFA members look forward to working through the initial review phase with the Council, industry, agency, and ADF&G as we tackle the next iteration of this action.

Sincerely,

Malcolm Milne

NPFA President