



March 28, 2025

Ms. Angel Drobnica, Chair  
North Pacific Fishery Management Council  
1007 West Third, Suite 400  
Anchorage, AK 99501

RE: Comment on D2 – GOA Tanner Crab Protections

Dear Chair Drobnica and Council Members:

The Alaska Bering Sea Crabbers (ABSC) is a trade association representing the majority of independent crab harvesters who commercially fish for king, snow (opilio), and Tanner (bairdi) crab with pot gear in the Bering Sea and Aleutian Islands (BSAI) Crab Rationalization Program. Our vessels primarily fish in the BSAI rationalized crab fisheries. However, there are times when a vessel may instead choose to fish in the state managed Kodiak Tanner crab fishery in a given year within sideboard rules. For example, with recent Bering Sea fishery closures and reduced catch limits, the state managed Kodiak Tanner crab fishery provided a welcome opportunity for some of our fishermen and members who reside in the community of Kodiak. In that regard, we appreciate the opportunity to comment on Agenda item D2 – GOA Tanner crab protections.

We urge the Council to proceed to initial review and consider an action to take the necessary measures to protect Tanner crab in areas of high abundance and implement habitat protections in similar areas. The Council discussion paper outlines these known areas of higher crab abundance across life stages in figures 3 and 5, respectively. Additionally, it's important to recognize the high vulnerability of Tanner crab during times when they are mating and molting/soft shell. Table 10 in the discussion paper illustrates that there are mobile bottom contact gears (bottom trawl and pelagic trawl) actively fishing in these areas year-round, with landings from January to December.

In addition to protecting areas of high concentration of crab, habitat protections remain important as well. Habitat in areas with longstanding crab abundance support the crab population and the biodiversity in the area. There is a high level of complexity in understanding the importance of habitat to crab as bottom dwellers, not only for food and refuge from predators, but also at the ecosystem level. We urge the Council to consider further habitat protections that would benefit Tanner crab.

The Tanner crab resource is important to crab fishermen, their families, and the community of Kodiak and surrounding areas. We encourage the Council to take action at this meeting and move the expanded discussion forward to an Initial Review with an appropriate range of alternatives to establish protections for GOA Tanner crab and habitat through area closures. As one of the most valuable species to the community, it's encouraging to see Tanner crab thriving once again in Kodiak. We are confident there can be a healthy balance that allows harvest of groundfish species while also protecting and maintaining healthy populations of Tanner crab.

Thank you for considering our comments.

Sincerely,

Cory Lescher  
Science Advisor / Policy Analyst  
*Alaska Bering Sea Crabbers*