Alaska Marine Conservation Council

March 28, 2025

North Pacific Fishery Management Council
1003 West 3rd Avenue, Suite 400
Anchorage, Ak 99501

Agenda Item D2 GOA Tanner Crab Protections

Dear Chair Drobnica and Council members,

The Alaska Marine Conservation Council (AMCC) is dedicated to protecting the long-term health of Alaska's marine ecosystems, which sustain vibrant fishery-dependent communities. Our members include fishermen, subsistence harvesters, marine scientists, small business owners, and diverse fishing families. Our ways of life, livelihoods, and local economies depend on sustainable fishing practices that contribute to healthy ecosystems.

AMCC respectfully requests that the Council move the expanded discussion forward to an Initial Review and begin the process of establishing protections for Gulf of Alaska (GOA) Tanner crab through area closures.

The **GOA Tanner crab protections expanded discussion paper** provides the Council with increased understanding of the importance of statistical areas **525630** and **525702** to the Tanner crab populations around Kodiak Island. These areas represent some of the highest densities of Tanner crab in the entire Kodiak District—the epicenter of the Tanner crab population—which provides harvest opportunities for directed Tanner crab fishermen. The directed Tanner crab fishermen are asking the Council to take a stance and protect these crab with year-round closures to mobile trawl gear.

Tanner crab fishermen, with the support of AMCC, have been coming before the Council for **21 years**, asking for protections of Tanner crab in their preferred habitat. In **2004**, fishermen drew lines around Kodiak Island and shared their local knowledge of the crab grounds, dating back decades to when crab was king. Every group of fishermen, from Kodiak and Old Harbor, drew lines around the areas the Council is considering for protection (see attached). Their input was corroborated by the Alaska Department of Fish and Game's annual trawl survey data. We knew it then, and we know it now: the identified areas are vital to Tanner crab throughout their life history.

Tanner crab fishermen have worked in good faith to refine the statistical areas **525702**, **525630**, and **535632** to determine prime habitat and abundance. This effort enables the Council to move the action forward in a precise and effective manner. AMCC applauds these efforts and the collaborative approach to protecting Tanner crab while balancing the needs of other user groups.

Again, we urge the Council to move forward with an Initial Review and take meaningful action to protect this essential fishery resource.

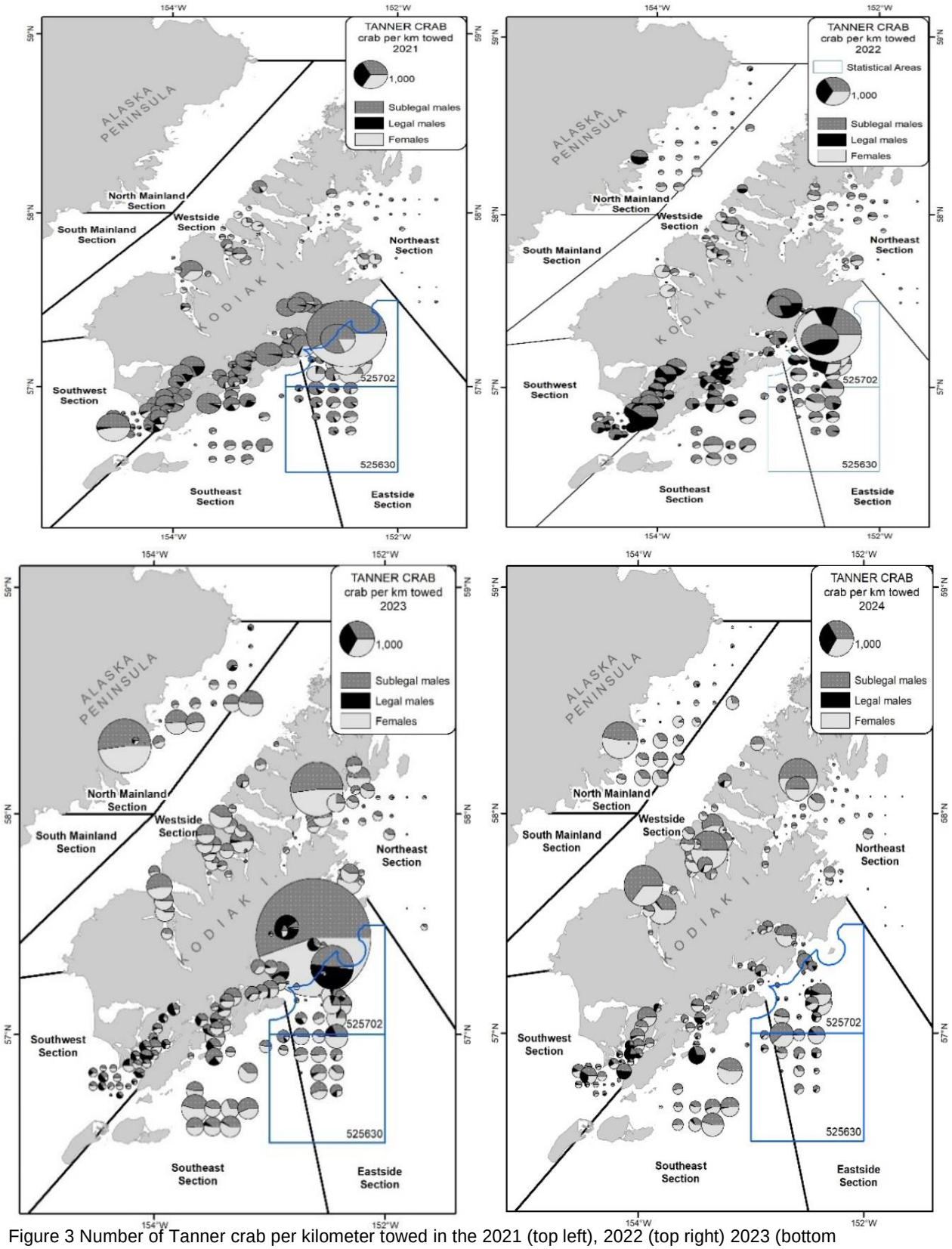


Figure 3 Number of Tanner crab per kilometer towed in the 2021 (top left), 2022 (top right) 2023 (bottom left) and 2024 (bottom right) Kodiak District large-mesh bottom trawl survey. Note: Statistical areas 525630 and 525702 are outlined in blue, (*GOA Tanner Protections March 2025, pg. 9)*

Long-Term Data Demonstrates the Importance of Protecting Key Areas

We have the benefit of long-term data from Tanner crab stock assessments. The first comprehensive large-mesh trawl survey of the Kodiak District occurred in **1987**, and since **1988** this survey has served as the standard stock assessment tool in the Kodiak District. Annual trawl survey results have been used since **1999** to determine whether Tanner crab abundance exceeds the regulatory thresholds that allow for commercial fisheries.

When Tanner crab abundance estimates from the **ADF&G trawl survey data** are considered over a longer time period of ten years, the importance of these areas is amplified. From **2013 to 2023**, an average of:

- **49%** of all mature female Tanner crab,
- **47%** of all mature male Tanner crab, and
- **41%** of all legal male Tanner crab abundance in the Kodiak District

was estimated from statistical areas **525702** and **525630**. Notably, roughly **30%** of total mature Tanner crab abundance was estimated in the single federal waters statistical area **525702** (*Appendix 5, GOA Tanner Crab Discussion Paper, pg. 16*).

Correlation Between Trawl Surveys and Winter Crab Fisheries

There is a **strong correlation** between the summer ADF&G trawl survey and the directed crab fishery in the winter. No data is indicating that this crab population moves out of these areas. On the contrary, these crabs appear to spend their entire lifecycle in near-shore protected areas and the offshore regions of **Barnabas Gully**. As the population grows, the larger crabs move offshore. Once offshore, as they continue to grow, molt, and mate, their vulnerability to encounters with groundfish gear **increases exponentially**.

"Tanner crab are more vulnerable to mortality during molting and mating, which occurs between February through mid-May each year. The time frame of vulnerability differs depending on temperature and location as well as the size and maturity of the crab, as the molt timing for small juveniles molting to larger juveniles may occur earlier than the molt timing for large juveniles molting to maturity. It is common for ADF&G to see large-scale Tanner crab molting events around Kodiak anytime between February and early May, while mating aggregations often occur towards the end of that time frame in mid-May. The regulatory closure date for the ADF&G Tanner crab pot fishery is in the middle of that time of vulnerability, on March 31."
(*GOA Tanner Protections March 2025, pg. 9*)

Increased Vulnerability During Molting and Mating

While large crab mate once a year until their **terminal molt**, juvenile crabs are growing rapidly and can molt **2-3 times per year**. This makes them highly vulnerable during this life stage, and **unobserved mortality** is likely to increase. PSC estimates that count whole crab fail to capture the crabs that come up in parts and pieces after experiencing the impacts of bottom trawl gear while molting.

Under current management, bottom trawling is allowed to occur **on top of these dense crab populations**, further endangering their survival. **April** is a slow month between the **pollock** and **rockfish** fisheries, which appears to lead to increased bottom trawling effort as market opportunities for low-value, high-volume **flatfish** expand. As expected, **PSC rates increased in 2024**, as shown in *Table 5, page 10* of the expanded discussion paper.

The data clearly demonstrates that statistical areas **525702** and **525630** are vital to the Tanner crab population throughout their lifecycle. The correlation between the ADF&G trawl survey and the directed crab fishery underscores the need for **year-round area closures** to protect these crab from mobile trawl gear impacts.

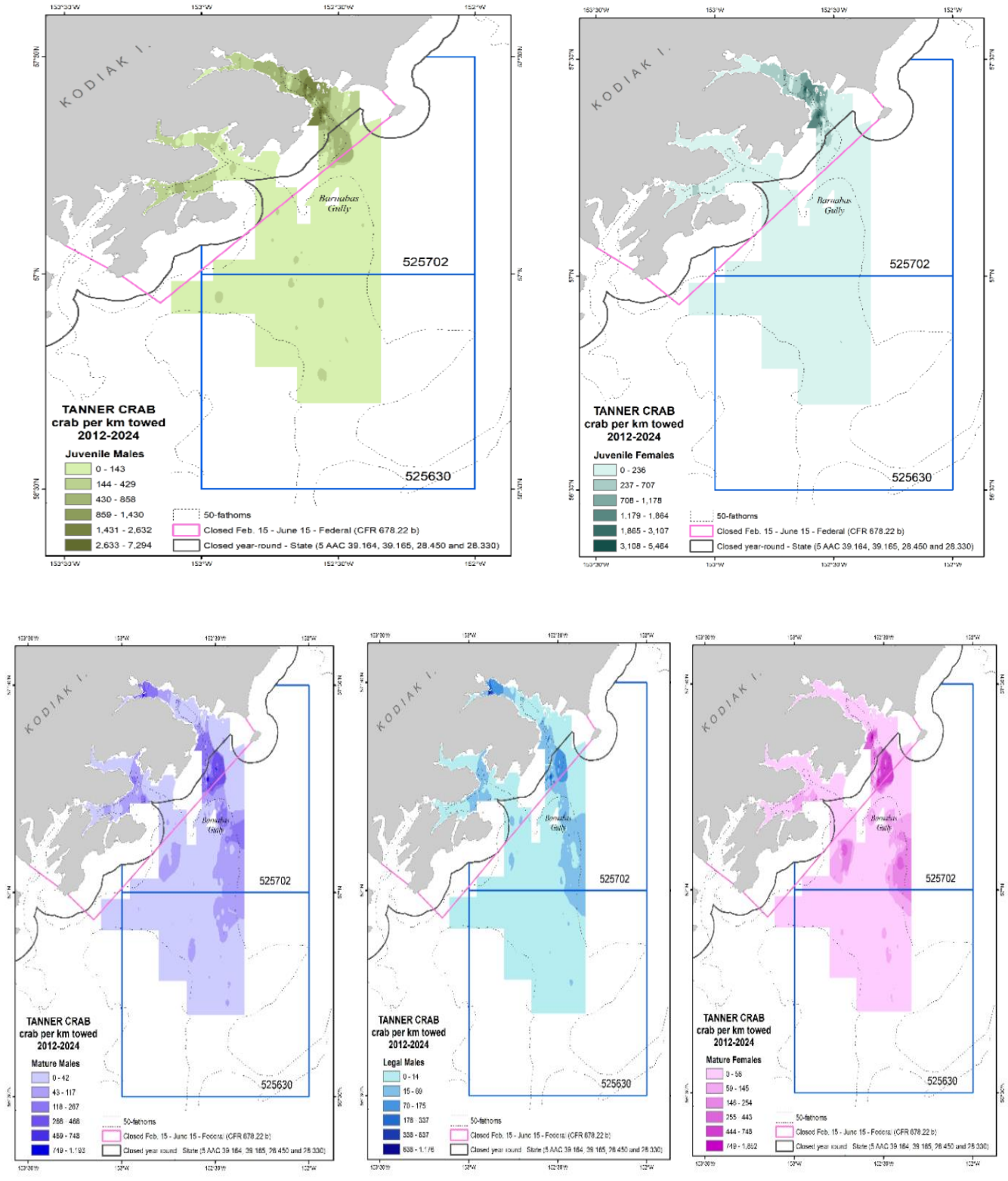


Figure 5 Tanner crab juvenile males (top left panel) and females (top right panel); Tanner crab mature males (bottom left panel), legal males (bottom middle) and mature females (bottom right panel) in crab per km towed from 2012-2024. The dotted line shows the 50 fathom bathymetric contour. *(GOA Tanner Protections March 2025 pg. 9)*

Economic Considerations: Tanner Crab vs. Groundfish Value

It is important to consider the **ex-vessel value** of the groundfish fisheries occurring in these statistical areas. From **2012 to 2023**, the percentage of total ex-vessel value for all groundfish gear types in statistical areas:

- **525630** = **2.8%** of the total ex-vessel value,
- **525702** = **4.4%** of the total ex-vessel value.

Thus, **92.8% of the groundfish value** comes from **other regions** in the GOA.

By comparison, the value of the **Tanner crab fishery** in these statistical areas is **significant**.

- **Stat area 525702** alone represents **38%** of the most recent **three-year average** of landings.
- The **values and numbers of participants** are detailed in *Table 7, page 12* of the expanded discussion paper.

Economic Importance to the Commercial Fishing Industry

The commercial fishing industry in Alaska is facing **challenging times**, with price declines in several important fisheries that sustain diversified fishing fleets. **Salmon** prices have particularly affected the small-boat fleet.

Additionally, as the **Bering Sea crab fleet** endures significant **reductions and closures** in the **BSAI crab fisheries**, the **state-managed Tanner crab fishery** has provided **welcome relief** for vessels with **limited entry permits** endorsed up to **120 feet**.

- These larger vessels, along with some **58-foot vessels**, tend to fish offshore, spreading out the effort.
- This allows the **small-boat fleet** to continue fishing in the bays and more protected areas.

The **economic importance** of the Tanner crab fishery to participants is clear:

- Each vessel carries **3-4 crew members**, nearly all of whom generate income.
- This translates to **hundreds of crew shares**, which will circulate throughout **Kodiak** and other coastal communities for months.

In **2025**, Kodiak again saw more vessels **selling crab off the docks**, generating direct value for the local economy.

- With an average price of **$15 per crab**, these vessels and their crews produced **increased value** even while docked.
- Other vessels had their crab processed and **direct marketed frozen crab clusters** to a growing domestic market.

Conservation-Minded Fishery Design

The Tanner crab fishery is intentionally designed to:

- **Benefit community-based fishermen**.
- **Minimize impacts** on crab stocks through:

    - **Low pot limits**.
    - **Daylight-only fishing**, reducing exposure of crab to cold winter nights.

Since the fishery **restarted in 1997**, fishermen have **championed conservation** through:

- **Threshold limits** for openings.
- **Conservative quotas**.
- **Limited pot pulls** to reduce bycatch and protect the crab population.

During the **March 2025 Board of Fisheries meeting**, proposals from **Kodiak-based Tanner crab fishermen** were passed to **further conservation measures**, including:

- **Increased escape panels** in crab pots, allowing juvenile and female crab to escape.
- **Strict pot limits**, regardless of the **GHL**, to reduce fishing pressure.

Shared Responsibility for Conservation

For the past **26 years**, Tanner crab fishermen have **worked diligently** to conserve the resource. Now, we are asking the Council to consider **regulatory changes** that would require **other fisheries** to share in the **responsibility of protecting these iconic species** in their preferred habitat.

The data and economic realities clearly demonstrate that statistical areas **525702** and **525630** are critical to the **Tanner crab population** and the economic well-being of **Kodiak** and other coastal communities. Protecting these areas through **year-round closures to mobile trawl gear** is essential to preserving this valuable fishery and ensuring the long-term sustainability of Tanner crab stocks.

Tanner Crab Fishery – Cyclical but Predictable

While the **Tanner crab fishery** is known to be **cyclical**, with abundance naturally rising and falling, it remains **predictable**.

- The **ADF&G annual trawl surveys** consistently detect **recruitment events** and track crab growth to maturity.
- *Figure 6* from the **ADF&G trawl survey** demonstrates this by illustrating the ability to track **cohorts of crab** as they grow.

Tracking Cohorts Over Time

For example:

- The **2013 cohort** of crab provided **several years of harvest opportunities** for legal males.
- The **2018 cohort** is currently supporting the **fishing opportunities** the fleet is experiencing now.
- Looking ahead:
    - While **harvests will decrease** over the next few years as the **2018 cohort** dwindles,
    - Another **cohort is emerging** and is expected to **reach harvestable size** by **2028**.

Fishermen directly observe the **growth of crab** on the grounds:

- In **2023**, many crab were just under legal size and were **carefully released**.

- In **2024**, the crab were notably **larger**, with less sorting required.
- The crab had reached their **terminal molt** and were **big and full of meat**, contributing to a productive and efficient harvest.

Precautionary Management and Conservation Efforts

The **Kodiak Tanner crab fishery** benefits from:

- **Precautionary management** by the **State of Alaska**, which ensures sustainable harvests.
- **Strong conservation measures** that have been **championed and supported** by the Tanner crab fleet, including:
    - **Threshold limits** for openings.
    - **Conservative quotas**.
    - **Limited pot pulls** to minimize crab mortality and protect the stock.

The **predictable nature of Tanner crab recruitment** and the effective **precautionary management measures** in place have fostered a **sustainable and valuable fishery**. The fleet's **commitment to conservation** and responsible fishing practices ensures that **future harvests** will continue to benefit both the **fishermen and the local economy**.

Flatfish Density and Responsible Trawl Management

Further analysis will benefit from understanding the **density of flatfish** in the high-density crab areas compared to other regions in the **Central Gulf of Alaska (CGOA)**.

- We believe the **trawl fleet** can effectively prosecute **flatfish fisheries** in regions **outside of the high crab density areas**.
- These Tanner crab habitats exhibit **crab densities unlike any other region** in the CGOA, making them uniquely vulnerable.

Alignment with National Standards

When considering the **National Standards** that guide **fisheries management plans**, area closures clearly align with **National Standard 9**, which prioritizes:

- **Minimizing and avoiding bycatch** to support sustainable fisheries.
- With strategic area closures, bycatch reduction is easily attainable.

Habitat Protection and Biodiversity

The **habitat features** in areas with longstanding crab abundance are vital to the **health and sustainability** of the Tanner crab population:

- **Infauna and benthic habitat features** play an important role in supporting the crab population.
- Protecting **biodiversity in these critical habitats** is essential.
- While habitat-crab relationships are complex, it is clear that **these areas provide key benefits** to the crab population.

Alaska's Legacy of Habitat Protection

The **State of Alaska** has long recognized the importance of protecting fish habitat:

- Alaska's **fish habitat protection statutes**, adopted shortly after statehood, remain unchanged to this day.
- This reflects the enduring Alaskan value that **fishery resources and habitats** are assets that improve quality of life and deserve protection from unnecessary human disturbance.

Precedent for Habitat Closures

The **North Pacific Fishery Management Council** has consistently used **area closures** throughout the North Pacific to:

- **Protect habitat** and vulnerable species, including crab.
- The **Conservation Area Summary Glossy** highlights numerous closures in federal waters as an effective management tool to **conserve habitat biodiversity and ecosystems**, even when **measuring effectiveness** of area closures presents challenges.
- The conservation value of **preserving benthic habitat integrity** is widely recognized.
- Areas with **high densities of vulnerable species**, such as crab, have been closed to trawling to **protect them in their habitat**.

Maintain the Focus on Crab Protection

As noted in our opening remarks, **fishermen have been seeking protections** for Tanner crab in these areas for **21 years**.

- We now have the **necessary data** to move this action, focused exclusively on **Tanner crab protections**, to an **initial review impact analysis**.
- We strongly believe it is **inappropriate** to use the discussion of Tanner crab protections as a vehicle to:
    - **Reconsider opening** currently closed areas to bottom trawling.
    - If there is interest in **exploring the efficacy of closed areas** around Kodiak Island, that discussion should occur **separately**, on its own track.
- **Opening areas currently closed** to bottom trawling is far outside the scope of this document and would **undermine the focus of this action**, which is to **protect crab**.

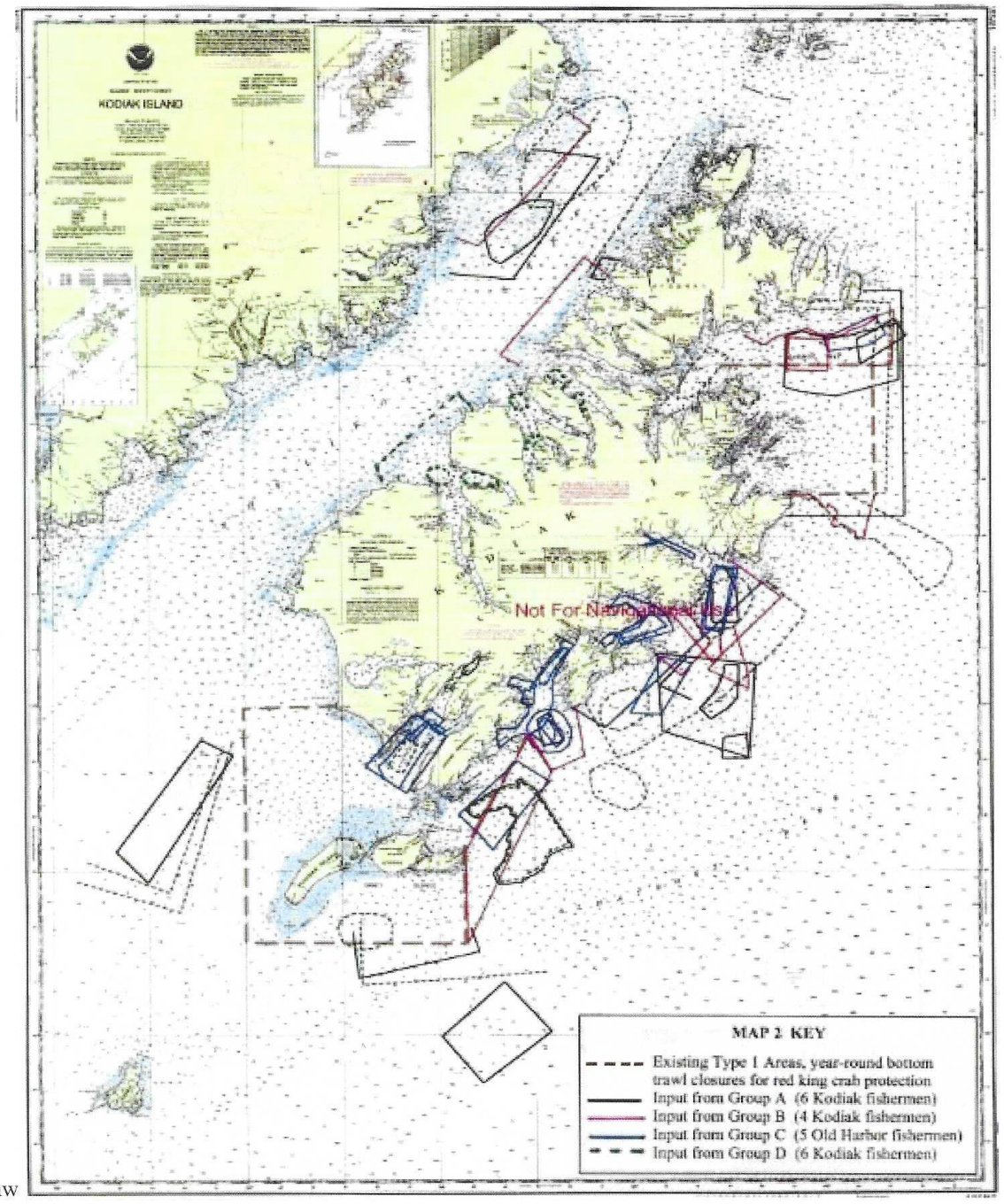
Kodiak is a **fishery-dependent community** that relies on a diverse range of species, including:

- **Salmon, halibut, sablefish, herring, groundfish, and crab**.
- The key to Kodiak's economic stability is **maintaining a resilient ecosystem** capable of supporting this diversity.

We know where the crab are – **let's act now to protect them**.

Sincerely,

Theresa Peterson
Fisheries Policy Director, Alaska Marine Conservation Council



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2004 Local Knowledge Map