

Old Harbor Fisheries Committee
P.O. Box 71
Old Harbor, AK 99643

March 27, 2022

Via: Email

Alaska Board of Fisheries
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Proposals 270 [Kodiak Tanner Crab Pot Limits]

Dear Chairman VanDort and Board members:

Old Harbor Strongly Supports Proposal 270 and advocates for further pot limit modifications.

Old Harbor crafted proposal 270 almost two years ago when there wasn't a tanner crab season. We could see the recruitment in our subsistence pots and anticipated a larger quota for the 2021 or 2022 season. We were concerned that a larger quota would trigger larger pot limits. Our proposal would ensure that there would never be more than 40 pots per vessel in the Kodiak Tanner crab fishery. However, with the experience of the 2022 season and the fleet's ability to catch substantial amounts of crab in a short time with the current 20 pot limit, our request is that the Board modify proposal 270 so that there is a single 20 pot limit for the Kodiak tanner crab fishery without regard to the size of the quota.

Kodiak's tanner crab fishery has struggled over the past 20 years to maintain a harvestable surplus of crab. Recruitment is irregular and episodic. The fishery is characterized by mostly local vessels with smaller vessels, under 60 ft. making up the bulk of the fleet. The 20-pot limit was adopted by the Board back about 1999 to ensure that a fishery could occur --- the fear was that the fishery couldn't open if there was a small harvestable surplus but no pot limit. In this context, the current "stair step" pot limit was adopted. Over the past 20 years the fleet has discovered that it can be very effective with 20 pots. Moreover, with the "daylight fishing only" limitation in the fishery, 20 pots are about as many pots as a vessel can pull twice a day. Most of the current participants in the fishery are very happy with the 20-pot limit.

It's unlikely that the fishery will see quotas above 5,000,000# for the foreseeable future. However, keeping higher pot limits in the regulation book could have the unintended consequence of attracting a number of larger vessels to the fishery in a year with a higher quota in part because of the larger pot limits. Rather than risk this type of occurrence. Old Harbor and the majority of the fleet would like to have the Board simply adopt a 20-pot limit for the Kodiak tanner crab fishery.

Very truly yours,

Duncan Fields, Manager