

Chair & Members  
State of Alaska Board of Fish,

Jan 16<sup>th</sup>, 2023

We are requesting that the Board of Fish take emergency action and implement regulatory language that would allow Kodiak Tanner Crab Catcher Vessels to tender crab for other registered Kodiak catcher vessels.

Tanner season in the Area J (Kodiak) opened January 15<sup>th</sup>. The quotas are significantly up, but the price at the dock has plummeted. While this is due to a complexity of issues and reasons, the magnitude of the drop was beyond what harvesters believed possible. Currently, the highest base price offered is in Dutch Harbor, Alaska. This offer also agrees to match other markets in the Bering Sea at the end of season. Kodiak Crab Alliance Cooperative (KCAC) would like to consider this offer without leaving its smaller vessel operators behind. General regulations prohibit a catcher vessel to tender tanner crab. We have offered potential language borrowed from the general Dungeness regs for the purpose of alleviating this problem. An action at this meeting under Miscellaneous Business would allow Kodiak tanner crab harvesters to also tender and give small catcher vessels the resources to access the same market value.

The Boards action would be a finding of emergency under 5 AAC 96.625 (f):

**(f) The Boards of Fisheries and Game recognize that in rare instances circumstances may require regulatory changes outside the process described in (b) - (d) of this section. It is the policy of the boards that a petition will be denied and not scheduled for hearing unless the problem outlined in the petition justifies a finding of emergency under AS 44.62.250(a). In accordance with state policy expressed in AS 44.62.270, emergencies will be held to a minimum and rarely found to exist. Except for petitions dealing with subsistence hunting or subsistence fishing, an emergency is an unforeseen, unexpected event that either threatens a fish or game resource; *or an unforeseen, unexpected resource situation where a biologically allowable resource harvest would be precluded by delayed regulatory action and such delay would be significantly burdensome to the petitioners because the resource would be unavailable in the future.***

As we all know, the price of diesel, bait, insurance, and groceries have skyrocketed. The record 2022 price of \$8.10/lb (for Tanners) has dramatically sunk by 63% in 2023. The average mean price from the 2019 & 2020 seasons is \$4.33 and the current local market is 31% below that number. The local offer is not near the anticipated number nor is it even near the 2019-20 mean price.

Smaller vessels with less stability will not be able to safely transport in open seas in a timely manner, to a processor 3+ days away. There would be expected weather delays, dead loss, and lost fishing time. The Board of Fish is able to provide decisive, adaptive management to address the problem. ***Kodiak tanner crab harvesters need the resource/ability to utilize the best market value possible and have enough time to prosecute the fishery in an orderly and safe manner prior to the March 31<sup>st</sup> closure date.***

Suggested language:

5 AAC 35.033 Tenders for Tanner crab

Notwithstanding 5 AAC 35.033 (a);

(d) in the Kodiak District, a vessel registered to fish for tanner crab may tender tanner crab from other registered Tanner crab vessels. A tender operator must be an authorized agent of a processor. Before using a vessel as a tender under this section, the tender operator shall register as a tender with the department at the department office in Kodiak. A tender operator shall complete an ADF&G fish ticket at the first point of delivery from the catcher vessel.

Kodiak Crab Alliance Cooperative