

Madame Chair and members of the Board:

My name is John Hilsinger. I live in Anchorage and have been involved in crab research and management in Alaska for over 50 years. My full comments are found in PC 210. Today I would like to encourage you to adopt Proposal 11, which would close state waters of the Aleutian Islands west of 170 W. Long. to trawling. The purpose of this proposal is to protect golden king crab habitat, primarily from large factory trawlers. I have had the opportunity to review all the comments opposing this proposal. They raise four main arguments against adoption:

1. **This is just an issue between a few boats and they should work it out privately.** This argument ignores impacts of trawling on habitat, which is the whole reason for the proposal. The reason that issues of grounds pre-emption and gear loss even come up is that they prove trawlers are operating on golden king crab habitat. Crab live on the bottom and feed almost exclusively of bottom dwelling organisms, such as worms, clams, mussels, snails, sea stars, and sponges that cannot escape a trawl. Golden king crab in much of the area have declined dramatically. Trawling certainly does not help rebuild that population.
2. **Closing these waters will shift effort and cause problems in other areas.** The average proportion of trawl catch that comes from state waters west of 170 W. Long is well under 1% of the total trawl catch, and in 2025, it was well under one-quarter of a percent. It is doubtful the effects of shifting this effort would even be noticeable.
3. **Crab bycatch in the trawl fishery is minimal.** The type of trawl gear used is not likely to catch crab which are a mobile species. Combined with the fact crab are only reported as bycatch when an entire crab is captured, it is not surprising the data show little bycatch. The primary concern is the impact on habitat.
4. **There is little or no evidence that trawling is damaging to benthic habitat.** The board has already closed trawling in state waters all around Kodiak Island and along the Alaska Peninsula at least from Kamishak Bay to the tip of Unimak Island specifically to protect crab habitat. This argument implies that Board did not have justification to do that. The council has made this issue one of its top research priorities. The precautionary approach is to close the area until there is data that prove trawling is not a problem.

In closing, I encourage to vote for Proposal 11 and would happily answer any questions.