

Dan Hull, Chairman NPFMC

North Pacific Fishery Management Council

605 W. 4th AVE.

Anchorage, Alaska 99501

Re agenda item: D-2 Crab Habitat Conservation Measures

Dear Chairman Hull and Council members:

The Kodiak Crab Alliance Cooperative (KCAC) is a co-op made up of the majority of Kodiak Tanner crab permit holders. We encourage the Council to expand the discussion paper with these items taken into consideration:

- (1) The directed Tanner crab fishery has been closed since 2014. We would like a better understanding of the effects other gear groups participating in federal groundfish fisheries are having on the Tanner crab during these times of low abundance.
- (2) In 2010 the Council recommended that PSC catch estimation be improved either by Amendment 89 or by the restructured observer program. The restructured observer program was anticipated to meet the Council's desire for more accurate and reliable catch accounting of fishing activities, including catch information for Tanner crab in the groundfish fisheries. Has this been the case?
- (3) One of the options in Amendment 89 was to have 100% observer coverage in the known areas of Tanner crab on the Eastside of Kodiak Island. The Council chose to let the restructured observer coverage pick this up, versus constraining the trawl fleet with 100% observer coverage. Can we look at the data collected over the last 7 years and say with confidence we know more now than we did in 2010?
- (4) How has the restructured observer program improved data of Tanner crab bycatch, particularly in the areas identified as critical habitat?
- (5) When the observer program came online, the Council requested NMFS to initiate an observer deployment strategy that ensures adequate coverage in the important areas (Council October 2010 newsletter). Does the deployment strategy provide adequate coverage?

KCAC looks forward to working with the Council on this very important issue. In addition to the recommendations above, we would like to see better understanding of whether or not the trawl sweeps are having the desired benefits. Our concern is the difference in the topography of Kodiak and the Bering Sea and the potential differences in the identified benefits of the sweeps as tested in the Bering Sea. In closing, please continue the discussion of this fully allocated, recovering species and continue to work with ADF&G to ensure the data collected is relevant to their needs and ability to project Tanner crab stock impacts from other users.

Sincerely, Pete Longrich, Brian Horn, Luke Lester, Alexis Kwachka, Ryan Johnson



KONIAG
INCORPORATED

May 26, 2017

Dan Hull, Chairman
North Pacific Fisheries Management Council
605 W. 4th Ave
Anchorage, AK 99501

Re Agenda Item: D-2 GOA Crab Habitat Conservation Measures

Dear Chairman Hull and Council members:

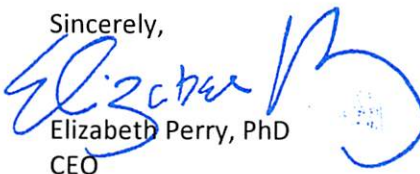
Koniag, Inc. is a regional Alaska Native Corporation formed under the terms of the Alaska Native Claims Settlement Act of 1971. Koniag, Inc. has approximately 3,900 Alutiiq Shareholders. Our region encompasses the Kodiak Archipelago in the Gulf of Alaska and a portion of the Alaska Peninsula. The communities in our region have been dependent on fisheries resources for subsistence and commercial purposes for centuries.

The Tanner crab populations in the Gulf of Alaska are in a period of low abundance and the directed Tanner crab fishery has been closed since 2014 to provide for the conservation of crab stocks. Prior to 2014, the Tanner crab fishery was an important source of winter fishing and income opportunity for many residents of Kodiak and the villages on Kodiak Island. This fishery was and is designed to benefit community based fishermen and to minimize the impact on crab stocks with pot limits and daylight only fishing. Being a winter fishery, the Tanner crab season was an important fishing opportunity for a fleet with limited winter fishing options and provided an opportunity for intergenerational transfer of crab fishing knowledge for communities that have not seen a commercial King crab season since the early 1980's.

Currently, Tanner crab fishermen are bearing the burden of conservation through multiple years of fishery closure while data on the impact the ground fish fisheries may have on Tanner crab stocks is lacking due to inadequate observer coverage on all ground fish gear types. Sustainable management of all fisheries depends on adequate observer coverage to minimize bycatch to the extent practicable in all fisheries.

As the Council reviews a discussion paper about central Gulf of Alaska Tanner crab conservation measures during its June, 2017 meeting, Koniag requests that you take actions to increase observer coverage in areas identified as essential fish habitat for Tanner crab around Kodiak Island to provide adequate data to understand the interactions of the ground fish fishery with Tanner crab. Furthermore, Koniag requests that the NPFMC take a precautionary approach that mitigates impacts of federal ground fish fisheries on Tanner crab stocks to address these uncertainties.

Sincerely,


Elizabeth Perry, PhD
CEO

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FAX (907) 562-5258

City of Larsen Bay
PO Box 08
Larsen Bay, AK 99624
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Email: cityoflarsenBay@gmail.com

Resolution NO. 17-08

A RESOLUTION REQUESTING THE NORTH PACIFIC FISHERY MANAGEMENT COUNCIL TO FULLY ANALYZE THE IMPACTS OF FEDERAL GROUND FISH FISHERIES ON THE RECOVERY OF CENTRAL GULF OF ALASKA TANNER CRAB STOCKS.

WHEREAS, healthy fisheries are the backbone of the economies and cultures of the rural coastal communities on Kodiak Island of Akhiok, Karluk, Larsen Bay, Old Harbor, Ouzinkie and Port Lions, including fishermen, support businesses and community residents; and

WHEREAS, the North Pacific Fishery Management Council (NPFMC), is reviewing a discussion paper on existing crab habitat protection around the Kodiak Archipelago; and

WHEREAS, the commercial Tanner crab fishery provides an important component of community based fleets in rural communities to maintain diversified fishing opportunity; and

WHEREAS, the Tanner crab fishery was designed to benefit small boat fishermen and to minimize impacts on the crab stocks with pot limits, day light only fishing and severe weather stand downs; and

WHEREAS, the fishery provides an important income opportunity for a fleet with limited winter commercial fishing income which affords vessel improvements and gear for upcoming fisheries; and

WHEREAS, coastal communities around Kodiak Island depend on the intergenerational transfer of fishing knowledge such that loss of access to a fishery results in a community loss of critical knowledge for future generations; and

WHEREAS, the current observer program in the Gulf of Alaska has resulted in lower coverage rates in the federal ground fish fishery and has reduced the data necessary to understand the impacts to the Tanner crab stocks from federal ground fish fisheries during a time of low abundance; and

WHEREAS, during cycles of low abundance the Tanner crab population in core areas have increased relevance to the health of the population as a whole; and

WHEREAS, when ground fish fisheries encounter core areas of Tanner crab stocks during periods of low abundance, such encounters result in a greater impact to the rebuilding of the Tanner crab; and

WHEREAS, the directed Tanner crab fisherman have been bearing the full burden of conservation through multiple years of directed fishery closures without adequate data to understand impacts of federally managed ground fish fisheries; and

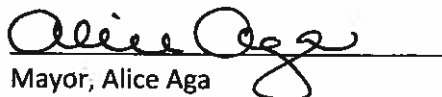
WHEREAS, pas NPFMC actions to increase observer coverage in areas identified as essential fish habitat for Tanner crab around Kodiak Island to provide adequate data to understand the interactions of the ground fish fishery with crab were never implemented; and

WHEREAS, sustainable management of all fisheries depends on adequate observer coverage to minimize by cat to the extent practicable; and

THEREFORE, BE IT RESOLVED that the CITY OF LARSEN BAY requests that the NPFMC provide assurance to the communities of the Kodiak Archipelago that the federal ground fish fisheries contain adequate sampling designs to provide confidence in regards to impacts on the health of the rebuilding Tanner crab stocks; and

BE IT FURTHER RESOLVED that the CITY OF LARSEN BAY requests that the NPFMC consider a precautionary approach to mitigate impacts of federal ground fish fisheries to the Tanner crab stocks to address these uncertainties.

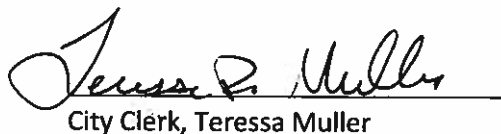
PASSED and APPROVED by a duly constituted quorum of the City of Larsen Bay this 10th day of May 2017.



Mayor, Alice Aga

5-11-17

Date



City Clerk, Teresa Muller

5/11/17

Date

**KODIAK ARCHIPELAGO RURAL REGIONAL LEADERSHIP FORUM
Resolution 03-2017**

**A RESOLUTION REQUESTING THE NORTH PACIFIC FISHERY MANAGEMENT
COUNCIL TO FULLY ANALYZE THE IMPACTS OF FEDERAL GROUND FISH
FISHERIES ON THE RECOVERY OF CENTRAL GULF OF ALASKA TANNER CRAB
STOCKS.**

WHEREAS, healthy fisheries are the backbone of the economies and cultures of the rural coastal communities on Kodiak Island of Akhiok, Karluk, Larsen Bay, Old Harbor, Ouzinkie and Port Lions, including fishermen, support businesses and community residents; and

WHEREAS, the North Pacific Fishery Management Council (NPFMC), is reviewing a discussion paper on existing crab habitat protection around the Kodiak Archipelago; and

WHEREAS, the commercial Tanner crab fishery provides an important component of community based fleets in rural communities to maintain diversified fishing opportunity; and

WHEREAS, the Tanner crab fishery was designed to benefit small boat fishermen and to minimize impacts on the crab stocks with pot limits, day light only fishing and severe weather stand downs; and

WHEREAS, the fishery provides an important income opportunity for a fleet with limited winter commercial fishing income which affords vessel improvements and gear for upcoming fisheries; and

WHEREAS, coastal communities around Kodiak Island depend on the intergenerational transfer of fishing knowledge such that loss of access to a fishery results in a community loss of critical knowledge for future generations; and

WHEREAS, the current observer program in the Gulf of Alaska has resulted in lower coverage rates in the federal ground fish fishery and has reduced the data necessary to understand the impacts to the Tanner crab stocks from federal ground fish fisheries during a time of low abundance; and

WHEREAS, during cycles of low abundance the Tanner crab population in core areas have increased relevance to the health of the population as a whole; and

WHEREAS, when ground fish fisheries encounter core areas of Tanner crab stocks during periods of low abundance, such encounters result in a greater impact to the rebuilding of the Tanner crab; and

WHEREAS, the directed Tanner crab fishermen have been bearing the full burden of conservation through multiple years of directed fishery closures without adequate data to understand impacts of federally managed ground fish fisheries; and

WHEREAS, past NPFMC actions to increase observer coverage in areas identified as essential fish habitat for Tanner crab around Kodiak Island to provide adequate data to understand the interactions of the ground fish fishery with crab were never implemented; and

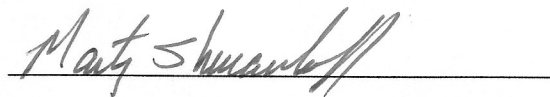
WHEREAS, sustainable management of all fisheries depends on adequate observer coverage to minimize by catch to the extent practicable;

THEREFORE, BE IT RESOLVED that the Kodiak Island Rural Regional Leadership Forum requests that the NPFMC provide assurance to the communities of the Kodiak Archipelago that the federal ground fish fisheries contain adequate sampling designs to provide confidence in regards to impacts on the health of the rebuilding Tanner crab stocks; and

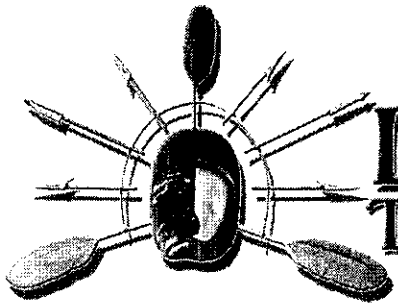
BE IT FURTHER RESOLVED that the Kodiak Archipelago Rural Regional Leadership Forum requests that the NPFMC consider a precautionary approach to mitigate impacts of federal ground fish fisheries to the Tanner crab stocks to address these uncertainties.

PASSED AND ADOPTED by the 47 leaders attending the Kodiak Archipelago Rural Regional Leadership Forum on April 27, 2017.

IN WITNESS THERETO:

A handwritten signature in cursive script, reading "Marty Shuravloff", is written over a horizontal line.

Marty Shuravloff, Chairman



LARSEN BAY TRIBAL COUNCIL

PHONE (907) 847-2207
FAX (907) 847-2307

PO Box 50
LARSEN BAY
ALASKA 99624

Resolution NO. 17-09

A RESOLUTION REQUESTING THE NORTH PACIFIC FISHERY MANAGEMENT COUNCIL TO FULLY ANALYZE THE IMPACTS OF FEDERAL GROUND FISH FISHERIES ON THE RECOVERY OF CENTRAL GULF OF ALASKA TANNER CRAB STOCKS.

WHEREAS, healthy fisheries are the backbone of the economies and cultures of the rural coastal communities on Kodiak Island of Akhiok, Karluk, Larsen Bay, Old Harbor, Ouzinkie and Port Lions, including fishermen, support businesses and community residents; and

WHEREAS, the North Pacific Fishery Management Council (NPFMC), is reviewing a discussion paper on existing crab habitat protection around the Kodiak Archipelago; and

WHEREAS, the commercial Tanner crab fishery provides an important component of community based fleets in rural communities to maintain diversified fishing opportunity; and

WHEREAS, the Tanner crab fishery was designed to benefit small boat fishermen and to minimize impacts on the crab stocks with pot limits, day light only fishing and severe weather stand downs; and

WHEREAS, the fishery provides an important income opportunity for a fleet with limited winter commercial fishing income which affords vessel improvements and gear for upcoming fisheries; and

WHEREAS, coastal communities around Kodiak Island depend on the intergenerational transfer of fishing knowledge such that loss of access to a fishery results in a community loss of critical knowledge for future generations; and

WHEREAS, the current observer program in the Gulf of Alaska has resulted in lower coverage rates in the federal ground fish fishery and has reduced the data necessary to understand the impacts to the Tanner crab stocks from federal ground fish fisheries during a time of low abundance; and

WHEREAS, during cycles of low abundance the Tanner crab population in core areas have increased relevance to the health of the population as a whole; and

WHEREAS, when ground fish fisheries encounter core areas of Tanner crab stocks during periods of low abundance, such encounters result in a greater impact to the rebuilding of the Tanner crab; and

WHEREAS, the directed Tanner crab fisherman have been bearing the full burden of conservation through multiple years of directed fishery closures without adequate data to understand impacts of federally managed ground fish fisheries; and

WHEREAS, pas NPFMC actions to increase observer coverage in areas identified as essential fish habitat for Tanner crab around Kodiak Island to provide adequate data to understand the interactions of the ground fish fishery with crab were never implemented; and

WHEREAS, sustainable management of all fisheries depends on adequate observer coverage to minimize by cat to the extent practicable; and

THEREFORE, BE IT RESOLVED that the Larsen Bay Tribal Council requests that the NPFMC provide assurance to the communities of the Kodiak Archipelago that the federal ground fish fisheries contain adequate sampling designs to provide confidence in regards to impacts on the health of the rebuilding Tanner crab stocks; and

BE IT FURTHER RESOLVED that the Larsen Bay Tribal Council requests that the NPFMC consider a precautionary approach to mitigate impacts of federal ground fish fisheries to the Tanner crab stocks to address these uncertainties.

PASSED and APPROVED by a duly constituted quorum of the Larsen Bay Tribal Council this

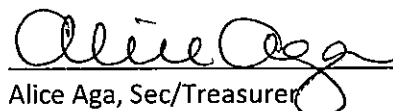
17 day of May 2017.



Chad Aga, Tribal President

5-17-2017

Date



Alice Aga, Sec/Treasurer

5-18-17

Date

NATIVE VILLAGE OF PORT LIONS

RESOLUTION NO. 2017-11R

A RESOLUTION OF THE NATIVE VILLAGE OF PORT LIONS TRADITIONAL TRIBAL COUNCIL REQUESTING THE NORTH PACIFIC FISHERY MANAGEMENT COUNCIL TO FULLY ANALYZE THE IMPACTS OF FEDERAL GROUND FISH FISHERIES ON THE RECOVERY OF CENTRAL GULF OF ALASKA TANNER CRAB STOCKS.

- WHEREAS,** the Native Village of Port Lions is a federally recognized Indian Tribe as defined in Section 3(c) of the Alaska Native Claims Settlement Act, as amended; and
- WHEREAS,** the Port Lions Traditional Tribal Council is the governing body of the Native Village of Port Lions; and
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- WHEREAS,** the Native Village of Port Lions has consistently implemented and operated successful membership and community services since its formal inception in August, 1978; and
- WHEREAS,** healthy fisheries are the backbone of the economies and cultures of the rural coastal communities on Kodiak Island, including fishermen, support businesses and community residents; and
- WHEREAS,** the North Pacific Fishery Management Council (NPFMC), is reviewing a discussion paper on existing crab habitat protection around the Kodiak Archipelago; and
- WHEREAS,** the commercial Tanner crab fishery provides an important component of community based fleets in rural communities to maintain diversified fishing opportunity; and
- WHEREAS,** the Tanner crab fishery was designed to benefit small boat fishermen and to minimize impacts on the crab stocks with pot limits, day light only fishing and severe weather stand downs; and
- WHEREAS,** the fishery provides an important income opportunity for a fleet with limited winter commercial fishing income which affords vessel improvements and gear for upcoming fisheries; and
- WHEREAS,** coastal communities around Kodiak Island depend on the intergenerational transfer of fishing knowledge such that loss of access to a fishery results in a community loss of critical knowledge for future generations; and
- WHEREAS,** the current observer program in the Gulf of Alaska has resulted in lower coverage rates in the federal ground fish fishery and has reduced the data necessary to understand the impacts to the Tanner crab stocks from federal ground fish fisheries during a time of low abundance; and
- WHEREAS,** during cycles of low abundance the Tanner crab population in core areas have increased relevance to the health of the population as a whole; and
- WHEREAS,** when ground fish fisheries encounter core areas of Tanner crab stocks during periods of low abundance, such encounters result in a greater impact to the rebuilding of the Tanner crab; and
- WHEREAS,** the directed Tanner crab fishermen have been bearing the full burden of conservation through multiple years of directed fishery closures without adequate data to understand impacts of federally managed ground fish fisheries; and

**Native Village of Port Lions
RESOLUTION NO. 2017-11R**

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WHEREAS, past NPFMC actions to increase observer coverage in areas identified as essential fish habitat for Tanner crab around Kodiak Island to provide adequate data to understand the interactions of the ground fish fisheries with crab were never implemented; and

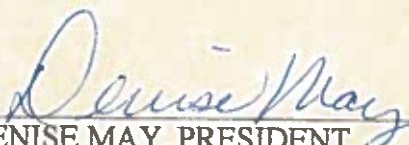
WHEREAS, sustainable management of all fisheries depends on adequate observer coverage to minimize by catch to the extent practicable;

NOW THEREFORE BE IT RESOLVED, that the Native Village of Port Lions Traditional Tribal Council requests that the NPFMC provide assurance to the communities of the Kodiak Archipelago that the federal ground fish fisheries contain adequate sampling designs to provide confidence in regards to impacts on the health of the rebuilding Tanner crab stocks; and

BE IT FURTHER RESOLVED that the Native Village of Port Lions Traditional Tribal Council requests that the NPFMC consider a precautionary approach to mitigate impacts of federal ground fish fisheries to the Tanner crab stocks to address these uncertainties.

CERTIFICATION:

We, the undersigned officers of the Port Lions Traditional Tribal Council, do hereby certify that the foregoing Resolution was duly adopted on the twenty-ninth day of April, 2017, with a quorum present and 4 votes for, 0 votes against, and 0 abstaining.


DENISE MAY, PRESIDENT


NANCY NELSON, COUNCIL MEMBER