

June 5, 2020

North Pacific Fishery Management Council
1007 West Third, Suite 400
Anchorage, AK 99501-2252

Re: Agenda item D-1, Observer Update With Respect to COVID-19 Response

Dear Chairman Kinneen and Members of the Council:

Koniag is a regional Alaska Native Corporation formed under the terms of the Alaska Native Claims Settlement Act of 1971. Koniag has approximately 4,200 Alutiiq Shareholders. Our region encompasses the Kodiak Island area in the Gulf of Alaska and a portion of the Alaska Peninsula. Koniag has been working diligently on issues affecting the viability and sustainability of the village communities of the Kodiak Archipelago and access to fisheries is a critical component of this effort. Thank you for the opportunity to comment on actions under consideration because of the COVID-19 pandemic.

Koniag supports protection of our marine resources through bycatch reductions of crab, halibut, and salmon that our region's communities have traditionally depended on for subsistence and commercial purposes. Archaeological data demonstrates that these and other species have sustained our communities for millennia and in the last century have provided commercial opportunities that provided much needed economic opportunities as the communities transitioned to the western cash economy.

It is our understanding there was minimal observer coverage on the flatfish fishery in the first few weeks of April due to COVID related concerns with deploying observers. This is unfortunate but understandable given the circumstances. This does, however, highlight an ongoing concern with adequate observer data to understand the interactions of bottom trawling in areas of importance to Tanner crab.

There are currently 183 permit holders in the Kodiak Tanner crab fishery and most of the participants are community-based vessels in Kodiak and Old Harbor. 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 is an important fishing opportunity for a fleet with limited winter fishing options and provides 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.

For several years, Tanner crab fishermen bore the burden of conservation through multiple years of fishery closure while data on the impact the groundfish fisheries may have on Tanner crab stocks is lacking due to inadequate observer coverage. Sustainable management of all fisheries depends on adequate observer coverage to minimize bycatch to the extent practicable in all fisheries.

As the Observer program explores alternative deployment methods in 2020 to observe catch in the partial coverage fleet, Koniag requests that efforts to increase coverage rates on bottom trawling on the east side of

Kodiak Island which has consistently had the highest Tanner crab population in the Kodiak District per annual Alaska Department of Fish & Game trawl surveys. Recently, these surveys indicate the Tanner crab population is rebuilding presumably due to favorable environmental conditions. Healthy Tanner crab populations will provide winter jobs and increase state shared fisheries taxes with Kodiak during a time municipal budgets are strained due to COVID-19.

Kodiak area fishermen have been requesting increased observer coverage rates for bottom trawl fisheries around Kodiak for decades and were hoping that the restructured observer coverage would provide an avenue for increased data. But, in actuality, the coverage rates on bottom trawling have decreased.

As measures are considered to reinstate observers in the partial coverage fleet for the remainder of 2020, please consider a significant increase in observer coverage in bottom trawl flatfish fisheries. Flatfish fisheries around Kodiak Island are known to be bycatch intense, impacting both halibut and Tanner crab stocks and were subject to minimal observer coverage this spring due to observer waivers. The gap is concerning and Koniag requests the Council to direct efforts toward this fishery and utilize the observer base in Kodiak to address this need. Increased coverage on flatfish targets will help get long awaited coverage on the east side of Kodiak Island, particularly areas of greatest Tanner crab abundance, where much of this fishery occurs.

Sincerely,



Shauna Hegna
President