



June 2, 2023

Agenda Item Staff Tasking E-1

Dear Chairman Kinneen and Council Members,

The Alaska Marine Conservation Council (AMCC) is dedicated to protecting the long-term health of Alaska's marine ecosystems which sustain vibrant fishery-dependent communities. Our members include fishermen, subsistence harvesters, marine scientists, small business owners and diverse fishing families. Our ways of life, livelihoods and local economies depend on the sustainable fishing practices that contribute to healthy ecosystems.

We request that the Council initiate a discussion paper on measures to address long standing concerns about GOA Tanner crab bycatch around Kodiak Island. Efforts to mitigate impacts of the federal groundfish fisheries on GOA Tanner crab have been actively pursued for nearly two decades. This issue is not new and Kodiak fishermen have done a lot of work over the years to contribute useful information to the Council's discussions.

Beginning in 2004, AMCC worked hand-in-hand with Kodiak Island fishermen who had concerns about the lack of conservation measures in federal waters of the Gulf of Alaska to address Tanner crab bycatch and the effects of bottom trawl gear on crab habitat. Crab protections were introduced as an alternative in the developing Gulf of Alaska rationalization program as part of the identified goal to "create a management program that improves conservation, reduces bycatch and provides greater economic stability for harvesters, processors and communities".

AMCC and fishermen produced local knowledge maps highlighting important crab habitat. Over 20 fishermen from Old Harbor and Kodiak participated in compiling the maps to show both historic and recent knowledge about where the crab live. There is commonality between the local knowledge and scientific data about what areas are important for crab. At the time over 150 fishermen supported Tanner crab protections as a critical component of the GOA rationalization management program. Components of the program design provided opportunity to increase bottom trawling around Kodiak with the ability to shift halibut bycatch use in bottom trawl targets. The flatfish fisheries were termed 'incentive fisheries' – the incentive being to fish cleaner in one fishery in order to gain more access to another fishery

that inherently has more bycatch. Bycatch saved in one fishery could be transferred to other fisheries that have the most adverse impact on crab and sensitive seafloor habitats. Due to the controversial nature of the GOA rationalization program, the Council tabled the action.

From 2007 through 2010, AMCC and Tanner crab fishermen came before the Council requesting Tanner crab protections. The request came as a result of increased trawling for flatfish around Kodiak Island. While the trawl sector was benefiting substantially from a variety of management measures that increased opportunities for targeting flatfish, the impact on Tanner crab stocks and the directed Tanner crab fishery was potentially significant. The rockfish program allows the fleet to transfer halibut PSC quota from the rockfish fishery to other trawl fisheries occurring in the fall which include important Tanner crab grounds. Higher groundfish MRA's for the directed arrowtooth flounder fishery increased effort in areas important for Tanner crab, in particular the northeast and eastside districts, closest to town. Arrowtooth flounder needs to be delivered quickly before enzyme breakdown occurs so fishing close to town is desirable. Fishermen dedicated significant time and resources in their advocacy to protect crab and in October 2010, the Council adopted an amended problem statement and preferred alternative for final action:

Problem Statement:

Tanner crab are a prohibited species bycatch in the Gulf of Alaska (GOA) groundfish fisheries. Directed fisheries for Tanner crab in the GOA are fully allocated under the current limited entry system. No specific conservation measures exist in the GOA to address adverse interactions with Tanner crab by trawl and fixed gear sectors targeting groundfish and low observer coverage in GOA groundfish fisheries limits confidence in the assessment of Tanner crab bycatch in those fisheries, and a greater level of observer coverage in the appropriate areas may provide the Council with a higher level of confidence in the assessment of any bycatch occurring in the designated areas as a basis for future management actions as necessary. Trawl sweep modifications have been effective in reducing unobserved bycatch mortality of Tanner crab in the Bering Sea, and similar effects may be realized in the Gulf of Alaska if modified trawl sweeps are employed in those groundfish fisheries. (October 2010 [motion](#))

A significant component of the final action was to require 100% observer coverage on non-pelagic vessels and 30% observer coverage on pot cod vessels in order to fish in identified statistical areas, illustrated in figure 2 from the analysis below, until the restructured observer program was implemented. At that time the Council anticipated a year of these higher coverage rates prior to an improved observer program.

Due to delays in implementation of the 100% observer coverage requirement, the action was never implemented. While the restructured program resulted in improved temporal and spatial coverage across groundfish sectors in the Gulf of Alaska, coverage rates for the non-pelagic trawl have decreased since inception of the restructured observer program. Consequently, we have limited data regarding our understanding of impacts to Tanner crab stocks from federal groundfish fisheries in areas known to have high Tanner crab densities. At the time of the

action, more than 100 fishermen testified in support of 100% observer coverage for Tanner crab areas and it is widely supported today by Gulf of Alaska fishermen.

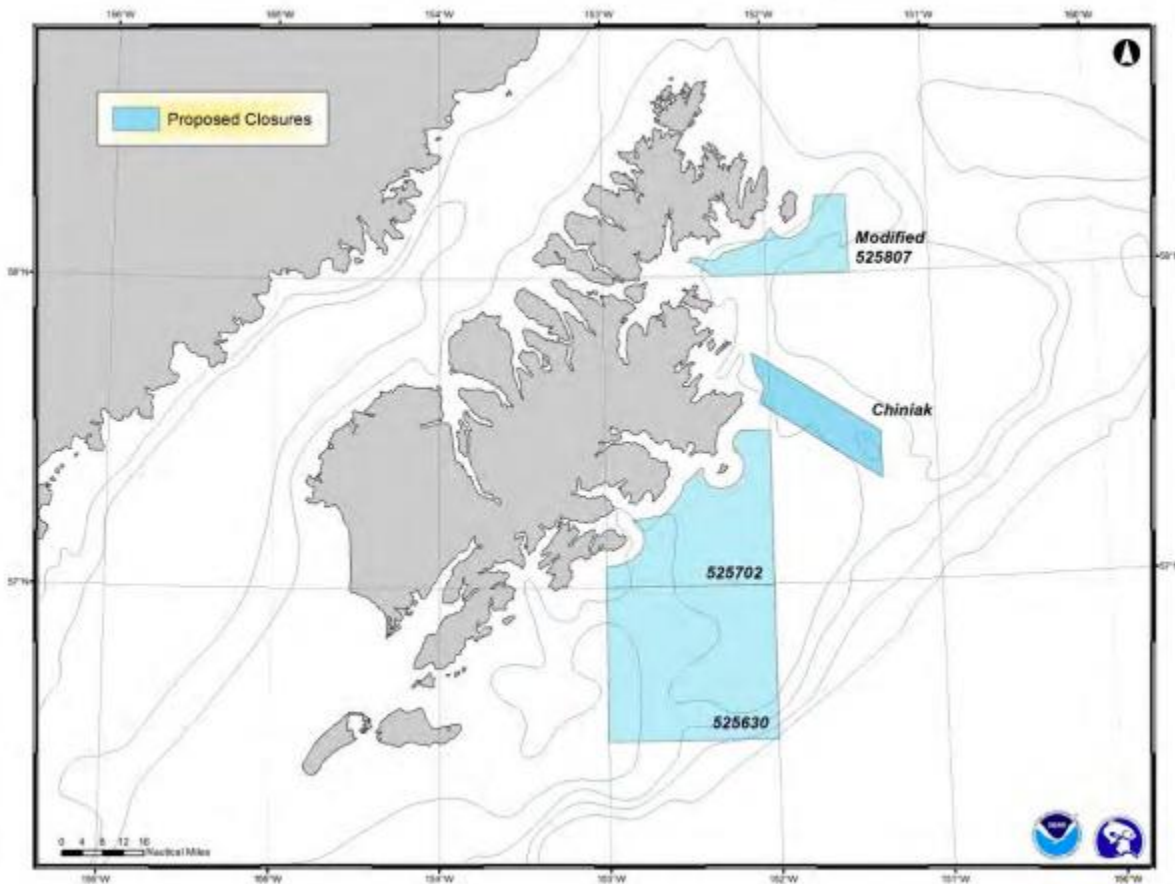


Figure 2 Area closures around Kodiak Island considered in Alternatives 2 and 3 in October 2010. Area Closures for C. Bairdi Crab Protections in GOA Groundfish Fisheries (page 4)

Kodiak is a fishery dependent community reliant on salmon, halibut and sablefish, herring groundfish and crab. The key to success is maintaining a resilient ecosystem necessary to support this economic diversity. In providing economic opportunity for groundfish fisheries, there should be enough “give” to enhance opportunities for Tanner crab. Healthy crab populations will increase jobs and increase Kodiak’s raw fish tax base which is used to maintain the infrastructure of the fishing community. The commercial Tanner crab fishery provides an important source of revenue to Alaska fishermen and Alaska communities in the winter and helps to maintain small boat fishermen during a time when there are limited fishing opportunities. In 2023, approximately 130 boats harvested over 5 million pounds of crab worth over 18 million dollars.

Since the early 1980’s the Alaska Department of Fish and Game has conducted annual trawl surveys to determine Tanner crab populations in the Kodiak district. Recent recruitment events in the Kodiak Tanner Crab Fishery provide for multiple years of harvest opportunity. The fishery

is designed to benefit community-based fishermen and to minimize the impact on crab stocks with low pot limits and daylight only fishing which minimizes exposure of the crab to cold winter nights. Since the fishery re-started in 1997, the fishermen have championed conservation with threshold limits for openings, conservative quotas and limited pot pulls. Last year, at the Alaska Board of Fisheries meeting, fishermen proposed additional pot limits to reduce impacts on crab and maintain a level playing field. Fishermen plan to come back again in 2025 and ask for another pot reduction, down to a 20-pot limit regardless of the quota. In summary, you have fishermen that have worked to conserve the resource for the past 25 years asking you to consider regulatory changes that would require other fishermen to share the conservation burden. Our focus for conservation is statistical areas 525702 and 525630.

Below is a list of ideas that are under development that could be considered for a discussion paper which would improve our understanding and potential mitigation measures for GOA Tanner crab:

- Develop Electronic Monitoring protocols and/or 100% observer coverage for trawl vessels to accurately assess Tanner crab interactions in these areas.
- Update and review of the Council’s previous action regarding Tanner crab protections;
- Analyze catch records and develop an economic model regarding the value of the groundfish bottom trawl fisheries and the Tanner pot fishery in the identified statistical areas;
- Review of ADF&G trawl survey data and Tanner crab abundance in identified statistical areas;
- Review of trawl gear currently used in the area;
- Review efficacy of the modified trawl sweeps intended to reduce unobserved mortality;
- Consider time on bottom of pelagic trawls operating in areas closed to bottom trawling, in particular bays associated with high Tanner crab abundance;
- Provide an overview of the current observer program, number of observed trips in this area and observed bycatch of Tanner crab;
- Consider time and area closures and other appropriate measures to protect crab, particularly during vulnerable life stages;
- Assess the following biological information on Tanner crab:
 - Accurate estimates of total fishery mortality in the NPT and PTR groundfish sectors
 - Improved understanding of preferred habitat at various life stages
 - Improved understanding of critical crab habitat
 - Improved understanding of seasonal movement and habitat use relative to groundfish seasons

While the above bullet points are initial suggestions for incorporation in a Council directed discussion paper, we also welcome your feedback and any additional ideas you may have. AMCC and Kodiak Tanner fishermen wish to work together with the Council, the State of Alaska and the National Marine Fisheries Service in a proactive manner toward increased accountability for fishing in Areas 525702 and 525630 and increased Tanner crab protections.

Sincerely,

A handwritten signature in cursive script that reads "Theresa Peterson".

Theresa Peterson
Fisheries Policy Director
Alaska Marine Conservation Council