

September 28, 2010

Eric Olson, Chair
North Pacific Fishery Management Council
605 W. Fourth Ave.
Anchorage, AK 99501

RECEIVED
SEP 29 2010

RE: Agenda Item C-5 GOA Tanner Crab Bycatch

Dear Chairman Olson and members of the Council,

Since 2004 Kodiak Island Tanner crab fishermen have asked the NPFMC to mitigate the impacts of the federal groundfish fisheries on Tanner crab stocks.

The Tanner crab fishery is critical to the diversified local fishing fleet on Kodiak Island.

Kodiak is a fishery dependent community reliant on salmon, halibut and sablefish, herring, groundfish and crab. Tanner crab fishermen participate in a combination of these fisheries to form year-round small businesses for many Kodiak families. The key to success is maintaining this economic diversity.

Stock assessment surveys around Kodiak Island indicate the Tanner crab population is rebuilding presumably due to favorable environmental conditions. Healthy crab populations will provide jobs and increase Kodiak's raw fish tax base. There are 183 permit holders in the Tanner crab fishery and 52 vessels registered for the 2010 season.

Management measures are needed that balance opportunity for everyone and the community as a whole.

Proposed closures encompass the areas of highest Tanner crab abundance.

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. Estimates of Tanner crab populations within the proposed area closures range from just over 16 million crab (2006) to over 38 million crab (2003 and 2008) and average 22.7% of the Kodiak District population for the years 2003-2009. The proportion of crab inside the area closures in the Eastside Section ranged from 20%-71% of the total Eastside Tanner population estimates (Area Closures, p. 15). The eastside section consistently has had the highest population of crab and has averaged over 48 million crab from 2003-2009. Current harvests are strongest on the Eastside of Kodiak Island.

Trawling for flatfish is increasing around Kodiak Island. While the trawl sector is benefiting substantially from a variety of management measures that increase opportunity for targeting flatfish, the impact on Tanner crab stocks and the directed Tanner crab fishery is potentially significant.

- The rockfish program allows the trawl fleet to transfer halibut PSC quota from the rockfish fishery to other trawl fisheries occurring in the fall which include important Tanner crab grounds.
- The higher groundfish MRA for the directed arrowtooth flounder fishery will likely concentrate 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. This encourages the fleet to operate in the Tanner crab grounds. Growing arrowtooth effort has increased impact on Tanner crab.

- Increased use of halibut excluders will allow the fleet to lower bycatch rates and shift halibut PSC into bottom trawl fisheries where halibut bycatch has always been a limitation. Nonpelagic trawling contributes the majority of Tanner bycatch in the federal groundfish fisheries in area 630, ranging from 56% to 99% from 2003-2009, and averaging 83% over the time period (Area Closures, p.27). Some authors suggest that groundfish trawls could easily capture or disrupt an entire Tanner crab mating aggregation (Area Closures p. 8).

While the Council pursues improvements to the Gulf observer program, conservation of Tanner crab remains a problem needing a solution.

Currently there are no conservation measures designed for Tanner crab in the Gulf of Alaska. The Red King Crab Type I and II areas and the state water bottom trawl closure around Kodiak Island provide some shelter for Tanner crab but there are distinct areas of biological concern in federal waters that remain unaddressed. As stated in the Council's problem statement "Tanner crab stocks have been rebuilding since peak fisheries occurred in the late 1970s. Specific protection measures should be advanced to facilitate stock rebuilding." (Area Closure, p. i).

There are significant gaps in observer data on Tanner crab bycatch.

There is large variability in the Tanner crab bycatch numbers that is not likely to reflect accurate encounters with Tanner crab in either trawl or pot fisheries. Council identified concerns about proceeding with alternatives that rely either on bycatch limits, or basing closures on observed bycatch. Instead, the Council initiated the current analysis and suite of alternatives, which identify closures based on Tanner crab abundance rather than on uncertain bycatch patterns.

Measures to protect Tanner crab should address both habitat impact and bycatch.

We know from photographs that trawl gear indiscriminately encounters Tanner crab. We know from research conducted by the Alaska Fishery Science Center Auke Bay Lab that areas closed to bottom trawling around Kodiak Island are productive for more species, including Tanner crab, than adjacent areas exposed to chronic bottom trawling. The study found juvenile Tanner crab were fairly common within the study area, but were "significantly more abundant in areas closed to trawling." (Stone et al, p. 473) Given these and other observations from the study, the paper concludes that bottom trawl closures may provide benefits to Tanner crab (Area Closures, p. 8).

We urge the Council to close important areas of abundance for Tanner crab to bottom trawling so that we may all enjoy the benefits of well-managed, sustainable fisheries.

Sincerely, *Tom Branshaw* / F/V NORTHERN MARINER

The undersigned Tanner crab permits holders, crew and families,
(please contact Kodiak Crab Alliance Cooperative, United Fishermen's Marketing Association, Inc. or Alaska Marine Conservation Council, to sign on)

Denise Branshaw / Branshaw Mariculture Inc.
Cole Wasson / Northern Mariner
Timothy Wasson / Northern Mariner

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SEP 27 2010

RE: Agenda Item C-5 GOA Tanner Crab Bycatch

Dear Chairman Olson,

September 23, 2010

My name is Peter Thompson and i have lived and fished out of Kodiak for 30 years. I began crab fishing in the Kodiak waters in 1980. Since then I have fished most of the major fisheries in the GOA, Aleutians, and the Bering Sea (including a number of trawl fisheries).

For the past 25 years I have been the owner/operator of a small combination vessel. I spend a lot of time on Kodiak's East side in and adjacent to all of the major deep mud gullies that are the prime rearing grounds for tanner crab.

With the increased bottom trawling efforts in the Kodiak waters, I am consistently amazed and concerned at the amount of "hard on the bottom" trawling in and adjacent to the areas considered for closure in alternatives #2 and #3.

In my opinion these areas (#525702, 523630, Chiniak gully, and Marmot modified #525807) are exactly the main grounds that need to be protected.

For years I have longlined in these areas and the halibut and codfish are puking up small tanner crab as they reach the surface and occasionally the tanner crab themselves will hang on the ground line until they near the surface, open their claws, and float away.

There are large numbers of juvenile tanner crab in these areas and they need protection so that the small boat fleet of Kodiak Island will have a chance at a sustainable tanner crab fishery in the future. In order for our local fleet to survive we need the ability to pursue multiple fisheries. The protection of Kodiak's most important tanner crab areas is essential to ensure a sustainable future and a healthy local economy.

Sincerely,


Peter Thompson

September 27, 2010

Eric Olson, Chair
North Pacific Fishery Management Council
605 W Fourth Ave
Anchorage, AK 99501

RECEIVED
SEP 28 2010

RE: Agenda Item C-5 GOA Tanner Crab Bycatch

Dear Chairman Olson:

My name is Ty Rouse. I've been a resident of Alaska for over 30 years. The first fishing job I had was working on the F/V Midnight Sun for Kodiak Tanner crab in the early 80's. Since then I have fished around Kodiak and the Bering Sea.

I saved and bought into Bristol Bay salmon, I own halibut IFQ's and I have a limited entry Kodiak Tanner Crab permit. Recently I purchased a larger vessel to be more competitive in the fisheries around Kodiak. I rely on many fisheries around Kodiak, including Tanner Crab for my bottom line. In today's markets, we have to participate in many fisheries to make a go of it.

In regards to bottom trawl, I believe everyone has a right to make a living, but at who's expense. I have no ill will towards trawlers but at the same time why is it that I'm expected to give up my lively hood for them. When is it my turn to make a living?

Trawlers devastate the ocean bottom no matter what. Yes, crab are coming back, but if trawlers were excluded from concentrated crab habitat, how much faster would they recover? Please help protect crab habitat from bottom trawlers.

Sincerely,



Ty Rouse
PO Box 2725
Kodiak, AK 99615

Eric Olson , Chairman
NPFMC

RECEIVED
SEP 28 2010

Re; Item C-5(1) Oct 2010 Area closures for bairdi crab protection

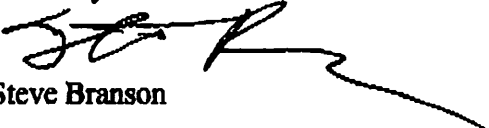
As a career crabber in the GOA and BSAI I support protecting the meager remaining tanner crab stocks in the GOA with closures of critical bairdi habitat areas to ground fish pot and bottom trawl gear. NMFS biologist Braxton Dew, after extensive research, established obvious links between the repeal of no trawl zones in BSAI red crab broodstock areas and the subsequent decline and crash of king crab. Anecdotal evidence I've heard from drag crew of bottom trawl bairdi bycatch in the proposed GOA protection areas as well as personal observation of numerous missing legged tanners with trawl chaffing gear adorning them lead me to believe there is a significant problem. Even if crab are not brought up in the net, contact with bottom trawl roller gear and web has to be detrimental.

The Magnussen Stevens Act dictates as law the reduction of bycatch and rebuilding of diminished stocks (National Standard 1). Implementation of these closures will be unpopular with bottom trawlers, eliminating some popular flatfish tows, but I'm confident the arrowtooth and flats quota will still be caught. Incidental damage to species worth dollars per pound while targeting fish worth pennies per pound seems counter productive.

Closures should be year round for bottom trawls and only open during Pollock season for pelagic trawls. Groundfish pots shouldn't be allowed in winter months due to cold weather mortality. Increased observer coverage is always a good idea but may not be effective for trawl/ crab interaction due to unobservable roller gear damage and mortality.

I have yet to see a management plan that's good for everybody, but making fishermen happy is, from my experience, not the councils business. Conservatively managing the resource is the Councils business.

Sincerely



Steve Branson

Eric Olsen, Chair
North Pacific Fishery Management Council
605 W. Fourth Ave.
Anchorage, AK 99501

RECEIVED
SEP 28 2010

RE: Agenda Item C-5 GOA Tanner Crab Bycatch

Dear Chairman Olsen and Council Members

My name is Peter Longrich I am a young fisherman, 34 years old I have lived in Alaska my whole life. I have been fishing in Alaska for more than twenty years and I have been operating a 58' longliner / crabber based in Kodiak for the past ten years. I have a bachelor's degree in applied physics. I like mechanical stuff, I like boats. When I walk by a dragger I am fascinated by all their equipment, what a way to catch fish. Ask anybody who's been dragging and they will tell you how dirty it is or they might not tell you. We know where the Tanner crabs live because ADFG does surveys every year with what else but a bottom trawl, the best way to catch every thing down there. Some of these areas like Ugak bay are nurseries. This is where the main body of crab reside and spill out into the surrounding areas. We need to keep bottom trawlers out of the crab grounds. A lot of the fish escape the trawls but crabs cannot get out of the way fast enough. Even if the crabs don't get caught in the trawl and end up as bycatch they are still getting run over and destroyed by the trawl gear. The draggers are tearing up the bottom targeting fish like arrowtooth worth 5 cents a pound, and killing valuable halibut and crab worth dollars per pound in the process. The only reason the draggers can afford to fish arrowtooth is because of the bycatch they are allowed to keep. Sooner or later somebody has to do the right thing. If the American public knew how much stuff the draggers threw over they would be outraged. The draggers are affecting other fisherman by catching our salmon, crab, blackcod, halibut, and tearing up the habitat in the process. Maybe we should all do it the easy way, everybody should get a dragger and well just keep everything that we catch. Problem solved just kidding. Since the GOA pie has already been divided up the fair thing to do is keep bottom trawls out of the crab grounds. The observer program had its chance. Why wait another twenty years for the observers to get their data together? We need action. Well good luck thank you for your time and service. So long and thanks for all the fish.

To: Eric Olson, Chairman
North Pacific Fisheries Management Council
6005 W. 4th, Suite 306
Anchorage, AK 99501-2252
Fax: 907-271-2817

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SEP 28 2010

Hello, my name is Ron Naughton and I am writing to comment on the proposed bottom trawl closure on the east side of Kodiak Island. (Council motion- April 2010 D-3(a) GOA Tanner crab bycatch)

I was born in Kodiak in 1960 and have lived here all my life. I have worked in the Seafood business since I was in high school, both as a processor and a harvester. I have seen the dominance of the catches around Kodiak go from crab to groundfish.

Currently I am the captain of the F/V Cape Kiwanda, a trawler based out of Kodiak. I began trawling in 1989 because it was a fishery that was less seasonal and therefore more financially reliable than say salmon or crab. One of the attributes of trawling is being able to fish for multiple species and important portion of that being cod and flatfish. (Rock sole, Arrowtooth Flounder, Rex sole, etc.)

The proposed closures are where a vast majority of the cod and sole fishing that I do takes place. They have been important fishing grounds that contribute to my income.

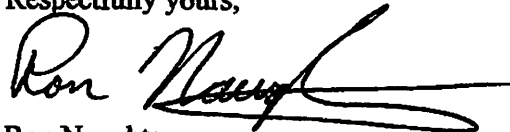
As I see it, the proposed closures are totally unnecessary and will be completely ineffective in attempting to rebuild crab stocks. If bottom trawling were the cause of the lack of crab around the Kodiak Island Archipelago then there should be crab in all the bays and other state waters around the Island where the crab were harvested "back in the day". This includes the bays and waters of Afognak Island also. All of these state waters have been closed to bottom trawling for a very long time and yet groundfish

dominate these waters also, according to ADF&Gs trawl surveys. Clearly, banning bottom trawling has done nothing to bring the crab back. So... why increase an area and a practice that have so far been completely ineffective?

I also find it worth noting that the area in question is not only good fishing grounds for trawlers but it is also where a good portion of the tanner crab harvest comes from. Could it be that the two are related? If they are, it's quite possible that a trawl closure would have the opposite effect intended. Here is the opening of the introduction to NMFS-**AFCS-11 Groundfish Food Habits and Predation on Commercially Important Prey Species in the Eastern Bering Sea from 1987 to 1989**, "Many large marine fish are predators of either juvenile or small adult fish and crab. Because predation forms the largest part of natural mortality of young fish and crab, it is important to estimate the magnitude of predation loss on commercially important populations." Although the report is for the Eastern Bering Sea, I am pretty sure the statement applies to all the fish and crab in the ocean.

My vessel and crew spend money each year in and around Kodiak on observers, fuel, groceries, boat supplies, maintenance, equipment, retail services, and entertainment. We do this by being part of a gear group that brings in some 50% of all the fish landed in Kodiak. Please keep the status quo so we can continue to contribute the local economy year round.

Respectfully yours,



Ron Naughton

Luke Lester
F/V Raging Beauty
P.O. Box 553
Kodiak, AK 99615
(907)539-5293

Eric Olson, Chair
North Pacific Management Fishery Management Council
605 W. 4th Ave. Ste. 306
Anchorage, AK 99501-2252

RE: Agenda Item C-5 GOA Tanner Crab Bycatch

Dear Chairman Olson:

I was born and raised in the fishing community of Kodiak, and have been working on boats since I was five years old and have since invested my life into the fishery. I have experienced several kinds of fisheries including; purse seining, pot cod, long lining, and crab. At the age of 22, I purchased my own purse seiner eager to begin my career as a captain. I have permits for the following fisheries; Bardi Tanner Crab, Kodiak Salmon and Herring purse seining. The ability to fish tanner crab, is extremely important to my livelihood. Our small community of Kodiak depends highly of each and every fishing season and I hope a decision can be made to make certain of a healthy future for everyone. I would like to see the safe development of tanner crab, as well as balance within each fishery.

Hundreds of local Kodiak residents depend on the tanner crab season, and it would be senseless to allow the trawlers to continue to have the authority to destroy their production. Trawlers in and around Kodiak are on the rise, they should have the requirements, regulations, and boundaries etc., to ensure the safety of our eco systems and reduce bycatch as much as possible.

We need a solution, and fast. No more delays, no more postponing, we need to take action regarding the trawling fleet, and help to protect the bardi tanner crab, before it is too late. Any proposed options are good reasonable options.

Sincerely,



Luke Lester, F/V Raging Beauty

To the members of the North Pacific Management Council,

I am a small boat owner and fisherman in Kodiak. I am writing to express my concern for the bycatch problem that takes place with draggers. My hope is that there will be follow through and tanner producing bays and other areas currently open to trawling will be closed. These grounds need to be protected to allow not only juvenile crab to mature but halibut and feeding king salmon as well.

In a recent article in the Kodiak Daily Mirror, a trawler was quoted as saying at a city council meeting that such closures would hurt the local economy. It must be pointed out that the majority of the trawl fleet is not based in Kodiak, and the wages earned by owners/operators and crew for the most part gets spent back in Oregon or Washington. It is true that the locals who work in the processing plants will miss out on that work, but the many small boat operators who hire locals will be punished by the NPFMC if they choose to leave these areas open.

The local economy will see growth if these areas are allowed to remain 'nursery' grounds for our future fisheries. By closing these areas the bycatch issue would undoubtedly decrease, as trawlers are not in areas known for these prohibited species. That is the idea isn't it?

In all reality your job is difficult because you don't have all the facts. It is surely time to require 100% coverage on gear types such as trawlers. The amount of damage they do is certainly frightening as we know it. Can you imagine how you would feel if you knew the whole story?

At the Kodiak City Council meeting the trawl skipper that spoke and asked for the city's support in fighting the potential closing of these areas stated that when you force trawlers to fish in areas with less fish concentration you will increase bycatch. This proves the point, and these skippers know it to be true, you must require 100% coverage.

Thank you in advance for your time and consideration on this issue. These waters are rich with life, and have the potential to grow a strong economy. Help make sure this will happen.

George Kirk
F/V Arctic Wave



To the members of the NPFMC:

I am a small boat fisherman from Kodiak. I am writing because I am concerned about the bycatch problem with the draggers. Please follow through and close any tanner crab producing bays and areas to trawling. Not only would tanner crab be protected but halibut and king salmon among other species will be saved.

As one local trawler noted at a Kodiak City Council meeting, "the closures would hurt the local economy and would not reduce crab bycatch."

The local economy would not be hurt as the fish would come in from other areas and from other gear types.. It may even increase the local economy by the crab population increasing. And how could it not reduce crab bycatch? That is the idea isn't it?

We need some good hard numbers on bycatch, and 100% observer coverage will do just that.

The same local trawler also stated. "When you force trawlers to fish in areas with less fish concentration, which this would do, you're going to increase bycatch." Well that is where you need the 100% coverage. And good hard numbers.

It is well known that things are skewed and it is time for good science. Please close all proposed areas and increase observer coverage.

Thanks in advance for your consideration.

Ryan Vickstrom

Ryan Vickstrom

Polar Star, Inc.
Patrick Pikus, President
P.O. Box 2843
Kodiak, Alaska 99615
(907) 486-5258 Fax (907) 486-5413

September 28, 2010

Eric Olson, Chair
North Pacific Fishery Management Council

RECEIVED
SEP 28 2010

Re: Agenda Item C-5: Tanner crab protection in the Gulf of Alaska

Dear Chair Olson:

I own and operate the F/V Polar Star, a 58-foot vessel that fishes for Tanner crab, Pacific cod, halibut, sablefish, and salmon out of Kodiak. My livelihood is dependent on having a variety of fisheries available to me to provide income year-round. Historically, the Tanner crab fishery was a significant source of income for myself as well as many others here in the local Kodiak fleet. I fished for Tanner crab from 1974 until 1994 when the fishery closed, and then also after it opened again in 2000. I would love to see the Tanner crab stocks rebound so that we could once again have a vibrant Tanner crab fishery.

I urge the Council to provide protection for our GOA Tanner crab stocks at the October council meeting by selecting Alternative 2 at final action. Recent stock assessment surveys indicate that the Tanner crab population is poised for a rebound. Unfortunately, this comes at a time of increased bottom trawl effort in the flatfish and arrowtooth fisheries, which have relatively high Tanner crab bycatch mortality. The areas under consideration in alternative 2 are clearly important to the Eastside Tanner crab population, and thus I believe that protective measures are warranted. The Council has previously demonstrated foresight by instituting protective measures such as the EFH and HAPC protections. I believe that this action should be regarded in the same vein: as a conservation measure intended to protect a biologically and commercially valuable species as well as the habitat necessary for that species to thrive.

Looking into the future, the biggest concern I have is with the detrimental impacts of bottom trawling. For a variety of reasons, including more efficient use of halibut PSC as well as higher groundfish MRAs in the arrowtooth fishery, the trawl sector is applying more bottom trawl fishing effort over longer periods of time right in the critical areas of Tanner crab abundance. Since there are no PSC limits, the Tanner crab stocks are completely unprotected from this increase in bottom trawl effort. My fear is that the Tanner crab recovery will be destroyed by increasing levels of bycatch mortality and habitat degradation. Thus, I believe that it would be prudent and within the Council's purview to provide protection for these critical areas of Tanner crab abundance.

Of the alternatives available to the Council at this action, I believe that a year-round area closure for bottom trawling would be the most prudent (alternative 2). At a minimum, the Marmot bay area (component 1, option 1) and the inner Eastside area 525702 (component 1, option 3) should be closed to bottom trawling year-round. These closures would provide protection for critical Tanner crab grounds and I feel that the groundfish fisheries will be able to adapt to accommodate the closure.

In conclusion, I strongly urge the Council to act at this juncture and help the Tanner crab stock on its way to recovery. The Tanner crab fishery was, and can be again, a vibrant part of the Kodiak fishing community.

Thank you for your consideration.

Sincerely,



Patrick J. Pikus
Polar Star, Inc.

RECEIVED
SEP 28 2010

1

Kobert Lindsey
F/U NORMA KAY
3162 SPRUCE CREEK
KODIAK, AK 99615

Dear Esteemed Members of the North Pacific
Fisheries Management Council:

I want to thank each and every
one of you for giving of yourselves
to insure the sustainability of
fisheries in the North Pacific.

As a lifetime resident of Kodiak,
a permit holder in the Kodiak Tanner
Crab, Salmon and miscellaneous finfish
fisheries, as well as board member on
a regional Board (CIRCAC) I understand
how complicated issues become at
the board level.

The issue I wish to address
at this time is the proposed
closure(s) of some or all of the
proposed Kodiak Tanner Crab
protection zones.

I cannot express how appreciative
I am of you for recognizing
the importance and merit of
these Crab protection zones by
putting this on the agenda.

in such a timely fashion.

Obviously the protection of one stock (Tanner Crab) from an incidental catch by another fishery is an item of merit which is your direct responsibility and is your fiduciary duty of protection.

There are several excellent options which you do have the authority to impose which can positively provide total, partial or no protection at all to the recovering stocks of Tanner Crab from hand or bottom trawling.

I would urge you to seriously consider closing all of the protection zones proposed to bottom trawling as the best way to protect the crab stocks.

If full closure is too much to justify, then at least close these areas during the mating and molting periods.

If you cannot justify closing the areas during mating and molting permanently, At least close it for a reasonable number of years during the mate and molt To give our crab a chance to recover To a sustainable yield.

The biggest argument which the trawl fleet can produce is that this will present an economic hardship to the fleet.

While this may be partially valid to a small percentage of the fleet, we know that it is a fact that any fish stocks left unharvested will only grow and reproduced, Thus a full or partial closure will only benefit the trawl fleet over the long term = No long term hardship over time.

And this is the gist of my letter; You the Council have a fiduciary duty to the best of your ability: Ensure Sustainability over Time.

4

I understand how complex the process is and the weight of your decisions.

Please take the time to consider the benefits of taking the most conservative measures as opposed to a short term adjustment.

There are also several other options for you to consider which would be far better than the status quo, such as closing some of the protection zones.

At the very least at least consider 100% observer coverage on any vessel engaged in hard on bottom trawling any time they are in the Crab Protection Zones.

The Tanner Crab Association has a Bone Fide offer to the trawlers to provide members of our association as observers should the financial cost of observers be a hardship to the trawlers.

The last option which I feel has merit is to consider requiring Fishing vessels engaged in a directed fishery which affects another fishery by incidental catch to become a stakeholder in the affected fishery.

In this case, if a trawler wants to become, or continue to be engaged in hard on bottom trawling in the Crab Protection zones, they must hold a valid appropriate permit for the Kodiak Tanner Crab fishery.

Stakeholders tend to be much more aware and protective of their own fisheries.

In closing I want to thank you all for your time and energy. You give for the benefit of so many here and now as well as future generations.

Sincerely, Robert B. Lindsey
Rob Lindsey

North Pacific Fishery Management Council
605 W. 4th, Suite 306
Anchorage, AK 99501-2252
Fax (907) 271-2817

RECEIVED
SEP 28 2010

September 28, 2010

Re: Agenda Item C-5 – Final action GOA Tanner Crab Bycatch

Dear Chairman Olson and members of the Council:

The Kodiak Island fish processors, all of whom have signed this letter, depend on fishery landings year-round from all gear sectors, and support responsible fishing and management measures which promote sustainable fisheries. We are opposed to the proposed large closure areas either seasonally or annually in the GOA Tanner crab bycatch alternatives. These closures have the potential to severely impact the entire community of Kodiak, including the processors, the processing workforce, vessel owners and crews, and fishing service and support sectors.

We do not support any additional closures either permanently or seasonally in the GOA for either trawl or pot gear.

Instead of taking precipitous and unnecessary action to close these important fishing grounds, we ask the Council to consider the following: A trailing amendment that examines the practicality of regulations that could require all CGOA flatfish trawlers to use sweep modifications similar to what the amendment 80 fleet is using in the Bering Sea.

The proposed closure areas are large, and their closure would negatively affect the health of both the pot and the trawl fleets. Over the years 2001 to 2009, fully 75% of Kodiak area non-pelagic harvests have come from these proposed closure areas between January 1 and July 31. The harvesters are unlikely to be able to supply the same level of production fishing outside the areas proposed for closure. The analysis shows that high CPUE occurs in the proposed closure areas for arrowtooth, shallow water flatfish and flathead sole. These are historical fishing grounds, and exploring new grounds will likely increase bycatch and reduce revenue. Not all areas outside the closure boxes are able to be trawled.

Flatfish is caught almost exclusively by the trawl fleet and our business plans have evolved over the years to depend on these flatfish deliveries, especially during the less productive months of the year (April, May, June, November and December). Our markets for trawl-caught flatfish (arrowtooth, rock sole, flathead sole, rex sole) would be harmed or reduced significantly should these closures be put into place and production affected. In turn, since Kodiak processors consistently rank within the top 10 Kodiak employers, Kodiak employment would decrease, as would raw fish tax revenue.

Fifteen percent of the fishery landing volume that comes across the Kodiak docks is flatfish. According to the Kodiak Chamber of Commerce Economic Indicator report for 2006, the flatfish

fishery generates \$6.5 million dollars annually just in ex-vessel revenue. This is an underestimate since the value of the incidental catches of cod, pollock, skates and other species is excluded from the fishery value computation. Data suggests that some vessels will lose as much as 30% of their ex-vessel revenue if these areas are closed. With the additional loss of revenues to the processors, the processing workforce and the trickle-down financial benefits to the service sector, the economic effects of changes to the flatfish fishery are substantial. The analysis shows that the level of tanner crab bycatch in the proposed closure areas is very small compared to bycatch levels in other fisheries throughout the North Pacific, and the tanner crab biomass has been rebounding in recent years. This is not a conservation issue, but an allocation issue.

If the Council is concerned about the quality of observer data to assess groundfish fisheries impacts to Tanner crab then we would support increased observer coverage for both pot gear and non-pelagic trawl gear in a portion of statistical area 525702. We believe the increased coverage requirement should be in place until the observer program restructuring now underway is implemented.

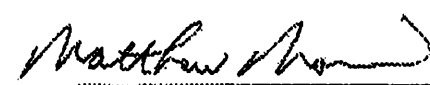
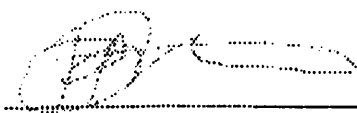
Kodiak's fishery economy depends on all fisheries, vessel sizes and gear types. Each sector needs to be vibrant and healthy for the community of Kodiak to prosper. The variety of harvesters of multiple gear types and vessel classes that fish out of Kodiak is what makes our processing businesses and Kodiak's fishing economy strong. We are asking the Council to consider the harvesters' long-term investments in the fisheries, and their dependence on the historic fishing grounds. Their livelihood, and the success of the processing sector in Kodiak, will be jeopardized if the proposed closures are put in place.

Thank you for your consideration of the health and stability of Kodiak.

Sincerely,

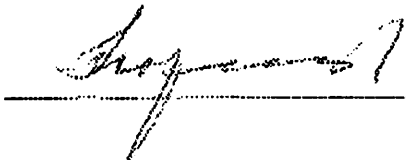
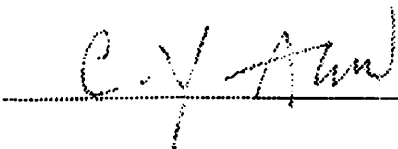
Alaska Fresh Seafoods

Alaska Pacific Seafoods

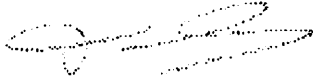


Alaska Seafood Systems

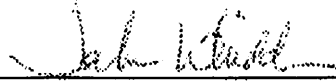
Global Seafoods



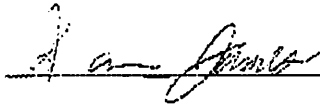
International Seafoods of Alaska, Inc



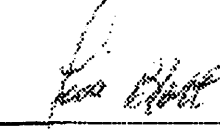
Pacific Seafood Kodiak



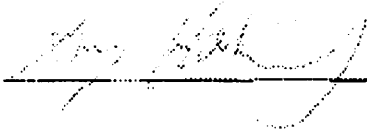
Kodiak Fish Meal Company



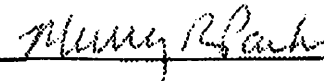
Ocean Beauty Seafoods



Trident Seafoods – Star of Kodiak



Western Alaska Seafoods



October 2010

Eric Olson, Chair
North Pacific Fishery Management Council
605 W. Fourth Ave.
Anchorage, AK 99501

RECEIVED

SEP 28 2010

RE: Agenda Item C-5 GOA Tanner Crab Bycatch

Dear Chairman Olson and members of the Council,

Since 2004 Kodiak Island Tanner crab fishermen have asked the NPFMC to mitigate the impacts of the federal groundfish fisheries on Tanner crab stocks.

The Tanner crab fishery is critical to the diversified local fishing fleet on Kodiak Island.

Kodiak is a fishery-dependent community reliant on salmon, halibut and sablefish, herring, groundfish and crab. Tanner crab fishermen participate in a combination of these fisheries to form year-round small businesses for many Kodiak families. The key to success is maintaining this economic diversity.

Stock assessment surveys around Kodiak Island indicate the Tanner crab population is rebuilding presumably due to favorable environmental conditions. Healthy crab populations will provide jobs and increase Kodiak's raw fish tax base. There are 183 permit holders in the Tanner crab fishery and 52 vessels registered for the 2010 season.

Management measures are needed that balance opportunity for everyone and the community as a whole.

Proposed closures encompass the areas of highest Tanner crab abundance.

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. Estimates of Tanner crab populations within the proposed area closures range from just over 16 million crab (2006) to over 38 million crab (2003 and 2008) and average 22.7% of the Kodiak District population for the years 2003-2009. The proportion of crab inside the area closures in the Eastside Section ranged from 20%-71% of the total Eastside Tanner population estimates (Area Closures, p. 15). The eastside section consistently has had the highest population of crab and has averaged over 48 million crab from 2003-2009. Current harvests are strongest on the Eastside of Kodiak Island.

Trawling for flatfish is increasing around Kodiak Island. While the trawl sector is benefiting substantially from a variety of management measures that increase opportunity for targeting flatfish, the impact on Tanner crab stocks and the directed Tanner crab fishery is potentially significant.

- The rockfish program allows the trawl fleet to transfer halibut PSC quota from the rockfish fishery to other trawl fisheries occurring in the fall which include important Tanner crab grounds.
- The higher groundfish MRA for the directed arrowtooth flounder fishery will likely concentrate 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. This encourages the fleet to operate in the Tanner crab grounds. Growing arrowtooth effort has increased impact on Tanner crab.

- Increased use of halibut excluders will allow the fleet to lower bycatch rates and shift halibut PSC into bottom trawl fisheries where halibut bycatch has always been a limitation. Nonpelagic trawling contributes the majority of Tanner bycatch in the federal groundfish fisheries in area 630, ranging from 56% to 99% from 2003-2009, and averaging 83% over the time period (Area Closures, p.27). Some authors suggest that groundfish trawls could easily capture or disrupt an entire Tanner crab mating aggregation (Area Closures p. 8).

While the Council pursues improvements to the Gulf observer program, conservation of Tanner crab remains a problem needing a solution.

Currently there are no conservation measures designed for Tanner crab in the Gulf of Alaska. The Red King Crab Type I and II areas and the state water bottom trawl closure around Kodiak Island provide some shelter for Tanner crab but there are distinct areas of biological concern in federal waters that remain unaddressed. As stated in the Council's problem statement "Tanner crab stocks have been rebuilding since peak fisheries occurred in the late 1970s. Specific protection measures should be advanced to facilitate stock rebuilding." (Area Closure, p. i).

There are significant gaps in observer data on Tanner crab bycatch.

There is large variability in the Tanner crab bycatch numbers that is not likely to reflect accurate encounters with Tanner crab in either trawl or pot fisheries. Council identified concerns about proceeding with alternatives that rely either on bycatch limits, or basing closures on observed bycatch. Instead, the Council initiated the current analysis and suite of alternatives, which identify closures based on Tanner crab abundance rather than on uncertain bycatch patterns.

Measures to protect Tanner crab should address both habitat impact and bycatch.

We know from photographs that trawl gear indiscriminately encounters Tanner crab. We know from research conducted by the Alaska Fishery Science Center Auke Bay Lab that areas closed to bottom trawling around Kodiak Island are productive for more species, including Tanner crab, than adjacent areas exposed to chronic bottom trawling. The study found juvenile Tanner crab were fairly common within the study area, but were "significantly more abundant in areas closed to trawling." (Stone et al, p. 473) Given these and other observations from the study, the paper concludes that bottom trawl closures may provide benefits to Tanner crab (Area Closures, p. 8).

We urge the Council to close important areas of abundance for Tanner crab to bottom trawling so that we may all enjoy the benefits of well-managed, sustainable fisheries.

Sincerely,

The undersigned Tanner crab permits holders, crew and community residents,

Print Name & Signature	Address	Community	Vessel/Occupation
REV ZWAHLEN R. Zahlman	1552 SALTWATER DR HOMER AK 99663	KODIAK HOMER AK	F/V SEABYRE FISHING
John Nevin John Nevin	P.O. Box 2125 Kodiak AK 99615	Kodiak	FV Aquarius Fisherman Permit Holder
Don Oumun Don Oumun	P.O. Box 1723 Kodiak AK	Kodiak	Flamingo Bay Permit Holder
Harvey Goodell Harvey Goodell	P.O. Box 3108 Kodiak AK 99615	Kodiak	Eden Harbor Permit Holder
Pete Hannah Pete Hannah	P.O. Box 1803 Kodiak AK 99615	Kodiak	Permit Holder
DI Vito DI Vito	3609 Sunset Dr. KOD. AK. 99615	KODIAK	Family Pilot Permit Holder.
Steve Ivanoff Steve Ivanoff	1327 Mountain View Kodiak		Alcutian Belle Permit Holder
Maria V. CHRISTIAN Maria V. Christian	P.O. Box 318 Kodiak AK	Kodiak	Permit Holder
ROBERT STELLMAN Robert Stebbins	P.O. Box 2603 Kodiak AK.	Kodiak	Permit Holder
PIET BIKUS Piet Bikus	PO BOX 2843 Kodiak AK.	Kodiak	Permit Holder
PANNY OLSEN Penny Olsen	P.O. Box 1743 KODIAK	KODIAK	Permit Holder

October 2010 Letter to the NPFMC

Print Name & Signature	Address	Community	Vessel/Occupation
RONALD BLONDIN <i>Ronald Blondin</i>	1412 Barcroft St	KODIAK, ALASKA	Legasea Owneroperator Tanner permit
JERRY L'ANOFF <i>Jerry L'Anoff</i>	119 MORPHY WAY PO. 8883	KODIAK AK	New Dawn Tanner permit
JAMES HORN <i>James Horn</i>	1776 MISSION	KODIAK	VENTRESS
Josh Wilson <i>Josh Wilson</i>	1524 mission ^{500 view} po. box 2119 ^{APPL. #2}	Kodiak	Major
Zak VIKSTROM <i>Zak Vikstrom</i>	3681 Gull drive P.O. Box 3133	Kodiak	Linen
Robin Clark <i>Robin Clark</i>	3831 Spruce Box 2009	Kodiak	Linner
MIKE CLARK <i>Mike Clark</i>	Box 2009	KODIAK	Permit holder LINNER
Stosh Anderson <i>Stosh Anderson</i>	Box 310 Kodiak AK 99615	Kodiak	Kestrel Tanner Permit Holder
Kavik Anderson <i>Kavik Anderson</i>	113 Barcroft Kodiak AK 99615	KODIAK	LISA GAYLE Tanner Permit Holder
ALEXUS KWACHKA <i>Alexus Kwachka</i>	326 COPE ST. KODIAK AK 99615	KODIAK	NO POINT PERMIT HOLDER

Print Name & Signature	Address	Community	Vessel/Occupation
PETER THOMPSON <i>Peter Thompson</i>	PO Box 3037 KODIAK, AK. 99615	KODIAK	OWNER/OPERATOR F/V DUES PAYER II
Switgard Duestedal <i>S. Duestedal</i>	P.O. Box 2787 Kodiak 99615	Kodiak	Science outreach
Jane Maria Eisemann <i>Jane Maria Eisemann</i>	PO Box 192 Kodiak AK 99615	Kodiak	co owner F/V Moondance tanner crab permit holder
Oliver Holm <i>Oliver N Holm</i>	PO Box 8749 Kodiak, AK 99615	Kodiak	F/V Salina owner - operator permit holder
EVA L. Holm <i>Eva L. Holm</i>	PO Box 8749 Kodiak, AK 99615	Kodiak	Co-owner F/V Salina
Fred L Holm <i>Fred L Holm</i>	PO Box 8938 Kodiak, AK 99615	Kodiak	F/V Salina crew
LEON LUND <i>Leo Lund</i>	1517 mission rd Kodiak AK 99615	Kodiak	F/V Linnea CREW
DAVE KUBIAK <i>Dave Kubiak</i>	PO Box 193 Kodiak, AK 99615	KODIAK	F/V MYTHOS OWNER
Charles m Peterson <i>Charles m Peterson</i>	1850 three sisters Kodiak ak 99615	Kodiak	tanner crew
Theresa Peterson <i>Theresa Peterson</i>	1850 Three Sisters Kodiak, AK 99615	Kodiak	co/owner Patricia Sue
Charles Peterson <i>Charles Peterson</i>	1850 Three Sisters Kodiak, AK	Kodiak	F/V Patricia Sue Tanner Permit

October 2010 Letter to the NPFMC

Print Name & Signature	Address	Community	Vessel/Occupation
Darius Kasprzak <i>Darius Kasprzak</i>	807 Jackson Lane Kodiak AK	Kodiak	F/V Marona Jug vessel Tanner fleet bait support on grounds
TERRY HAINES <i>Terry Haines</i>	724 HILLSIDE DR	KODIAK	CREWMAN
Steve Branson <i>Steve Branson</i>	Box 451 Kodiak 99615	Kodiak	Crew Crab Halibut Sable fish Squid Salmon Ground fish etc
Fred Stager <i>Fred Stager</i>	POB 8243 Kodiak 99615	Kodiak	F/V Sisiutl Tanner Permit Holder
Steve Mathieu <i>Steve Mathieu</i>	1721 Mission Rd Kodiak AK	Kodiak	F/V KATHUNA
William E. Alwert <i>Bill Alwert</i>	1510 Rezanoff	KODIAK	Tanner Crab Permit Holder F/V BUCCANEER
MARY E Alwert <i>MARY E Alwert</i>	12415 Noch Dr	Kodiak	Tanner Permit holder F/V Katherine
Ty Rowe <i>Ty Rowe</i>	PO Box 2725 Kodiak AK 99615	Kodiak	Tanner Crab Permit Holder F/V Loki
Ralph Skonberg Jr. <i>Ralph Skonberg Jr.</i>	Box 2626 Kodiak AK 99615	Kodiak	F/V crew Buccaneer
Horace Collins <i>Horace Collins</i>	Box 1654 Kodiak AK 99615	Kodiak	F/V BUCCANEER crew
David Bravo <i>David Bravo</i>	Box 2930 Kodiak AK 99615	Kodiak	crew

October 2010 Letter to the NPFMC

Print Name & Signature	Address	Community	Vessel/Occupation
HARLES E. KEVE [Signature]	P.O. Box 1573 KODIAK, AK. 99615	KODIAK	MAR DEL SID
John D. Gilbert John F. Miller	P.O. Box 271 KODIAK AK. 99615	KODIAK	Susan Marie
Anthony Craig Opheim Anthony C. Opheim	BOX 10 OCCINKIE AK 99644	OCCINKIE AK 99644	Crew man
Roger Larionoff	Box 43 Ouzinkie AK	Ouzinkie	Crew man
Burt Green	Box 963 KODIAK AK	KODIAK AK	Crew man
Carl Strombe	P.O. Box 3686	KODIAK AK	Crewman
Carl Strombe	P.O. 963	KODIAK	OWNER
Thomas Zuer Thomas	1971 1/2 N. 10th St	KODIAK	CREW
Colin McCoygal Killer	1447 Hillside Pl. Homer AK 99606	Homer	Crew
Evan Kinsley	P.O. Box 516 CO. 99615	COBROCK	Crew
RYAN LACEY [Signature]	7860 130th AV. TOWER GROVE HEIGHTS 12161, 55076	KODIAK	CREW

Juanyne Olsen P.O. Box 1849 KODIAK CREW
 Kasey Colson Kodiak AK. 99615 FLU SUSAN

October 2010 Letter to the NPFMC

Print Name & Signature	Address	Community	Vessel/Occupation
Michael A. Patitucci <i>Michael A. Patitucci</i>	1646 Spruce cir Kodiak AK 99615	Kodiak	Denice Marie long line Salmon Crew, Captain
Marks Patitucci <i>Marks Patitucci</i>	6521 Stinky ave Carmichael, CA 95608	Kodiak	Lady Kathryn Salmon Sift
Kyan Palmer <i>Kyan Palmer</i>			
Hugh Ryden <i>Hugh Ryden</i>	PO Box 356 1221 Mission Rd	Kodiak	F/V Radiance Owner/operator
Luke Randall <i>Luke Randall</i> Cape Current	P.O. Box 57B Seal Bay Kodiak, AK 99697	Kodiak	Cape Current owner/operator
Liz Ann Schmetzenbach	720 E Remond Unit 8 Kodiak AK 99615	Kodiak	Samdra Sue Crew/longline salmon
James Coffman	1540 Graduation lane Middleburg FL 32068	Kodiak	Beverlee J Salmon
Daniel Miller <i>Daniel Miller</i>	Box 2865 Kodiak AK	Kodiak	Axva D Halibut Tanner Crab
KE Decker <i>KE Decker</i>	P.O. Box 714	Kodiak	Nick Pitt Halibut Tanner Crabs
LUDER DOCHTERMAN <i>Luder Dochterman</i>	PO Box 714	KODIAK	NORTHPOINT STORMBIRD FISH
Dan mcfar <i>Dan mcfar</i>	PO Box 8632	Kodiak	F/V Dancia

October 2010 Letter to the NPFMC

Print Name & Signature	Address	Community	Vessel/Occupation
BRIAN BLOMQUIST <i>Brian Blomquist</i>	P.O. Box 159 KODIAK AK 99615	KODIAK	F/V SABRINA
RANDY BLONDER <i>Randy Blonder</i>	Box 159 KODIAK, AK	KODIAK	STEPHIE Lynn
ZALEIGH EAGER <i>Zaleigh Eager</i>	PO BOX 8278 KODIAK AK 99615	KODIAK	Silver Fox
Lennor Cole <i>Lennor Cole</i>	PO Box 1819 KODIAK AK 99615	KODIAK	Silver Fox
Frank Miles <i>Frank Miles</i>	Box 2744 KODIAK, AK 99615	KODIAK	F/V Lady Lu
Maryann Miller <i>Maryann Miller</i>	P.O. Box 2744 KODIAK, AK 99615	KODIAK	F/V Lady Lu
Nichole Miles <i>Nichole Miles</i>	PO BOX 2744 KODIAK, AK 99615	KODIAK	F/V LADY LU

October 2010 Letter to the NPFMC

Print Name & Signature	Address	Community	Vessel/Occupation
Robert b hindsey II <i>Robert b hindsey II</i>	11723 South russiwn creek Rd Kodiak Alaska 99615	FLATS	NORMA J Crewman
Gregg M Levenson <i>Gregg Levenson</i>	11876 middle bay Dr. Kodiak AK 99615	Bells Flats Kodiak	F/V Sea Dream Crewman
Mark Levenson	11876 middle bay Dr Kodiak AK 99615	Kodiak Bells Flats	F/V Sea Dream Owner
Tim Levenson	P.O Box 1284	Kodiak	F/V Sea Dream Skipper
Arliss Abakama	PO Box 1422	KODIAK	F/V MAJOR CREWMAN
Robert MAY	3268 view crest Kodiak, AK 99615	(Kodiak) Port Lion	Kaging bounty

September 28, 2010

Eric Olsen, Chair of North Pacific Management Council

605 W. 4TH Ave.

Anchorage, Alaska 99501

RE: Tanner Crab Bycatch

Dear Chairman and members of the Council,

My name is Raymond May born and raised on and around Kodiak Island. Recently I invested into the Kodiak Tanner crab fishery because of it going into limited entry, and I didn't qualify for an original issue permit. I also fish Kodiak salmon and Kodiak herring with my 48' F/V Northwestern.

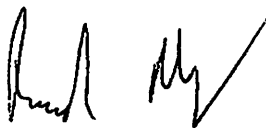
I would like to express my concern about trawling in critical habitat for crab on the eastside of Kodiak. While I am fishing for salmon in the summer I am able to see trawling in areas that are crucial to Kodiak tanner crab.

Can we please try to protect this small local fisheries. I also would like to see certain areas completely closed to trawling to protect some of the tanner crab critical habitat grounds. If that isn't an option then why not have 100% observer coverage in the tanner crab critical habitat areas. At the very least shouldn't there be a bycatch limit set for trawlers on tanner crab.

The Kodiak tanner crab fishery may be a small fishery, but it does need protection one way or another. Being a small boat owner and invested in this fishery it has become an important part of my lively hood financially.

Thank you for your time and consideration.

Sincerely,



Raymond May

F/V Northwestern

North Pacific Fishery Management Council
605 W. 4th, Suite 306
Anchorage, AK 99501-2252
Fax (907) 271-2817

September 28, 2010

Re: Agenda Item C-5 – Final action GOA Tanner Crab Bycatch

Dear Chairman Olson and members of the Council:

My name is Tracy Chandler, I am a 30 year resident of Kodiak. My husband operates a trawl vessel that fishes out of Kodiak *year round*. Agenda Item C-5 would have a negative impact, not only on my community, but on my family as well. I am writing to appeal to your sense of fairness and logic. **The proposed closures are not only untimely but unsubstantiated.**

With the changes to the Observer Program presently going through the Council, there will finally be enough data to make educated decisions regarding conservation. To push these closures through now, without the necessary data from all gear types and knowing we will soon have this data available, flies in the face of reason. I would ask that the Council not rush to judgment on this decision; that you wait until you are able to make an informed decision based on facts from all sides. If, once all data is in, it is found that conservation needs would indeed be met by these closures; the Council can always revisit this motion.

There is not sufficient evidence to suggest that closing these areas to bottom trawling will increase crab stocks. *If crab stocks are steadily increasing now, why would we alter any of the current practices? Shouldn't we keep the status quo until there is clear evidence as to the cause of the increase in crab stocks? I feel that anyone truly concerned with conservation of these crab stocks would be looking to scientific evidence over political opinion. True conservation may call for closures to all gear types, in both State and Federal waters, in these areas. Conversely, it may call for continued fishing in these areas by all types, since there is not actually a problem to be solved here.*

To close the proposed areas based on the available data, and given the lack of data from other gear types, would be nothing less than a discriminatory act against Kodiak's trawl fleet by the North Pacific Fisheries Management Council.

Sincerely,



Tracy Chandler

Groundfish Data Bank

Alaska

PH: 907-486-3033 FAX: 907-486-3461 P.O. BOX 788 - KODIAK, AK. 99615

Julie Bonney, Executive Director jbonney@gsi.net
Katy McGauley, Fisheries Biologist agdb@gsi.net



September 28, 2010

Eric Olson, Chairman
NPFMC
605 W. 4th Avenue, Suite 306
Anchorage, Alaska 99501-2252

Fax: 907-271-2817

Re: C-5 GOA Tanner Crab Bycatch

Dear Chairman Olson,

Alaska Groundfish Data Bank (AGDB) is a member organization that includes the majority of both the shorebased processors located in Kodiak and the trawl catcher vessels based in Kodiak. The Kodiak trawlers are mostly family owned businesses who have participated in the federal groundfish fisheries since Americanization of the fisheries.

This action has the potential to severely impact the community of Kodiak, Kodiak Island processors, the processing workforce, the vessel owners, vessel crews, fishing service and support sectors. We are extremely concerned and continue to ask ourselves what the purpose of this action is and why the Council is in such a rush.

The members of AGDB support the following as an outcome for this action:

- (1) A trailing amendment that examines the practicality of regulations that could require all GOA flatfish trawlers to use sweep modifications similar to what the amendment 80 fleet is using in the Bering Sea.

We do not support any additional closures either permanently or seasonally in the GOA for either trawl or pot gear.

History of the GOA Crab Bycatch Package

This issue is in front of the Council because of concerns expressed by the small boat fleet out of Kodiak along with concerns expressed by the Alaska Marine Conservation Council (AMCC). Testimony by the small boat sector has expressed concerns regarding the reliability of the crab bycatch data due to the level of observer coverage in the GOA as well as whether the data that is available is representative of actual fishing activity. They have also expressed concerns regarding impacts to habitat by bottom trawl gear in areas of historically important crab harvests.

In 2008, to address the monitoring concerns, AGDB, Groundfish Forum (GFF), AMCC along with trawl and pot sector representatives developed an agreement that required 100% observer coverage for both the pot and trawl sectors in a subarea of particular concern in statistical area 525702 for a two year period (see Appendix I). The agreement was signed by 23 trawlers. However, the project was dropped because NMFS and ADFG could not find a Principal Investigator and the pot fleet refused to sign. The Council then launched an analysis in October of 2009. Instead of just focusing on the issues of concerns (i.e. impacts to habitat and observer coverage) the alternatives under consideration now include the potential for large closure areas along the Eastside of Kodiak.

The first time the Council saw the analysis was April of 2010. At that time both the SSC and the AP recommended that the analyses not go out for public review since many pieces of data needed to be added to fully understand the potential impact of the various alternatives. However, despite being aware of the SSC's concerns, the Council voted to send the document out for final action anyway without another review process at the October 2010 meeting. As members of the fishing industry, the potential outcome of this action is not well understood – too many areas to focus on, poorly designed areas for either closures or expanded observer requirements. The Council needs to **STOP** and determine what the problem is that they are trying to solve, have the best available data in front of them to solve the problem and focus on a solution – let's move away from the grab bag approach.

Alternative 3 – Increased observer coverage in areas of concern

- A. The increased observer coverage requirement under this action conflicts with the observer program restructuring action: The special areas of increased observer coverage will significantly complicate the current sampling plan as envisioned by the observer program for restructuring. Presently, NMFS plans to remove the increased monitoring requirement once the observer program restructuring package is implemented. If the Council plans to continue mandating increased coverage in the monitoring boxes after implementation of restructuring then they will be mandating crab bycatch as the priority for monitoring over all other fishery issues and management priorities depleting the precious available funds for fishery monitoring. According to the crab analysis (Table 57) the additional observer coverage requirement would result in an additional 2,128 days if all areas and both trawl and pot gear types are included. If the Council chooses alternative 3 under the observer restructuring action (Table 41) an additional 9,576 observer days will be funded. This means that more than one-fifth of the new observer days would be allocated to crab bycatch monitoring versus allowing flexibility for the observer program to deploy these days as necessary. This is a very short sighted approach which we do not support. However, depending on implementation timelines of the two actions, increased observer coverage through the GOA crab bycatch action could be in place for a short time until superseded by observer restructuring. It is possible that the GOA crab bycatch action could be in place in 2012 while observer restructuring would be in place in 2013; thus, a one year increased monitoring period could occur, reverting to a service delivery model that improves the quality and statistical precision of and confidence in observer data via restructuring. This approach we would support as long as it is applied equally to both the trawl and pot sectors.

B. Observer Coverage Costs: It is unclear to us why the Council is treating the two sectors differently with regards to observer coverage levels – 30% for the pot fleet and 100% for the trawl fleet. According to the Commissioner at the April 2010 meeting, the pot sector is much less capitalized than the trawl sector and thus the trawl sector can afford the 100% coverage but the pot sector cannot. The analysis shows that the pot sector Pacific cod ex-vessel value is \$20.28 million compared to \$15.24 million for non-pelagic trawl caught flatfish and cod (table 32 -page 77). The total number of unique vessels that fished in area 630 for the pot sector was 129 and for the non-pelagic trawl sector was 74 vessels (table 14 – page 33). A per vessel average ex-vessel value is thus \$205,946 for trawl gear and \$156,977 for pot gear. The majority of the pot sector is less than 60 ft while virtually all the trawl sector is over 60 ft – the trawl sector is operating on a much smaller margin than the pot sector since flatfish harvests occur over most of the year while the directed Pacific cod fishery is a short pulse fishery during the A season and B season fisheries.

According to a study commissioned by the BC Ministry of Environment Oceans & Marine Fisheries (GSGislason & Associates Ltd. May 2010), the groundfish trawl fishery faces several challenges or threats which affect its business viability. First, the increased world price of oil, and hence diesel fuel prices, over the past 10 years has increased industry operating costs significantly. Second, there has been increased market competition from other whitefish species such as basa from Vietnam, catfish from the US and tilapia from around the world. The industry is also facing growing public demand for ecocertification, increased monitoring costs and increased costs associated with new safety requirements. These changes are putting downward pressure on trawl fish prices and revenues, and upward pressure on trawl fish production costs. The trawl industry is a low value, high volume fishery which has limited capability to accommodate either lower prices or higher costs. In other words, the trawl sector is no more capable of absorbing the additional cost for increased observer coverage than the pot sector.

There was also concern expressed that requiring observer coverage on the under 60 foot pot vessels maybe problematic since many of these vessels maybe too small to carry observers. However, there was no similar concern for the less than 60 ft trawl sector. Another issue was that if the coverage requirement becomes too high then the pot vessels may avoid the high monitoring boxes. In both cases this holds true for the trawl sector as well.

The final rationale was that crab bycatch was much less than the trawl sectors bycatch. However, the bycatch in the Pacific cod pot fishery accounted for 20%, 27%, and 43% in reporting area 630 in 2005, 2007, and 2008. Additionally, 50% of the cod catch by the pot sector is taken by under 60 foot vessels and is unobserved suggesting that the sector's crab bycatch data is even less reliable. Smaller vessels most likely fish closer to shore than the larger observed pot fleet; thus bycatch of crab by the smaller vessels is most likely not representative of the larger observed pot sector. For 2010, pot crab bycatch is again high with total crab bycatch numbers at 59% of the total and the rate (crab/MT) is at almost 5 times higher than non-pelagic trawl targets in area 630. The 2010 crab bycatch data is as follows as of Sept 18, 2010 (Reference: NMFS catch reports, car250_psc_crab.xlsx file for week ending Sept. 18th):

- (1) Non-pelagic trawl gear (all targets): Groundfish catch of 32,988 MT and crab bycatch of 50,708 crabs.
- (2) Pot gear (cod target): Groundfish catch of 10,696 MT and crab bycatch of 74,111 crabs.

Therefore, we believe all sectors should be treated equally with regards to the observer coverage level. The intense monitoring agreement (Appendix I) stated each sector would be subject to 100%

observer coverage for two years; when this was agreed to it was assumed that outside funding would be obtained to pay the costs. If the sectors are going to fund the increased monitoring themselves then some equity should be arrived at. We would propose the same observer coverage requirement for pot and trawl, at the over and less than 60 foot vessel size break. So for example, 50% observer coverage for the over 60 ft pot and trawl sector and 30% for the under 60 ft sectors – this would improve data quality in the monitoring box(s), balance economic impact due to increased observer coverage costs, and reduce the incentive to totally avoid the monitoring box(s).

- C. **Choosing the appropriate gear types:** Vessels using pelagic trawl gear to fish directly for pollock should be exempted from the monitoring boxes. According to table 8 (page 28) pelagic trawl gear accounted for 304 crabs on average from 2003 – 2009 or 0% of the grand total. The Council dropped H&L gear from further consideration in April of 2010 which had similar crab bycatch amounts - 287 crabs on average from 2003 – 2009 or 0% of the grand total.
- D. **Choosing the appropriate areas for monitoring boxes:** The Council needs to be cognizant of the different impacts to the gear types with regards to monitoring costs when choosing areas for intense monitoring. Trawl gear is mobile gear that can move across all the monitoring boxes within a given fishing trip. Fishermen want to fish where CPUE for their targeted harvest is highest thus the 100% observer coverage requirement could limit their ability to move inside and outside the boxes if they do not have an observer on board. If too many areas are chosen the net result could be that the fleet will end up at the higher observer coverage level for all of area 630. Developing the right intense monitoring boxes is a key decision point for controlling observer costs for the fleet.

The motion allows the Council to pick and chose the appropriate monitoring boxes. Figure 12 (Historical tanner crab harvest locations for the period 2001 – 2009) and Figure 14 (number of mature male and mature female Tanner crab summed from 2001 – 2009) help inform this choice when you consider crab abundance based on ADF&G surveys. Table 16 helps valid the choice based on abundance by examining observed tanner crab bycatch. Finally, target groundfish catch within the area shows how much commercial fishing actually occurs in the boxes to understand the importance of the area to the fleet. Our recommendations are as follows for the monitoring boxes:

Chiniak Gully (Option 2): Drop. It is obvious that option 2 (Chiniak Gully) should be eliminated. First there is very little commercial crab harvest in the zone and very little surveyed adult crab in the zone. Table 16 (observed tanner crab bycatch) helps valid this choice where 6% of the total number of crab taken as bycatch was taken for the years from 2001 – 2009. Additionally observed bycatch in recent years (from 2005 – 2009) is even lower than the average varying between 1 – 2% of total crab bycatch.

Marmot Area (Option 1): Drop. This area is low to medium for importance with regards to commercial harvests and survey abundance of adult tanner crab. However, the amount of crab bycatch is 4% of the total number of crab taken as bycatch within the boxes and has a low amount of observed groundfish catch in proportion to the other proposed area closures at 1% for non-pelagic gear and 1% for pot (table 35).

Statistical Area 525630 (Option 4): Drop. This area is low to medium for importance with regards to commercial harvests and survey abundance of adult tanner crab. The amount of crab bycatch is 24% of the total number of crab taken as bycatch for the years from 2001 – 2009. However, historically this has not been an important area for the crab stocks (see figure 12).

Statistical Area 525702 (Option 3): Most important area for tanner crab. This area has the highest commercial harvests and the highest survey abundance of adult tanner crab. The amount of crab bycatch is 31% of the total number of crab taken as bycatch for the years from 2001 – 2009 and is showing an increasing trend for more recent years. It is also an extremely important fishing area for the non-pelagic trawl sector with 45% of the flathead sole observed catch and 50% of the shallow water flatfish observed catch for the years 2007 – 2009. For the pot sector, 5% of the observed cod catch comes from the area; however, the data does not represent all fishing effort within the closed area. Table 15 shows that only 1 – 6 pot vessels are observed annually over the period 2001 to 2009 while the number of unobserved vessels has ranged from 8 to 28 vessels on an annual basis. This is a wind protected area where many of the small pot vessels fish; identifying this area would allow the Council to understand crab bycatch for the small pot cod vessels. This area was also identified for intense monitoring by the sectors in 2008. To control monitoring costs the box should be narrowed (see appendix 1) to mirror what was originally agreed to by both sectors.

Alternative 2 – Close areas to pot and trawl groundfish fisheries

We do not support any additional closures for either trawl or pot gear – there is not a conservation concern and the efficacies of present closures areas have never been revisited. Additional closures may actual make things worse for bycatch and the ability of the fleets to meet OY for the different groundfish target fisheries.

- A. **Current bycatch rates and numbers are not a conservation concern:** Bycatch is 0.2% of total abundance in the Kodiak District and 0.3% of the East side abundance for both pot and trawl gear. Bycatch is considered “adverse” but not significant to the sustainability of the stock. The harvest specifications EIS concludes that bycatch of this magnitude is not considered to have an impact on stocks of Tanner crab in the GOA (NMFS 2007). For comparison purposes, ADF&G sets CBL’s (crab bycatch limits) for the scallop fishery – currently, .5% when the Tanner crab fishery is closed or 1% of crab abundance estimates when the fishery is open. For the BSAI bottom trawl fisheries Tanner crab bycatch caps, at the lowest crab biomass abundance levels, are .5% in Zone one and 1.2% in Zone two. Thus, based on other bycatch cap regimes, the observed Kodiak district tanner crab bycatch for all gear types (not just scallop dredge in one case or bottom trawl in the other) is less than half of any cap at the estimated .2% bycatch level.

Recent bycatch estimates have not changed from those in the historical time clip (i.e. from early 1990’s to present); bycatch is typically around .2%. From 1997 through 2009 the total Tanner crab population in the Kodiak District ranged from just over 19 million crabs to over 186 million in 2007. The average Tanner crab population estimate from 2003-2009 is approximately 109 million crabs. Crab bycatch numbers have increased as the crab biomass has increased; however the percentage of bycatch compared to biomass has remained similar.

According to ADFG, for the Kodiak District Tanner crab, “the 2008/2009 population estimate is the fourth highest on record since trawl assessment surveys were started in 1988: (Source: <http://www.sf.adfg.state.ak.us/FedAidPDFs/FMR10-32.pdf>). Tanner crab populations around Kodiak have been rebounding from lows in the mid-1990s, despite bottom trawl fishing and continued bycatch in the groundfish fisheries throughout this period. Of particular interest is the Eastside section of the Kodiak district; this district presently has the highest tanner crab abundance and is adjacent to the most intensely bottom trawl area around Kodiak Island, suggesting that bottom trawling is not negatively impact Tanner crab stocks.

- B. Mortality of crab bycatch and sex and age of by-caught crab further minimizes bycatch impacts to crab stock. The Council decided to use both 20 and 50% for pot gear and 80% for trawl gear mortality rate but suggested that if industry brought additional information to the Council at their October meeting the new information would be considered. A recent (April – June 2010) joint NMFS/AGDB Kodiak study suggests an overall 46% crab mortality rate for trawl gear: “A total of 1265 crabs were assessed, 820 during ATF trips and 445 from SHF trips. Average estimated mortality varied significantly between vessels, from 32% to 54% for ATF and from 38% to 68% for SWF trawling. Overall averages were 37% for the ATF trips, 52% for SWF trips and 46% overall. These are all substantially below the 80% bycatch mortality estimate currently used for trawl bycatch mortalities for Tanner crabs. That estimate was based on Stevens (1990), who studied catches of joint-venture trawls delivered to a Soviet mothership in the Bering Sea, with relatively long processing times. The 2010 data reported here is more likely reflective of current GOA bottom trawl fisheries”.

The NMFS/AGDB study results are consistent with the published Stevens work in that CAPTIME (average towing time+ time on deck) had a significant relationship to crab mortality rate. In the Stevens work average CAPTIME was 9.3 hours for king crab and 8.3 hours for tanner crab. In the NMFS/AGDB study average CAPTIME was 2 hours. So intuitively the early results of the NMFS/AGDB study match what would be expected based on the published Stevens study.

The crab bycatch data (table 22 – page 38) suggests that 69% of the crabs are juvenile males. This segment of the population is the least important to the crab spawning biomass – in order of importance - adult females, adult males, juvenile females and lastly juvenile males (N. Sagalkin, pers. comm.).

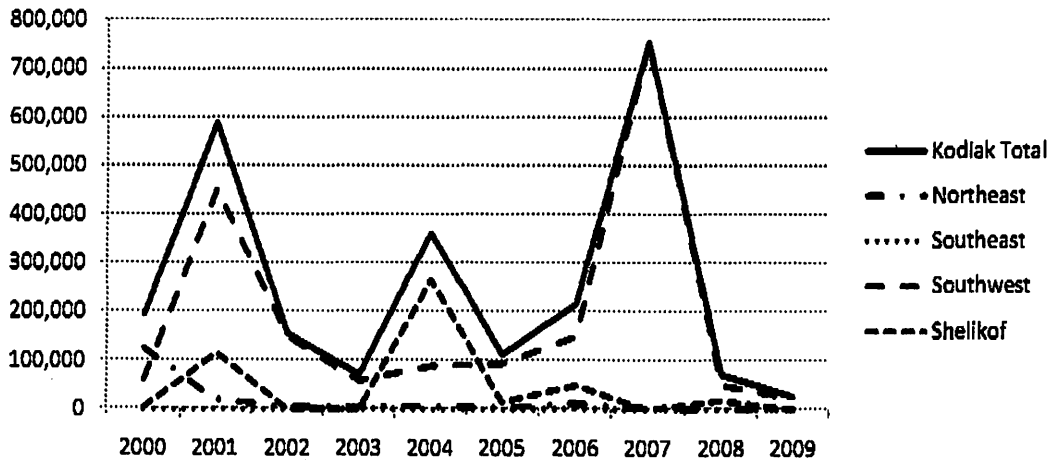
- C. Closures either seasonally or permanently is old school and won't bring crab back: Permanent or seasonal closures are an old school approach for bycatch management. Hard lines don't allow for protection when the species to be protected moves across those lines or allow fishing opportunity within the closure areas when the species you are trying to protect is no longer there (Bering Sea Chinook Savings Area is a prime example of this where the bycatch of Chinook was often greater inside than outside the closure box).

Tanner crab have moved into and outside the designated closures boxes on an annual basis as shown in the analysis on page 16 – figure 14. The proportion of crab inside the area closures in the Eastside Section ranged from 20% to 71% of the total Eastside Tanner crab population estimate. The proportion of crab inside the proposed closures in the Northeast Section was generally lower, ranging from 13% to 39% of the total Northeast Tanner crab population estimate for the time period 2003 to 2008 (Analysis, P 15). Removing flexibility for the fleet to move as crab move will only exacerbates the fleet's ability to control bycatch and hamper the fleet's ability to harvest the available groundfish quotas.

It is also important to point out that the non-pelagic trawl closures that we have in place have not brought crab back. For example the red king Type I and Type II closure areas for bottom trawl were originally implemented in 1986 and made permanent in 1993. These bottom trawl closures were designed to protect Kodiak red king crab because of the poor condition of the king crab resource off Kodiak. At the peak of red king crab fishery (1965/66) the annual harvest was 94 million pounds. The last commercial season was 1982/83 with a harvest of 8.7 million pounds. As figure 1 shows the stocks have not rebounded and are at an all time low abundance level despite being closed since 1986. Closing these areas has put them off limits for bottom trawl groundfish harvests, an impact to the

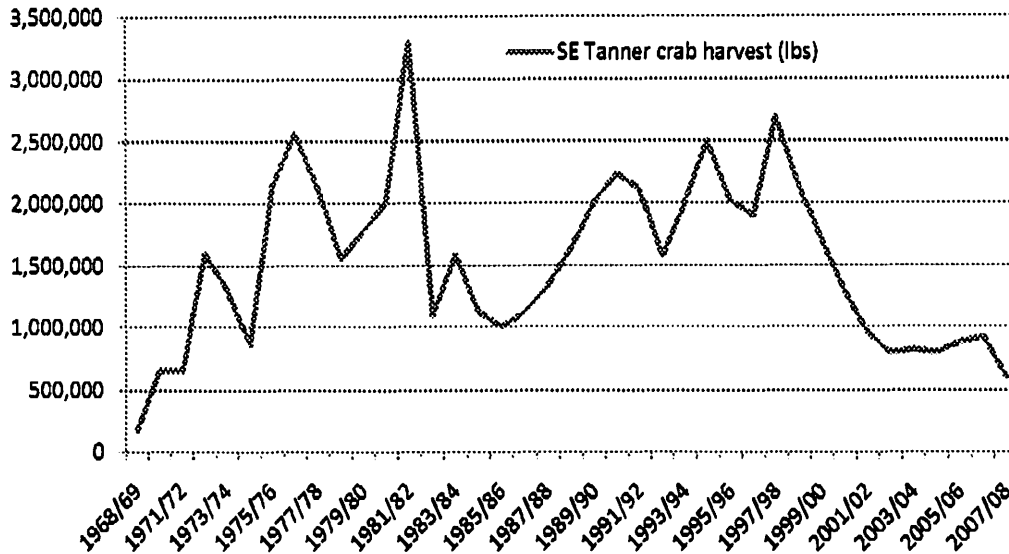
trawl sector, with no net gain with regards to the red king crab stocks. Obviously, environmental conditions are bigger drivers for red king crab biomass and abundance than setting aside closure areas to see if the crab will come back. Other similar examples include (1) Southeast red king crab: from a peak harvest of 2M lbs in 1968 to 214,000 in the last open season in 1997/98. It has been closed ever since; (2) Southeast Tanner crab: See Figure 2. Average harvest in the 1990's was about 2M pounds but has averaged .9M lbs annually since 1999/2000 – according to ADFG, the decline in harvests corresponds to lower survey catch rates and indicates real declines in abundance (ADFG FMR 08-62). Note that trawling has been prohibited in Southeast Alaska since 1998. (3) Cook Inlet King and Tanner crab: abundance levels of Tanner crab have been at low levels since the mid 1990's and there have been no commercial harvests since; abundance levels of Red King crab have been at extremely low levels since the mid 1980's and no commercial, recreational or subsistence harvests will be allowed until the stocks recover. Cook Inlet has been closed to bottom trawling since 2001 yet the crab stocks have not rebounded. (4) Prince William Sound Tanner crab – no fishery since 1988 and abundance levels are at historic lows.

Figure 1. Kodiak Area Red King population estimates by district and year 2000-2009.



Source: <http://www.sf.adfg.state.ak.us/FedAidPDFs/FMR10-32.pdf>

Figure 2. Commercial Southeast Tanner crab harvests in pounds (ADFG fmr 08-62)



- D. **Predation as source of crab mortality:** Reducing groundfish catch would likely increase predation on juvenile crab and crab larvae. *The top 5 predators of Tanner crab in the Gulf of Alaska are Pacific cod, Pacific halibut, sculpin spp., flathead sole, and walleye pollock.* P 12. The trawl sector believes that their fishing activity is actually helping the crab stocks by removing predators from the CGOA ecosystem that prey on tanner crab.

- E. **Seasonal Crab bycatch.** Jan 20 – July 31 versus August 1 to Dec 31. More crab are caught as trawl bycatch because of the seasonal halibut cap structure not because bycatch is higher during the first part of the year. Halibut caps were structured to maximize value of flatfish (i.e. Rex Sole with roe) and to reduce halibut bycatch based on seasonal movement of halibut. As can be seen in the tables below, there were over two times more fishing days in the first half of the year, on average from 2001-2009, due to availability of halibut PSC to prosecute the trawl cod and flatfish fisheries compared to the second half of the year; and, on average, 77.4% of groundfish harvested in Area 630 from 2003-2009 was caught in the first half of the year compared to the second half of the year corresponding to halibut PSC availability:

Days open to trawl gear in the CGOA by complex 2001-2009

Year	Jan 1 - Jul 31			Aug 1 - Dec 31		
	Shallow	Deep	Total	Shallow	Deep	Total
2001	150	148	298	28	21	49
2002	146	155	301	22	18	40
2003	183	149	332	58	76	134
2004	192	105	297	41	0	41
2005	192	97	289	23	5	28
2006	168	128	296	71	43	114
2007	166	148	314	96	121	217
2008	141	122	263	91	123	214
2009	192	95	287	125	153	278
AVG	170	127	297	62	62	124

Groundfish harvest (mt) using non-pelagic gear: Jan.-July vs. Aug-Dec., 2003-2009 (Source: NMFS catch reports)

Year	Jan - Jul	Aug - Dec	Total
2003	25,585	5,087	30,671
2004	26,117	5,455	31,572
2005	23,744	363	24,107
2006	25,579	5,867	31,446
2007	32,424	11,320	43,745
2008	31,356	16,493	47,849
2009	31,196	12,721	43,917
Avg.	28,000	8,186	36,187
% of Total	77.4%	22.6%	100.0%

F. Cumulative impacts of closures to trawl gear. The red King crab closures in 1986, the inside 3 mile closures in 2000, and the Steller sea lion closures in 2001 have resulted in a significant amount of fishing area closed to the trawl sector. **The Kodiak trawl fleet can't afford to lose more grounds.** Any additional areas will reduce flexibility for the fleet to move around to avoid bycatch and maximize target groundfish harvest rates. In fact, before implementing any additional closures the efficacies of present closures should be considered. The result of the inside three closures in 2000 (Board of Fish Proposal 132) was the decimation of the < 60 ft trawl fleet: the small trawl vessel fleet based in Kodiak declined from around 15 vessels < 60 ft to only two that currently fish out of Kodiak; this was the small trawl vessels prime fishing area. It should be noted that Kodiak district sections adjacent to these areas that were closed in 2000, are not recovering and are in fact performing poorly when compared to other sections adjacent to those more intensely bottom trawled.

G. Area Closures will have a huge Economic Impact to not only the trawl sector but the overall community of Kodiak:

Observed groundfish catch by gear type and target in the proposed closed areas, as a proportion of the total observed catch in that target, by gear type, in reporting area 630 (Analysis Table 38).

Gear	Target	2001	2002	2003	2004	2005	2006	2007	2008	2009	Av 01-09
NPT	ATF	30%	18%	45%	51%	26%	65%	82%	58%	74%	50%
NPT	Flathead	93%	71%	26%	67%	6%	9%	89%	79%	78%	60%
NPT	P Cod	28%	42%	9%	12%	1%	17%	28%	26%	18%	20%
NPT	Btm Poll	63%	36%	100%	35%	23%	76%	68%	75%	88%	70%
NPT	Rex						100%		98%	84%	74%
NPT	Rockfish	0%	10%	7%	3%	0%	1%	6%	3%	4%	4%
NPT	SWF	55%	28%	41%	43%	63%	80%	61%	57%	69%	58%

Up to 88% of groundfish is harvested by non-pelagic gear in the proposed closure areas (Analysis Table 38). 69% of the shallow water flatfish, 78% of flathead and 74% of arrowtooth were harvested in these areas by the trawlers in 2009. These are significant numbers.

“For the shallow water flatfish target fishery, there are few areas outside of the proposed area closures where significant catch occurs. Therefore, particularly for shallow water flatfish, it may be difficult to fully harvest the TAC outside the proposed area closures” (Analysis, p 82). However it is important to point out that ABC’s as well as TAC’s for flatfish have never ever been reached due to halibut bycatch cap restrictions thus closing these areas will increase the amount of flatfish that will not be harvested on an annual basis bringing actual catches even farther below ABC’s and TAC’s.

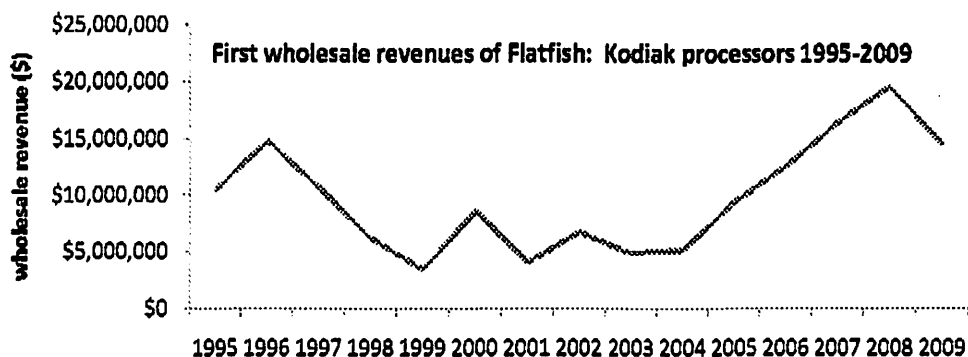
15% of the fishery landing volume that comes across the Kodiak docks is flatfish. According to the Kodiak Chamber of Commerce Economic Indicator report (Table 52 in the analysis), this fishery generated \$6.4 million dollars in ex-vessel revenue in 2006. This is an underestimate because incidental catch (pollock, cod, skates, other marketable species) is not included as part of the fishery. In 2008, again according to the Kodiak Chamber of Commerce economic indicator report (<http://kodiak.org/pdfs/econ-profile-kodiak-09.pdf>), flatfish ex-vessel revenue was over \$8.5 million (page 26). Wholesale revenue from flatfish across all the Kodiak processors has increased substantially over recent years and was over \$14.5 million in 2009 (see revised Analysis Table 55 and graph below). Add in additional revenues to the KIB (raw fish tax), Kodiak Island processors, the processing workforce and the trickle-down financial benefits to the service and support sectors and the effects are magnified. The Council analysis (Table 45) suggests that some vessels will lose as much as 30% of their ex-vessel revenue if these areas are closed, seven from area 525702. This data considers only those vessels with Kodiak registered addresses and does not take in account that there are numerous vessels that reside in and fish out of Kodiak year-round that have registered addresses in Washington and Oregon. The KIB labor force, with less fish crossing the docks, will also be affected.

Analysis Table 5S revised. First wholesale revenues of Kodiak processors by species (in dollars) (1995-2009).

Source: Jon McCracken, NPFMC. Flatfish revenues 1995-2009 are depicted graphically in the figure below.

Species	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009
Pollock and Pacific Cod	57,676,104	74,447,330	52,606,288	62,626,309	73,412,002	65,668,095	61,323,482	43,575,665	45,590,688	62,930,625	73,463,569	72,674,768	75,212,858	87,415,130	52,153,460
Haiibut and Sablefish	22,534,581	28,599,072	38,441,173	23,861,232	28,866,143	27,739,523	28,616,318	27,446,192	35,668,853	38,866,827	40,032,729	36,359,124	53,206,713	50,856,898	41,842,083
King and Tanner Crab	4,319,361	3,247,326	1,821,944	1,547,476	4,561,219	7,494,551	6,807,231	8,127,264	7,017,851	7,933,197	8,903,039	9,517,672	8,106,729	12,162,422	6,682,122
Herring							1,853,842	1,404,470	1,949,958	4,280,851	3,896,177	1,804,505	2,011,010	3,189,873	4,410,602
Salmon	96,396,221	56,820,206	49,208,829	70,522,442	61,990,607	60,272,913	60,539,810	34,569,861	43,148,424	43,771,152	57,308,997	60,445,594	70,109,452	58,239,415	77,735,119
Other	4,885,905	9,677,194	9,294,865	8,330,083	6,355,915	6,258,587	5,354,761	5,715,798	9,054,723	6,970,643	8,307,517	12,510,362	15,292,810	15,757,694	14,528,873
Flatfish	10,588,331	14,792,811	10,704,547	6,220,051	3,419,304	8,703,027	4,094,416	6,770,761	4,866,964	5,186,147	9,479,724	14,580,195	16,383,937	19,638,564	14,557,125
Grand Total	197,274,975	188,163,413	162,745,675	173,292,574	178,699,585	176,217,861	168,589,860	133,610,011	148,307,441	169,939,432	201,391,752	207,912,221	240,323,507	247,259,995	211,909,383

Source: COAR data
 * Withheld for confidentiality



AGDB members Care about Conservation and the Sustainability of the Resource

Our members care about conservation measures that will benefit tanner crab. A quick review of the holders of limited entry permits for tanner crab suggests that at a minimum 10% are held by either trawl vessel owners or operators. This percentage is higher when trawl crew members are considered. To advance crab conservation we are willing to do the following:

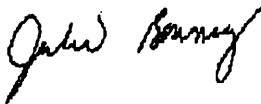
- A. **Modified trawl sweeps to reduce impacts of trawl to habitat and reduce unobserved crab mortality.** Modifications to trawl sweeps (bobbins) to increase clearance over the sea floor have been made and will soon be required on the flatfish catcher processors in the Bering Sea. They have been shown to substantially reduce the mortality (unobserved) of Tanner (and other) crabs encountered by trawls (Hammond, 2009). Although the results have not been replicated in the Gulf, several Kodiak trawlers have modified their trawl sweeps in a proactive effort to reduce trawl impact and unobserved crab mortality. It is anticipated that sweep mods would have similar benefits in the GOA. We believe a trailing amendment should be advanced at this time that would explore whether modified sweeps should be required for the flatfish trawl sector in the GOA. If so, we would work to develop the appropriate regulations through an industry work session.
- B. **Education to reduce handling mortality:** Based on the AGDB/NMFS research this summer on trawl crab mortality it is apparent that education that improves handling techniques and better-designed discard chutes can reduce handling mortality for both fleets (pot and trawl). We are willing to start that educational process for our members.

- C. Continue to do biweekly reports for tanner crab bycatch rates in Groundfish fisheries in the GOA: Starting in 2009 and continuing into 2010, AGDB has distributed GOA crab bycatch reports to vessel owners, operators and the Kodiak plant managers. This PSC bycatch Report summarizes biweekly and cumulative Bairdi crab numbers and rates by target fishery, the current fishing year with comparisons to the previous year. We will also include weekly PSC Bairdi rates/numbers by target fishery and vessel. The purpose of these reports is to generate fleet awareness of the PSC rates and amounts plus keeps the fleet individually accountable under the limited access system that we operate under. These reports encourage the fleet to communicate on the grounds day by day to avoid crab hotspots.
- D. Increased observer coverage if the Council determines that increased monitoring is needed to assess impacts to Tanner crab stocks: Observer restructuring will address monitoring however if the Council believes the timeline for improvements for data quality needs to be moved up, we would support an increased observer coverage requirement for both pot gear and non-pelagic trawl gear in a portion of stat area 525702 as negotiated by the sectors in 2008 (see Appendix 1). The observer coverage requirement should be the same for both gear types (pot and trawl) and vessel classes (under 60 ft and over 60 ft). The increased coverage requirement would be in place until the observer program is restructured. We only support increased monitoring if there is equitable treatment for both gear types with regards to the observer coverage requirement (i.e. all gear types by vessel class at the same observer coverage percentage).

In conclusion, members of AGDB are willing to step up for crab conservation but we are unwilling to close any additional areas for trawling or pot fishing – either seasonally or annually. Additional closures will only hamper the fleet's ability to meet National Standard 1 (OY) and National Standard 9 (minimize bycatch). Closure areas are old school and do not provide the fleet the flexibility to move as fish do to avoid the multiple bycatch species and harvest the available groundfish target quotas. Trawl flatfish harvests are a significant contributor to the overall Kodiak community economy (NS 8) and the catch amount cannot be made up in other areas of the CGOA. Losing the flatfish harvests (especially shallow flatfish) will have a significant impact to Kodiak economic viability. The Council needs to take reasoned approaches that balance national standard objectives.

Thanks for the opportunity to comment.

Sincerely,



Julie Bonney
Executive Director
Alaska Groundfish Data Bank, Inc

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Appendix I

Final agreement to increase information on crab bycatch in Gulf of Alaska pot gear and non-pelagic trawl gear fisheries occurring around Ugak and Sitkalidak Island

Context: Representatives of trawl and cod pot fisheries have been discussing tanner crab bycatch in the non-pelagic trawl and pot gear fisheries. Participants in these discussions were Julie Bonney (Alaska Groundfish Data Bank), Theresa Peterson (Alaska Marine Conservation Council), John Gauvin (H&G Workgroup), Jeff Stephan (United Fishermen's Marketing Association, Inc), Oliver Holm (fisherman-pot sector), Jerry Bongen (fisherman-pot sector), Jeff Scott, (fisherman-trawl sector), Curt Waters (fisherman-trawl sector), Alexis Kwachka (fisherman- pot sector), and Walter Sargent (fisherman- pot sector).

The focus of the discussions has been data gaps surrounding the extent of incidental catch of tanner crab (*Chionoecetes bairdi*) in the Kodiak area. According to the NPFMC's draft report on crab bycatch in the Gulf, the trawl flatfish and cod fisheries and the pot cod fishery account for most of the bairdi tanner crab bycatch in Gulf fisheries. Extrapolations from the limited observer data result in high variability from year to year and serve to reduce stakeholders' confidence in the degree to which the data reflect actual bycatch amounts and rates. After some discussion on the status of the tanner resource in the Kodiak district of the Gulf of Alaska and the crab bycatch issue in general, the group agreed that the objective should be to increase the observer coverage in two areas of specific concern to each fishery sector represented at the meeting. The increased coverage would be designed to provide a more accurate picture of the extent of non-pelagic trawl and pot cod tanner crab bycatch in an area where stakeholders have various concerns regarding the available data and possible effects on the tanner resource.

The area of primary concern to the pot gear fishery is known as the "sandbox", at the 60-80 fathom contour outside the Type 2 closure off Ugak. This area is an important fishing ground for the Kodiak tanner fishery and is fished extensively by flatfish and cod trawl vessels. The most recent ADF&G crab survey shows some abundance of adult male bairdi in this area. Likewise, the trawl representatives attending the discussion are concerned about incidental catch of tanner crab in the pot cod fishery which is conducted extensively inside the Type 2 trawl closure area adjacent to Ugak where the same ADF&G survey shows high relative abundance of adult female bairdi resource.

Attendees agreed that a requirement to carry a fishery observer for pot cod and non-pelagic trawl fishing is needed to improve tanner crab bycatch data in the above mentioned locations (Figure 1). Existing observer coverage requirement for cod and flatfish trawl fisheries that operate in the above area is 30% for the shoreside trawl and 100% for the at-sea trawl (H&G sector). For the pot fishery, 30% coverage is required for vessels over 60 ft and no coverage is required for vessels less than 60 ft. Many pot cod vessels are less than 60 feet in length and therefore not required to carry observers.

Steps to improve data to assess the extent of tanner crab bycatch in the areas of concern: All parties to this agreement concur that the goal should be to improve accuracy of bycatch data so that both sectors and fishery managers can better evaluate bairdi bycatch. To

accomplish this, parties to this agreement will jointly request that the North Pacific Council and the Alaska Board of Fisheries enact a requirement for 100% observer coverage for all vessels fishing for cod with pots or fishing with non-pelagic trawls within the areas delineated in the attached figure (the triangle drawn around "sandbox" as delineated in the attached figure plus the area inside the Type 2 area delineated by the orange lines in the attached figure). Once in place, vessels fishing with non-pelagic trawls and pot cod fishermen will, for a period of two years during both the State and Federal A season fisheries (January 1 to June 10), be required to carry a NMFS-trained observer to fish within the two areas shown in the attached figure. For a limited number of trips ADF&G shellfish biologists may be on board vessels to supplement data collection or, if appropriate, replace NMFS-trained observers.

The cost of 100% observer coverage for both fisheries represents a large increase in operating costs to fish the designated areas. Outside funding that will cover a large portion of the increased cost must be secured before the monitoring project can move forward. The group agrees to work jointly with appropriate staff from ADF&G, NMFS Alaska Region and Alaska Fisheries Science Center to collaborate on a proposal to provide funding to pay for the additional observer coverage needed during the two year project. This would potentially include funding from the North Pacific Research Board (NPRB) or other institutions.

Before work on funding mechanisms is done, both sectors need to demonstrate that there is sufficient support to move forward with getting better information on bairdi bycatch in the areas of interest. To this end, pot and trawl sectors will identify vessel fishermen who fish in the areas where observers will be required for this two year project. Both sectors agree to collect signatures of these stakeholders. Once approximately 75% of the fishery participants have agreed to the project, the group will then work jointly to develop work proposals to seek funding to pay for and administer the additional observer coverage during the two year period during which additional observer catch data will be collected. Once sufficient funding is found for the increased observer coverage, fishery managers will be asked to enact a requirement for 100% observer coverage inside the areas specified for the project for the two year period.

Both the pot and trawl sector agree that the only way that this project will move forward is when both sectors agree to participate.

Julie Bonney
Alaska Groundfish Data Bank

Theresa Peterson
Alaska Marine Conservation Council

07/29/2009 07:03 24840303899

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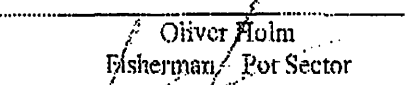
Julie Boung
Julie Boung
Alaska Groundfish Data Bank

Theresa Peterson
Theresa Peterson
Alaska Marine Conservation Council

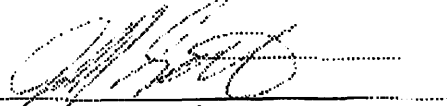


John Gauvin
H&G Workgroup

Jeff Stephan
United Fishermen's Marketing Assn, Inc.



Oliver Holm
Fisherman - Pot Sector



Jeff Scott
Fisherman - Trawl Sector

Curt Waters
Fisherman - Trawl Sector

Walter Sargent
Fisherman - Pot Sector

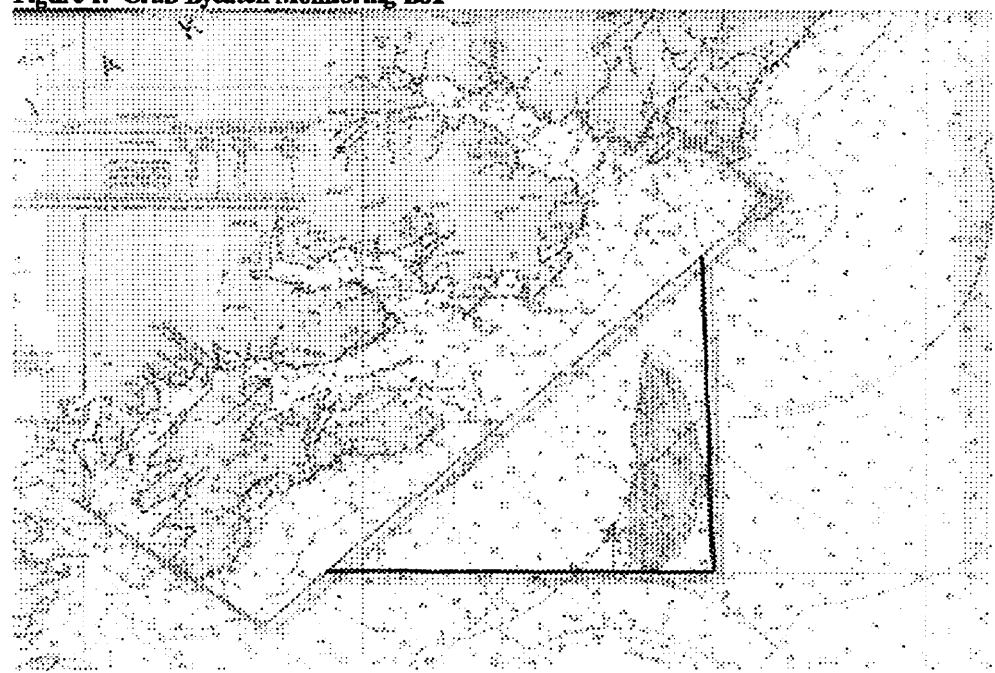
Jerry Bongon
Fisherman - Pot Sector

Alexus Kwachka
Fisherman - Pot Sector

Fishery Participant Signatures

Name	Signature	Vessel	Sector
Mike McElhenny	[Signature]	Alaska Beauty	Trawler
Tom Williams	[Signature]	Ed Conner	Trawler
PETER McCORMY	[Signature]	Stella	Trawl
Jack Scott	[Signature]	Ed Conner	Trawler
Rob Long	[Signature]	Ed Conner	Trawler
Christy Kallaghan	[Signature]	Laura	Trawler
Tom Wickham	[Signature]	Polina Soma	TRAWLER
Court Waters	[Signature]	Mar Dal Noste	Trawler
Storm Thaxa	[Signature]	Michelle Rorie	TRAWLER
RVIN SHAWER	[Signature]	TOPAZ	TRAWLER
Walter Taylor	[Signature]	Alaska Beauty	Trawler
Ryan Piller	[Signature]	ALASKA BEAUTY	Trawler
Eric Damsen	[Signature]	MAL PASCO	Trawler
Paul Taylor	[Signature]	MAR PASCO	Trawler
Zach Stigall	[Signature]	Mar Pasco	Trawler
Tom Simeon	[Signature]	ALASCAN	TRAWLER
Mike Kellison	[Signature]	Collie Brothers	Trawler/Port
Bob Kellison	[Signature]	Collie Brothers	Trawler
Ken Kellison	[Signature]	Collie Brothers	Trawler/Port
Jason Lawrence	[Signature]	TOPAZ	Trawler
Walter Johnson	[Signature]	WALTER N	Trawler
MICK LEWIS	[Signature]	MAR EN TRAIL	TRAWLER
Richard Starr	[Signature]	ALASKAN DEFIANT	Trawler
Eric Damsen	[Signature]	Eric Damsen	Trawler

Figure 1: Crab Bycatch Monitoring Box



Crab Bycatch Monitoring Zones:

All pot and trawl vessels fishing within these boundaries are subject to 100% observer coverage

..... Type II closure area: closed to trawling Feb 15 - June 15

----- Extension of monitoring area outside of Type II closure area.



"The Sandbox" 60-80 fathom contour: cod and Redfish fishing zone.

To the members of the NPFMC:

I am a small boat fisherman from Kodiak. I am writing because I am concerned about the bycatch problem with the draggers. Please follow through and close any tanner crab producing bays and areas to trawling. Not only would tanner crab be protected but halibut and king salmon among other species will be saved.

As one local trawler noted at a Kodiak City Council meeting, "the closures would hurt the local economy and would not reduce crab bycatch."

The local economy would not be hurt as the fish would come in from other areas and from other gear types.. It may even increase the local economy by the crab population increasing. And how could it not reduce crab bycatch? That is the idea isn't it?

We need some good hard numbers on bycatch, and 100% observer coverage will do just that.

The same local trawler also stated. "When you force trawlers to fish in areas with less fish concentration, which this would do, you're going to increase bycatch." Well that is where you need the 100% coverage. And good hard numbers.

It is well known that things are skewed and it is time for good science. Please close all proposed areas and increase observer coverage.

Thanks in advance for your consideration.

Sam Kirk

Sam Dima

To the members of the NPFMC:

Please be aware that once again the local Kodiak trawl association is staging a blitz of processor workers, both letters and public testimony. They will be stating that they will lose hours at work. Please consider the reality. There will be just as much fish to process due to quota with area closures to trawlers. The small local boats will be able to bring in more fish, and by keeping the trawlers within the bycatch limits, ultimately more hours will be gained by those processors. There will be more juvenile tanner crab and halibut left on the grounds to be caught legally and harvested. The income made by those small catcher boats and their crews will be spent locally also, instead of going out of state as with so many trawl crews.

Thank you for your consideration on this issue. Your careful thought and swift action is appreciated.

George Kirks
George Kirks

To the members of the NPFMC:

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Thanks in advance for your consideration.



Todd Lenihan

Kodiak Crab Alliance Cooperative

September 28, 2010

Chairman Eric Olson
North Pacific Fishery Management Council
605W 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Agenda item C-5

Dear Chairman Olson,

The Kodiak Crab Alliance Cooperative urges the Council to move forward with crab protections in the Gulf of Alaska. Crab fishermen have born the burden of conservation in the crab fishery. We had no fishery for 6 years. We have a very restrictive fishery now that we can fish; we're limited by pots and daylight hours during the fishery. These limits were put into place by the board of fish to mitigate mortality and handling. The Alaska Department of Fish and Game has also closed portions of bays and areas of concern to fishing to protect the stock and further allow it to grow.

By comparison we have watched council action expand trawl efforts in shallow water flats with no bycatch reduction or protection put in place. Our members have seen intensive fishing on known crab grounds and are very concerned about the effects of trawl gear on the stocks and benthic habitat; we strongly support closing areas to trawl of known and shown areas of abundance of crab.

Kodiak Crab Alliance Cooperative supports all effort to reduce bycatch of unintended species for all gear types. At this juncture we feel that gear modifications will not address the issue. The issue for us is protecting the crab. Both trawl and pot improvement have not been tried or proven effective in the Gulf of Alaska. When the observer program and data improves we will embrace bycatch reduction innovation for everyone.

Directed tanner crab fisherman have made the sacrifices to facilitate crab rebuilding. It is very frustrating to watch the flat fish fisheries expand with what appears to be no regard to the tanner crab stocks. We have waited for and asked for tanner crab protections for many years. Kodiak Crab Alliance Cooperative requests that the Council protects tanner crab and the benthic habitat which crabs live to help rebuild our once vibrant stocks to what they should be.

Sincerely,

Frank Miles

Ray May

Alexus Kwachka

Luke Lester

September 28 2010

North Pacific Fishery Management Council

605W 4th avenue, suite 306

Anchorage, Alaska 99501-2252

Agenda item C-5

Chairman Olson,

My name is Alexis Kwachka and I own a limited entry permit for tanner crab. I am very concerned about protecting tanner crab and the bottom which they live in. I have had to move my gear during a tanner opening because p-cod opened up. It was the move it or lose it that got me started thinking about impacts that trawl gear might be having on crab. This right after our fishery opened up after a 6 year stand down to let stocks build back up enough to start fishing again. This was 10 years ago now. Soon after this we started talking to the Council about protections of some sort. This agenda item has been passed around many years now. We are at final action and it is time to do something to protect tanner crab in the Gulf.

For the record I have no problems with any other gear type or fishing practice. With that said I feel very deeply that there have to be serious conservations benefits and restrictions on all gear groups. Resource extraction comes with a cost which we are all responsible for. As a fisherman I can only do my best. That is how I fish and try to live. Consequently I have not always been the most competitive fisherman.

Bycatch reduction and habitat protection will probably turn out to be one of the most important management decisions you the North Pacific Management Councils will make for our fisheries well being.

Please put meaningful protections in place for tanner crab in the Gulf of Alaska

Sincerely,

Alexis Kwachka



Family Pride, Inc.

3609 Sunset Drive, Kodiak, AK 99615

907-486-4661

907-539-2667

My name is DJ Vinberg. I own and operate the fishing vessel "Family Pride." I own both a Kodiak Tanner permit and Pot Fish Cod in the Kodiak area on the east side.

I support shutting down the Trawl fleet on the Eastside in the designated area, especially during the January, February, and March times of the year – when the Tanner population is more likely to be impacted. I believe that in order for our Tanner population to grow into a more valuable and profitable fishing sector (as it once was) for the Kodiak community, then the damage done both directly (crab caught in nets) and indirectly by destroying the habitat has to be kept as a minimum.

Kodiak's ability to survive is largely based on its diversity and ability to adjust. In recent times we have gotten away from common sense and politically set the stage to favor one gear type – Trawlers at the expense of all other participants.

Take the recent Fall Federal Cod opening, commonly known as the "B" season. For the trawlers to be allowed to catch 16-18 million pounds of the 22 million Total Allowable Catch and do it in four days is wrong on all levels:

The Trawlers flood the Processors with an inferior product. Product has to set on the dock or on the boats for several days, waiting to be processed. Small fish are taken directly to the biodry, yet still come off the TAC. This is a waste of resource.

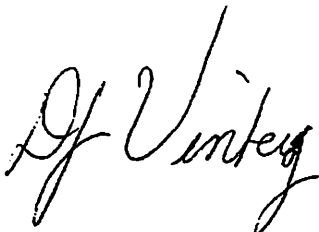
Deny all other gear types (pot, longline, and jig fishermen) to even get close to their historical catch levels.

For them to be allowed to approach Tom Petersen and make a "deal" to catch the remaining quota is no different than the Pot Cod Fleet approaching Tom with the same proposal to exclude other gear types and still catch the quota in the name of quality (larger fish and no small ones for biodry). And keep the Processors and their workers busy over a longer period. The Pot Cod Fleet is a better representation of the local Kodiak fleet than the Trawlers are and therefore will invest the money made back into the community of Kodiak.

I support allowing Pot Cod fishing in the designated area as I believe that this fishing has little or minimum impact on the Tanner population. Any incidental crab catch can be returned unharmed to the ocean and crab mortality rate kept at a minimum.

My point is this: because I am a pot fisherman for both Tanners and Cod and we as a fishing sector are not as organized as the Trawl fleet does not mean that we do not exist. We should not be penalized for this handicap. I hope that you will use good judgment and manage our resource for all participants. And manage it for the longer term with sustainability and participation being key ingredients in your solution.

Sincerely,



September 28, 2010

Eric Olsen, Chair
North Pacific Fishery Management Council
605 W. Fourth Ave.
Anchorage, AK 99501

RE: Agenda Item C-5 GOA Tanner Crab Bycatch

Chairman Olsen and members of the Council,

For the record, my name is Frank Miles and I hold a Kodiak Tanner Crab permit. I support tanner crab protection measures, which would help revitalize a fishery the small boat fleet increasingly depends on.

Tanner crab is important to the mostly resident small boat fleet and the community of Kodiak.

Rationalized fisheries such as halibut/sablefish, GOA rockfish, Bering Sea crab, and GOA LLP reduction, has severely limited fishing opportunities for many fishermen. A healthy tanner crab fishery is needed to bridge the gap between the winter and summer fisheries.

Trawl industry is benefiting from built in efficiencies from management changes and are increasingly fishing shallow water flatfish(SWF) within the areas of high tanner crab abundance. Trawl sector has no incentive to avoid tanner crab areas as they have no annual cap(shut down trigger) on the numbers of crab they incidentally catch. We should not forget the clear photos of the "anomaly" tows of tanner crab brought before this council.

The present 30% observer program with the 70% self reporting component, has not provided sound data reflective of true interaction with pot or trawl fleets. Why would actual numbers be recorded? What is the incentive? While the observer restructuring for the GOA moves forward, the rebuilding tanner crab stocks would most likely benefit from area closures.

Conservation should be shared by all fishing sectors.

Conservation and by catch was one of the primary goals built into the reauthorization of the MSA. The directed tanner crab fishery has bore the burden of conservation of tanner crab solely. ADFG closed tanner crab for a period of 6 years to rebuild declining tanner stocks, while at the same time an expansion of the trawl effort within the known tanner areas has increased. Additionally, the directed tanner crab fleet has embraced further limitations by ADFG such as pot limits, daily fishing hours, and GHL by areas.

While a closure of these tanner areas may present a burden to a few trawl vessels, these affected vessels would be able to fish in areas outside of proposed closed areas.

I urge the council to move forward with closures to the trawl fleet of areas of abundance for Tanner crab.

Frank Miles
F/V Lady Lu
Box 2744
Kodiak, AK 99615

Sept. 27 2000

Eric Olson, Chair
North Pacific Fishery Management Council
605 W. Fourth Ave.
Anchorage AK. 99501

R.E. Agenda Item C-5-COCA Tanner Crab Bycatch

Dear Chairman Olson,

My name is Jim Monroe & have fished both King & Tanner Crab around Kodiak Is. since the early 70's. I have also fished Salmon, Halibut, sablefish, herring, Pea-sock; but have never fished the bottom. Many fishermen I know gave dragging a try when crab & salmon went down hill. But soon gave it up saying it just does too much damage. I have seen pictures of deck loads of tanner crab, halibut & other product that wasn't being targeted just shoveled over the side including many salmon.

I tried to get my hands on some of these photos, but as I just got back to town & received this letter I hope this gets to you in time. I will try to make the meeting in Anchorage. But I do have prior engagements.

I am a firm believer there are better ways to catch fish with less bycatch & environmental damage than raking the seafloor.

Jim Monroe
FR LDD415144

North Pacific Fishery Management Council
605 W. 4th, Suite 306
Anchorage, AK 99501-2252
Fax (907) 271-2817

September 28, 2010

Re: Agenda Item C-5 – Final action GOA Tanner Crab Bycatch

Dear Chairman Olson and members of the Council:

My name is Jason Chandler and I am the operator of the F/V Topaz, a Kodiak based, family owned and operated trawl vessel. I am writing to protest any action, other than status quo, on agenda item C-5. This proposal is a clear attack on the trawl fleet, and represents no substantial benefit to the tanner crab stock. I have been watching this proposal progress through the council process, and was amazed in April to see it forced ahead to final action, despite the recommendations of the SSC and AP.

I can only assume that this action represents one groups agenda, as all evidence points to the fact that the trawl fleet is not damaging the crab stock around Kodiak Island. With the stock presently rebounding, making any changes seems ridiculous. I would, in fact, argue that closing or further limiting the trawl fisheries will have an adverse affect on Tanner crab stock. The areas in question represent some of the most heavily trawled areas around Kodiak, which is precisely where the crab are rebounding. The harvesting of predatory species (arrowtooth, pollock, and cod) from these areas makes it possible for small crab to grow and reproduce.

With the restructured observer program on the horizon, implementing an area of increased coverage for one year will only be a further hardship on fishermen and gather little extra data. These areas are huge, requiring 100% coverage for the trawl fleet is unrealistic. It effectively means that a trawler would be carrying an observer every trip while fishing on the east side of Kodiak. I look forward to the new observer program, to collecting data from all gear types, that has a higher level of confidence.

Sincerely,



Jason Chandler

**Ronald Blondin
1412 Baranof St
Kodiak, Alaska 99615
907-486-6329**

To: North Pacific Fisheries Management Council,

I Ronald Blondin, born and raised in Kodiak and been a commercial fisherman for 30 years, for Tanners, Dungeness crab, Salmon, Cod, and Halibut.

My concerns have to do with trawlers working hard on the bottom gear in many sensitive areas around Kodiak. I have no lobbyist to pay big money and do my talking for me.

Halibut stocks are steadily declining and Tanner crab stock are rising slowly. We can save these fisheries and ensure a future for them if we limit the by catch by these trawlers and there unselective fishing they do. No one is asking to shut them down but to fish in none sensitive areas. The East side of Kodiak has to be protected! We must do something now before it is too late.

Thanks for listing to my concerns, *Ronald Blondin*

North Pacific Fishery Management Council
200th Plenary Session – October 6-12, 2010
Anchorage, Alaska – Hotel Captain Cook
Fax: 907.271.2817 Tel: 907.271.2809

Public Comment of Stephen Taufen, Groundswell Fisheries Movement

RE: C-5 GOA Tanner Crab Bycatch

Final action to close areas to minimize bycatch of Tanner crabs

Mr. Secretary, Chairman Olson & Council members:

We favor closure along the lines of Alternative 2 for year round closures under the timing specified as Option 1 for all trawl gear.

As to Area definitions under Component 1, we endorse full trawl closure in the proposed Northeast combined option 1 and 2, for area 525807 and the Chiniak Gully, & option 3 for the Eastside (525702). As to the Southeast Section (525630) the Council may want to modify and reduce the area to that most crucial to tanner stocks, rather than as drawn on fixed 'zero-minute' latitude and longitude lines.

We favor trawl closure for a 10-year period (or as best science advises) in order to properly learn from and assess the resulting bycatch mitigation and consequent crab rebuilding and to demonstrate the revitalized crab harvesting performance. It is important to remember that *"the Council initiated the current analysis and suite of alternatives, which identify closures based on Tanner crab abundance rather than on groundfish bycatch patterns."*

In addition, the Council might also combine greater Observer coverage requirements – to *"provide the Council with a high level of confidence in the assessment of any bycatch caught in the closed areas, as a basis for future management action..."*

We believe that not only will the trawl segment not be kept from attaining its Total Allowable Catches by this action, but that the overall Net National Benefit (and State of Alaska benefits) will be increased under the proposed closures. We have included additional annual tables (like Table 52 in the document) of the Ex-vessel volumes and values, by species, delivered since 2002 to Kodiak.

These tables will help dispel the false arguments of those who state that "an entire fishery will go away" when referring to shallow water flatfish (19 cents a pound) and (the overly abundant) arrowtooth flounder (6 cents a pound). There is no comparison (even if some percentage loss occurred in these limited species) to the higher value that can be gained from revitalized Tanner crab stocks – as Tanners sold for \$1.60 ex-vessel last year.

Kodiak was once the Crab Capital of the World, and tanner crab harvests exceeded 30 million pounds. It makes conservation sense and good economic sense to choose Alternative 2 with specific emphasis on trawl closures, at this time.

The following quotes are included to emphasize key points for the City and Borough of Kodiak, and remind the Council of how easily the statutory requirements can be met.

The Problem Statement says, “*No specific conservation measures exist in the GOA to address adverse interactions with Tanner Crab*” and concludes, “*Specific protection measures should be advance to facilitate stock rebuilding.*”

Key statements in the Sept. 2010 Public Review document’s Executive Summary are:

(Page iii) “Alternative 2, closing the proposed areas to groundfish fishing, would benefit crab stocks by reducing a source of mortality.”

(Page iv) “The timing, general location, and overall level of fishing effort in the GOA groundfish fisheries is not expected to change, as the proposed area closures are small and fishing will likely continue to occur in neighboring areas.”

More important, (Pages 107-109), under National Standards, the C-5(1) Public Review document states:

NS#1 Optimum Yield: *“Target groundfish species that are currently caught in these [proposed closure] areas include flatfish, Pacific cod, Pollock, rockfish, and sablefish. It is not anticipated that the imposition of area closures will prevent the fishery from achieving annual total allowable catch [TAC] for these species.”* And, *“a reduction in bycatch mortality of crab species may result in an increase in yield from the directed fishery”* – serving the achievement of optimum yield.

NS#5 Efficiency: – the recent change in regulation emphasizes the standard is *“to consider rather than promote efficiency. Efficiency in the context of this change refers to economic efficiency...”* Economic efficiency is related to product choices, with higher value and higher quality products bringing back the highest economic returns – because it is the demands of consumers which matter foremost, not simply reducing the cost of limited operations (production efficiency) for a select few in a subgroup of trawlers.

NS#8 Rebuilding: *“An analysis of the alternatives suggests that while impacts may be noticeable at the individual operation level for at least a few of the vessels, the impacts at the community level for any of the involved fishing communities would be well under the level of significance. The sustained participation of these fishing communities would not be put at risk by any of the alternatives being considered.”* That pretty well dispels the fear-mongering that has hit Kodiak by the trawlers who are the opponents of the NPFMC’s proposal to reduce bycatch, use common sense and restore more fisheries than groundfish alone.

It is these legal requirements which the trawlers are desperately trying to avoid, and one of their favorite means of doing so is to draw *red herrings* across the tracks of decision makers. And to use public relations tactics, and even false statements, to reframe the arguments.

The Tanner Crab fleet is not accurately characterized by calling them “the trawlers’ opponents” – as this Amendment and its closures are required by law to address a long-known bycatch

problem. More accurately, the Tanner fleet is the proponent of renewing a viable and valuable key fishery – one that Kodiak's economy was built on.

Crabbers believe Kodiak's economy has a right to "efficiency" as defined by getting more economic rewards for less destruction of highly valued fish stocks, at our front door, while serving consumers and the greater economy, as well.

Bycatch reduction is about eliminating wanton waste, bad behavior, and sheer greed as a determinant of individual wealth over public wealth. One look at the additional tables we have provided for GOA fishery products delivered to Kodiak will help all decision makers place the specious arguments re flatfish and arrowtooth flounder, in their proper place. There are bigger goals to be served than the mere incomes of a few individual opponents to good conservation and management.

Likewise, the efforts of the trawlers would be far better spent if they learned the true economic facts of how much many of the parent firms of processors they deliver to in Kodiak actually pay for similar species in Japan's ports. And about the true full value of the products produced – and related concerns of Abusive Transfer Pricing – in order to ensure the value that belongs in the USA is kept here and shared as part of the ex-vessel price.

In closing, here are some quotes by Alaska's Congressional delegates that put this action in historical perspective:

In 1996, on the House floor, the principal author of a bill (H.R. 39) to amend and reauthorize the MSA Congressman Don Young – also chairman of the committee of jurisdiction; in the Congressional Record on September 18, 1995 at H9116 – stated:

"The reduction of bycatch in our fisheries is one of the most crucial challenges facing fisheries managers today" – Don Young, 1996

Also in dispute is that somehow this Bycatch reduction Amendment arrived unexpectedly on Kodiak's economic doorstep, in 1996 Senator Ted Stevens declared under the accompanying Senate version:

"Under S.39, the councils will ... be required to reduce the amount of bycatch in every fishery around our country." – Ted Stevens, 1996

It is no surprise this delayed action finally comes before you these 14 years later.

We leave you to your duty, in the belief that the Council will exercise its powers by following the law and national standards instead of serving select interests.

Stephen Taufen – Groundswell Fisheries Movement

ALASKA DEPARTMENT OF FISH & GAME
Division of Commercial Fisheries
2002 PORT OF KODIAK LANDING REPORT
Fish Ticket Harvesting and COAR Buying Data

For: Trevor Brown, Kodiak Chamber of Commerce, chamber@kodiak.org - (907) 486-5557
 Contact: Mike D. Plotnick, 907-465-6133, mike_plotnick@fishgame.state.ak.us
 Data Source: COAR, Zephyr, Venus, Neptune & Triton Databases

Year	Species	Fish Ticket Pounds ^a	% of Lbs. VOLUME	Ave \$/Lb	Ex-vessel Value	% of Ex-Vessel VALUE
2002						
1	salmon, Chinook	0	0.0%	\$ -	\$0	0.0%
2	salmon, sockeye	0	0.0%	\$ -	\$0	0.0%
3	salmon, coho	0	0.0%	\$ -	\$0	0.0%
4	salmon, pink	0	0.0%	\$ -	\$0	0.0%
5	salmon, chum	0	0.0%	\$ -	\$0	0.0%
6	[Roe - n/a]	0	0.0%	\$ -	\$0	0.0%
A	Subtotal Salmon	57,828,811	21.7%	\$ 0.325	\$18,798,037	22.7%
7	halibut, Pacific	11,039,896	4.1%	\$ 1.900	\$20,975,802	25.3%
8	Sablefish	3,887,386	1.5%	\$ 2.062	\$8,014,256	9.7%
B	Subtotal - H&S	14,927,282	6.6%	\$ 1.942	\$28,990,058	35.0%
9	Bering Sea Crab ^(b)	509,389	0.2%	\$ 3.498	\$1,781,948	2.1%
10	Dungeness	650,248	0.2%	\$ 2.024	\$1,316,106	1.6%
11			0.0%	\$ -		0.0%
12	Scallops	398,152	0.1%	\$ 6.530	\$2,600,000	3.1%
C	Subtotal Crab	1,557,789	0.6%	\$ 3.658	\$5,698,054	6.9%
13 - D	Herring, Pacific	7,982,000	3.0%	\$ 0.159	\$1,273,000	1.5%
14	Skates	0	0.0%	\$ -	\$0	0.0%
15	Misc. (Sea Cucumbers)	130,915	0.0%	\$ 1.160	\$151,861	0.2%
16	Octopus	218,327	0.1%	\$ 0.571	\$124,614	0.2%
17	Miscellaneous	18,641	0.0%	\$ 1.056	\$19,691	0.0%
E	Subtotal Misc.	367,883	0.1%	\$ 0.805	\$296,166	0.4%
18	Rockfish ^(b)	2,997,638	1.1%	\$ 0.130	\$390,720	0.5%
19	Black Rockfish	174,389	0.1%	\$ 0.339	\$59,114	0.1%
20			0.0%	\$ -		0.0%
F	Subtotal Rockfish	3,172,027	1.2%	\$ 0.142	\$449,834	0.5%
21 - G	Pacific Cod	73,139,944	27.4%	\$ 0.213	\$15,546,138	18.8%
22 - H	lingcod	0	0.0%	\$ -	\$0	0.0%
23	Pollock, walleye	83,331,663	31.2%	\$ 0.098	\$8,139,083	9.8%
24	[Pollock roe - n/a]		0.0%	\$ -		0.0%
I	Subtotal Pollock	83,331,663	31.2%	\$ 0.098	\$8,139,083	9.8%
25	Flatfish ^(b)	16,636,317	6.2%	\$ 0.177	\$2,947,214	3.6%
26	Flathead Sole	2,519,706	0.9%	\$ 0.140	\$352,591	0.4%
27	Rex Sole	666,202	0.2%	\$ 0.230	\$153,253	0.2%
J	Subtotal Flatfish	19,822,225	7.4%	\$ 0.174	\$3,453,058	4.2%
28 - K	Arrowtooth flounder	0	0.0%	\$ -	\$0	0.0%
29 - L	Pac. Ocean Perch	4,833,278	1.8%	\$ 0.050	\$242,446	0.3%
M	TOTAL	266,962,902	100.0%	\$ 0.310	\$82,885,874	100.0%

ALASKA DEPARTMENT OF FISH & GAME
Division of Commercial Fisheries
2003 PORT OF KODIAK LANDING REPORT
Fish Ticket Harvesting and COAR Buying Data

For: Trevor Brown, Kodiak Chamber of Commerce, chamber@kodiak.org - (907) 486-5557

Contact: Mike D. Plotnick, 907-465-6133, mike_plotnick@fishgame.state.ak.us

Data Source: COAR, Zephyr, Venus, Neptune & Triton Databases

Year	Species	Fish Ticket Pounds ^a	% of Lbs. VOLUME	Ave \$/Lb	Ex-vessel Value	% of Ex-Vessel VALUE
2003						
1	salmon, Chinook	0	0.0%	\$ -	\$0	0.0%
2	salmon, sockeye	0	0.0%	\$ -	\$0	0.0%
3	salmon, coho	0	0.0%	\$ -	\$0	0.0%
4	salmon, pink	0	0.0%	\$ -	\$0	0.0%
5	salmon, chum	0	0.0%	\$ -	\$0	0.0%
6	[Roe - n/a]	0	0.0%	\$ -	\$0	0.0%
A	Subtotal Salmon	83,646,938	30.5%	\$ 0.214	\$17,890,468	21.6%
7	halibut, Pacific	7,891,904	2.9%	\$ 2.839	\$22,407,370	27.0%
8	Sablefish	2,405,403	0.9%	\$ 3.340	\$8,034,046	9.7%
B	Subtotal H&S	10,297,307	3.8%	\$ 2.956	\$30,441,416	36.7%
9	Bering Sea Crab ^(b)	1,419,442	0.5%	\$ 4.270	\$6,060,780	7.3%
10	Dungeness	472,573	0.2%	\$ 1.490	\$704,134	0.8%
11			0.0%	\$ -		0.0%
12	Scallops	confidential	#VALUE!	#VALUE!	confidential	#VALUE!
C	Subtotal Crab	1,892,015	0.7%	\$ 3.576	\$6,764,914	8.2%
13 - D	Herring, Pacific	4,361,882	1.6%	\$ 0.249	\$1,086,270	1.3%
14	Skates	0	0.0%	\$ -	\$0	0.0%
15	Misc. (Sea Cucumbers)	153,903	0.1%	\$ 1.370	\$210,847	0.3%
16	Octopus	64,875	0.0%	\$ 0.430	\$27,896	0.0%
17	Miscellaneous	118,493	0.0%	\$ 0.437	\$51,764	0.1%
E	Subtotal Misc.	337,271	0.1%	\$ 0.861	\$290,507	0.4%
18	Rockfish ^(g)	10,982,826	4.0%	\$ 0.064	\$700,627	0.8%
19	Black Rockfish	83,854	0.0%	\$ 0.380	\$31,865	0.0%
20			0.0%	\$ -		0.0%
F	Subtotal Rockfish	11,066,680	4.0%	\$ 0.066	\$732,492	0.9%
21 - G	Pacific Cod	52,935,977	19.3%	\$ 0.310	\$16,410,153	19.8%
22 - H	lingcod	0	0.0%	\$ -	\$0	0.0%
23	Pollock, walleye	73,136,066	26.7%	\$ 0.090	\$6,582,246	7.9%
24	[Pollock roe - n/a]		0.0%	\$ -		0.0%
I	Subtotal Pollock	73,136,066	26.7%	\$ 0.090	\$6,582,246	7.9%
25	Flatfish ^(h)	14,264,333	5.2%	\$ 0.052	\$747,899	0.9%
26	Flathead Sole	2,798,544	1.0%	\$ 0.090	\$251,869	0.3%
27	Rock Sole	8,123,946	3.0%	\$ 0.140	\$1,137,352	1.4%
J	Subtotal Flatfish	25,186,823	9.2%	\$ 0.085	\$2,137,120	2.6%
28 - K	Arrowtooth flounder	0	0.0%	\$ -	\$0	0.0%
29 - L	Pac. Ocean Perch	11,507,301	4.2%	\$ 0.050	\$575,365	0.7%
M	TOTAL	274,368,260	100.0%	\$ 0.302	\$82,910,951	100.0%

ALASKA DEPARTMENT OF FISH & GAME
Division of Commercial Fisheries
2004 PORT OF KODIAK LANDING REPORT
Fish Ticket Harvesting and COAR Buying Data

For: Trevor Brown, Kodiak Chamber of Commerce, chamber@kodiak.org - (907) 486-5557

Contact: Mike D. Plotnick, 907-465-6133, mike_plotnick@fishgame.state.ak.us

Data Source: COAR, Zephyr, Venus, Neptune & Triton Databases, Run 07/09/2007

Year	Species	Fish Ticket Pounds ^a	% of Lbs. VOLUME	Ave \$/Lb	Ex-vessel Value	% of Ex-Vessel VALUE
2004						
1	salmon, Chinook	0	0.0%	\$ -	\$0	0.0%
2	salmon, sockeye	0	0.0%	\$ -	\$0	0.0%
3	salmon, coho	0	0.0%	\$ -	\$0	0.0%
4	salmon, pink	0	0.0%	\$ -	\$0	0.0%
5	salmon, chum	0	0.0%	\$ -	\$0	0.0%
6	[Roe - n/a]	0	0.0%	\$ -	\$0	0.0%
A	Subtotal Salmon	112,834,853	36.1%	\$ 0.165	\$18,638,784	20.0%
7	halibut, Pacific	8,509,514	2.7%	\$ 2.870	\$24,422,305	26.2%
8	Sablefish	2,704,684	0.9%	\$ 2.880	\$7,789,490	8.4%
B	Subtotal - H&S	11,214,198	3.6%	\$ 2.872	\$32,211,795	34.6%
9	Bering Sea Crab ^(b)	1,439,453	0.5%	\$ 3.967	\$5,709,747	6.1%
10	Dungeness	362,658	0.1%	\$ 1.500	\$543,987	0.6%
11	Misc. Shellfish	505,128	0.2%	\$ 3.892	\$1,965,856	2.1%
12			0.0%	\$ -		0.0%
C	Subtotal Crab	2,307,239	0.7%	\$ 3.563	\$8,219,590	8.8%
13 - D	Herring, Pacific	6,689,629	2.1%	\$ 0.250	\$1,672,407	1.8%
14	Skates	3,318,308	1.1%	\$ 0.145	\$482,388	0.5%
15	Misc. (Sea Cucumbers)	137,098	0.0%	\$ 2.170	\$297,503	0.3%
16	Octopus	0	0.0%	\$ -	\$0	0.0%
17			0.0%	\$ -		0.0%
E	Subtotal Misc.	3,455,406	1.1%	\$ 0.226	\$779,891	0.8%
18	Rockfish ^(g)	6,130,327	2.0%	\$ 0.107	\$659,004	0.7%
19	Black Rockfish	83,854	0.0%	\$ 0.380	\$31,865	0.0%
20			0.0%	\$ -		0.0%
F	Subtotal Rockfish	6,214,181	2.0%	\$ 0.111	\$690,869	0.7%
21 - G	Pacific Cod	61,847,264	19.8%	\$ 0.280	\$17,317,234	18.6%
22 - H	lingcod	0	0.0%	\$ -	\$0	0.0%
23	Pollock, walleye	86,339,185	27.6%	\$ 0.110	\$9,497,310	10.2%
24	[Pollock roe - n/a]		0.0%	\$ -		0.0%
I	Subtotal Pollock	86,339,185	27.6%	\$ 0.110	\$9,497,310	10.2%
25	Flatfish ^(h)	3,366,262	1.1%	\$ 0.759	\$2,553,596	2.7%
26	Flathead Sole	2,764,065	0.9%	\$ 0.110	\$304,047	0.3%
27	Rock Sole	4,188,090	1.3%	\$ 0.150	\$628,214	0.7%
J	Subtotal Flatfish	10,318,417	3.3%	\$ 0.338	\$3,485,857	3.7%
28 - K	Arrowtooth flounder	0	0.0%	\$ -	\$0	0.0%
29 - L	Pac. Ocean Perch	11,549,653	3.7%	\$ 0.060	\$692,979	0.7%
M	TOTAL	312,770,025	100.0%	\$ 0.298	\$93,206,716	100.0%

Table 52

ALASKA DEPARTMENT OF FISH & GAME
Division of Commercial Fisheries
2006 PORT OF KODIAK LANDING REPORT
Fish Ticket Harvesting and COAR Buying Data

For: Trevor Brown, Kodiak Chamber of Commerce, chamber@kodiak.org - (907) 486-5557

Contact: Mike D. Plotnick, 907-465-6133, mike_plotnick@fishgame.state.ak.us

Data Source: COAR, Zephyr, Venus, Neptune & Triton Databases, Run 07/09/2007

Year	Species	Fish Ticket Pounds ^a	% of Lbs. VOLUME	Ave \$/Lb	Ex-vessel Value	% of Ex-Vessel VALUE
2006						
1	salmon, Chinook	210,592	0.1%	\$ 0.940	\$197,956	0.2%
2	salmon, sockeye	8,146,700	2.1%	\$ 0.840	\$6,843,228	6.4%
3	salmon, coho	4,338,634	1.1%	\$ 0.660	\$2,863,498	2.7%
4	salmon, pink	117,392,708	30.8%	\$ 0.160	\$18,782,833	17.7%
5	salmon, chum	9,102,850	2.4%	\$ 0.330	\$3,003,941	2.8%
6	[Roe - n/a]	0	0.0%	\$ -	\$0	0.0%
A	Subtotal Salmon	139,191,484	36.6%	\$ 0.228	\$31,691,456	29.8%
7	halibut, Pacific	3,454,834	0.9%	\$ 3.788	\$13,085,725	12.3%
8	Sablefish	2,467,618	0.6%	\$ 3.580	\$8,834,073	8.3%
B	Subtotal H&S	5,922,452	1.6%	\$ 3.701	\$21,919,798	20.6%
9	Crab ^(e)	3,215,170	0.8%	\$ 2.131	\$6,851,290	6.5%
10			0.0%	\$ -		0.0%
11			0.0%	\$ -		0.0%
12			0.0%	\$ -		0.0%
C	Subtotal Crab	3,215,170	0.8%	\$ 2.131	\$6,851,290	6.5%
13 - D	Herring, Pacific	5,624,729	1.5%	\$ 0.110	\$618,720	0.6%
14	Skates ^(e)	3,099,190	0.8%	\$ 0.222	\$688,156	0.6%
15	Squid, majestic	3,375,890	0.9%	\$ 0.070	\$236,312	0.2%
16	Octopus, N. Pac.	209,709	0.1%	\$ 0.630	\$132,117	0.1%
17			0.0%	\$ -		0.0%
E	Subtotal Misc.	6,684,789	1.8%	\$ 0.158	\$1,056,585	1.0%
18	Rockfish ^(c)	6,878,056	1.8%	\$ 0.163	\$1,124,548	1.1%
19	Black Rockfish	214,151	0.1%	\$ 0.400	\$85,660	0.1%
20			0.0%	\$ -		0.0%
F	Subtotal Rockfish	7,092,207	1.9%	\$ 0.171	\$1,210,208	1.1%
21 - G	Pacific Cod	50,039,197	13.1%	\$ 0.410	\$20,516,071	19.3%
22 - H	lingcod	0	0.0%	\$ -	\$0	0.0%
23	Pollock, walleye	101,523,425	26.7%	\$ 0.140	\$14,213,280	13.4%
24	[Pollock roe - n/a]		0.0%	\$ -		0.0%
I	Subtotal Pollock	101,523,425	26.7%	\$ 0.140	\$14,213,280	13.4%
25	Flatfish ^(d)	20,421,644	5.4%	\$ 0.210	\$4,281,385	4.0%
26			0.0%	\$ -		0.0%
27			0.0%	\$ -		0.0%
J	Subtotal Flatfish	20,421,644	5.4%	\$ 0.210	\$4,281,385	4.0%
28 - K	Arrowtooth flounder	30,710,932	8.1%	\$ 0.070	\$2,149,765	2.0%
29 - L	Pac. Ocean Perch	10,496,787	2.8%	\$ 0.160	\$1,679,486	1.6%
M	TOTAL	380,922,816	100.0%	\$ 0.279	\$106,188,044	100.0%

ALASKA DEPARTMENT OF FISH & GAME
Division of Commercial Fisheries
2007 PORT OF KODIAK LANDING REPORT
Fish Ticket Harvesting and COAR Buying Data

For: Trevor Brown, Kodiak Chamber of Commerce, chamber@kodiak.org - (907) 486-5557

Contact: Stephen E. Wright, ADF&G, 907-465-6121, stephen.wright@alaska.gov

Data Source: COAR, Zephyr, Venus, Neptune & Triton Databases, Run 06/16/10

Year	Species	Fish Ticket Pounds ^a	% of Lbs. VOLUME	Ave \$/Lb	Ex-vessel Value	% of Ex-Vessel VALUE
2007						
1	salmon, Chinook	141,433	0.0%	\$ 0.900	\$127,290	0.1%
2	salmon, sockeye	6,917,024	2.2%	\$ 1.000	\$6,917,024	5.1%
3	salmon, coho	2,131,673	0.7%	\$ 0.600	\$1,279,004	1.0%
4	salmon, pink	76,587,267	24.0%	\$ 0.200	\$15,317,453	11.4%
5	salmon, chum	4,850,061	1.5%	\$ 0.350	\$1,697,521	1.3%
6	[Roe - n/a]	0	0.0%	\$ -	\$0	0.0%
A	Subtotal Salmon	90,627,458	28.4%	\$ 0.280	\$25,338,292	18.9%
7	halibut, Pacific	8,566,482	2.7%	\$ 4.240	\$36,321,884	27.0%
8	Sablefish	3,121,787	1.0%	\$ 3.690	\$11,519,392	8.6%
B	Subtotal - H&S	11,688,269	3.7%	\$ 4.093	\$47,841,276	35.6%
9	Crab ^(e)	2,813,914	0.9%	\$ 2.775	\$7,808,617	5.8%
10			0.0%	\$ -		0.0%
11			0.0%	\$ -		0.0%
12			0.0%	\$ -		0.0%
C	Subtotal Crab	2,813,914	0.9%	\$ 2.775	\$7,808,617	5.8%
13 - D	Herring, Pacific	4,958,669	1.6%	\$ 0.126	\$625,825	0.5%
14	Skates ^(e)	3,063,788	1.0%	\$ 0.243	\$745,717	0.6%
15	Squid, majestic	892,046	0.3%	\$ 0.050	\$44,602	0.0%
16	Octopus, N. Pac.	271,354	0.1%	\$ 0.650	\$176,380	0.1%
17			0.0%	\$ -		0.0%
E	Subtotal Misc.	4,227,188	1.3%	\$ 0.229	\$966,699	0.7%
18	Rockfish ^(c)	9,621,801	3.0%	\$ 0.173	\$1,666,718	1.2%
19	Black Rockfish	208,662	0.1%	\$ 0.390	\$81,378	0.1%
20			0.0%	\$ -		0.0%
F	Subtotal Rockfish	9,830,463	3.1%	\$ 0.178	\$1,748,096	1.3%
21 - G	Pacific Cod	54,860,197	17.2%	\$ 0.510	\$27,978,700	20.8%
22 - H	lingcod	0	0.0%	\$ -	\$0	0.0%
23	Pollock, walleye	75,115,030	23.5%	\$ 0.170	\$12,769,555	9.5%
24	[Pollock roe - n/a]		0.0%	\$ -		0.0%
I	Subtotal Pollock	75,115,030	23.5%	\$ 0.170	\$12,769,555	9.5%
25	Flatfish ^(d)	24,682,876	7.7%	\$ 0.218	\$5,384,775	4.0%
26			0.0%	\$ -		0.0%
27			0.0%	\$ -		0.0%
J	Subtotal Flatfish	24,682,876	7.7%	\$ 0.218	\$5,384,775	4.0%
28 - K	Arrowtooth flounder	28,828,292	9.0%	\$ 0.070	\$2,017,980	1.5%
29 - L	Pac. Ocean Perch	11,468,117	3.6%	\$ 0.160	\$1,834,899	1.4%
M	TOTAL	319,100,473	100.0%	\$ 0.421	\$134,314,714	100.0%

ALASKA DEPARTMENT OF FISH & GAME
Division of Commercial Fisheries
2008 PORT OF KODIAK LANDING REPORT
Fish Ticket Harvesting and COAR Buying Data

For: Trevor Brown, Kodiak Chamber of Commerce, chamber@kodiak.org - (907) 486-5557

Contact: Stephen E. Wright, ADF&G, 907-465-6121, stephen.wright@alaska.gov

Data Source: COAR, Zephyr, Venus, Neptune & Triton Databases, Run 06/16/10

Year	Species	Fish Ticket Pounds ^a	% of Lbs. VOLUME	Ave \$/Lb	Ex-vessel Value	% of Ex-Vessel VALUE
2008						
1	salmon, Chinook	139,399	0.1%	\$ 1.033	\$143,998	0.1%
2	salmon, sockeye	10,092,001	3.7%	\$ 1.191	\$12,023,146	8.3%
3	salmon, coho	2,489,356	0.9%	\$ 1.227	\$3,054,546	2.1%
4	salmon, pink	35,833,656	13.0%	\$ 0.363	\$13,024,146	9.0%
5	salmon, chum	7,660,294	2.8%	\$ 0.510	\$3,906,750	2.7%
6	[Roe - n/a]	0	0.0%	\$ -	\$0	0.0%
A	Subtotal Salmon	56,214,706	20.4%	\$ 0.572	\$32,152,586	22.1%
7	halibut, Pacific	8,802,235	3.2%	\$ 4.244	\$37,360,248	25.7%
8	Sablefish	2,475,359	0.9%	\$ 4.130	\$10,223,233	7.0%
B	Subtotal - H&S	11,277,594	4.1%	\$ 4.219	\$47,583,481	32.8%
9	Crab ^(d)	2,753,837	1.0%	\$ 2.900	\$7,986,127	5.5%
10			0.0%	\$ -		0.0%
11			0.0%	\$ -		0.0%
12			0.0%	\$ -		0.0%
C	Subtotal Crab	2,753,837	1.0%	\$ 2.900	\$7,986,127	5.5%
13 - D	Herring, Pacific	6,601,857	2.4%	\$ 0.205	\$1,350,728	0.9%
14	Skates ^(e)	3,583,476	1.3%	\$ 0.420	\$1,505,060	1.0%
15	Squid, majestic	201,112	0.1%	\$ 0.050	\$10,056	0.0%
16	Octopus, N. Pac.	339,695	0.1%	\$ 0.680	\$230,993	0.2%
17			0.0%	\$ -		0.0%
E	Subtotal Misc.	4,124,283	1.5%	\$ 0.423	\$1,746,109	1.2%
18	Rockfish ^(b)	3,835,037	1.4%	\$ 0.200	\$767,007	0.5%
19	Black Rockfish	239,103	0.1%	\$ 0.260	\$62,167	0.0%
20			0.0%	\$ -		0.0%
F	Subtotal Rockfish	4,074,140	1.5%	\$ 0.204	\$829,174	0.6%
21 - G	Pacific Cod	60,352,347	21.9%	\$ 0.570	\$34,400,838	23.7%
22 - H	lingcod	534,014	0.2%	\$ 0.620	\$331,089	0.2%
23	Pollock, walleye	74,601,582	27.1%	\$ 0.180	\$13,428,285	9.2%
24	[Pollock roe - n/a]		0.0%	\$ -		0.0%
I	Subtotal Pollock	74,601,582	27.1%	\$ 0.180	\$13,428,285	9.2%
25	Flatfish ^(c)	5,695,931	2.1%	\$ 0.180	\$1,025,268	0.7%
26			0.0%	\$ -		0.0%
27			0.0%	\$ -		0.0%
J	Subtotal Flatfish	5,695,931	2.1%	\$ 0.180	\$1,025,268	0.7%
28 - K	Arrowtooth flounder	38,296,712	13.9%	\$ 0.070	\$2,680,770	1.8%
29 - L	Pac. Ocean Perch	10,993,877	4.0%	\$ 0.160	\$1,759,020	1.2%
M	TOTAL	275,520,880	100.0%	\$ 0.527	\$145,273,475	100.0%

ALASKA DEPARTMENT OF FISH & GAME
Division of Commercial Fisheries
2009 PORT OF KODIAK LANDING REPORT
Fish Ticket Harvesting and COAR Buying Data

For: Trevor Brown, Kodiak Chamber of Commerce, chamber@kodiak.org - (907) 486-5557

Contact: Stephen E. Wright, ADF&G, 907-465-6121, stephen.wright@alaska.gov

Data Source: COAR, Zephyr, Venus, Neptune & Triton Databases, Run 06/16/10

Year	Species	Fish Ticket Pounds ^a	% of Lbs. VOLUME	Ave \$/Lb	Ex-vessel Value	% of Ex-Vessel VALUE
2009						
1	salmon, Chinook	66,847	0.0%	\$ 0.656	\$43,875	0.0%
2	salmon, sockeye	9,849,992	3.4%	\$ 1.104	\$10,874,240	9.4%
3	salmon, coho	1,929,089	0.7%	\$ 0.603	\$1,162,396	1.0%
4	salmon, pink	91,576,900	31.2%	\$ 0.260	\$23,803,685	20.6%
5	salmon, chum	7,382,985	2.5%	\$ 0.436	\$3,217,508	2.8%
6	[Roe - n/a]	0	0.0%	\$ -	\$0	0.0%
A	Subtotal Salmon	110,805,813	37.7%	\$ 0.353	\$39,101,704	33.8%
7	halibut, Pacific	7,703,550	2.6%	\$ 3.351	\$25,812,865	22.3%
8	Sablefish	2,506,855	0.9%	\$ 4.470	\$11,205,643	9.7%
B	Subtotal - H&S	10,210,405	3.5%	\$ 3.626	\$37,018,508	32.0%
9	Crab ^(d)	2,584,942	0.9%	\$ 2.340	\$6,048,764	5.2%
10			0.0%	\$ -		0.0%
11			0.0%	\$ -		0.0%
12			0.0%	\$ -		0.0%
C	Subtotal Crab	2,584,942	0.9%	\$ 2.340	\$6,048,764	5.2%
13 - D	Herring, Pacific	10,043,685	3.4%	\$ 0.204	\$2,052,437	1.8%
14	Skates ^(e)	4,055,956	1.4%	\$ 0.250	\$1,013,989	0.9%
15	Squid, majestic	673,400	0.2%	\$ 0.060	\$40,404	0.0%
16	Octopus, N. Pac.	244,228	0.1%	\$ 0.560	\$136,768	0.1%
17			0.0%	\$ -		0.0%
E	Subtotal Misc.	4,973,584	1.7%	\$ 0.239	\$1,191,161	1.0%
18	Rockfish ^(b)	3,360,298	1.1%	\$ 0.110	\$369,633	0.3%
19	Black Rockfish	122,052	0.0%	\$ 0.430	\$52,482	0.0%
20			0.0%	\$ -		0.0%
F	Subtotal Rockfish	3,482,350	1.2%	\$ 0.121	\$422,115	0.4%
21 - G	Pacific Cod	46,810,726	15.9%	\$ 0.317	\$14,815,756	12.8%
22 - H	lingcod	106,464	0.0%	\$ 0.330	\$35,133	0.0%
23	Pollock, walleye	58,222,587	19.8%	\$ 0.190	\$11,062,292	9.6%
24	[Pollock roe - n/a]		0.0%	\$ -		0.0%
I	Subtotal Pollock	58,222,587	19.8%	\$ 0.190	\$11,062,292	9.6%
25	Flatfish ^(c)	6,818,461	2.3%	\$ 0.190	\$1,295,508	1.1%
26			0.0%	\$ -		0.0%
27			0.0%	\$ -		0.0%
J	Subtotal Flatfish	6,818,461	2.3%	\$ 0.190	\$1,295,508	1.1%
28 - K	Arrowtooth flounder	29,530,804	10.0%	\$ 0.060	\$1,771,848	1.5%
29 - L	Pac. Ocean Perch	10,285,469	3.5%	\$ 0.070	\$720,004	0.6%
M	TOTAL	293,875,290	100.0%	\$ 0.393	\$115,535,230	100.0%

STAN SARGENT F/V TANUSHA
P.O. BOX 574 KODIAK, AK 99615
907 486-3028 FAX 486-3028 sargent.stan@yahoo.com

Erik Olson, Chair
North Pacific Fishery Management Council
605 W. Fourth Ave.
Anchorage, Ak 99501

9/24/2010

RE: Agenda Item C-5 GOA Tanner Crab By catch

Dear Chairman Olson:

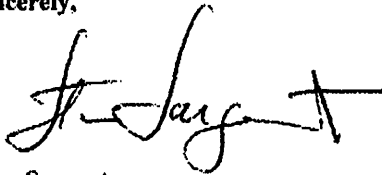
I am a Kodiak Tanner permit holder, my vessel is under 60' which participates in the Kodiak Tanner Crab fishery.

The Tanner fishery is very important to me as part of my diversified yearly fishing effort. Starting in January with the Tanner fishery, my boat goes into the Halibut longline fishery, Kodiak purse seine fishery and lastly the pot cod fishery. This diversity is important to maintaining a viable fish boat and crew income on a yearly basis.

I think it is common knowledge that bottom trawling for flatfish is increasing around Kodiak Island and that it is very detrimental to the Tanner and Halibut fisheries. It is very clear that major Tanner areas need to be protected from this destructive fishery.

I appreciate your consideration and hope that the council will take common sense measures to protect all the major Tanner crab areas.

Sincerely,



Stan Sargent

PUBLIC TESTIMONY SIGN-UP SHEET

PAGE 1

Agenda Item: C-5 GOA TANNER CRAB CLOSURES

	NAME (PLEASE PRINT)	TESTIFYING ON BEHALF OF:
1	Stephen Mallinson	Bay Islander
2	George Hutchings	Hickory Wind
3	Raymond May	Northwestern
4	CHANDLER JOHNSON	WALTER N
5	Frankie Brown	VANGUARD handout
6	TREVOR BROWN	CITY OF KODIAK/KODIAK ISLAND Borough handout
7	LORI SWANSON	GROUND FISH FORUM
8	Rob Lindsey	
9	Lee Woodard	Leslie Lee INC.
10	DI Vinberg	Family PRIDE
11	Bob Krueger	Alaska Whitefish Tanners ASSOC.
12	Stosh Anderson	SELF handout
13	GABRIEL SARAVIA	SELF
14	Curt Waters	Mar Dell Noite
15	Chuck McCallum	Gulf Alaska Coastal Communities
16	Walter Sargent	self
17	Kent Leslie	Excalibur II (PPT)
18	Mike McEwenie	MARCY J handout
19	Oliver Holm	F/V Sulina
20	Stephen Tufen	Groundswell Fisheries Movement (group) handout
21	DAVID DARR	F/V WAZPIKIFION / F/V ROSILLA
22	Chuck BURREGE	LONG STAR INDEPENDENT CO-DRAWER
23	Theresa Peterson	AMEA handout
24	PATRICK O'DONNELL	F/V Cacaville handout
25	Darius Kasprzak	F/V Marona

NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person "to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act.

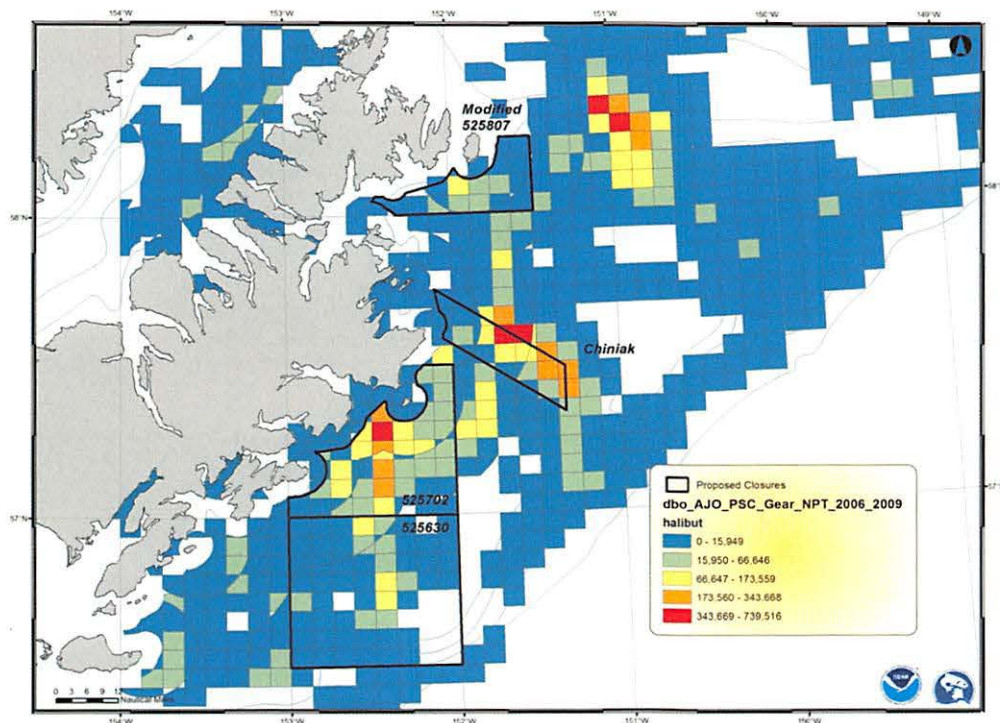
PUBLIC TESTIMONY SIGN-UP SHEET PAGE 2

Agenda Item: C-5 GOA Tanner Crab Closures

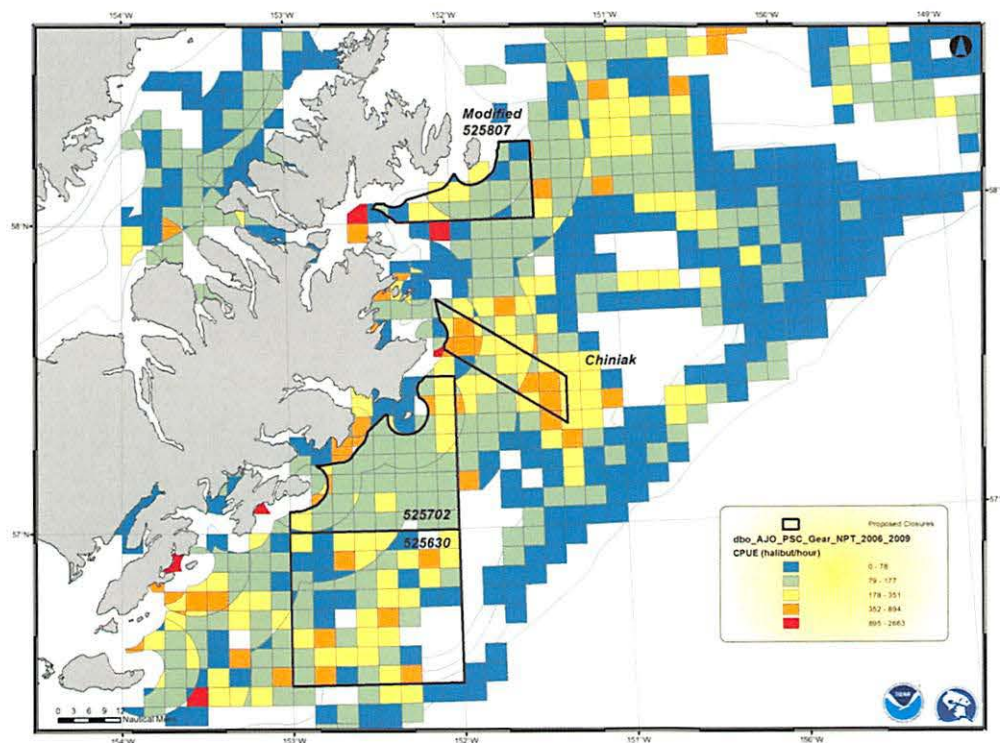
#	NAME (PLEASE PRINT)	TESTIFYING ON BEHALF OF:
1	PETE THOMPSON	SELF
2	FREDDY CHRISTIANSEN	SELF
3	Luke Lester	SELF
4	Dennis Eggers	T/V Dusk handout
5	Don Ashley	F/V Gold Rush handout
6	BRENT PAINE	UCB
7	ALEXUS KWACHKA	KCAC handout
8	Bert Ashley	F/V GOLD RUSH
9	DAVID KUBIAK	F/V MYTHOS, myself
10	KEITH CONNOLLY	F/V DOWN
11	ELIAS OLAFFSSON	DANTRAWL PPT
12	Mike Hellaso	Collier Brothers
13	JOHN GAUVIN	Alaska Seafood Cooperative
14	Susan Robinson	Fishermen's First
15	Jeff Stephan	UFMA
16	Julie Bonny	AGDB
17	Kurt Cochran	MARATHON
18	Rob Langston	F/V Laura
19	Joe Hamm	F/V Chellissa
20		
21		
22		
23		
24		
25		

NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person "to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act."

Location of halibut bycatch in the nonpelagic trawl fisheries, from CIA database

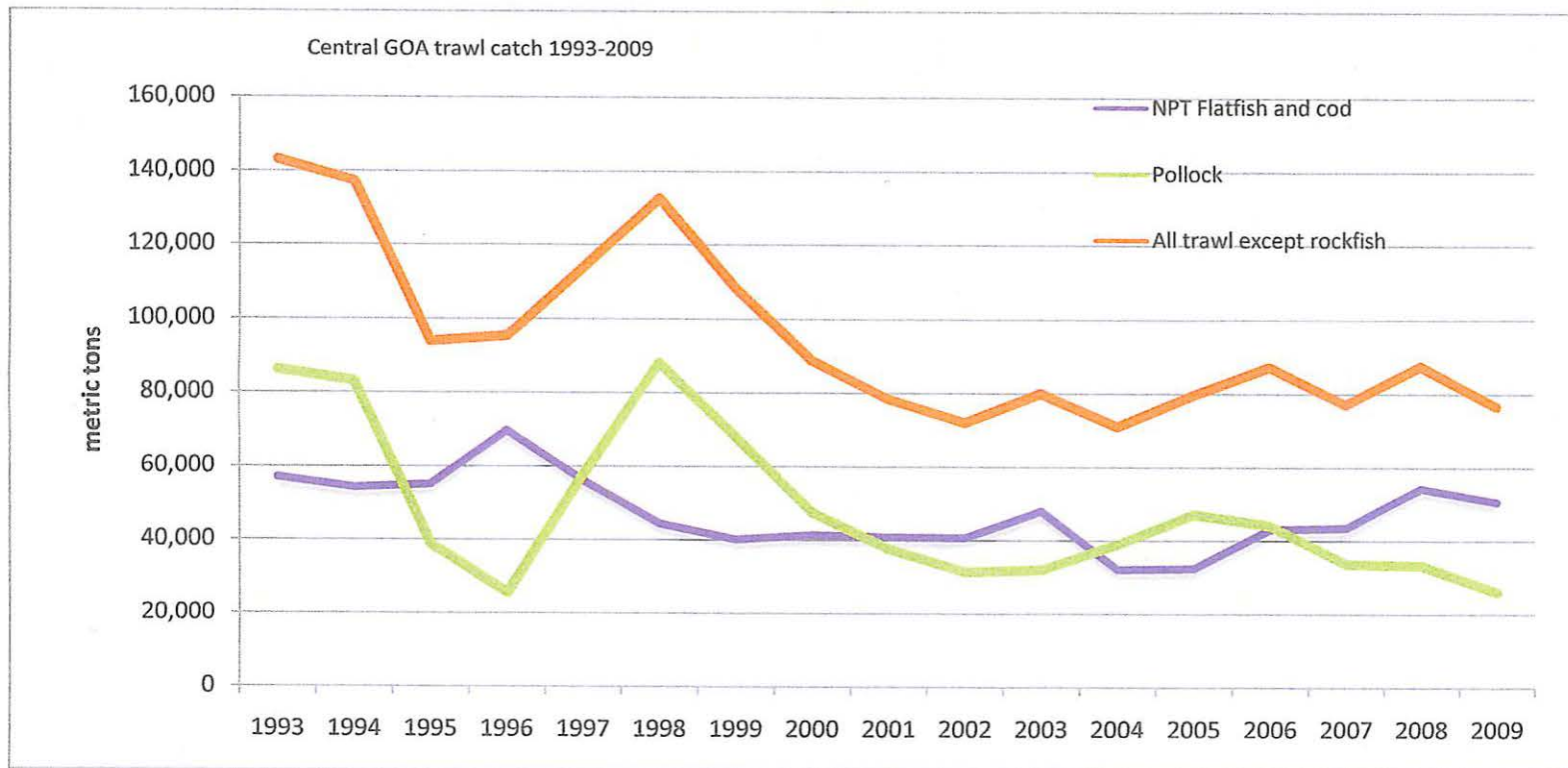


Halibut bycatch (kg) per groundfish effort (hours) in the nonpelagic trawl fisheries, from CIA database



Alaska Groundfish Data Bank

Agenda Item C-5: GOA Tanner crab bycatch



Alexus C-5

October 1, 2010

NPFMC
605 West 4th, Suite 306
Anchorage Alaska 99501-2252

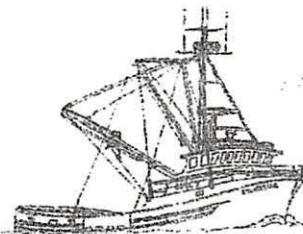
As an active fisherman in the GOA ground fish and Kodiak Tanner Crab fishery, I would urge the council to take action to protect and promote a resource for sustainability and optimum value. I support 100 percent video monitoring of all vessels and gear types for a minimum of one year. It is important to emphasize that this monitoring should be 24 hrs per day for every voyage inclusive of travel time. A monitoring program or any increase in observer coverage should not burden the harvester. As is the MOU throughout other regions, observer programs that are mandated, are primarily funded by the federal government. In the absence of 100% video monitoring, I feel it necessary to enact trawl closures in areas identified as important to tanner crab abundance.


It has come to my attention that a letter from the Kodiak Borough Mayor will be submitted to this Council opposed to closures intending to protect the fragile Tanner crab stocks. I have not been able to obtain a clear answer as to the origins of this letter, how it was conceived, or what drove the Mayor to take this position. It is notable, however, that the letter was forwarded to the Council- without public comment and circumventing the joint City/Borough "Fisheries Advisory Committee". While the Mayor may have a legal right to forward such a letter, it should be noted that the concerns of Kodiak's diverse population were not reflected. I would suggest that this letter was coerced and the content may have been misrepresented to our Mayor.

I also feel it important to request this Council discuss the recent decision to allow one gear type, the trawl fleet, to change their fishing practices mid-season, during the 2010 GOA P-cod B-season. By agreeing to a cooperative fishery, NMPS essentially re-allocated ---- million pounds of cod to the trawl fleet. This action did not take into consideration the adverse affect to the Central Gulf fixed gear fleet. It seems improper and discriminating at best. I wonder if such a decision should have been vetted publically and all affected fishers represented. I would also ask this Council if the formation of coops would be better defined in the FMP, instead of being implemented in the middle of an ongoing season.

In summary, I ask the Council, to require video monitoring on all vessels and gear types for a minimum of one year in areas of Tanner crab importance or as a safe guard, enact trawl closures to protect the fragile tanner crab stocks. Secondly, the Council must seek to review the re-allocative and adverse economic impact that the "cooperative" trawl fishery (during the 2010 P-cod / B season) imposed on other sectors.

We have commercially fished Alaskan waters for 37 years and are life long residents. Our livelihood is derived and dependant on P-cod, Tanner Crab, and salmon. We are invested in our fisheries, our State, and our community. For these reasons, we believe that the future health of our State and its' coastal municipalities will be dependant on robust, abundant, and diverse fisheries. A stable future reflects a plan including: rebuilding, sustainability, and conservation.




Ron Kavanaugh
Owner/Operator
FV Sylvia Star LLC
1533 Sawmill Circle
Kodiak Alaska 99615
(907)486-5061

Alexus
C-5

Thorvold Olsen
F/V Viking Star
PO Box 322, Kodiak, AK 99615
Telephone 907-654-5387 / Fax 907-486-8126
October 2, 2010

Mr. Eric Olson, Chairman
North Pacific Fishery Management Council
605 W. 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Public Comment: "C-5 GOA Tanner Crab Bycatch Final action to close areas to minimize bycatch of Tanner crabs."

Dear Mr. Olsen,

I ask that you take action at this meeting to close the tanner crab grounds to trawling. It is time to stop the bycatch of tanner crabs and the serious habitat destruction that is occurring as a result of trawling in the tanner crab grounds.

We have to keep the trawlers out of the tanner crab grounds at all costs.

The trawl doors weigh about 2,500 pounds each, and the trawl nets weigh between 6,000 to 8,000 pounds each.

It has been well known that trawl doors and trawls kill tanner crab, and also destroy critical crab habitat. This has been going on in the Kodiak area since the 1980s. It is time for the Council to take action to stop this practice and this destruction.

I am a lifelong Alaskan. I have fished tanner crab since the early 1970s. I have been fishing in Alaska for over 61 years. I am still an active fisherman, and I still run my own boat. Commercial fishing is 100% of my income. I own and operate the 58' F/V Viking Star, which is a pot, longline and seine vessel. I fish out of Kodiak for tanner crab, halibut, salmon and pot cod. My entire crew are local residents.

Please keep the tanner crab grounds closed to trawlers.

Sincerely



Thorvold Olsen

Alexus C-5

September 27, 2010
Eric Olson, Chair
North Pacific Fishery Management Council
605 W. Fourth Ave.
Anchorage, AK 99501

RE: Agenda Item C-5 GOA Tanner Crab Bycatch

Dear Chairman Olson and Members of the Council,

My name is Steven Horn, I am a lifelong Kodiak resident and fisherman. I fish salmon, herring, tanner crab and state waters P.cod.

I started fishing tanner crab in 1973/74 as a crewman, since 1975 to present I have fished tanner crab with my own vessel when there is a season (I also fished King Crab from 1975 thru 1982).

I have survived the ups and downs of the fishing business by diversifying. Crabbing is very important to my economic success.

I am 100% in favor of the proposed area closures to bottom trawling. I believe this to be a good start although a little late. More areas should also be considered in Shelikof Strait and the Alitak area.

It is unfathomable to me how the tanner crab fishery could be closed for 6 years yet during these same years another fishery (bottom trawling) could continue unchecked without bycatch restrictions and only 30% observer coverage which by the way is a joke.

The tanner crab resource has rebounded enough to have a very small and very limited fishery but it's a long way from being fully recovered. I strongly urge you to pass these area closures as well as increase all observer coverage's because tanner crab bycatch and mortality is only part of the trawl bycatch problem.

Sincerely,



Steven E. Horn
F/V Gallant Girl
1210 Mission Rd.
Kodiak, AK 99615
907-486-5211

Table 36 Observed groundfish catch by gear type and target in the proposed closed areas, as a proportion of the total observed catch in that target, by gear type, in reporting area 630

Gear type	Target Fishery	2001	2002	2003	2004	2005	2006	2007	2008	2009	Average 2001-2009
Non-pelagic trawl	Arrowtooth Flounder	30%	18%	45%	51%	26%	65%	82%	58%	74%	60%
	Flathead Sole	93%	71%	26%	67%	6%	9%	89%	79%	78%	60%
	Pacific Cod	28%	42%	9%	12%	1%	17%	28%	26%	18%	20%
	Pollock (bottom)	63%	36%	100%	35%	23%	76%	68%	75%	88%	70%
	Rex Sole						100%		98%	84%	74%
	Rockfish	0%	10%	7%	3%	0%	1%	6%	3%	4%	4%
	Shallow Water Flatfish	55%	28%	41%	43%	63%	80%	61%	57%	69%	68%
Pelagic trawl	Pollock	35%	7%	46%	27%	30%	24%	25%	23%	24%	27%
Pot	Pacific Cod	11%	2%	3%	4%	20%	17%	5%	21%	21%	14%

Table 37 Average observed groundfish catch by gear type and target in each of the proposed closed areas, as a proportion of the total observed catch in that target, by gear type, in reporting area 630, for 2001-2009 and 2007-2009

Gear type	Target Fishery	Marmot		Chiniak		525702		525630	
		2001-2009	2007-2009	2001-2009	2007-2009	2001-2009	2007-2009	2001-2009	2007-2009
Non-pelagic trawl	Arrowtooth Flounder	1%	2%	3%	1%	13%	14%	33%	54%
	Flathead Sole	2%	2%	9%	10%	36%	45%	14%	21%
	Pacific Cod	0%	0%	5%	6%	9%	13%	6%	4%
	Pollock (bottom)	1%	2%	29%	28%	36%	39%	5%	10%
	Rex Sole	0%	0%	1%	1%	12%	14%	61%	68%
	Rockfish	0%	0%	0%	0%	1%	0%	3%	4%
	Shallow Water Flatfish	2%	3%	7%	8%	49%	50%	0%	0%
Pelagic trawl	Pollock (bottom)	4%	6%	5%	11%	17%	7%	0%	0%
Pot	Pacific Cod	1%	2%	3%	1%	5%	2%	5%	9%

Location of observed groundfish catch in proposed closed areas

Observed groundfish catch and Tanner crab bycatch is mapped by gear type (for trawl and pot gears) in the color figures included at the end of this document, in Appendix A. As depicted in Color Figure 2, the primary density of groundfish catch for nonpelagic trawl vessels occurs in the central portions of the proposed closed areas 525702 and 525630. In comparison with Color Figure 1, it is apparent that this same area is also one where a high amount of crab bycatch is observed. Color Figure 3 maps the bycatch rate for nonpelagic trawl vessels (number of crab per mt groundfish catch), and while this area still has a higher bycatch rate than some other parts of reporting area 630, it is nonetheless apparent that the high bycatch in this area is due at least in part to the intensity of groundfish fishing that occurs in this area.

For nonpelagic trawl fisheries, a large proportion of groundfish in the various flatfish and pollock target fisheries is harvested within the proposed area closures. 65-70% of groundfish caught in the pollock target occurs in the Chiniak and 525702 closures; 50-60% of groundfish in the arrowtooth flounder and flathead sole target occurs in 525702 and 525630; 50% of shallow water flatfish occurs in 525702; and 60-70% of the rex sole target fishing occurs in 525630. Color Figure 4, Color Figure 5, Color Figure 6, and Color Figure 7 show the distribution of groundfish catch in the arrowtooth flounder, shallow water flatfish, flathead sole, and pollock target fisheries from 2003-2009. These maps are not based solely on observer

Don Asuley Flv Good Rush C-5

CGOA ABC, TAC and harvest: all gears, CP/CV

	Arrowtooth			Shallow water flats			Flathead sole			Rex Sole		
	ABC	TAC	Catch	ABC	TAC	Catch	ABC	TAC	Catch	ABC	TAC	Catch
2005	168,950	25,000	17,379	27,250	13,000	4,676	30,020	5,000	1,941	7,340	7,340	1,603
2006	134,906	25,000	25,579	24,258	13,000	7,411	25,195	5,000	2,679	5,506	5,506	2,944
2007	139,582	30,000	22,194	24,258	13,000	8,512	26,054	5,000	2,467	5,446	5,446	2,440
2008	167,936	30,000	25,595	28,174	13,000	8,947	28,174	5,000	3,131	6,731	6,731	2,518
2009	164,251	30,000	23,305	29,873	13,000	8,385	29,273	5,000	3,355	6,630	6,630	4,410
Average	155,125	28,000	22,810	26,763	13,000	7,586	27,743	5,000	2,715	6,331	6,331	2,783

% of TAC harvested

	Arrow	SWF	Flathead	Rex
2005	69.5%	36.0%	38.8%	21.8%
2006	102.3%	57.0%	53.6%	53.5%
2007	74.0%	65.5%	49.3%	44.8%
2008	85.3%	68.8%	62.6%	37.4%
2009	77.7%	64.5%	67.1%	66.5%
Average	81.5%	58.4%	54.3%	44.0%

% of ABC harvested

	Arrow	SWF	Flathead	Rex
2005	10.3%	17.2%	6.5%	21.8%
2006	19.0%	30.6%	10.6%	53.5%
2007	15.9%	35.1%	9.5%	44.8%
2008	15.2%	31.8%	11.1%	37.4%
2009	14.2%	28.1%	11.5%	66.5%
Average	14.7%	28.3%	9.8%	44.0%

Patrick O'donnell

C-5

WEEK END DATE	NAME	AREA	GEAR	TARGET	HALIBUT	AIRDI TANNE	CHINOOK	JON-CHINOOI	AMPLED HAULS
30-Jan-10	CARAVELLE	GOA	NPT	C	29.424	0	0	0	6
6-Feb-10	CARAVELLE	GOA	NPT	C	96.716	0	0	0	1
27-Feb-10	CARAVELLE	GOA	PTR	P	0	0	37	0	2
27-Mar-10	CARAVELLE	GOA	NPT	H	24.605	0	0	0	2
10-Apr-10	CARAVELLE	GOA	NPT	W	0.466	0	0	0	10
29-May-10	CARAVELLE	GOA	NPT	C	12.53	0	0	0	1
17-Jul-10	CARAVELLE	GOA	NPT	H	16.372	0	0	124	18
24-Jul-10	CARAVELLE	GOA	NPT	H	37.341	3.782	0	0	15
31-Jul-10	CARAVELLE	GOA	NPT	H	33.406	0	0	54	10
4-Sep-10	CARAVELLE	GOA	NPT	C	2.462	0	0	0	2
18-Sep-10	CARAVELLE	GOA	PTR	P	0	0	2	0	2
25-Sep-10	CARAVELLE	GOA	PTR	P	0	0	6	1	1



October 9, 2010

Eric Olson, Chair
North Pacific Fishery Management Council
Anchorage, AK 99510

Agenda Item: C-5 Gulf of Alaska Tanner Crab

Dear Chairman Olson,

The Council has been considering the issue of Tanner crab bycatch for a number of years beginning with a series of discussion papers and the analysis before you now. You have received repeated letters from Kodiak Island fishermen at every turn, including a letter for this meeting signed by over 100 fishermen, including over 40 tanner crab permit holders, and community residents. We urge you to take action that provides protection for Tanner crab. We believe there is sufficient justification for action and that there can be an outcome that is fair to all involved.

Below are a few key points to consider:

1. What is the problem this action is intended to solve?

- Recent action by the council has resulted in greater efficiency for the non-pelagic trawl fisheries. There has been increased trawl effort inside very important places for Tanner crab. The benefits to the trawl sector have not been matched with appropriate protection for Tanner crab.
- Tanner crab have been showing encouraging signs of rebuilding on the east side. By reducing interaction with Tanner crab in the places where it has high potential to rebuild can improve the likelihood of rebuilding success.
- Observer data is thin but it does indicate that the non-pelagic trawl fishery is responsible for an average of 83% of Tanner crab bycatch in the years 2003-2009 in the Central Gulf of Alaska Management Area 630. The Council has a long history of approving measures to reduce bycatch based on Magnuson-Steven Act requirement to minimize bycatch to the extent practicable. That alone is a goal of this Council.

In this case we know intensive mobile bottom gear can result in chronic habitat disturbance as well as observed and unobserved crab mortality. Given

documented podding behavior of Tanner crab, one trawl tow can result in an extreme bycatch event. We don't know how often this occurs. We agree the large closures analyzed in the document are more than is needed. Therefore we are recommending a surgical approach to defining a closure that can balance the costs and benefits of protection and address the practicability of this action.

2. Does the analysis prove a trawl closure will result in crab rebuilding?

"Proof" is not a standard the Council uses to make conservation management decisions. Clearly there is often uncertainty in management decisions but we aim to act on the best information available and apply practical solutions.

It appears there are a number of conditions that must conspire to result in crab rebuilding, which scientists do not entirely understand. But it makes sense that when rebuilding appears to be possible, which is happening in the east side areas of Kodiak, then we would take appropriate steps to improve the likelihood of rebuilding.

Favorable conditions are supporting Tanner crab rebuilding in the east side region. It is important to note that, historically, this area is consistently important for the Tanner crab population. It has been a primary area of high abundance through time and is where rebuilding is showing the most promise. For reasons not well understood, the east side areas seem to be the best conditions for Tanner crab. It has also been a focal area for the directed crab fishery historically. It is reasonable to assume that rebuilding the population would have most success in this area and that this area is a candidate for a surgical closure combined with more robust observer coverage in the surrounding waters to inform future management.

3. Have existing trawl closures successfully helped crab?

There has been discussion about the efficacy of existing trawl closures. Indeed the results are mixed.

- The Nearshore Bristol Bay Trawl Closure and Red King Crab Savings Area were established to protect juvenile crab and adult crab as well as crab habitat. Assessment of this action shows that protection has contributed to recovery of Bristol Bay red king crab.

"These MPA's, in combination with favorable environmental conditions, may have assisted in the recovery of the Bristol Bay red king crab stock. Survey information suggests that sessile benthic invertebrates used by juvenile king crab may be increasing in Bristol Bay (NPFMC, 2004d)." Witherell & Woodby. Marine Fisheries Review. 2005. 67(1).

- Pribilof Is. Blue King Crab and St. Matthew Blue King Crab conservation closures were established to protect habitat and reduce bycatch after both stocks collapsed. Blue king crab has not recovered around the Pribilofs but red king crab

came back in this area. The reason for the failure of some stocks and successful recovery of others is an important scientific question.

“The Pribilof Islands Conservation Area has not been successful in rebuilding the blue king crab stock, although it may have served to limit the effects of trawl fisheries on juvenile crabs and habitat. Despite the protection offered by the MPA, and closure of the crab fisheries, the Pribilof Islands stock of blue king crab has continued to decline to very low levels and is considered to be in an “overfished” condition (NPFMC, 2004c). On the other hand, the Pribilof Islands red king crab stock seems to have benefited from the trawl closure, with increased abundance since 1996 (NPFMC, 2004c).” Witherell & Woodby. Marine Fisheries Review. 2005. 67(1).

- Bering Sea Bairdi and Opilio populations do not show hotspots of distribution in the Bering Sea so it was not possible to identify specific areas to protect. That is why the Council employed area bycatch caps as a tool to manage bycatch of bairdi and opilio. (Pers. comm. with David Witherell) Unlike the Bering Sea, there do seem to be clear areas of primary importance to Tanner crab on the east side of Kodiak Island. This makes an area approach to protection more reasonable for the Kodiak stock.
- Red King Crab Savings Areas around Kodiak have resulted in no increase in king crab. It is unknown why but it may be due to ecological conditions that we cannot control. However Tanner crab rebuilding is occurring inside the no trawl zones. ADFG maps showing abundance of juvenile and adult Tanner crab show marked rebuilding inside closed areas on the east side. But this does not appear to be extending to the same extent in the adjacent areas open to trawling.

As stated in the analysis, adult Tanner crab tend to move offshore into the areas not protected (see analysis p. 13; also discussed with ADFG area biologist). Extending protection now to some new areas would take advantage of a rebuilding opportunity.

Conclusion

AMCC is supportive of discrete closures to contribute to the rebuilding potential for Tanner crab. We also urge the Council to require 100% observer coverage in a larger area to improve the data for future decisions. Gear modification is a useful tool to reduce the footprint of the trawl fishery but we do not believe this is a sufficient response to the purpose and need.

Sincerely,



Theresa Peterson

Kodiak Outreach Coordinator

= TANNER CRAB PODDING BEHAVIOR =

glossus stenolepis), and octopus (*Octopus dofleini*) which were visible through the front porthole (a flat Plexiglas plate approximately 20 cm in diameter and approximately 30 cm from the substrate at an angle of about 30°). After all sampling dives in 1991 and 1992, crabs were counted from the videotape over all straight-line transects. Numbers of crabs in mounds were estimated by carefully examining 12 mounds which were videotaped in detail and "reconstructing" them as a pyramid. Numbers of crabs in other mounds, or those which were only partially visible, were estimated by comparing size and shape with mounds of known number.

Crab density (crabs per square metre) was estimated from the videotape in 1-min intervals, and the midpoint position was estimated for each interval, representing an average distance of 15.0 m (range 5–30 m). These irregularly spaced observations were subsequently interpolated to a systematic 10-m (1991) or 20-m (1992) interval grid and mapped using an inverse distance-weighted formula:

$$Z = (\sum Z_i W_i) / \sum W_i$$

where Z is the weighted, averaged crab density at the grid-point, Z_i is the observed density at location (X_i, Y_i) , and W_i is a weighting factor equal to the inverse of the squared euclidean distance between the grid point and position X_i, Y_i . The mean density (of weighted Z values) and 95% confidence interval (CI) about the mean were calculated by summing over all gridpoints. Total numbers of crabs present each year (and CI about the total) were estimated by multiplying the mean density (or CI) by the total gridpoint area. Since most of the 1991 observations were made in a limited area, crabs were summed in a 150×150 m ($22\,500$ m²) area bounded by 370–520 m E–W (UTM distances) and 550–700 m N–S (see Fig. 4A). The 1992 observations and summations were made over the entire area of Fig. 4B, equal to 500×500 m ($250\,000$ m²).

Crabs were collected from the aggregation with a manually operated grabber and placed in one of two plastic baskets. On deck, all crabs were sexed and measured to the nearest 0.1 mm with steel vernier calipers across the widest portion of the carapace (carapace width, CW). Condition of the shell was recorded on a four-point scale: (1) soft, (2) clean and hard, (3) old hardshell with scratches and/or epifauna, or (4) very old shell with extreme wear and/or fouling. Egg conditions for females were recorded as new (orange, uneyed) or old (brown, eyed), and approximate clutch fullness was estimated in 25% increments. In 1992, we distinguished females seen in the videotapes as being either buried in the sediment or exposed on the sediment surface. This distinction was also made during capture on several dives. Multiparous females were distinguishable from juveniles and adult males by their uniform size, dark shell coloration, relatively short legs, and the presence of barnacles. Thirty-eight mature females were sacrificed, and ovary condition was recorded in three categories: (1) ripe (large orange ovaries, no external embryos) (2) spent (small orange ovaries, usually with new embryos attached to pleopods), or (3) degenerate (small, whitish, stringlike appearance).

On 21, 22, and 26 April 1993, a remotely operated vehicle (ROV) was used to examine the seafloor at site AG, while the support vessel drifted at about 1 kn. Starting positions for each drift were chosen so that the ROV would pass through or near site AG, but this was not always achievable because direction of travel was dependent on wind and current. Posi-

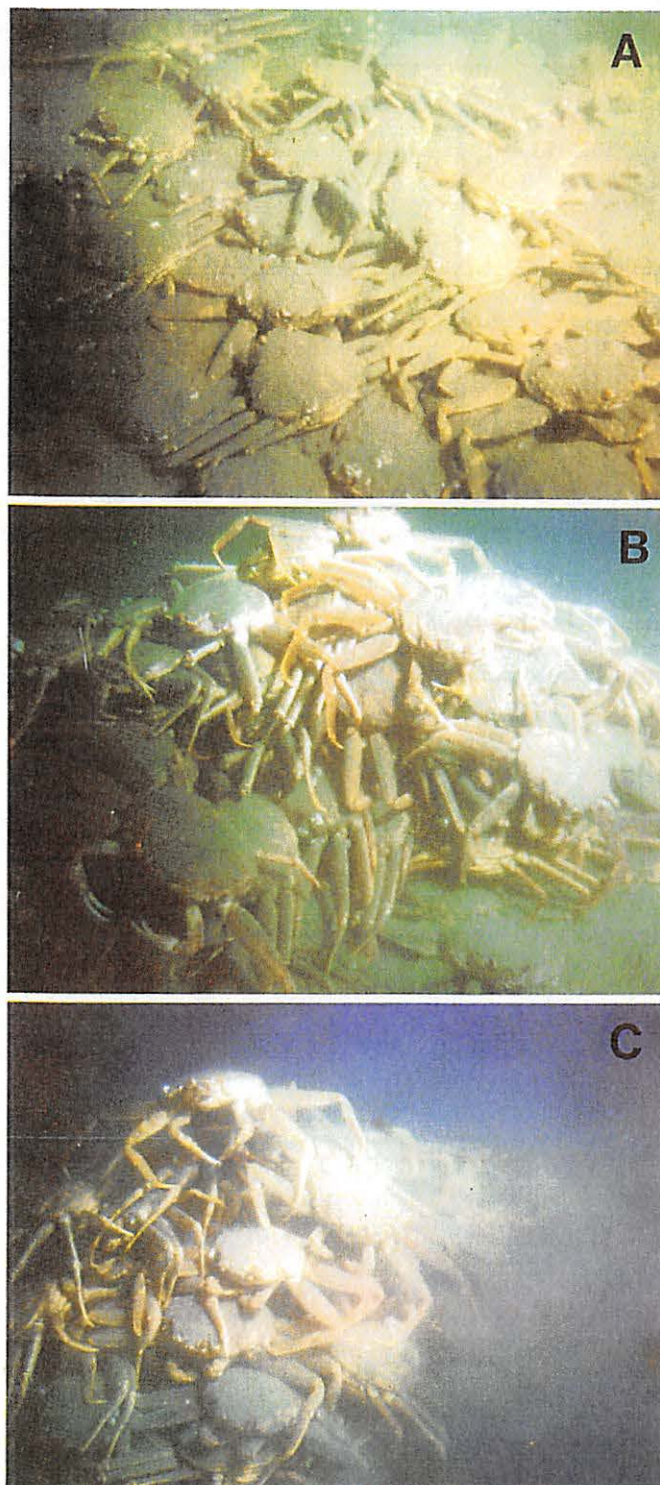


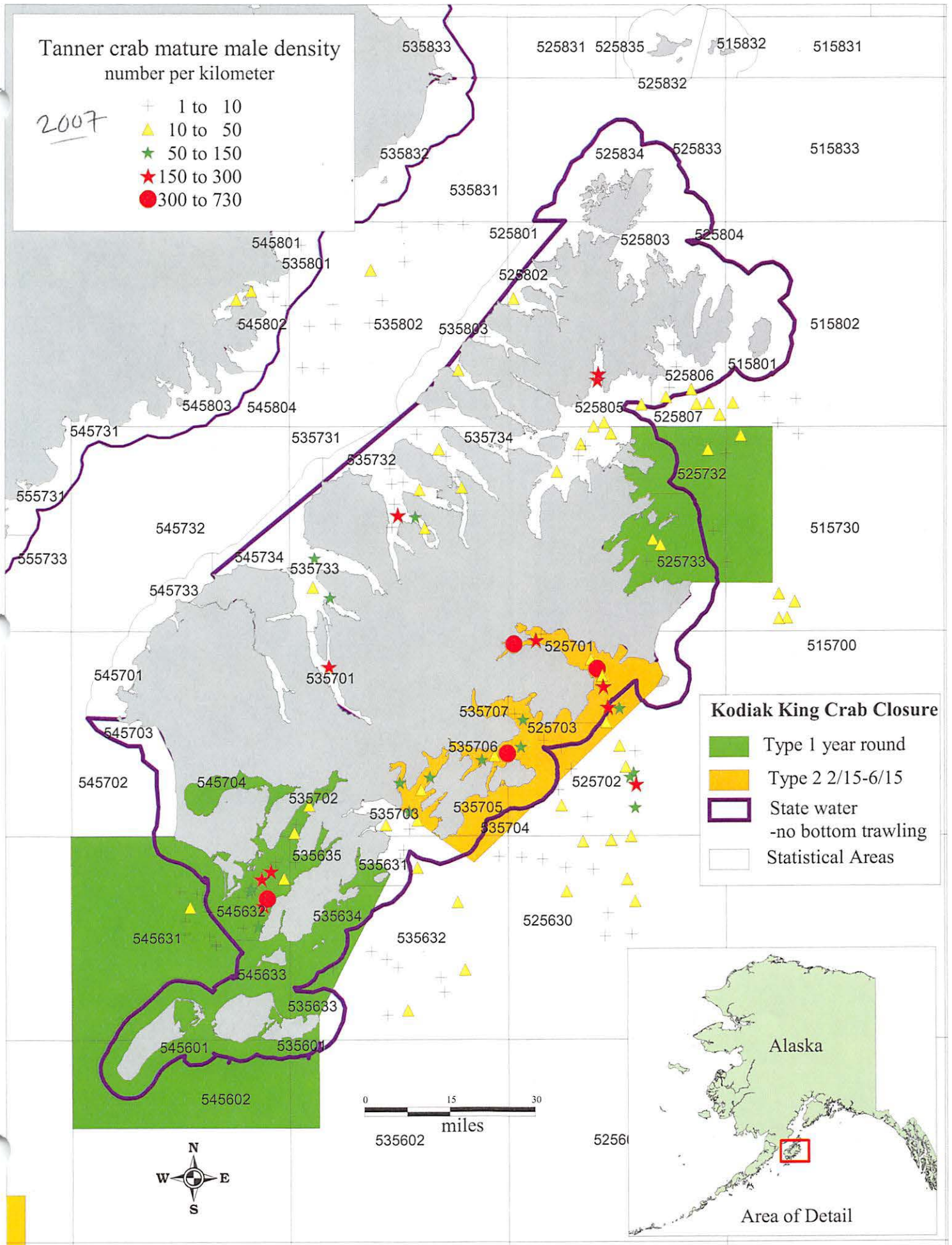
FIG. 2. (A) Early stage of mound formation consisting of a "mat" of female crabs in one or two layers. (B) Elongated mound of multiparous female Tanner crabs. Note the barnacles indicating advanced shell age. (C) Typical conical mound of female Tanner crabs, with a cloud of suspended sediment particles trailing off to the right.

tion of the vessel and numbers of crabs were determined at 5-min intervals, but position of the ROV relative to the vessel could not be determined. Exposed crabs were sexed but all buried crabs were assumed to be females.

Tanner crab mature male density
number per kilometer

2007

- + 1 to 10
- ▲ 10 to 50
- ★ 50 to 150
- ★ 150 to 300
- 300 to 730



Kodiak King Crab Closure

- Type 1 year round
- Type 2 2/15-6/15
- ▭ State water -no bottom trawling
- ▭ Statistical Areas

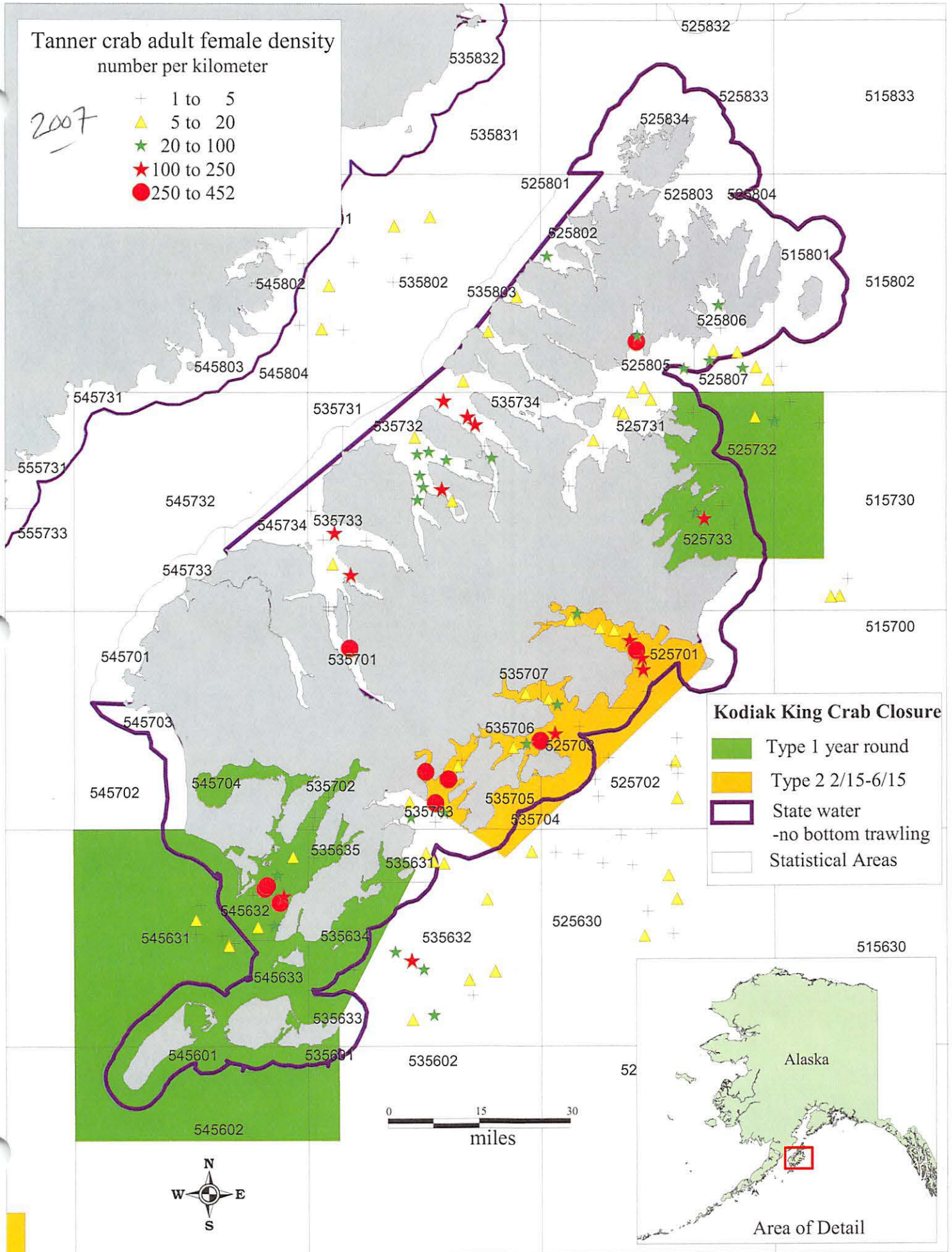
Alaska

Area of Detail

Tanner crab adult female density
number per kilometer

2007

- + 1 to 5
- ▲ 5 to 20
- ★ 20 to 100
- ★ 100 to 250
- 250 to 452



- Kodiak King Crab Closure**
- Type 1 year round
 - Type 2 2/15-6/15
 - ▭ State water -no bottom trawling
 - ▭ Statistical Areas

0 15 30
miles



KODIAK ISLAND

NOTICE TO MARINERS
This chart is a reproduction of the NOAA Chart 1648, Kodiak Island, Alaska, published in 1998. It is not for navigation. It is intended for informational purposes only. All rights reserved.

LEGEND
This chart contains the following symbols:
- Shaded areas: Shaded areas of varying colors indicate different depths or bathymetry.
- Symbols: Symbols of various shapes and colors indicate navigational hazards, lights, and other features.
- Lines: Lines of various colors and styles indicate boundaries, routes, and other navigational information.

Not For Navigation Use

MAP 2 KEY

- - - Existing Type 1 Areas, year-round bottom trawl closures for red king crab protection
- Input from Group A (6 Kodiak fishermen)
- Input from Group B (4 Kodiak fishermen)
- Input from Group C (5 Old Harbor fishermen)
- - - Input from Group D (6 Kodiak fishermen)

reapportionment of halibut PSC allowance (128 metric tons in 2007, 135 metric tons in 2008, and 139 metric tons in 2009) has clearly supported additional fishing activity, but the benefit derived from the rollover depends on target preferences and opportunities, which have varied year-to-year, as well as the impact of this additional halibut mortality on other fisheries (e.g., target halibut fisheries) and stock productivity.

Table 2-19. Vessel count, total catch, and halibut PSC by target for trawl vessels in central and western GOA during the 5th season (Oct 1 – Dec 31) from 2000 - 2009

Species Complex	Target		2000	2001	2002	2003	2004	2005	2006	2007	2008	2009
Shallow-water	Shallow-water flatfish	Vessel Count	16	9	26	2	0	0	7	7	7	24
		Target catch	1,711	183	3,518	*	0	0	1,776	3,204	5,773	5,970
		Halibut PSC	82	9	213	*	0	0	210	208	238	138
	Pacific cod	Vessel Count	1	53	9	3	0	0	3	6	9	6
		Target catch	*	10,166	170	*	0	0	*	710	2,170	392
		Halibut PSC	*	437	6	*	0	0	*	15	56	7
	Flathead sole	Vessel Count	2	4	2	2	0	0	1	0	2	5
		Target catch	*	194	*	*	0	0	0	0	*	1,320
		Halibut PSC	*	4	*	*	0	0	0	0	*	13
Deep-water	Rex sole	Vessel Count	4	1	2	1	0	0	1	1	0	3
		Target catch	1,353	*	*	*	0	0	*	*	0	*
		Halibut PSC	38	*	*	*	0	0	*	*	0	*
	Arrowtooth	Vessel Count	2	1	8	13	0	0	7	6	8	8
		Target catch	*	*	2,702	6,700	0	0	2,095	1,808	2,025	1,098
		Halibut PSC	*	*	70	186	0	0	122	38	45	12
	Deep-water flatfish	Vessel Count	2	0	0	0	0	0	0	0	0	0
		Target catch	*	0	0	0	0	0	0	0	0	0
		Halibut PSC	*	0	0	0	0	0	0	0	0	0
	Rockfish	Vessel Count	0	0	0	1	0	0	3	7	5	4
		Target catch	0	0	0	*	0	0	*	973	1,392	458
		Halibut PSC	0	0	0	*	0	0	*	9	23	1
Days open during 5th season**			92	20	16	14	0	0	7	82	82	92

Source: Target catch was from Blend data/Catch Accounting, while halibut PSC was from NMFS PSC data

* Withheld for confidentiality

** All closures during the 5th season were to prevent exceeding halibut PSC limit

Catch of shortraker rockfish and rougheye rockfish under the pilot program

In its motion defining the pilot program, the Council specifically requested staff to examine catch of shortraker rockfish and rougheye rockfish under the program's allocations. During development of the program, the Council was in the process of separating management of the two species in the Gulf of Alaska to allow for more precise TAC management. In 2005, NMFS managed the two species under separate TACs for the first time. Prior to that year, the species were managed under a single TAC. Although TACs of the two species are separated, in most fisheries they remain subject to an "aggregate rockfish" MRA that limits retained catch to 5 percent or 15 percent of catch of species for which directed fishing is permitted. Under this rule, 'aggregate rockfish' catch includes catch of all *Sebastes* and *Sebastes* excluding black rockfish, blue rockfish, and dark rockfish. In part, to avoid possible overharvest of shortraker rockfish and rougheye rockfish, the Council elected to use more precise and limiting management in the rockfish pilot program. Catcher processor cooperatives are limited by a constraining allocation of these two species with no discards permitted.²⁴ Catcher processors in the limited access fishery and all catcher vessels are limited by a 2 percent MRA applicable to shortraker and rougheye in the aggregate. This more species-specific, reduced MRA is intended to limit any potential incentive to 'top off' on these two species.

²⁴ The allocations of shortraker and rougheye to the catcher processor sector are based on specific percentages of the TAC selected by the Council determined after considering historic catches by catcher processors in the rockfish fishery (i.e., 30.03 percent of the Central Gulf shortraker TAC and 58.87 percent of the Central Gulf rougheye TAC). Each catcher processor cooperative receives a percentage of each of those allocations equal to its percentage of the sector's primary rockfish species quota shares.

Shallow water flatfish in the GOA Central Regulatory Area

	ABC	TAC	Catch	Catch as % of TAC
1991	22,200	7,000	3,074	44%
1992	21,260	7,000	6,313	90%
1993	21,260	10,000	9,291	93%
1994	12,950	12,950	3,742	29%
1995	23,140	12,950	5,057	39%
1996	17,170	12,950	8,876	69%
1997	19,260	12,950	7,328	57%
1998	19,260	12,950	3,204	25%
1999	19,260	12,950	2,298	18%
2000	16,400	12,950	6,319	49%
2001	16,400	12,950	5,955	46%
2002	23,080	13,000	5,970	46%
2003	21,740	13,000	4,289	33%
2004	27,250	13,000	2,958	23%
2005	27,250	13,000	4,656	36%
2006	24,258	13,000	7,401	57%
2007	24,258	13,000	8,512	65%
2008	29,873	13,000	8,947	69%
2009	29,873	13,000	8,385	65%
2010*	29,999	13,000	4,339	33%

SMALLER TAC = HIGHER % OF CATCH

*catch through September 25

October 2010 Letter to the NPFMC

Print Name & Signature	Address	Community	Vessel/Occupation
* Chris BERNIS Chris Bernis	Box 23 Kodiak, AK 99615	Kodiak, AK	Permit Holder
* STEVEN E HORN St E Horn	1210 mission RD Kodiak AK 99615	Kodiak AK	Permit Holder F/V GALLANT GIRL
* Ron Kawanaugh R, ←	1533 Sawmill Kodiak AK		Sylvia Star Permit Holder
* George Kirk George Kirk	Box 2796 Kodiak AK	Kodiak	Permit holder Boat owner operator
* Raymond MAY Raymond May	Box 8985 Kodiak AK 99615	Kodiak	Permit holder F/V Northwestern
* Luke Lester Lester	P.O. Box 553 Kodiak, AK	Kodiak	Permit holder F/V Raging Beauty
* Berry Schauff Berry Schauff	316 center st Kodiak, AK 99615	Kodiak	Permit holder Devotion
* Alfie R. Stept Alfie R. Stept	PO Box 2917 Kodiak, AK 99615	Kodiak	Fisheries Association
* THOMAS MILLET Tom Millet	BOX 1931 KODIAK, AK 99615	Kodiak	F/V fisherman GLACIER BAY
* Cheston Clark Cheer	P.O. Box 242 Sithu, AK 99835	Sithu	F/V Lorna Dee F/V Silver spray
* DERRON BALL Derron Ball	417 VINYARD AVE BLACKSBURG, VA 24060	KODIAK	F/V SILVER SPRAY

October 2010 Letter to the NPFMC

Print Name & Signature	Address	Community	Vessel/Occupation
Howard Peterson <i>Howard Peter</i>	P.O. Box 1063 KODIAK	KODIAK	RAVEN Capt.
REX WOLFE <i>Rex Wolfe</i>	P.O. Box 5223 Kodiak	KODIAK	RAVEN crew
Tim Kelly <i>Tim Kelly</i>	Box 8957 Kodiak	Kodiak	Raven crew
Walter F. Sargent <i>[Signature]</i>	1830 Mission Rd Kodiak	Kodiak	Major Capt
LINDA L. SARGENT <i>Linda L. Sargent</i>	1830 MISSION RD KODIAK	KODIAK	MAJOR OWNER
* TRAVIS R. BERNIS <i>[Signature]</i>	Box 33	OLD HARBOR	DAHLIA BERTREX FISHERMAN
Georgene L. Ingh <i>[Signature]</i>	Box 123	Old Harbor	Resident
Alex Shugak, Sr. <i>[Signature]</i>	Box 123	Old Harbor	Resident/ commercial fisherman
* AI CRATTY JR <i>[Signature]</i>	P.O. Box 1 OLD HARBOR AK	OLD HARBOR	MARKYLA DALLIN OWNER
Lianna Peterson <i>[Signature]</i>	P.O. Box 140 Old Harbor AK	Old Harbor	
* Edward Pestekoff <i>[Signature]</i>	Box 56 old HARBOR, AK 99649	old Harbor	MELINA OWNER/OPERATOR

North Pacific Fishery Management Council
200th Plenary Session – October 6-12, 2010
Anchorage, Alaska – Hotel Captain Cook
Fax: 907.271.2817 Tel: 907.271.2809

Public Comment of Ludger W. Dochtermann, F/V North Point, F/V Stormbird

RE: C-5 GOA Tanner Crab Bycatch

Final action to close areas to minimize bycatch of Tanner crabs

Mr. Secretary, Chairman Olson & Council members:

At this time, I favor closure for all trawl gear (suboption 1) in all of the proposed areas, under Alternative 2 for year round closures (Option 1). I do not favor allowing any modified gear exemptions. Should an exemption be made for pelagic trawling off-the-bottom for pollock, there should be an immediate implementation of a 100% observer coverage in these areas, for at least two years running.

I take particular objection to the Alaska Groundfish Data Bank and the Alaska Whitefish Trawlers Association self-reporting because it does not appear to meet Information Quality Act (Data Quality Act) guidelines ensuring and maximizing the quality, objectivity, utility and integrity of information (including statistical information) disseminated by the agency. I further expound upon these concerns, below.

I'd like to remind the Council that on multiple occasions since 2005, I have submitted a request for placement on the agenda of a Full (100%) Observer Coverage for All GOA Trawl Vessels for one year, before any further privatization could occur. [See attached.] Not once have you voted to put this important item on the agenda, and as a result, today we still face questions of data adequacy. But make no mistake, pictures don't lie.

I repeatedly stated the objective was, "To accurately evaluate the trawl fishery subsector's entire catch performance regarding the bycatch of non-targeted species and the on-board management conduct of the fishery's prosecution." I also said that "no one loses when we all know what are the true conditions of the prosecution of such fisheries" and "everyone wins when regulations are based on the best data, and when they follow the National Standards..."

I concur with the good Problem Statement and staff's conclusive statement that "Alternative 2, closing the proposed areas to groundfish fishing, would benefit crab stocks by reducing a source of mortality" and that, "the timing, general location, and overall level of fishing effort in the GOA groundfish fisheries is not expected to change, as the proposed area closures are small and fishing will likely continue to occur in neighboring areas."

You have already concluded that under National Standard 8 on Rebuilding that "An analysis of the alternatives suggests that while impacts may be noticeable at the individual operation level for at least a few of the vessels, the impacts at the community level for any of

the involved fishing communities would be well under the level of significance. The sustained participation of these fishing communities would not be put at risk by any of the alternatives being considered.” Under NS#1 you also correctly concluded that “It is not anticipated that the imposition of area closures will prevent the [groundfish] fishery from achieving annual total allowable catch for [its] species.”

It is time to give our Tanner crab the chance to rebuild as that is the means to achieve the optimum yield required by law. By refusing to cooperate earlier, and by the Council refusing to enact 100% coverage for one base year, every season grows more critical – as you now face in other crab arenas of Alaskan waters.

As a halibut fisherman, I also have concerns about the on-bottom trawling harms in these areas, and I dispute the contention that somehow trawlers are doing us a magical favor to strip out predatory cod. There are better means of cod fishing in these zones, with less damage to crab.

Your role to fully consider all stocks that are “in the fishery” goes beyond prohibited retention requirements to constrain catches of tanners and halibut to a minimal amount, because that does not necessarily mean overfishing is prohibited – and you must seriously consider the on-bottom effects of trawls and unseen mortality of crab due to this wanton waste practice.

I speak for many tanner fishermen when asking for closures to all trawling, but also know that if any groundfish fishing were to be allowed in any of those areas, it is long past time to require that any groundfish activity in these areas must have 100% full-time observer coverage. This cannot wait for separate action on observer programs, any longer. It must be implemented immediately.

You are not required to resolve productive efficiency or cost of fishing problems for trawlers alone, but to consider economic efficiency and maximize the overall benefit. Crab is far more valuable to consumers and our local economy, especially if we can rebuild to over 10 million annual pounds of sustainable harvest. The processing workers and processors would enjoy additional, not less income; and more fishing jobs would result.

I urge you to be sufficiently precautionary, especially considering any range of uncertainty, because of the adverse fishery impacts on non-targeted species. They can fish groundfish elsewhere, we cannot find the tanner crab outside its critical areas. The economic effects of rebuilding are clear – tanner crab are far more valuable and provide additional revitalization to Kodiak’s economy.

INFORMATION QUALITY ACT:

The AGDB maintained multiple Conflicts of Interest, as 1) the large-processor representative on Kodiak’s Fishery Advisory Board; 2) managers for five rockfish vessel cooperatives linked to the closed-class of processors; and 3) having state corporate filings implying it may engage in waterfront processing activities. Those are inappropriate conflicts for a group contracted to supply objective data that might meet the requirements of the Information Quality Act.

These are all the more reasons for Council staff to exercise great care in working with AGDB or for the Council to rely upon the integrity of the information they provide. One needs to look no

further than the pictures documenting trawl bycatch than to know something is gravely wrong with information reported to date.

At issue is the utility or usefulness of the information to the public, where the Agency and Council must assess the potential uses of the information from its own perspective and that of the public. There is also the issue of objectivity, whereby data must be presented in an accurate, clear, complete and unbiased manner, in the proper context along with supporting data or models so that the public can assess for itself whether there may be some reason to question the objectivity of the sources. This influential scientific and statistical information must also be reproducible to demonstrate its objectivity, because it has such a clear and substantial impact on important public policies or important private sector decisions. There must be a high degree of transparency about the data and methods to facilitate its reproducibility by qualified third parties, subject to an acceptable degree of imprecision.

While the objectivity standard does not override other compelling interests such as privacy and other confidentiality protections, when data is protected the Agency must apply "an especially rigorous robustness check to analytical results" and document what checks were undertaken.

The AGDB has enticed its way into the primary data reporting position while holding these conflicts of interest. The Council and its staff has over-relied upon AGDB as a working partner, instead of balancing its role as an independent data reporter. It is particularly disturbing to find that those consulted for the Council's GOA Tanner Closure report before you today do not include any of the representatives of Kodiak's tanner crab fleet organizations.

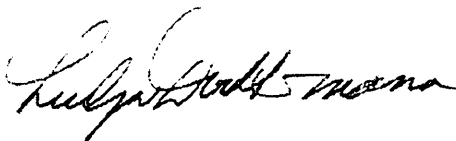
In local meetings, AGDB's owner (Julie Bonney) has been providing false information regarding the ex-vessel and wholesale value of the Flatfish species, and mischaracterizing what the results of any time and area closures will be on the Community. In their desperation, the Alaska Whitefish Trawlers Association has been similarly providing false information. I suspect this will continue at the Council level during this session.

I hope that NOAA General Counsel and the Office of Law Enforcement are diligent on these serious matters, and ask staff a few questions about why tanner crab fishermen were not adequately consulted in drafting up the report being used for this agenda item at this session.

You are fully aware that the greater number of crab vessels are already preparing for the Bering Sea/Aleutian Islands crab fishery, and October is bad timing for us to attend Council sessions on crab issues. Please consider our written testimony seriously and help rebuild our tanner stocks.

Sincerely,

Ludger W. Dochtermann, F/V North Point, F/V Stormbird – P.O. Box 714; Kodiak, AK 99615



BYCATCH MITIGATION

NS-9 Bycatch

Conservation and Management measures shall, to the extent practicable,
1) minimize bycatch; and
2) minimize mortality (when bycatch cannot be avoided)

Priority is First to AVOID BYCATCH,
Second, return to the sea alive

Precautionary Approach

The councils should adhere to the Precautionary approach and UN Code of Conduct for Responsible Fisheries (Art. 6.5)

Within framework of Article 15, UNCED Rio Declaration... & THE APPLICATION OF PRUDENT FORESIGHT

Title 50 Wildlife & Fisheries, Sec. 600.350

Any proposed conservation and management measure that does NOT give priority to avoiding the capture of bycatch species must be supported by the **APPROPRIATE ANALYSIS**.

In their evaluation, the Councils **MUST consider the net benefits to the Nation**, which include, but are not limited to:

- [1] Negative impacts on affected stocks;
- [2] Incomes accruing to participants in directed fisheries, both in the short and long term;
- [3] Incomes accruing to participants in fisheries that target the bycatch species, etc.

The Precautionary Approach & Burden of Proof:

Recognizes that changes in fisheries systems are only slowly reversible, difficult to control, not well understood, and subject to changing environment and human values.

Takes into account the uncertainties in fisheries systems and the need to take action with incomplete knowledge, it requires, *inter alia*:

The Councils **MUST select measures that**, To the extent practicable, **WILL minimize Bycatch and bycatch Mortality**:

Should consider the following factors:

- [E] changes in fishing, processing, disposal and marketing costs;

- [F] changes in fishing practices and Behavior of fishermen;

- [H] changes in the economic, social, or cultural value of fishing activities and non-consumptive uses of fisheries resources,

- [I] Changes in the distribution of Benefits and Costs

Exercises **PRUDENT FORESIGHT ...**

- A) consideration of future generations +
- B) **prior identification of undesirable outcomes and of measure that will avoid them or correct them promptly**
– (risk = 'expected loss')
- C) that any necessary corrective measures are initiated without delay,
- ... H) appropriate placement of the burden of proof by adhering to the requirements above.

To establish legal or social management frameworks – rules controlling access to fisheries, data reporting requirements, etc. And adopt interim measures that safeguard the resources until such plan are adopted.

Links fisheries management intimately with general environmental management.

GOA GROUNDFISH TRAWL SUBSECTOR OBSERVER PROPOSAL

North Pacific Fishery Management Council — 197th Plenary Session
February 10-16, 2009 Anchorage, Alaska Fax: (907) 271-2817
For the Official Record

D-3 Groundfish Issues & D-5 Staff Tasking – Requesting Placement on the Agenda

Name of Proposer: Ludger W. Dochtermann

Date: (orig. June 1, 2005) April 8, 2010

Address:

P.O. Box 714
Kodiak, Alaska

Telephone:

(907) 486-5450

Applying: NS#1 issues of 'rebuilding', optimum yield, preventing overfishing; NS#2 –best science & providing most current, comprehensive information; NS#3 'close coordinated management'; NS#7 minimize costs (damaged stocks, wasted fuel etc.) NS#8 sustained community participation & NS#9 minimize bycatch & mortality on non-targeted species. For multi-species management to maximize net national benefits from Kodiak fisheries.

Brief Statement of Proposal:

Full (100%) Observer Coverage on All GOA Trawl Vessels for the Year 2011, and once in every 5 or 7 years thereafter. By "Year 2010," I mean before any further Rationalization regulations are promulgated, so inherent in this proposal is a halt to further action until the best (adequate) scientific data is made available.

Objectives of Proposal (What is the problem?):

To accurately evaluate the trawl fishery subsector's entire catch performance regarding the bycatch of non-targeted species and the on-board management conduct of the fishery's prosecution. There is a serious need to have years of full knowledge regarding bycatch for several reasons, not the least of which is for comparison with other years of reduced coverage where the Nation relies upon self-reporting during non-observer hauls.

Need and Justification for Council Action (Why can't the problem be resolved through other channels?):

Due to the nature of the extraordinary value of bycatch – often exceeding the value of targeted species, and due to the nature of massive discards when incidents of 'bad hauls' occur, NOAA Fisheries and the Council need more accurate base data years' statistics. Absent the presence of constant recording cameras and other means of full data collection, and given the need for human confirmation of such 'remote sensing' were it to occur, the 2010 fishery would be a first start in accurate measurement.

Human behavior in the interests of overwhelming economic rewards absent effective comparison data and enforcement commands that NOAA base its decisions on more accurate data, and confirm that behavior is not incorrectly reported when observer coverage is not at 100% levels. The Council and NOAA are also aware of the uselessness of GOA bycatch data. The OMB needs to review Compliance with the Data Quality Act in the self-reporting system.

The recent submittal of pictures of tanner crab bycatch in the Kodiak groundfishery at the June 2009 session clearly demonstrates the need for 100% observer coverage, full time for 1 base year. While some have historically considered Bering Sea crab pod encounters to be rare instances, whether true or not, around Kodiak trawlers fish shallow bays and other grounds that increase the likelihood of pod encounters or simply dragging through crab abundantly concentrated on the ocean floor.

Foreseeable Impacts of Proposal (Who wins, who loses?):

The program would arguably be costly and operationally inconvenient to many vessels, however government could cover much of the costs in return for the knowledge gained. For the cost of not having full and complete knowledge – at least once every 7 years, and at least “once” (in 2010) – before creating any further arbitrary resource allocation (property rights shifting) regulations (such as “rationalization schemes”) may be a grave loss to society and regional economies as heavy-impact, intense methods of fishing – i.e. hard-on-bottom trawling – proceed unabated and unwatched.

The question of “who loses” has been answered — crab and halibut fishermen — unless a 100% observer program for 1 base year is put in place. Considering that Kodiak was once the “king crab capital of the world” and its restoration is severely harmed by trawl subsector bycatch incidents, the Council needs this base year to analyze such comparable losses.

The question of “who wins and who loses?” is also moot under the logic that the Public resource is an invaluable asset of the Nation, and no one loses when we all know what are the true conditions of the prosecution of such fisheries. Everyone wins when regulations are based on the best data, and when they follow the National Standards in the Magnuson-Stevens and Sustainable Fishery Acts, in their spirit and intent – especially when the regulatory process proceeds on science, not politics and greed.

Are there Alternative Solutions? If so, what are they and why do you consider your proposal the best way of solving the problem?:

There is another means of keeping an eye on the prosecution of the fishery, but the cost of having numerous Coast Guard vessels on site, around the clock, along with ‘random-boarding’ (fair) observer coverage would be much higher than instituting a full-coverage year-stratification program that operates only once every 5 to 7 years.

Also, the Council could ban bottom trawling in state waters around Kodiak altogether.

Supportive Data and Other Information (What data are available and where can they be found?):

This is a complex matter, as NOAA has not had adequate budgets for better research. But the conduct of the trawl fishery and the witnessing of its highly destructive prosecution are well known among NOAA, Alaskan communities and fishing crews. The Council and NOAA might have greater insight on data collection and statistical need, and that could all come out during the evaluation of this proposal were the Council to create an agenda item specifically to task going forward with 100% observer coverage in 2010.

I ask you to please take this into discussion in Groundfish issues, and to propose in staff tasking to agenda this proposal and to conduct complete analysis as soon as possible.

Signature:

Ludger W. Dochtermann, F/V North Point, F/V Stormbird – Kodiak, AK



Agenda Item C(5): GOA Tanner crab bycatch

Chairman Olson and members of the Council:

My name is Michael R. McElhenie. I've been a commercial fisherman in Alaska since 1982. I've participated in pot fishing for red, blue, brown, Bairdi, opilio, hair crab and Pacific cod in the Bering Sea. I've trawled for Pollock, cod, sole and rockfish in the Bering Sea, Gulf of Alaska and Washington and Oregon coasts. I've longlined halibut, black cod and Pacific cod in the Bering Sea, Gulf of Alaska and Washington/Oregon coasts. I've shrimped off of Washington and Oregon. I've scalloped off of New Bedford, Mass. And Cape May, New Jersey.

C-5 Gulf of Alaska Tanner Crab

1. Gear modification for pot and non-pelagic trawl gear applied to the Central Gulf Area to reduce impacts on Tanner crab and bottom habitat.
2. In the implementation of the newly adopted observer program, apply 100% observer coverage for non-pelagic trawl gear and an appropriate percentage to be determined by NMFS for pots in ADFG stat areas 525702 and 525630.
3. A reduced closed area for non-pelagic trawl gear in 525702 and 525630 as shown on map.



Office of the Mayor and Council
710 Mill Bay Road, Room 216, Kodiak, Alaska 99615

September 30, 2010

Eric A. Olson, Chairman
North Pacific Fishery Management Council
605 West 4th, Ste. 306
Anchorage, AK 99501

Re: Agenda Item C-5, Final Action GOA Tanner Crab Bycatch

Dear Mr. Olson:

The Kodiak City Council has received input from the local fishing fleet and has reviewed the material pertaining to the upcoming final action on the October 2010 North Pacific Fishery Management Council (NPFMC) agenda on Tanner crab bycatch in the Gulf of Alaska (GOA). The City Council urges the NPFMC to collect all available and pertinent data prior to making a decision on this important issue that might affect our local economy. The City Council also requests that a robust observer program to collect such data be put into place; one that would not create an unnecessary hardship for working fishers, but would be funded by the federal government, as it is their responsibility to gather the data.

The City Council understands the need to protect the crab stocks and reduce bycatch. However, as a fisheries dependent community that relies on harvesting of all species, we request the NPFMC to make a decision that takes the impacts to Kodiak's economy into consideration when making a final decision on the Tanner crab bycatch issue.

The City of Kodiak urges the NPFMC to implement management policies that provide economic stability to our community.

Sincerely,

A handwritten signature in blue ink that reads "Carolyn L. Floyd".

Carolyn L. Floyd
Mayor

C: Chris Oliver, NPFMC Executive Director

Dear Chairman Olson and Council members:

My name is Franke Brown, owner and operator of the F/V Vanguard. I have been fishing for 24 years. The first 4 years I longlined and crabbed. I have been trawling for the last 20 years with a few seasons longlining and crabbing on the Vanguard. I am also a Kodiak tanner crab permit holder – I care about the crab and would love to see a viable tanner crab fishery in Kodiak. However, I am not willing to sacrifice my groundfish harvests hoping to survive on crab revenues.

What I have seen in all these fisheries – longline, pot and trawl – is bycatch and the need to be flexible. We all need the ability to move to clean fishing areas with high CPUE and low bycatch rates. A good example of this was the 2010 B season cod opener. The entire trawl fleet made a voluntary agreement not to fish in one area (outside the proposed closure areas) because of the fear of high halibut bycatch which had been a problem in the past in that area during this time of year. The B season cod fishery ended up being prosecuted in two of the proposed closure areas (Chiniak gully and the sandbox). As you can see in your hand out, there was zero tanner crab bycatch reported for this opener and very little halibut bycatch. Closures could have an adverse affect on bycatch moving out of those areas and limiting the fleet. I feel that bycatch would actually increase substantially if we are moved out of our most productive fishing grounds.

Area closures (boxes) are old school and have not worked. The closures already in place have had no positive effect on the recovery of the Kodiak king crab populations. Presently tanner crab stocks are rebounding the best in areas we fish, while areas where less trawling occurs are not rebounding (Table 1 – 15). Tanner crab bycatch is not adverse towards the stock at 0.2% for the Kodiak district. The bycatch

trends have not changed overtime – historically all gear types have always taken about 0.2% if the total tanner crab biomass

I wish to thank the Council for their recent final action on the Observer program restructuring package. Once the new program is in place and we have more accurate data it will be easier to make rational decisions on fishery management issues.

I support status quo with a trailing amendment for modified trawl sweeps.

Thank you.

Frankie Brown C5

Table 3. Vessel PSC rates, B season CGOA trawl cod fishery 2010

WEEK END		GEAR	TARGET	HALIBUT (Kg/mt)	BAIRDI	SAMPLED HAULS
DATE	NAME				TANNER (no.)	
4-Sep-10	LONESTAR	NPT	C	52.424	0	8
4-Sep-10	MAR DEL NORTE	NPT	C	27.627	0	5
4-Sep-10	PROGRESS	NPT	C	6.615	0	5
4-Sep-10	VANGUARD	NPT	C	53.171	0	2
4-Sep-10	HAZEL LORRAINE	NPT	C	6.354	0	5
4-Sep-10	WALTER N	NPT	C	2.661	0	6
4-Sep-10	PEGGY JO	NPT	C	4.052	0	5
4-Sep-10	HICKORY WIND	NPT	C	2.059	0	2
4-Sep-10	SEA MAC	NPT	C	127.05	0	4
4-Sep-10	MARATHON	NPT	C	1.659	0	3
4-Sep-10	BAY ISLANDER	NPT	C	3.469	0	3
4-Sep-10	LESLIE LEE	NPT	C	125.461	0	1
4-Sep-10	PACIFIC STAR	NPT	C	2.492	0	9
4-Sep-10	CARAVELLE	NPT	C	2.462	0	2
4-Sep-10	MICHELLE RENEE	NPT	C	4.875	0	4
4-Sep-10	PACIFIC RAM	NPT	C	35.584	0	5
4-Sep-10	NEW LIFE	NPT	C	5.782	0	2
4-Sep-10	CHELLISSA	NPT	C	25.796	0	1
11-Sep-10	DUSK	NPT	C	1148.443	0	2
11-Sep-10	DAWN	NPT	C	49.137	0	2
11-Sep-10	TOPAZ	NPT	C	82.58	0	2
11-Sep-10	EXCALIBUR II	NPT	C	3.832	0	2
11-Sep-10	ELIZABETH F	NPT	C	7.128	0	4
11-Sep-10	PEGGY JO	NPT	C	6.294	0	2
11-Sep-10	HICKORY WIND	NPT	C	80.614	0	3
11-Sep-10	LAURA	NPT	C	22.027	0	2
11-Sep-10	MAR PACIFICO	NPT	C	8.992	0	3
11-Sep-10	GOLD RUSH	NPT	C	13.556	0	2
11-Sep-10	WINDJAMMER	NPT	C	97.45	0	3
11-Sep-10	MARCY J	NPT	C	26.056	0	2
18-Sep-10	DUSK	NPT	C	6.518	0	3
18-Sep-10	DAWN	NPT	C	118.319	0	3
18-Sep-10	TOPAZ	NPT	C	47.475	1.702	3
18-Sep-10	ELIZABETH F	NPT	C	76.109	0	5
18-Sep-10	PEGGY JO	NPT	C	78.373	0	3
18-Sep-10	HICKORY WIND	NPT	C	5.038	0	1
18-Sep-10	LAURA	NPT	C	106.167	0	6
18-Sep-10	MAR PACIFICO	NPT	C	1.585	0	4
18-Sep-10	WINDJAMMER	NPT	C	54.753	0	2
18-Sep-10	MARCY J	NPT	C	16.115	0	2

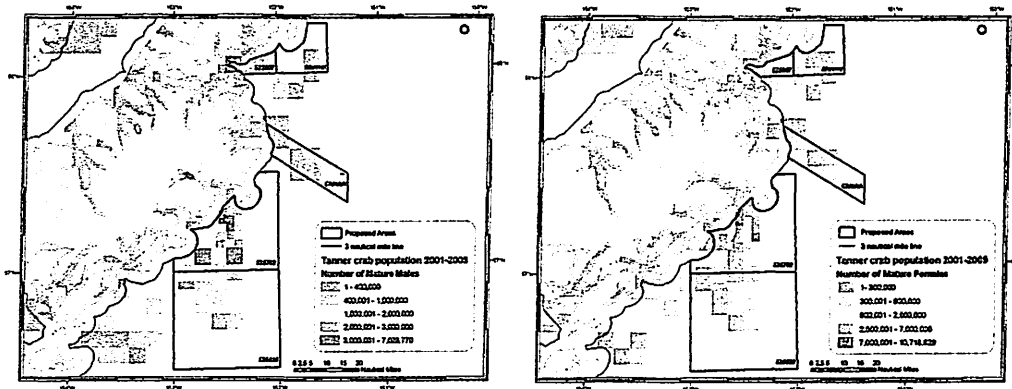
Table 1 Population estimates for total numbers of Tanner crab for Kodiak District, by section from the ADF&G bottom trawl survey

Year	Northeast	Eastside	Southeast	Southwest	Westside	North Mainland	Kodiak District
1997	3,550,650	4,578,002	1,379,455	1,172,719	2,113,986	6,754,956	19,549,768
1998	10,685,184	18,270,254	4,784,391	801,642	2,883,401	8,554,251	45,979,123
1999	6,075,563	17,913,837	8,859,587	2,126,585	2,591,322	9,741,951	47,308,845
2000	15,698,017	19,832,495	8,275,551	6,658,290	3,402,796	11,889,904	65,757,053
2001	42,326,627	61,399,533	25,240,766	21,281,118	5,824,141	13,655,815	169,728,000
2002	16,294,283	39,331,894	15,151,262	9,262,329	3,196,077	18,627,785	101,863,630
2003	13,443,591	36,166,904	6,058,690	3,141,350	4,593,172	7,013,798	70,417,505
2004	16,321,335	26,352,608	12,333,843	3,575,099	1,804,194	10,356,807	70,743,886
2005	17,403,505	19,113,246	10,974,042	3,011,422	3,947,639	13,226,334	67,676,188
2006	21,906,413	68,461,704	33,083,614	15,342,283	9,334,219	16,914,410	165,042,643
2007	18,653,830	98,433,348	35,342,446	25,861,206	4,582,398	3,382,721	186,255,949
2008	21,179,965	50,858,092	10,731,234	23,520,341	8,397,115	4,825,933	119,512,680
2009	16,992,570	39,006,970	7,768,620	9,716,347	5,623,343	5,283,555	84,391,405
97-09 average	16,963,964	38,439,914	13,844,885	9,651,595	4,484,139	10,017,555	93,402,052
03-09 average	17,985,887	48,341,839	16,613,213	12,024,007	5,468,869	8,714,794	109,148,608

Source: Spalinger *in press*

Similar to the trends of the total Tanner crab population, mature Tanner crab population estimates are highest in statistical area 525702 and inside state waters of Marmot Bay (statistical area 525805; Figure 13).

Figure 13 Numbers of mature male and mature female Tanner crab as surveyed by the ADF&G trawl survey, summed 2001-2009



3.2.1 Tanner crab abundance inside proposed area closures

The proposed area closures are located in the Northeast and Eastside sections of the Kodiak District. The proposed closure in statistical area 525807, the “boot”, and the proposed Chiniak closures are in the Northeast Section. The proposed 525702 and 525630 closures are in the Eastside Section. Estimates of Tanner crab populations within the proposed area closures range from just over 16 million crabs (2006) to over 38 million crabs (2003 and 2008) and average 22.7% of the total Kodiak District population (Table 2). The proportion of crab inside the area closures in the Eastside Section ranged from 20% to 71% of the total Eastside Tanner crab population estimate. The proportion of crab inside the proposed closures in the Northeast Section was generally lower, ranging from 13% to 39% of the total Northeast Tanner crab population estimate (Table 2 and Figure 14).

SSC's suggestion for evaluating allocative benefits of closures

	Bycatch in 630 (average 2003-2009; Table 8)	% observed catch occurring in proposed areas (Table 17)	Bycatch in proposed areas	% bycatch mortality by gear	Bycatch mortality in proposed areas	% of observed bycatch that are legal males (Table 22 and 23)	Legal male bycatch in proposed areas
nonpelagic trawl	129,573	x .7	90,701	x .8	72,561	x .1	7,256
pot 20%	26,813	x .22	5,899	x .2	1,180	x .1	118
pot 50%	26,813	x .22	5,899	x .5	2,949	x .1	295

- Directed crab fishery average 2003-2009 (Table 26):
 - Eastside 232,602 crab; Northeast crab 101,853

Amended Table 13, specifically for Nonpelagic Trawl Gear

Year	Tanner crab bycatch in reporting area 630 for Jan-July	Proportion of total bycatch in Jan-July	Tanner crab bycatch in reporting area 630 for Aug-Dec
2003	89,700	80%	22,433
2004	48,768	98%	995
2005	87,653	100%	0
2006	189,733	81%	44,505
2007	107,872	68%	50,764
2008	58,685	64%	33,011
2009	55,326	32%	117,569
Average 2003-2009		70%	

Figure 14B Estimated Tanner crab population inside the proposed area closures (boxes) in the Eastside (525702 and 525630) and Northeast (Marmot and Chiniak) Sections, 2003-2009.

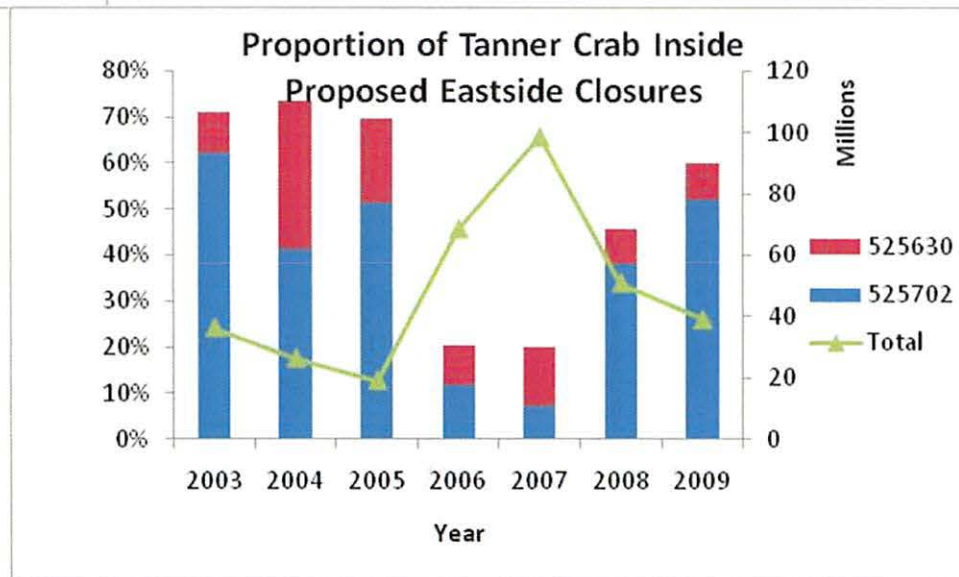
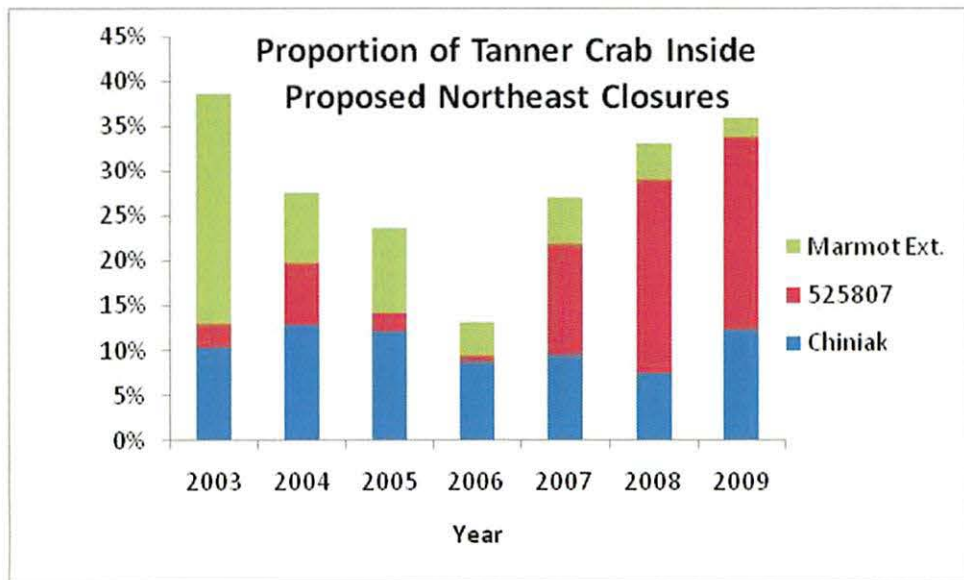
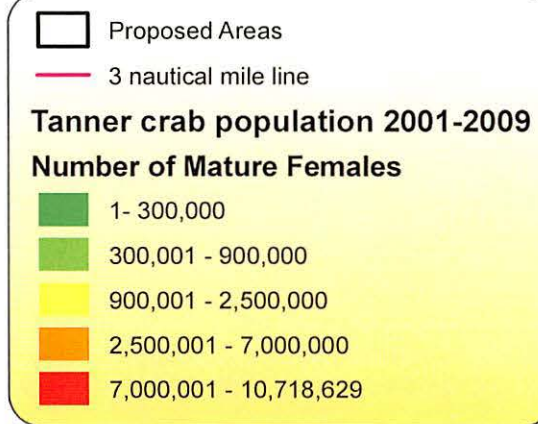
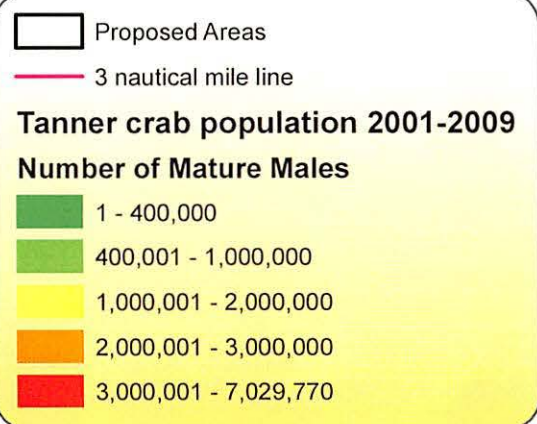
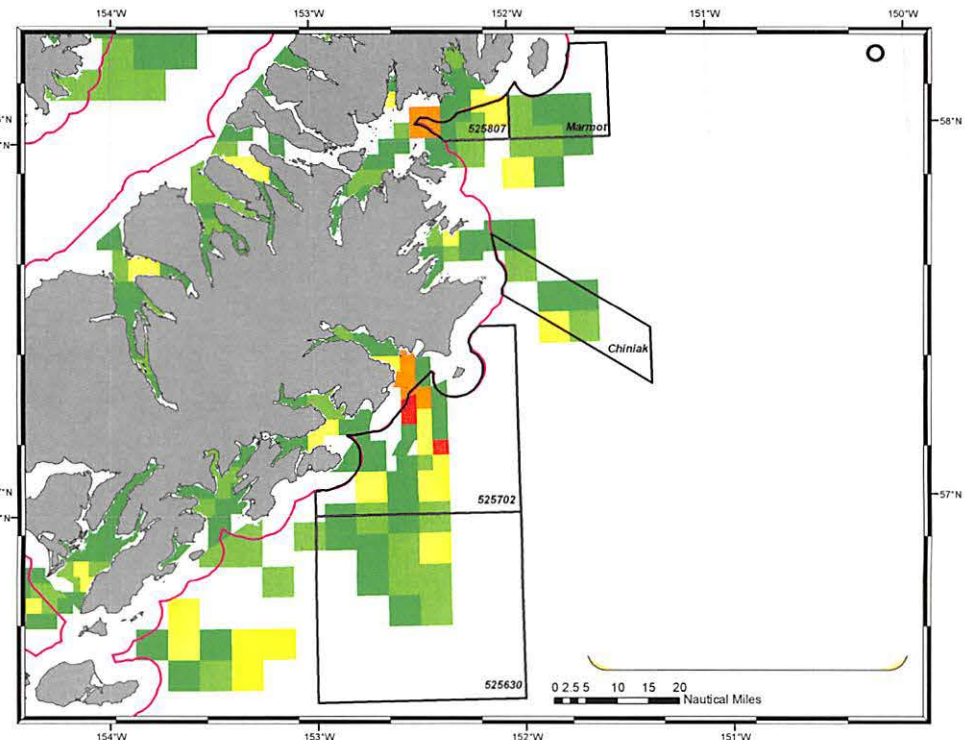
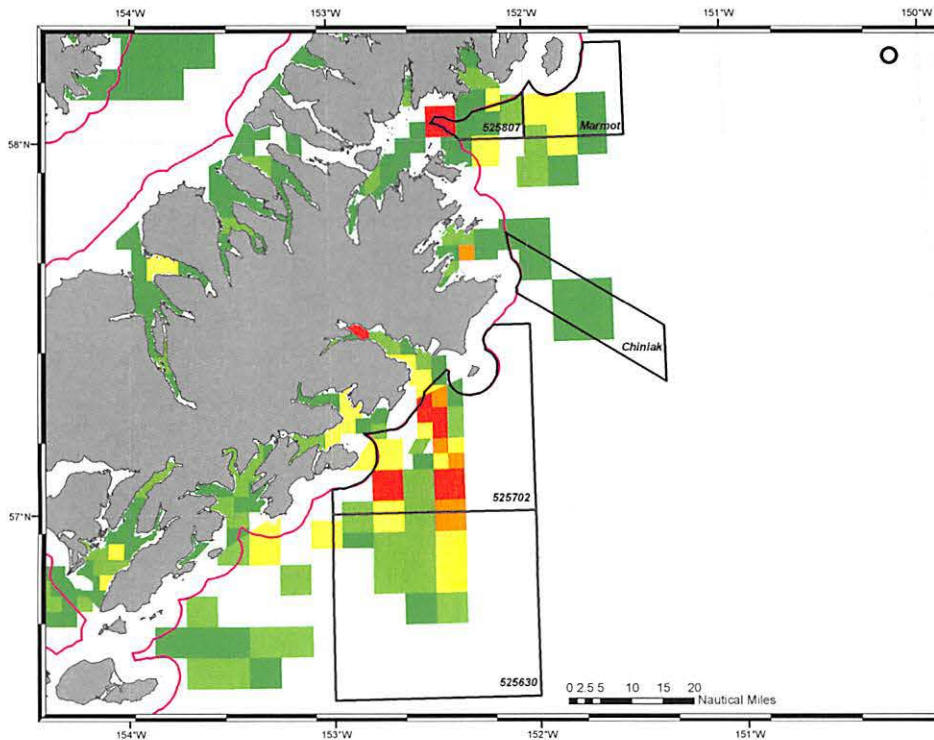


Figure 13 Numbers of mature male and mature female Tanner crab as surveyed by the ADF&G trawl survey, summed 2001-2009

MATURE MALES

MATURE FEMALES



Enforcement Committee Minutes

October 5, 2010

Hotel Captain Cook

Anchorage, Alaska

Committee present: Roy Hyder (Chair), CAPT Mike Cerne, Martin Loefflad, Sue Salvesson, Ken Hansen, Garland Walker, Sherrie Myers, Jonathan Streifel, and Jon McCracken (Staff)

Others present: Diana Evans, Ray Reichl, Alan Kinman, Berry Spivey, Matt Richards, Erin Caldwell, Julie Bonney, and Bob Alverson

C-5 GOA Tanner Crab Bycatch

Diana Evans presented an overview of the analysis that proposes additional protection to Gulf of Alaska (GOA) Tanner crab from the adverse effects of groundfish fisheries in order to facilitate rebuilding of GOA Tanner crab stocks.

With respect to Alternative 2, monitoring and enforcement costs, the Committee augmented the discussion in the analysis with additional perspectives on Suboption 4 (vessels using pelagic trawl gear would be exempt from closures) and Suboption 5 (vessels using pelagic trawl gear to directed fish for pollock would be exempt from the closures). Suboption 5 would provide for more effective enforcement of Council intent compared to Suboption 4 for the following reasons:

- The analysis shows that less than 0.5 percent of observed catch of rockfish occurs in the closed areas;
- Monitoring a pelagic trawl exemption only during the pollock season (suboption 5) versus seasonally or year round for any vessel using pelagic trawl gear (suboption 4) would be more cost effective and focused during a limited period of time (weeks instead of months);
- The directed fishery for pollock with pelagic trawl gear when the fishery with non-pelagic trawl gear is closed does have a performance standard (no more than 20 crab of a specified size onboard the vessel at any point in time). Although this trawl performance standard is very difficult to enforce, it does provide an incentive to avoid fishing for pollock with pelagic trawl gear in direct contact with bottom habitat contrary to regulatory intent. A pelagic trawl performance standard has not been established for directed fisheries for non pollock groundfish (e.g. rockfish) with pelagic trawl gear. Thus, use of pelagic trawl gear to target rockfish in the closed areas could be fished hard on bottom with incidental catch of crab, other bottom dwelling organisms or rocks and still be consistent with a prohibition on use of non-pelagic trawl gear.

The Committee also noted that under Alternative 3, vessels less than 60 feet LOA would be required to carry observers for at least some of the fishing inside the proposed closure areas. These vessels have never carried an observer before, and would be required to prove compliance with existing safety and all other vessel requirements in 50 CFR part 679.50. Some level of increased enforcement may be necessary to ensure these vessels meet these requirements.

D-3(d) Preliminary Review of HAPC Proposals

Diana Evans provided a brief overview of the two HAPC proposals recommending six skate nursery areas in the Bering Sea. Given this agenda item was an informational presentation the Committee took no action on this agenda item.

Halibut/Sablefish IFQ Leasing Issues

Ken Hanson provided a brief overview of some of the challenges of enforcing some tenets of the Alaska Halibut/Sablefish IFQ program concerning leasing. To assist the Committee in future discussions concerning this issue, the Committee has some interest in knowing the Council's current views on the original provisions in the IFQ program that control or specify the form of participation in the fishery, such as requiring quota holders to be on board during fishing, specifying percentage of vessel ownership, or provisions that inhibit leasing. Given that a number of economic, social, and environmental factors have influenced forms of participation in the IFQ fishery since the program's inception, the enforcement agencies would benefit from understanding whether these provisions remain priority objectives for the Program. Each law enforcement agency has limited resources with which to enforce the myriad of Alaska fishery regulations, and deploys its resources in accordance with various priorities, which include enforcement of various regulations that support fishery management program design. The regulations must remain relevant to program managers, policy makers, fishery participants, and law enforcement in order to have their intended effect.



Use A Sorting Table
and a Discard Chute!



HANDLE AND DISCARD CRAB WITH CARE!

RETURN CRAB TO THE SEA AS QUICKLY AS POSSIBLE



Return crab to sea quickly
Handle gently while discarding
Use a discard chute to reduce injuries
Remove crab before redeploying gear

Fish in crab by-catch hot spots
Allow crab to accumulate on deck or in scuppers
Crush or dismember crab
Treat crab like a hockey puck

