

Dear Chair Kozak and members of the Bering Sea and Gulf of Alaska Crab Alaska committee,

On behalf of the Kodiak Crab Alliance and the Alaska Marine Conservation Council, please see the following proposed mitigation measures and support for identified ADF&G research priorities to protect Tanner Crab stocks around Kodiak island:

- For a period of 2 years, full retention of crab bycatch in all GOA trawl fisheries and EM to monitor compliance.
 - The retained crab bycatch will provide the Westward region crab managers the ability to assess the stock complex of the bycaught crab.
 - Westward region crab managers will have increased temporal and spatial understanding of crab bycatch.
- Require 100% observer coverage for a period of 3 years for Non-Pelagic Trawl (NPT) fisheries associated with high crab bycatch in proposed closure areas.

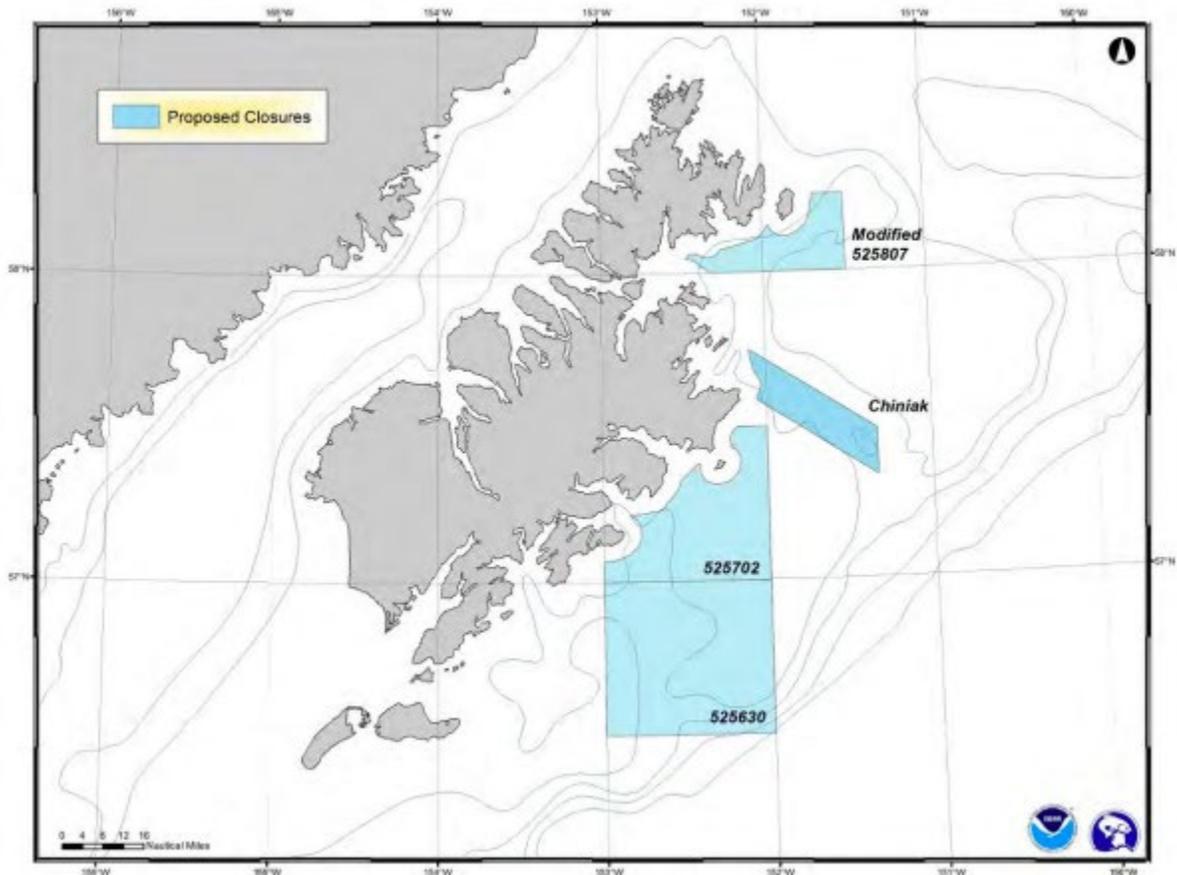


Figure 2 Area closures around Kodiak Island considered in Alternatives 2 and 3 in October 2010. Area Closures for *C. Bairdi* Crab Protections in GOA Groundfish Fisheries (page 4)

Rationale for request:

- In 2010 the North Pacific voted to require 100% observer coverage on NPT vessels and 30% observer coverage on pot cod vessels in order to fish in identified statistical areas until the restructured observer program was implemented. At that time the Council anticipated a year of these higher coverage rates prior to an improved observer program. The [full analysis](#) captures the identified purpose and need and the suite of alternatives.
- Due to delays in implementation of the 100% observer coverage requirement of the action, which was supported by nearly 100 fishermen and the Council, the requirement was never implemented.
- While the restructured program resulted in improved temporal and spatial coverage across groundfish sectors in the Gulf of Alaska, coverage rates for the non-pelagic trawl have decreased since inception of the restructured program and reduced the data necessary to understand impacts to Tanner crab stocks from federal groundfish fisheries in non-pelagic trawl fisheries.
- It is important to apply management measures appropriate for different gear types. There is a significant difference in the volume of groundfish landed by the trawl fleet and the pot fleet in the proposed areas of Tanner crab abundance. The mitigation request is focused on non-pelagic trawl activity in the identified areas due to the volume of trawl harvest and the magnitude of potential impacts associated with large bottom trawl nets.
- The proposed mitigation measures will augment research priorities identified by the Westward Alaska Dept. of Fish and Game Division, especially:
 - Better estimates of total fishery mortality in the groundfish sector responsible for the greatest harvest in important crab and groundfish grounds;
 - Improved understanding of preferred habitat at various life stages;
 - Improved understanding of critical crab habitat;
 - Improved understanding of seasonal movement and habitat use relative to groundfish seasons;
 - Improved understanding of trawl fishing effects and habitat modifications when considering Essential Fish Habitat effects;
 - Improved natural mortality estimates with groundfish diet and predation