



**Kodiak Island Borough**  
710 Mill Bay Road, Rm. 234  
Kodiak, AK 99615  
907.486.9310



**City of Kodiak**  
710 Mill Bay Road, Rm. 219  
Kodiak, AK 99615  
907.486.8636

September 22, 2016

Chairman Dan Hull  
North Pacific Fishery Management Council  
Anchorage, Alaska  
Submitted electronically by email to: [npfmc.comments@noaa.gov](mailto:npfmc.comments@noaa.gov)

Re: Gulf of Alaska Trawl Bycatch Management

Dear Chairman Hull:

As you know, the City of Kodiak and Kodiak Island Borough have been active participants in the Gulf Trawl Bycatch Management development process since 2012. At every opportunity, we have shared our perspectives with the North Pacific Fishery Management Council, based on the ten goals identified by the community.

Kodiak municipal leaders consider the community to be a stakeholder with equal weight and importance to the harvesting and processing interests affected by a new trawl management program. The welfare of all stakeholder groups will continue to be our focus as the Council moves forward.

We believe it is imperative to let the Council know once again that our community will continue to be at the table in the ongoing development of the Gulf Trawl Bycatch Management program, to be a part of how fishery management evolves over time. The entire Kodiak Island Borough – the health and strength and culture of the communities – is dependent on fisheries.

In June we provided the Council with the McDowell economic study commissioned by the City and Borough to gather information and help analyze the economic effects of fisheries on the community. This study provides a baseline profile of the community's direct involvement in the fishing and processing sectors; estimates economic effects on support businesses; catalogues municipal infrastructure and utilities' relationship to the industry, and clarifies the enormous contributions of the seafood and support industries to the community economy.

We also provided written and oral testimony focused particularly on those proposed program elements that relate to community stability, and noted where community protection aspects were the strongest, as well as where they might be lacking. In short, we are dedicated to understanding and communicating what an eventual management program should include, to ensure the continued economic and social health of the community as a whole.

In June, the first point we made in our comment letter to the Council was the following:

“We support creating a universal community stability element (such as Element 8 of Alternative 2), and analyzing: 1) consolidation limits, 2) target species regional delivery requirements and 3) active participation criteria, for inclusion in all the alternatives as applicable. These elements deal with many of the key community goals and concerns.”

The importance of this community stability element continues to be number one.

We included a strong expression of support for regional or port delivery requirements in our June testimony; this aspect of the proposed management program remains extremely important to the community. We most definitely continue to support the inclusion of regional (Kodiak Island Borough) and/or port delivery requirements based on historical landings, as one of the key provisions to maintain or increase target fishery landings and revenues.

The Kodiak Island Borough and the City of Kodiak both recognize the significant investments made by the City and the industry at the Port of Kodiak.

The McDowell economic study commissioned by the community confirms the dependence of Kodiak on the harvesting and processing of groundfish (as well as other species). The community continues to make large investments in physical infrastructure to support the seafood industry. The volume and capacity of our water and electrical infrastructure is predicated on meeting the ongoing demands of the processing sector.

From pages 3 through 5 of the study:

- Seafood processors use approximately one-third of all electricity and half of water consumed in the City of Kodiak and surrounding area.
- The Kodiak Electric Association has invested approximately \$60 million in its electrical generation and management systems in recent years.
- More than \$45 million was spent upgrading the City-owned Pier III. A new crane owned by Matson Inc. expanded the capacity of the facility, allowing it to handle larger vessels.
- The city-owned Kodiak Shipyard offers the largest Travelift in Alaska, a wash-down pad, electricity, and equipment rental. Costing approximately \$18 million, the facility has hauled about 50 vessels per year since it opened in 2009.
- Seafood processing in the KIB accounted for a total of 2,370 annualized jobs and \$132 million in labor income in 2014, including all direct, indirect and induced effects.
- In total, in 2014 the seafood industry accounted for 3,920 jobs in the KIB, \$236 million in total annual labor income, and \$396 million in total output, including all multiplier effects.

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- With seafood industry-related labor income totaling \$236 million, commercial fishing and seafood processing together accounted for about 30 percent of all personal income in the KIB economy in 2014 (directly or through multiplier effects).

Thank you for your continued consideration of our comments. We felt it was important to reiterate our support for this important regional delivery element of the program before the Council again takes up this action in December. The community leaders representing the City of Kodiak and the Kodiak Island Borough remain focused on maintaining healthy harvesting and processing sectors, and achieving the best economic and social outcome for the whole community.

Best regards,



Jerrol Friend, Mayor  
Kodiak Island Borough



Pat Branson, Mayor  
City of Kodiak

Attached:  
KIB and City Resolutions

**CITY OF KODIAK  
RESOLUTION NUMBER 2012-31**

**A JOINT RESOLUTION OF THE COUNCIL OF THE CITY OF KODIAK AND  
THE KODIAK ISLAND BOROUGH ASSEMBLY SUPPORTING COMMENTS TO THE  
NORTH PACIFIC FISHERY MANAGEMENT COUNCIL ON PENDING ACTIONS  
REGARDING COMPREHENSIVE MANAGEMENT OF PROHIBITED SPECIES  
CATCH BY THE TRAWL FISHERY IN THE CENTRAL GULF OF ALASKA**

WHEREAS, the North Pacific Fishery Management Council is considering the need for and beginning development of a comprehensive program to manage prohibited species catch by the trawl fleet of the central Gulf of Alaska; and

WHEREAS, any such comprehensive management program for fisheries in the central Gulf of Alaska will have major and direct effects on the economy and well-being of residents of the Kodiak region; and

WHEREAS, National Standards of the Magnuson-Stevens Fishery Conservation and Management Act require that federal fishery management decisions take into account the importance of fishery resources to fishing communities, in order to provide for the sustained participation of such communities and minimize adverse economic impacts on such communities; and

WHEREAS, the City of Kodiak and the Kodiak Island Borough represent the communities of the Kodiak region, rather than individual user groups or fishing interests; and

WHEREAS, the City of Kodiak and the Kodiak Island Borough have begun a program to participate directly in public processes for fishery policy decision-making as outlined in Resolution No. 2012-30 of the City of Kodiak.

NOW, THEREFORE BE IT RESOLVED by the Council of the City of Kodiak and the Assembly of the Kodiak Island Borough that these bodies support the Kodiak Fisheries Workgroup's proposed overarching purpose for consideration of fishery management issues of interest and concern to the Kodiak region as follows:

**Overarching Purpose:**

1. Maintain healthy, sustainable resources in the central (and western) Gulf of Alaska.
2. Promote a sustainable, vigorous economy in the Kodiak region with healthy and competitive harvesting and processing sectors and support industries.
3. Maintain quality of life and social well-being in Kodiak.

BE IT FURTHER RESOLVED by the Council of the City of Kodiak and the Assembly of the Kodiak Island Borough that these bodies support the Kodiak Fisheries Workgroup's proposed goals for management programs as follows:

Goals for Management Programs:

1. Provide effective controls of prohibited species catch and other bycatch to provide for balanced and sustainable fisheries and healthy harvesting and processing sectors.
2. Maintain or increase target fishery landings and revenues to Kodiak.
3. Maintain or increase employment opportunities for vessel crews, processing workers, and support industries.
4. Provide increased opportunities for value-added processing.
5. Maintain opportunities for fishermen to enter the fishery.
6. Maintain opportunities for processors to enter the fishery.
7. Minimize adverse economic impacts of consolidation of the harvesting or processing sectors.
8. Maximize active participation by owners of harvesting vessels and fishing privileges.
9. Maintain the economic strength and vitality of Kodiak's working waterfront.
10. Establish methods to measure success and impacts of all programs, including collection and analysis of baseline and after-action data.



CITY OF KODIAK

MAYOR

ATTEST:

CITY CLERK

Adopted: September 27, 2012

Introduced by: Borough Assembly  
Requested by: Kodiak Fisheries Workgroup  
Drafted by: Borough Clerk  
Introduced on: 09/20/2012  
Adopted on: 09/20/2012

**KODIAK ISLAND BOROUGH  
RESOLUTION NO. FY2013-10**

**A JOINT RESOLUTION OF THE KODIAK ISLAND BOROUGH ASSEMBLY AND THE  
CITY OF KODIAK COUNCIL SUPPORTING COMMENTS TO THE NORTH PACIFIC  
FISHERY MANAGEMENT COUNCIL ON PENDING ACTIONS REGARDING  
COMPREHENSIVE MANAGEMENT OF PROHIBITED SPECIES CATCH (PSC) BY THE  
TRAWL FISHERY IN THE CENTRAL GULF OF ALASKA**

**WHEREAS,** the North Pacific Fishery Management Council is considering the need for and beginning development of a comprehensive program to manage prohibited species catch by the trawl fleet of the central Gulf of Alaska; and

**WHEREAS,** any such comprehensive management program for fisheries in the central Gulf of Alaska will have major and direct effects on the economy and well-being of residents of the Kodiak region; and

**WHEREAS,** National Standards of the Magnuson-Stevens Fishery Conservation and Management Act require that federal fishery management decisions take into account the importance of fishery resources to fishing communities, in order to provide for the sustained participation of such communities and minimize adverse economic impacts on such communities; and

**WHEREAS,** the Kodiak Island Borough and the City of Kodiak represent the communities of the Kodiak region, rather than individual user groups or fishing interests; and

**WHEREAS,** the Kodiak Island Borough and the City of Kodiak have begun a program to participate directly in public processes for fishery policy decision-making as outlined in Resolution No. FY2013-09 of the Kodiak Island Borough

**NOW, THEREFORE BE IT JOINTLY RESOLVED BY THE KODIAK ISLAND BOROUGH ASSEMBLY AND THE CITY OF KODIAK COUNCIL** that these bodies support the Kodiak Fisheries Workgroup's proposed overarching purpose for consideration of fishery management issues of interest and concern to the Kodiak region as follows:

**Overarching Purpose:**

1. Maintain healthy, sustainable resources in the central (and western) Gulf of Alaska.
2. Promote a sustainable, vigorous economy in the Kodiak region with healthy and competitive harvesting and processing sectors and support industries.
3. Maintain quality of life and social well-being in Kodiak.



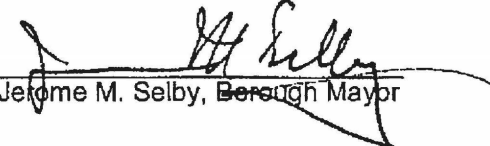
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48 **NOW, THEREFORE BE IT FURTHER JOINTLY RESOLVED BY THE KODIAK ISLAND**  
49 **BOROUGH ASSEMBLY AND THE CITY OF KODIAK COUNCIL** that these bodies  
50 support the Kodiak Fisheries Workgroup's proposed goals for management programs as  
51 follows:

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53 **Goals for Management Programs:**

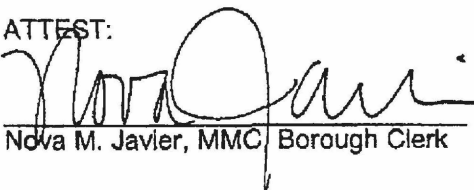
- 54 1. Provide effective controls of prohibited species catch and other bycatch to provide  
55 for balanced and sustainable fisheries and healthy harvesting and processing  
56 sectors.  
57 2. Maintain or increase target fishery landings and revenues to Kodiak.  
58 3. Maintain or increase employment opportunities for vessel crews, processing  
59 workers, and support industries.  
60 4. Provide increased opportunities for value-added processing.  
61 5. Maintain opportunities for fishermen to enter the fishery.  
62 6. Maintain opportunities for processors to enter the fishery.  
63 7. Minimize adverse economic impacts of consolidation of the harvesting or  
64 processing sectors.  
65 8. Maximize active participation by owners of harvesting vessels and fishing  
66 privileges.  
67 9. Maintain the economic strength and vitality of Kodiak's working waterfront.  
68 10. Establish methods to measure success and impacts of all programs, including  
69 collection and analysis of baseline and after-action data.

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71 **ADOPTED BY THE ASSEMBLY OF THE KODIAK ISLAND BOROUGH**  
72 **THIS TWENTIETH DAY OF SEPTEMBER, 2012**  
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75 KODIAK ISLAND BOROUGH

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77   
78 Jerome M. Selby, Borough Mayor

79 ATTEST:

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81 Nova M. Javier, MMC  
82 Borough Clerk  
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Mr. Dan Hull, Chair  
North Pacific Fisheries Management Council  
605 4<sup>th</sup> Avenue Suite 306  
Anchorage, Alaska 99501

Recent changes to the federally managed Sablefish fishery allowing long-line pot fishing in the Gulf of Alaska requires a new level of cooperation.

Incorporation of this new gear type requires cooperative effort by fishermen to embrace new technologies to share the location of different gear types on the fishing grounds in real time.

As noted by different participants in the IFQ sablefish program, gear conflict is one of the primary concerns. Participants in the same IFQ program (pots and long-line) enjoy the option to harvest regardless of weather, catch rates, dock price, or whale depredation.

We believe this is a unique opportunity for harvesters to work together, using the best available technologies, to minimize these risks while using different gear types. The use of gear identification technologies is greatly needed in the Alaskan long-line fishery. Safety concerns can be minimized by allowing the experimental usage of existing commercially viable identification technology.

In recent years there has been a significant increase in the number of vessels using or transmitting an Automatic Identification System position on the sablefish grounds. This technology helps everyone on the continental shelf edge to avoid one another's gear and to not waste time driving to a spot on the grounds when you can see where someone is fishing. Many people have been reluctant to equip because of fear that their "fishing spot" will be seen by others, but the truth is there aren't secrets after more than 20 years of IFQ.

The most effective and cheapest technologies have been in use worldwide for more than a decade. Tried and true Automatic Identification System (AIS) technology is available as an affordable buoy transponder. They have a range of 7 miles, cost around \$200, and stay powered for more than a week using a rechargeable lithium-ion battery. Transponder buoys can be programmed to display the parent vessels name and contact information.

Cost is not prohibitive for vessels that choose not to broadcast a AIS signal. Many standard VHF radios cost less than \$250 and receive AIS buoy signals as well as nearby vessels that are broadcasting. It is simple to configure these radios to a plotter. Unfortunately the CG or FCC does not currently sanction these devices for use.

These technologies are presently being used outside 12 miles by a few vessels experimentally to validate their feasibility. Interaction with other users on the grounds has been extremely positive. Freighters and trawlers can see the gear and avoid the area where you are working. AIS transponders give the long liner confidence to spread their gear out over many miles. These strategies help in keeping whales from easily finding nearby or adjacent deployed sets helping to lessen whale interactions with long-line gear.

This is an opportunity to employ available technology to minimize gear conflict in the GOA sablefish pot and HL fishery with AIS transponding buoys. I am requesting the NPFMC work with the FCC and USCG in adopting an exemption for Class B AIS Buoy Transponders for use in the Sablefish fisheries either through fishing cooperatives or by individual fishermen.

Yours Truly,

Garrett Elwood

F/V Western Freedom

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