

Ladies and Gentlemen of the Board,

My name is Dennis Eggers, I represent Burch Brothers Fish LLC. We have the F/V Dawn and I operate the Fishing Vessel Dusk based in Kodiak. I am opposed to proposals 2-5 (CGOA) and proposals 18-21 (WGOA) that would reallocate Pacific cod quota from Federal fisheries to State fisheries (inside 3 mile).

There are multiple reason why this is a bad idea. From a conservation perspective it makes no sense to increase the state cod Guideline harvest level. Requiring larger amounts of cod catch inside three miles versus allowing fishermen to target cod across the cod's geographic range results in localized depletion and damage to cod spawning habitat. There is no at sea monitoring for the state cod fisheries – no observer coverage and no vessel monitoring systems. The federal fishery, on the other hand, have the newly implemented observer program that requires at-sea observer coverage for all vessel's 40 ft and greater and vessel monitoring systems for all gear types except jig gear. Reallocating Cod TAC to the state fisheries would move positively observed catch and data into state non-observed / non-monitored fisheries. This would be a step backwards in bycatch management! In the federal system there are many mechanisms to control bycatch while in the State fisheries the assumption is that small boat fisheries of certain gear types have no bycatch. As a fisherman, I know all fisheries have bycatch.

As has been proven over time – both with the state cod fisheries and the small boat set asides in the federal fisheries – build a fishery and vessels will come. The reason that the Fred Wahl boat yard which builds wide body 58 ft vessels is so prolific today is because of fish policies that took from one user group to create opportunities for another user group. As policy makers you can never fund the fish eating monster –Fred Wahl is waiting to take boat orders- more wide bodied 58 ft vessels will enter the fishery if the (GHL) Gulf Harvest Level is increased which was demonstrated in spades over the last 10 to 15 years and the less efficient participants advocating for more fish today will still not win. If you reallocate away from federal participants you create economic disruption to a wide set of stakeholders – harvesters, processors and coastal communities and me. Our (FFP) Federal Fisheries Permit numbers are 4 (Dusk) and 5 (Dawn). However, you still won't solve the problem of too many state water participants. When the State water groundfish management plans for Pacific cod were adopted in 1996, the vision was to have year round harvest for maximum benefit to local communities, the region and the State. The truth is the majority of the catch occurs in less than a month underscoring the fishery that has been built.

Thank you for the opportunity to comment.