



RC 21

PAVLOF FISHERIES, LLC.

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October 17, 2018

Alaska Board of Fisheries
PO Box 115526
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dfg.bof.comments@alaska.gov

RE: Oppose Proposals 12, 13 and 14 to increase the Dutch Harbor Subdistrict (Area O)
Management Plan Pacific Cod Guideline Harvest Levels

Dear Chairman Jensen,

On behalf of the fishing vessel Pavlof and its crew we would like to submit the following comments to oppose the proposals 12, 13 and 14 which seek to increase the GHL in the Area O state water pacific cod fishery.

The Pavlof is a pot catcher processor, we employ 22 crew members and participate in the federal Pacific cod fishery in the EEZ off the State of Alaska. Our vessel is fully reliant on Pacific cod. This year we had a total of 18 days fishing during the A season and 18 days in the B season. In 2017 we had 28 days during A season and 71 days in B season. Pavlof Fisheries, LLC, an Alaska LLC, was established in 2004 and we purchased the vessel because of its historical participation in the cod fishery and have operated fully in the cod fishery since 2006. Our investment in this seemed secure with the cod divided between the gear sectors based upon historic participation. In the original allocation pot catcher processors received a small amount of the allocation (1.5%) and the increased pressure from the Area O fishery has caused a severe decline in allocations to our sector. The introduction of the state water parallel fishery in 2014 caused a severe decline in our catch as there were catcher-processors without federal LLP's fishing our sectors allocation.

Our understanding is when the State of Alaska first authorized the parallel fishery it was to give opportunity to the under 58-foot vessels which already participated in other fisheries. Now an entire new fleet has been constructed with vessels that are 58 feet in length and 30-40 feet wide. These are not limit seiners owned by Alaskans these vessels have been constructed to take advantage of the size restriction and exploit an already fully allocated fishery. In 2010 after many years of work the cod fishery was rationalized and split into percentages based upon historical participation, significant investments were made, and the fishery was fully capitalized at that time. The introduction of this new fleet to an already fully capitalized fishery could cause the downfall of this cod industry. The over 60-foot pot vessels and the pot catcher processor

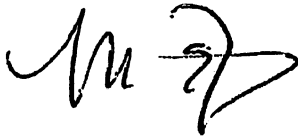
fleet operate outside of 3 miles and their efforts are not concentrated in one small area. We also operate with the standard A and B season split to insure the catch is not concentrated in A season while the fish are spawning.

Prior to the establishment of the Area O fishery, the all gear Pacific cod catch in EBS state waters was less than 1% of the EBS all gear Pacific cod harvest (federal/state combined). In 2017, that amount has increased to 8% of all EBS Pacific cod total removals occurring in state waters also 90 percent of that catch is taken during A season while the fish are spawning. This has created too much pressure on the spawning stock. The Dutch Harbor Subdistrict comprises less the 1% of the EBS Pacific cod fishing grounds. The current harvest inside of 3 miles is more than ten times the level of the average historic catch inside 3 miles (prior to the Area O fishery).

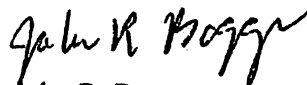
This increased effort on the spawning biomass most assuredly has a negative impact on the Pacific cod stocks. While I no longer reside in Alaska, I am Alaskan Native and have fished and worked in the Alaska fishing industry for most of my life. The cod you propose to allocate is already fully utilized and this continued reallocation of harvest from federal to state waters will put our company out of business.

Thank you for your consideration of our comments and we respectfully request you put a moratorium on further increases to the Area O GHIL for Pacific cod.

Sincerely,



Mary E. Boggs
VP Operations



John R. Boggs
Managing Member