



March 8, 2019

ADF&G Board of Fisheries
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
(907) 465-6094 FAX

Re: Supplemental Comments Regarding Proposal 180

Dear Chairman Morisky,

After further discussions with ADF&G staff and other Aleutian Islands stakeholders, we are satisfied that the best approach to developing the under-utilized state waters crab fisheries in the Adak/Aleutian Islands area is to initially work under a Commissioner's Permit, *with one regulatory amendment*.

The proposed amendment to the regulations would allow ADF&G to consider biological thresholds (soft shell crab, meat infill) when establishing the opening date for these state waters fisheries.

We are requesting this amendment because these will be small vessel (Under 60) fisheries, and the current November 1st opening date will create some significant weather-related risk to harvesters. Recognizing this, we support an amendment that gives ADFG the authority to open the fisheries as early, but no earlier than August 15, if biological thresholds are met (eg - avoidance of soft shell crab and/or low infill).

We recognize that there is a lack of data related to abundance, location and the applicable biological season(s) for these state waters stocks; and that the most prudent mechanism to start collecting this information is to conduct an exploratory fishery by allowing limited fishing under a Commissioners Permit, with some on-board monitoring/sampling by an ADFG representative. We believe that this can be done without any other amendments to the current regulations.

Golden Harvest Alaska Seafood does not expect this to be a highly profitable venture, but it is important to our operations as well as Adak-based harvesters and the larger community.

A. During the peak Pacific cod season, Golden Harvest employees over 300 people at the Adak plant. However, after that seasonal peak our employment levels drop

significantly. One of our most important challenges is to maintain a core, full-time workforce of 50 to 100 people in the community, which requires a diverse set of fisheries throughout the year. This proposed fishery would be part of a portfolio of under-utilized species that we are working to develop, which will help us maintain a sustainable level of year round employment and full time residency in Adak.

B. During the first few years of this fishery Golden Harvest will also be investing in the development of markets for this crab, and working with the harvesters to determine the best gear for targeting these state water resources while also avoiding bycatch of other species.

Thank you for your consideration,

Jason Ogilvie
Golden Harvest Alaska Seafood
Adak, Alaska