



March 29, 2016

Mr. Dan Hull, Chairman  
North Pacific Fishery Management Council  
605 W 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501-2252

RE: Aleutian Islands Groundfish Offshore Sector, Agenda C-5

Dear Chairman Hull,

United States Seafoods, LLC (“US Seafoods”) is a long time participant in the multispecies fisheries in the Bering Sea and Aleutian Islands. A substantial part of our history and operations is in the Aleutian Islands offshore fisheries. US Seafoods is very interested in any action that affects fishing opportunities in the Aleutian Islands because of our unique dependence.

Every year US Seafoods catcher processors and catcher vessels harvest Pacific cod, Pacific ocean perch, Atka mackerel, Greenland turbot, and arrowtooth and Kamchatka flounder in Amendment 80 and trawl limited access fisheries in the Aleutian Islands. Our vessels have been negatively impacted by the development of a separate Aleutian Islands TAC in the Pacific cod fishery, Steller sea lion restrictions, the creation of new Aleutian Islands trawl LLPs, and efforts to assist Adak in the Pacific cod fishery. We always try to work with other stakeholders and even voluntarily stood down in 2014 to help Adak access more Pacific cod. Unfortunately, the fishing opportunities of historical participants, particularly US Seafoods, are continuing to be reduced.

A seasonal split for the Aleutian Islands Pacific cod fishery is not necessary from a conservation or management perspective, as the analysis points out. The 2015 revision to Steller sea lion protection measures provides freezer longliners with improved access to Pacific cod grounds beginning January 1<sup>st</sup>, returning the sector closer to their historical fishing opportunity.

As the Council discusses potential actions affecting the Aleutian Islands fisheries, please consider the investment and dependence of US Seafoods in those fisheries. Any action should be developed to ensure that vessels with a history of reliance on these fisheries be given priority. Unlike most of the other participants in the Aleutian Islands offshore fisheries, US Seafoods’ non-AFA/non-A80 catcher vessels do not benefit from secure catch share allocations in other fisheries. Without these allocations to fall back on, continued access to the Aleutian Islands fisheries is critical to these catcher vessel operations. Thank you for the opportunity to provide our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew Upton".

Matthew G. Upton  
Attorney at Law  
United States Seafoods, LLC