

Recommended Revisions to Current Alternatives

American Seafoods Company

1. In alternative 2, apply the shoreside delivery requirement only to the amount reserved from BSAI trawl CV allocation (3000/5000 mt).

Rationale: As currently drafted, 100% of AI P.cod ITAC must be delivered to a shoreplant regardless of size of ITAC. If 3000/5000 mt reserve is adequate for community stability, the restriction should not apply to ALL AI P.cod, only to that 3000/5000

2. In Option 1, add alternatives to require 50% to be delivered by (a) February 21 or (b) February 28.

Rationale: History has made it clear that it is not possible to mobilize an operation after March 1 to successfully fish AI trawl cod. History has shown that there is little possibility of mobilizing and catching 50% of the AI P. cod quota after March 7.

3. In Option 2, add alternatives to require 1000 mt of processed P. cod by (a) February 14 or (b) February 21 or restrictions expire.

Rationale: Same as #2 above. If a material shoreside cod processing operation is not happening, give others time to plan and react.

4. In alternative 2, clarify that relief from shoreside delivery option opens the AI P cod fishery to all eligible vessels.

Rationale: This appears to be the Council intent based on the draft analysis but current language removes the delivery requirement but does not remove the requirement that all AI P. cod must be caught by CVs.

5. In Option 3, add an alternative to require an affirmative statement by shoreside processor of intent to operate including name of operator, intended quantity and operating plan.

Rationale: Simply saying you plan to operate is not much of a good faith act. History has shown that to have any hope of good faith behavior, you need to require more. If a plant is really going to process cod, it should affirmatively say what it is going to do.

6. In Option 3, add an alternative to remove the shoreside delivery requirement for all AI P. cod ITAC amounts over the lower of the 3000/5000 mt reserved quota or the actual amount of P. cod that the shoreside processors say they will process.

Rationale: This alternative would allow the historical users to have access to that P. cod that is in excess of the stated needs of the shoreside processor.

7. Add an alternative that removes the restriction that 3000/5000 of the CV trawl quota be harvested in the AI if the shoreside delivery restrictions are lifted.

Rationale: If this reserve is not going to be delivered AI shoreside, the trawl CV fleet should be able to catch its allocation in the BS.

Add ~~alternative~~ Option

Option 5.

Any processor that has processed cod in

the Aleutian Islands ^{MANAGEMENT AREA} in at least

~~(a) to or (b)~~ 12 ~~or~~ years ~~from~~ between

2000 - 2014 shall ~~be~~ allowed to

~~process up to 2000 mt from the~~

~~set aside~~

↑
EXEMPTED FROM THESE RESTRICTIONS
~~PROVISIONS OF THIS ACT~~,
UP TO LEVELS OF 2000 MT
FOR PROCESSING UP TO
LEVELS