

*Meddar Corporation
F/V Aleutian Challenger
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January 23, 2017

Dan Hull, Chairman
North Pacific Fisheries Management Council
605 W 4th Ave, Suite 306
Anchorage, Alaska 99501

Regarding Item: C6 BSAI Trawl Limited Access Yellowfin Sole

Dear Chairman Hull,

My name is Robert Breskovich, and my family and I own and operate the *F/V ALEUTIAN CHALLENGER (AC)*, one of the smallest AFA catcher vessels in the fleet. She's going on her 34th year fishing in Alaska and has been fishing in the Trawl Limited Access Sector (TLAS) Yellowfin Sole (YFS) fishery since September of 2015. The *AC* also participated extensively for many years in the Joint Venture YFS fishery beginning in the early 1980's.

Because this issue and any subsequent Council action on this issue greatly effects my fishing company, I have been watching this issue closely. I had the pleasure of testifying before the Council last year at the February meeting on this issue and provided you with my concerns at that time. I've just reviewed the February 2017 Initial Draft Review document prepared by Council staff and ask that if the Council moves this issue forward that you chose as your preliminary preferred alternative, **Alternative 2 Sub-option 2.1 and 2.1.2**. I believe this preferred alternative strikes a fair balance limiting access in low abundance years and limits new entrants which could compress the fishery in the early part of the year when Halibut and other PSC rates are typically more problematic, while allowing more participants access to the fishery when the Yellowfin Sole TAC (abundance) is high.

When the Council reviewed this issue at last February's meeting testimony was provided that the *AC* and the other CVs that entered the fishery in 2015 acted in a cavalier, non-cooperative manner. These allegations were proven to be misguided and uninformed and largely disproven. The *AC*'s 2015 Halibut PSC mortality rate was 12.5% below the fleet average in 2015. Arguments quickly shifted stating the 2015 CV entrants caused harm to traditional business activities dependent on the TLAS YFS. It's widely known that since no markets were available to independent CVs in TLAS YFS fishery the AFA F/T's and the one vertically integrated Amendment 80 operation who own their own CVs in their own words "had been carving up the fishery for years". Dependency is a subjective issue. For example, for my vessel, 25% of her income in 2016 was derived from TLAS YFS. I'm not privy to the AFA F/T's financial information, but the revenue from a 15,000 MT TLAS YFS fishery pales in comparison to the revenue generated by the AFA F/T Pollock cooperative's allocation of 465,316, MT this year of Eastern Bering Sea Pollock (this not include the CDQ Pollock

allocations that's exclusively harvested by the AFA F/T's). The largest of those company's annual revenues in recent years was reported to be nearly \$400,000,000. To put that in perspective, assuming this company caught half the TLAS YFS allocation in 2016, the value of that production would have been roughly \$6,000,000. Again, I'm not privy to anyone else's information though it's reasonable to assume their revenues from TLAS YFS represent less 1.5% of their annual income. In this light if there was ever a David v Goliath story before the Council it's here with a couple of the largest AFA F/T companies ganging up against, in the AC's case, a small family owned operation.

For years, I have tried to secure a market for my trawl vessel with an AFA F/T or Amendment 80 Mothership in the TLAS fishery but was never successful until 2015. As previously mentioned in my testimony to you in February of last year, in 2015, knowing our mothership P. Cod opportunities in the Aleutian Islands were coming to an end due to action by the Council that impacts available Aleutian Island P. Cod offshore markets (Amendment 113), we were finally able to establish a TLAS YFS market with Fishermen's Finest (FF) and began making offshore deliveries of YFS in September 2015. At that time, there was no discussion of limiting entry into TLAS YFS. This year will be the AC's third consecutive year fishing TLAS YFS and we've grown dependent on the fishery.

In summary, I ask that the Council take no action that prohibits my vessel's ability to fish YFS in future years.

Sincerely,



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F/V Aleutian Challenger
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**Comments on agenda item C6**

1 message

Patrick O'Donnell <gwfisheries@yahoo.com>
Reply-To: Patrick O'Donnell <gwfisheries@yahoo.com>
To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Tue, Jan 24, 2017 at 4:36 PM

Patrick O'Donnell
Golden West Fisheries, Inc./ F/V Caravelle
PO Box 3075
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January 24th, 2017

North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501

Sent via e-mail: npfmc.comments@noaa.govRe: [Agenda item C6 BSAI Yellowfin Sole Trawl Limited Access Fishery](#)

Dear Chairman Hull and members of the Council,

My name is Patrick O'Donnell. I own the F/V Caravelle which I purchased in September 2002. The F/V Caravelle is endorsed to fish in the BSAI and is one of the 17 unique vessels identified as participating in the Yellowfin Sole Fishery from 2003 - 2016 (Page 6 of the analysis). My vessel participated in the Yellowfin sole fishery in 2007 and delivered to a floating processor.

I do not agree with the suite of years chosen for historical participation (2008-2015). If the Council uses the 2008-2015 suite of years then my vessel will not qualify to participate in the yellowfin sole fishery in the future. I also note that the additional restrictions discussed reduce the number of qualifying vessels from 17 down to 3 as follows: imposing a restriction requiring one landing during the period 2008-2015 reduces the 17 vessels down to 8 vessels; requiring one targeted landing to a mothership or CP in the yellowfin sole Trawl Limited Access fishery in any two years between 2008-2015 reduces the 8 vessels down to 3 vessels.

I do not believe there is a current race for fish within the yellowfin sole fishery. I believe that the increased ITAC levels in the pollock fishery and the reduction in the yellowfin sole TAC from a high of 225,000 MT in 2008 to 144,000MT in 2016 (Table 2-1 page 13) is driving this request (i.e., competition within the user groups).

This Action will further restrict opportunity for independent vessel owners such as myself from participating, and will serve to constrain future opportunity in the Yellowfin sole fishery when TACs increase.

Therefore I Support Alternative 1: No Action-Status Quo

Sincerely

Patrick O'Donnell