

# ALASKA BOAT COMPANY, LLC

**AGENT FOR:**

Alaska Rose  
Bering Rose  
Destination  
Patricia Lee

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**AGENT FOR:**

Great Pacific  
Messiah  
Sea Wolf  
Aleutian No 1

September 26<sup>th</sup>, 2019

Mr. Simon Kinneen, Chairman  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup>, Suite 306  
Anchorage, AK 99501

**RE: D2 - BSAI Pacific Cod Limited Access Privilege Program Scoping Paper for the Trawl Catcher Vessel Sector and Pot Catcher Vessels ≥ 60 feet**

Dear Chairman Kinneen:

Thank you for the opportunity to provide comment on the above scoping document and future actions surrounding the potential development of a BSAI Pacific Cod Limited Access Privilege Program ("LAPP") for the trawl catcher vessel ("trawl CV") sector. Alaska Boat Company, LLC operates six American Fisheries Act ("AFA") trawl CV's with extensive history in the BSAI Pacific Cod trawl CV fishery. The authors and contributors of this document were tasked with the synthesis of a large volume of information, some of which is nuanced and may not have been made readily available, specifically regarding how the AFA Non-Exempt Catcher Vessel fleet has been operating through the Intercooperative Agreement and Cod Agreement (together the "Agreements").

The North Pacific Fisheries Management Council (the "Council") adopted catch limits on the amount of non-pollock groundfish species ("Sideboards") that may be harvested by AFA catcher vessels pursuant to Section 211(c) of the AFA. In order to effectively manage these Sideboards, the High Seas Catcher Coop, Mothership Fleet Coop, and Inshore Coops<sup>i</sup> enter into the Agreements on an annual basis. 50 C.F.R. §679.61(e)(2)(i)-(ii) require cooperatives to include provisions that would prevent each non-exempt member from exceeding their individual vessel sideboard limit for each BSAI species issued to the vessel by the coop. Since these caps/allocations are issued to coops in the aggregate it was left up to the coops/intercoop to establish limits for individual vessels as well as mechanisms for transfer.

Alaska Boat Company, LLC has abided by and built their business model around terms set forth in the Agreements, which were created under the framework established by the AFA and Council. In the development of allocative alternatives under a Pacific Cod LAPP proposal for the trawl CV sector, Alaska Boat Company would strongly encourage the Council to consider those vessel level sideboard limitations and transfer mechanisms which all members of the Agreements enter into on an annual basis.

Thank you in advance for your time,



Caitlin Yeager  
Operations Specialist  
Alaska Boat Company, LLC

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<sup>i</sup> The Inshore coops are comprised of the Akutan Catcher Vessel Association, Northern Victor Fleet Cooperative, Peter Pan Fleet Cooperative, Unalaska Fleet Cooperative, Unisea Fleet Cooperative, and Westward Fleet Cooperative