

# ALASKA BOAT COMPANY, LLC

**AGENT FOR:**

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**AGENT FOR:**

Great Pacific  
Messiah  
Sea Wolf  
Aleutian No 1

November 27<sup>th</sup>, 2020

North Pacific Fishery Management Council Simon Kinneen, Chair  
1007 West Third Ave., Suite 400  
Anchorage, AK 99501-2252

**RE: C-5 BSAI Pacific cod Trawl Catcher Vessel LAPP – Initial Review**

Dear Chairman Kinneen and North Pacific Fishery Management Council Members,

Thank you for the opportunity to provide comment on the elements within the development of a potential BSAI Pacific cod LAPP for the trawl CV sector. Council staff was tasked with the analysis of a variety of elements, many of which are intertwined, and have the potential for unintended consequences given the complexity of platforms and historical business arrangements in the fishery.

Alaska Boat Company operates six AFA trawl CV's jointly owned by two CDQ groups. These vessels have extensive history operating out of the BSAI and delivering their catch to Alyeska Seafoods in Unalaska, AK. Our fleet maintains close working relationships with both our fellow Unalaska Fleet Cooperative members as well as those outside of our coop delivering to Alyeska Seafoods. All of the AFA trawl CV's delivering to Alyeska have benefitted from the mechanisms provided through the Intercooperative structure to promote effective management of their operations. By using these tools, we were able to maintain a long-term balance between Alyeska's pollock and pacific cod trawl fleets, thereby preventing inefficiencies in 'overboating' one fleet and 'underboating' another.

We realize the difficulties in trying to capture these nuanced arrangements and agree that there is not a 'one size fits all' approach. Furthermore, we acknowledge the council's intent in the creation a program that awards active participants without leading to over consolidation or overcapitalization. In an effort honor the council's priorities and address the previously mentioned difficulties I would propose the inclusion of the following in future analysis:

- 1) The adoption of Staff suggested changes under Element 2.1. Eligibility – *“Any LLP license assigned to a vessel that authorized that vessel’s legal landings of targeted trawl CV BSAI cod during the qualifying years or an LLP license, as of Feb 7, 2019 (control date), assigned to an AFA trawl CV that had BSAI Pacific cod catch in 1997 is eligible to receive harvest shares”<sup>1</sup>*

<sup>1</sup>Initial Review Draft of BSAI Pacific Cod Trawl Catcher Vessel Cooperative Program; Table ES-1; Pg. 15; line item 3.

- 2) The inclusion of a “sunrise period” under Element 7 Transferability, which would act as a mechanism in which parties are allowed a one-time opportunity to address their ongoing business arrangements. This approach would be independent of any allocative method chosen and open for a limited period after initial allocation to AFA sideboard exempt vessels who engaged in transfers as authorized through the Intercooperative Agreement.

NOAA Catch Share Policy encourages the development of well designed catch share programs under the confines of the MSA, with a suite of guiding principles, one of which urging “*Councils (...) should be mindful of imposing too many constraints on transferability that would stifle the innovation and flexibility fishermen need for competitive cost-efficient business decision making.*”<sup>2</sup> Through the provisions listed above, I believe the Council will be able address both their concerns and those of industry, while minimizing any additional burden on agency. This approach was modeled after similar concepts in the rockfish and halibut programs, the efficacy of which could be analyzed by council staff in determining the applicability of this mechanism moving forward.

Thank you in advance for your consideration.



Caitlin Yeager

<sup>2</sup> NOAA Catch Share Policy; Catch Share Guiding Principles; Pg. 14