

**Alpine Cove Fisheries,
LLC**

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11/25/11

Mr. Eric Olson
North Pacific Fishery Management
Council
605 West 4th Avenue, Suite 306
Anchorage, Ak. 99501-2253

Re: Agenda Items C-5 FLL Vessel Replacement**Dear Chairman Olsen:**

Alpine Cove Fisheries, LLC is qualified to fish in the Western Gulf of Alaska Hook and Line CP sector (WG HAL CP). We are totally dependent on the relatively small WG HAL CP sector p-cod allocation. During recent years (2008-11), Alpine Cove has consistently harvested approximately 20% of the p-cod caught by the HAL sector in the WG. As you know, there are 18 LLPs eligible to fish in the WG HAL CP sector. 16 of the 18 are also eligible to fish in the BSAI p-cod fishery. Clearly, most of the WG eligible licenses have not been used in the WG during the last 4 seasons, due probably to very large p-cod TACs in the BSAI compared to the WG.

The "*Longline Catcher Processor Subsector Single Fishery Cooperative Act*", became law in 2010, and provides the BSAI eligible HAL CP licenses the ability to form a fishery cooperative in the BSAI p-cod fishery. This cooperative presumably allows WG eligible members of the BSAI co-op to fish in the WG HAL CP fishery, and return to harvest a contractually agreed amount of p-cod in the BSAI later.

We are very concerned that BSAI HAL CP co-operative members are able to expand their fishing effort in the WG HAL CP p-cod fishery whenever they choose, while simultaneously enjoying the benefits of the much larger rationalized p-cod fishery afforded to them in the BSAI, by the "*Longline Catcher Processor Subsector Single Fishery Cooperative Act*".

We ask the Council to consider our concerns regarding the impact of rationalized CPs from the Bering Sea potentially returning to the Western Gulf HAL CP fishery whenever it suits them. Specifically, we ask for an expanded section to be included in the analysis that identifies, and quantifies the harvesting capacity currently eligible to fish in the WG HAL CP sector. The analysis should identify the potential impacts to small entities in the

WG HAL CP sector, under the current level of capitalization in this sector, as well as provide an estimate of future impacts associated with increased capitalization.

Clearly a small TAC of ~5000 tons in the Western Gulf of Alaska cannot last long if 18 boats choose to "race for fish" in the sector. Such a scenario is ruinous to Alpine Cove Fisheries, LLC.

We feel that it is worthwhile for the NPFMC to analyze the need for Vessel Replacement for the HAL CP sector in the BSAI. However, we ask for the Council to recognize that there remains a great deal of latency in the Western Gulf of Alaska HAL CP sector.

Improving the quality of the fishing fleet in the BSAI is on balance a very good thing to pursue, but please do not fail to consider the impact of such an action on smaller entities in the Gulf of Alaska, who will be forced to compete with the new vessels.

Best regards,



Joe Childers

CC: Greg Elwood

PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: C-5 Freezer LL Vessel Replacement

NAME (PLEASE PRINT)	TESTIFYING ON BEHALF OF:
1 Joe Childers	Alpine Cove Fisheries, LLC
2 Kenny Down	Freezer Longline Coalition
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NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person "to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act.