

March 27, 2014

Mr. Eric Olson, Chair

North Pacific Fishery Management Council

605 W. 4th Street, Suite 306

Anchorage, AK 99501-2252

Re: Progress report on the formation of a Western Gulf FLC Coop

Dear Chairman Olson:

My name is Greg Elwood I am the owner and an operator of the Alpine Cove.

The Alpine Cove is 76ft and is the smallest freezer long liner in the Federally Managed Alaska cod fisheries.

The Alpine Cove is solely dependent our access Western Gulf Cod which is the only endorsement that the Alpine Cove holds. We do not hold an amendment endorsement that would allow Alpine Cove to participate in the freezer long line fishery in the Bering Sea.

Alpine Cove has been trying to facilitate dialogue about forming a coop with Freezer Long line Coalition for over two years! We are having difficulty making any progress in our repeated attempts to become an additional member in what FLC refers to as its informal Gulf Coop. We are very interested in having all the advantages that the Bering Sea Coop enjoys with its active coop.

It is important to note that during council deliberation regarding the MLOA that Alpine Cove agreed to cooperate with FLC Kenny Downs to not interject.

Alpine Cove was preparing to request the council to do a comprehensive analyzes on the impacts of MLOA to the Alpine Cove which could have delayed the progress of implementing MLOA into regulation.

Alpine Cove had testified before the council that additional harvesting capacity very likely would end up damaging the Alpine Cove.

FLC's Kenny Downs expressed his concerns to me during the MLOA council meeting and asked Alpine Cove to not ask for a further analyzes which could have delayed MLOA.

I believed Kenny, when he told me we would get there {forming a coop} as he put it! In exchange for Alpine Cove's cooperation during MLOA's preliminary action Kenny did indeed testify before the council. He stated FLC's desire to form a Western Gulf coop involving Alpine Cove and indicted this was possible and it was the desire of many of the members to get the coop formed. Two years have passed and MLOA has indeed manifested as a serious problem for Alpine Cove.

The FLC has previously testified to the council {2013} that they are respecting Alpine Coves historical presence and has been standing down in the Gulf and is not presently harming the Alpine Cove. That has all changed as of the 2014 cod A season as the newly constructed Northern Leader and at least four FLC member vessels entered Western Gulf in February / March 2014 for the first time and commenced harvesting. This one super long liner and other FLC boats radically reduced Alpine Coves six year historical A season percentage by one third in Western Gulf or nearly 300 tons.

In addition to the Northern Leader two more FLC members are presently building very large supersized state of the art vessels that were all constructed under the size exemption MLOA. They will be entering the Bering Sea in 2014.

Alpine Cove can only assume, as we saw this year in Western Gulf, that these new vessels most assuredly dramatically alter the harvest capability even more assuring a spillover effect to the Western Gulf from the Bering Sea freezer long line fleets increased capacity.

The Bering Sea freezer long liners are enjoying all the benefits of a financially secure and flexible system that has stopped a dangerous and wasteful derby style fishery enabling them to move between the Western Gulf & the Bering Sea without any impact to their rationalized fishery the Bering Sea.

Alpine Cove desires this same model for all the same reasons Safety, efficiency and predictability & viability.

I was informed {2013} in my communications with FLC quota manager that the {FLC Stand-down policy} of allowing Alpine Cove to harvest at our historical average was in play for 2013 / 2014.

FLC quota manager reached out to Alpine Cove well before 2014 A season asking what our harvest intentions were for 13 / 14. On behalf of FLC indicated that they needed to know so Mary Furuness would have some idea what kind of effort and which vessels would be catching what amounts in order to manage the fishery rationally. The quota manager even e-mailed me while I was fishing that she had spoken to Mary Furuness indicated to Mary to expect Three FLC long-liners participating in Western Gulf A season and to expect Alpine Cove to be fishing longer then the FLC vessels as it always takes longer for our small vessel to catch our historical percentage of WG.

So why is it that forming a coop is so difficult? I have been told by FLC members that that a single FLC member (that just happens to be building a super long liner) is the impediment to forming a coop. This one member believes that he owns 50% of Western Gulf and to date has refused to engage in a meaningful way a resolution.

The fact is FLC doesn't need a coop as their harvesting capacity has been so greatly increased by the passage of MLOA as they now have the ability to prosecute WG in as little as a week.

Northern Leaders 2014 entrance into Western Gulf is a harbinger of things to come as demonstrated in 2014. The pressure to produce additional revenue in order to support the new super long liners presently entering the Bering Sea will have devastating financial effects on our derby style Western Gulf directed fishery.

We are asking for help in protecting our historical involvement in Western Gulf.

As we enter our Seventh Year of full participation we believe our very existence is in jeopardy!

Truly, Greg Elwood

Owner operator of the Alpine Cove

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