

Bering Sea Pot Cod Cooperative

218 Center St
Kodiak, AK 99615

May 24, 2014

Mr. Eric A. Olson
Chairman
North Pacific Fishery Management Council
605 W. 4th Ave., Suite 306
Anchorage, Alaska 99501-2252

RE: E1-Staff Tasking; Redistribution of A/B Season TAC in the >60' LOA BSAI Pot
Cod CV Sector

Dear Chairman Olson:

The Bering Sea Pot Cod Cooperative (BSPCC) respectfully requests the Council initiate a Discussion Paper to consider the possibility of redistributing TAC from the B season to the A season in the $\geq 60'$ LOA BSAI Pot Cod CV sector. This request stems from an aggregate of conditions that in the last several years have created a situation that makes the attainment of Optimum Yield (OY) in this fishery not only challenging, but also financially marginal.

While our sector has been successful in harvesting nearly all of its A season TAC in recent years, factors such as a lack of aggregated Pacific cod in the B season, the recent BS/AI TAC split, overlap of other directed fisheries prosecuted by this fleet and depressed market prices worldwide make attainment of OY an elusive goal.

The BSPCC believes that redistributing the seasonal allowance so that 70% of the annual TAC is able to be harvested in the A season will alleviate some of these conditions and therefore allow a higher attainment of OY.

We appreciate your time and consideration on this issue and look forward to your response.

Respectfully,



Craig Lowenberg
Bering Sea Pot Cod Cooperative