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May 30, 2025

North Pacific Fishery Management Council  
605 W 4th Ave, Suite 306  
Anchorage, AK 99501

Dear Chair Drobnica and Member of the North Pacific Fisheries Management Council:

As a seasoned pot cod fisherman in the Bering Sea, my fishing career began as a deckhand in 1993. By 1995, I worked my way up to captain. I've navigated waters in both the Bering Sea and the Aleutian Islands, and I own two boats dedicated to pot cod fishing.

I am writing today to voice my opposition to the development of a LAPP for the pot CP and/or the pot CV  $\geq$  60 ft sector. The main concern I have is equity amongst users. Proponents of the LAPP are arguing for quota based on longevity which is going to harm a lot of new participants who have invested a lot to participate in this fishery. Adopting a LAPP will also make it next to impossible for new entrants into the fishery as we have seen in other rationalized fisheries.

There are many reasons being offered to justify rationalization, one of which is bycatch. I do not agree that creating a LAPP is the only solution to help with crab bycatch. In the current fishery, we are staying out of king crab savings areas and have also made gear modifications at significant costs. Many of us are crab fishermen and do not want to harm crab stocks, so we do our best to avoid them.

The race to fish is also an excuse widely used as a reason to adopt a LAPP. Fishing is a dangerous business no matter how it is prosecuted, and we all have to make prudent decisions when we leave port. We've seen disasters under crab rationalization when delivery deadlines must be met. I've personally had more risks under crab rationalization due to offload dates, and with only two processors, the risk is higher than ever.

While some may not view this as an entry-level fishery, many of us recognize it as one that remains accessible and viable for new participants. I am proof of this as this fishery I worked my way up to being a captain. Many fishermen have bought permits to build upon their business. This fishery is a great place for them to get a start. If the LAPP goes through, they are going to be left with very little as they won't have the longevity.

The first meeting on cod rationalization was held back in 2014. At that time, the fleet made it clear that the only acceptable options were to either split all quota evenly among all permit holders or to leave the fishery open access. That position has not changed.

This approach is fair—we've all experienced both good and bad years in the cod fishery. It has long served as a fill-in fishery: when we need it, we fish; when we don't, others benefit from increased opportunity. Even one boat standing down can mean an additional 2–3 days of fishing for others.

I'm concerned that if we go down the path of a limited access program, I—and future captains and permit owners—will be pushed out of opportunity in this fishery.

Sincerely,

Oystein Lone  
F/V Pacific Mariner and Confidence