

Bering Sea Pot Cod Cooperative
218 Center St
Kodiak, AK 99615

September 20, 2013

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

Dear Mr. Chairman:

Re: B-3; ADF&G Report (including review of BOF Statewide cod proposals)

The groups and individuals listed below respectfully request that the Council communicate with the Alaska Board of Fisheries (BOF) by letter asking the BOF to support a moratorium on the establishment of state water Pacific Cod fisheries in Area O of the BSAI Area, and to oppose any increase in the Guideline Harvest Level (GHL) for any additional P Cod in the Aleutian Island Area.

This request is consistent with the BSAI Groundfish Fisheries Management Approach adopted by the Council in its June 2013 FMP for Groundfish of the BSAI Management Area (Groundfish FMP). This request comports with the Council's ongoing responsibility to cooperate and coordinate management programs with the BOF to meet conservation requirements, promote economically healthy and sustainable fisheries and fishing communities, and maximize efficiencies in management programs through continued consultation, coordination, and cooperation.

This request is also consistent with the Council's management approach for BSAI Groundfish Fisheries. This request is both a judicious and responsible fishery management practice and it will ensure the sustainability of the P Cod fishery resource for the benefit of future and current generations.

One of the policies that the Council adopted and underscores throughout the Groundfish FMP, is the Council's mandate to consider and adopt measures that accelerate the Council's precautionary, adaptive management approach that protect managed species from overfishing. Our

Mr. Eric A. Olson
September 20, 2013
Page 2 of 3

request is consistent with that mandate. In addition, this request seeks to make management measures in the Area O P Cod fishery that are based on the best scientific information available. Further, the request balances many competing uses of the P Cod resource to achieve sustainable fishery management goals, protect the long-term health of the P Cod resource and the optimization of yield.

While we look forward to working with you and Council staff on your letter to the BOF, we suggest it voice the Council's position that it does not support any new or expanded P Cod fisheries in the state waters of Area O until a long-term management plan is adopted by the BOF, after a draft management plan for that fishery is reviewed and then approved by relevant advisory committees, NPFMC staff, ADF&G, affected users, and the BOF.

In effect, the Council would be supporting a moratorium on any new or expanded P Cod fisheries in state waters by all gear groups until the resource is better understood, and an appropriate long-term management plan is adopted by the BOF. The Area O P Cod fishery is fully allocated and fully prescribed. The NMFS database indicates that there are more than 200 fixed gear boats 60' LOA and less that are presently qualified to participate in the BSAI state water fishery. Those boats could move in the Area O state water P Cod fishery with adverse effects if that fishery is not managed for the long-term health of all participants in the P Cod fishery, and the P Cod resource.

Any further allocation into a state water fishery will negatively impact and financially harm the traditional harvesters.

The industry is presently dealing with the uncertainty of a looming BSAI TAC split as well as SSL RPA's that are in development. Until these issues are resolved by the Council, any decision that has the actual or unintended effects of reallocating fish cannot properly be made without fully understanding all the long term management and resource impacts.

There are currently plenty of opportunities to new entrants into the P Cod fishery. Furthermore, it is past time for the Council to take a precautionary, adaptive management approach that protects the P Cod fishery from overfishing. The parallel-season state water P Cod fishery is presently being conducted without observer coverage, logbooks, or VMS. The

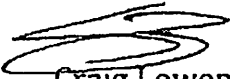
Mr. Eric A. Olson
September 20, 2013
Page 3 of 3

bycatch issues in this fishery are an important factor in managing any fishery in accordance with the Magnuson Stevens Act. The Council's letter is a proactive cautious request of the BOF that will ensure the sustainability of the P Cod resource.

By supporting a BOF moratorium on any new or expanded P Cod fisheries in Bering Sea Area O and in the AI, the Council will be helping the BOF to make an informed decision.

Thank you very much for your consideration in this matter.

Sincerely,



Craig Lowenberg, Manager
Bering Sea Pot Cod Cooperative

On Behalf of:
Alaska Boat Company
Alaskan Leader Fisheries
Atlanta Corp
Coastal Villages Region Fund
Freezer Longline Coalition
F/V Arctic Lady
F/V Baranof
F/V Cape Caution
F/V Courageous
F/V Katrina Em
F/V Kona Kai
Groundfish Forum
Kaldestad Fisheries, LTD
Kodiak Vessel Owner's Association
Jeff Steele
Jerry Bongen
Trident Seafoods
United Catcher Boats
United Fishermen's Marketing Association

Cc: Chris Oliver, Executive Director
North Pacific Fishery Management Council

Dennis Deaver
1628 Palm Ave. SW
Seattle, WA 98116
F/V Pacific Sun, F/V Beauty Bay

September 4, 2013

North Pacific Fisheries Management Council
605 W. 4th Ave
STE 306
Anchorage, AK 99501-2252

Dear Council Members:

I am writing this letter to encourage the North Pacific Fisheries Management Council to write a letter to the Alaska Board of Fisheries supporting **Proposal 34 – 5 AAC 28.610. Fishing season for Bering Sea-Aleutian Islands Area.** This proposal calls for a moratorium on any new or expanded Pacific Cod fisheries in state waters of Area O until a long-term management plan is adopted by the Board of Fisheries, after a draft management plan for that fishery is reviewed and then approved by relevant AC's, the NPFMC, and ADF&G.

This request is consistent with the Council's ongoing responsibility to cooperate and coordinate management programs with the BOF to meet conservation requirements, promote economically healthy and sustainable fisheries and fishing communities, and maximize efficiencies in management programs through continued consultation, coordination, and cooperation. June 2013 FMP for Groundfish of the BSAI Management Area, page 7.

Support for my position on this issue is as follows:

- The opportunity for <60' vessels to participate in the Pacific Cod fishery inside state waters of Bering Sea-Aleutian Islands Area O currently exists in the form of a parallel fishery and roll-over provisions, essentially making implementation of a new or expanded state water fishery unnecessary and duplicative.
- Implementation of a new state water fishery in Bering Sea-Aleutian Islands Area O will foster a "race for fish" scenario, which can create unsafe fishing conditions and is contrary to the current fisheries management trend.
- Increasing the fishing effort inside state waters of Bering Sea-Aleutian Islands Area O may have unintended consequences for Stellar Sea Lion interactions.
- A bycatch accounting system and observer coverage program is not currently available to responsibly manage a new or expanded state waters Pacific Cod fishery.
- All indications point toward an eminent Pacific Cod TAC split between the Bering Sea and Aleutian Islands areas in the very near future. The impacts of this potential split are not fully known at this time. Until the uncertainty about the TAC split is resolved and the ramifications are fully understood, implementation of a new state waters fishery would be premature.
- Implementation or expansion of a new state waters Pacific Cod fishery will cause financial harm to my business.

I appreciate the opportunity to express my concerns and look forward to your support.
Thank you.

Sincerely, *Dennis Deaver*

Dennis Deaver

Kevleen K LLC
8941 179th PL SW
Edmonds, WA 98026

September 4, 2013

North Pacific Fisheries Management Council
605 W. 4th Ave
STE 306
Anchorage, AK 99501-2252

Dear Council Members:

I am writing this letter to encourage the North Pacific Fisheries Management Council to write a letter to the Alaska Board of Fisheries supporting **Proposal 34 – 5 AAC 28.610. Fishing season for Bering Sea-Aleutian Islands Area**. This proposal calls for a moratorium on any new or expanded Pacific Cod fisheries in state waters of Area O until a long-term management plan is adopted by the Board of Fisheries, after a draft management plan for that fishery is reviewed and then approved by relevant AC's, the NPFMC, and ADF&G.

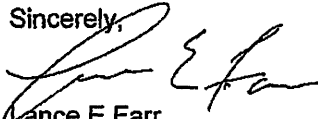
This request is consistent with the Council's ongoing responsibility to cooperate and coordinate management programs with the BOF to meet conservation requirements, promote economically healthy and sustainable fisheries and fishing communities, and maximize efficiencies in management programs through continued consultation, coordination, and cooperation. June 2013 FMP for Groundfish of the BSAI Management Area, page 7.

Support for my position on this issue is as follows:

- The opportunity for <60' vessels to participate in the Pacific Cod fishery inside state waters of Bering Sea-Aleutian Islands Area O currently exists in the form of a parallel fishery and roll-over provisions, essentially making implementation of a new or expanded state water fishery unnecessary and duplicative.
- Implementation of a new state water fishery in Bering Sea-Aleutian Islands Area O will foster a "race for fish" scenario, which can create unsafe fishing conditions and is contrary to the current fisheries management trend.
- Increasing the fishing effort inside state waters of Bering Sea-Aleutian Islands Area O may have unintended consequences for Stellar Sea Lion interactions.
- A bycatch accounting system and observer coverage program is not currently available to responsibly manage a new or expanded state waters Pacific Cod fishery.
- All indications point toward an eminent Pacific Cod TAC split between the Bering Sea and Aleutian Islands areas in the very near future. The impacts of this potential split are not fully known at this time. Until the uncertainty about the TAC split is resolved and the ramifications are fully understood, implementation of a new state waters fishery would be premature.
- Implementation or expansion of a new state waters Pacific Cod fishery will cause financial harm to my business.

I appreciate the opportunity to express my concerns and look forward to your support.
Thank you.

Sincerely,



Lance E Farr
Owner
F/V Kevleen K

Scott Campbell Sr
83972 Eastside Rd
Milton-Freewater, Or. 97862

September 4, 2013

North Pacific Fisheries Management Council
605 W. 4th Ave
STE 306
Anchorage, AK 99501-2252

Dear Council Members:

I am writing this letter to encourage the North Pacific Fisheries Management Council to write a letter to the Alaska Board of Fisheries supporting **Proposal 34 – 5 AAC 28.610. Fishing season for Bering Sea-Aleutian Islands Area.** This proposal calls for a moratorium on any new or expanded Pacific Cod fisheries in state waters of Area O until a long-term management plan is adopted by the Board of Fisheries, after a draft management plan for that fishery is reviewed and then approved by relevant AC's, the NPFMC, and ADF&G.

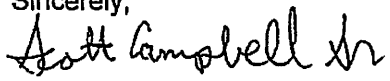
This request is consistent with the Council's ongoing responsibility to cooperate and coordinate management programs with the BOF to meet conservation requirements, promote economically healthy and sustainable fisheries and fishing communities, and maximize efficiencies in management programs through continued consultation, coordination, and cooperation. June 2013 FMP for Groundfish of the BSAI Management Area, page 7.

Support for my position on this issue is as follows:

- The opportunity for <60' vessels to participate in the Pacific Cod fishery inside state waters of Bering Sea-Aleutian Islands Area O currently exists in the form of a parallel fishery and roll-over provisions, essentially making implementation of a new or expanded state water fishery unnecessary and duplicative.
- Implementation of a new state water fishery in Bering Sea-Aleutian Islands Area O will foster a "race for fish" scenario, which can create unsafe fishing conditions and is contrary to the current fisheries management trend.
- Increasing the fishing effort inside state waters of Bering Sea-Aleutian Islands Area O may have unintended consequences for Stellar Sea Lion interactions.
- A bycatch accounting system and observer coverage program is not currently available to responsibly manage a new or expanded state waters Pacific Cod fishery.
- All indications point toward an eminent Pacific Cod TAC split between the Bering Sea and Aleutian Islands areas in the very near future. The impacts of this potential split are not fully known at this time. Until the uncertainty about the TAC split is resolved and the ramifications are fully understood, implementation of a new state waters fishery would be premature.
- Implementation or expansion of a new state waters Pacific Cod fishery will cause financial harm to my business.

I appreciate the opportunity to express my concerns and look forward to your support.
Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Scott Campbell Sr". The signature is written in black ink and is positioned above the printed name.

Scott Campbell Sr

Scott Campbell Jr
802 Rhea Ln

September 4, 2013

North Pacific Fisheries Management Council
605 W. 4th Ave
STE 306
Anchorage, AK 99501-2252

Dear Council Members:

I am writing this letter to encourage the North Pacific Fisheries Management Council to write a letter to the Alaska Board of Fisheries supporting **Proposal 34 – 5 AAC 28.610. Fishing season for Bering Sea-Aleutian Islands Area.** This proposal calls for a moratorium on any new or expanded Pacific Cod fisheries in state waters of Area O until a long-term management plan is adopted by the Board of Fisheries, after a draft management plan for that fishery is reviewed and then approved by relevant AC's, the NPFMC, and ADF&G.

This request is consistent with the Council's ongoing responsibility to cooperate and coordinate management programs with the BOF to meet conservation requirements, promote economically healthy and sustainable fisheries and fishing communities, and maximize efficiencies in management programs through continued consultation, coordination, and cooperation. June 2013 FMP for Groundfish of the BSAI Management Area, page 7.

Support for my position on this issue is as follows:

- The opportunity for <60' vessels to participate in the Pacific Cod fishery inside state waters of Bering Sea-Aleutian Islands Area O currently exists in the form of a parallel fishery and roll-over provisions, essentially making implementation of a new or expanded state water fishery unnecessary and duplicative.
- Implementation of a new state water fishery in Bering Sea-Aleutian Islands Area O will foster a "race for fish" scenario, which can create unsafe fishing conditions and is contrary to the current fisheries management trend.
- Increasing the fishing effort inside state waters of Bering Sea-Aleutian Islands Area O may have unintended consequences for Stellar Sea Lion interactions.
- A bycatch accounting system and observer coverage program is not currently available to responsibly manage a new or expanded state waters Pacific Cod fishery.
- All indications point toward an eminent Pacific Cod TAC split between the Bering Sea and Aleutian Islands areas in the very near future. The impacts of this potential split are not fully known at this time. Until the uncertainty about the TAC split is resolved and the ramifications are fully understood, implementation of a new state waters fishery would be premature.
- Implementation or expansion of a new state waters Pacific Cod fishery will cause financial harm to my business.

I appreciate the opportunity to express my concerns and look forward to your support.

Thank you.

Sincerely,

Scott Campbell JR
Scott Campbell Jr

Arctic Sun Fisheries, Inc.
12042 SE Sunnyside Rd
PMB 333
Clackamas, OR 97015

September 23, 2013

North Pacific Fisheries Management Council
605 W. 4th Ave
STE 306
Anchorage, AK 99501-2252

Dear Council Members:

Re: B-3; ADF&G Report (including review of BOF Statewide cod proposals)

I am writing this letter to encourage the North Pacific Fisheries Management Council to write a letter to the Alaska Board of Fisheries supporting **Proposal 34 – 5 AAC 28.610. Fishing season for Bering Sea-Aleutian Islands Area**. This proposal calls for a moratorium on any new or expanded Pacific Cod fisheries in state waters of Area O until a long-term management plan is adopted by the Board of Fisheries, after a draft management plan for that fishery is reviewed and then approved by relevant AC's, the NPFMC, and ADF&G.

This request is consistent with the Council's ongoing responsibility to cooperate and coordinate management programs with the BOF to meet conservation requirements, promote economically healthy and sustainable fisheries and fishing communities, and maximize efficiencies in management programs through continued consultation, coordination, and cooperation. June 2013 FMP for Groundfish of the BSAI Management Area, page 7.

Support for my position on this issue is as follows:

- The opportunity for <60' vessels to participate in the Pacific Cod fishery inside state waters of Bering Sea-Aleutian Islands Area O currently exists in the form of a parallel fishery and roll-over provisions, essentially making implementation of a new or expanded state water fishery unnecessary and duplicative.
- Implementation of a new state water fishery in Bering Sea-Aleutian Islands Area O will foster a "race for fish" scenario, which can create unsafe fishing conditions and is contrary to the current fisheries management trend.
- Increasing the fishing effort inside state waters of Bering Sea-Aleutian Islands Area O may have unintended consequences for Stellar Sea Lion interactions.
- A bycatch accounting system and observer coverage program is not currently available to responsibly manage a new or expanded state waters Pacific Cod fishery.
- All indications point toward an eminent Pacific Cod TAC split between the Bering Sea and Aleutian Islands areas in the very near future. The impacts of this potential split are not fully known at this time. Until the uncertainty about the TAC

split is resolved and the ramifications are fully understood, implementation of a new state waters fishery would be premature.

- Implementation or expansion of a new state waters Pacific Cod fishery will cause financial harm to my business.

I appreciate the opportunity to express my concerns and look forward to your support.
Thank you.

Sincerely,



Craig Lowenberg
Operations Manager