

**Bering Sea Pot Cod Cooperative**

218 Center St  
Kodiak, AK 99615

November 27, 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**

For the record, the Bering Sea Pot Cod Cooperative would like to express it's concerns regarding the recent action taken by the Alaska Board of Fisheries to implement a new State waters Pacific Cod pot fishery for vessels 58' LOA and less in the Bering Sea Management Area O.

Specifically, we are concerned about the impacts the new State waters Pacific cod fishery may have on Stellar sea lions and the existing Federal Pacific cod fisheries. Our members also question the assumed biomass in State waters and whether the new fishery is even necessary. It seems that if large concentrations of Pacific cod existed in State waters, the existing fisheries (parallel season) would have more fully utilized this resource. Finally, the new fishery has the potential to stimulate significant effort with the possibility of over-capitalization and localized depletion of the resource.

We appreciate the opportunity to express our concerns.

Sincerely,



Craig Lowenberg  
Bering Sea Pot Cod Cooperative

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