Ray Caudill Box 172 Unalakleet, AK 99684 May 20, 2014

North Pacific Fishery Management Council 605 West 4th Avenue Anchorage, AK 99501

Dear Council:

I have been a local fisherman in Unalakleet for many years and have been slowly investing in pursuing the Norton Sound Red King Crab Fishery under the 32 foot exemption. Currently, I have a large investment at stake with considerable debt. If this exemption is eliminated, I would be completely shut out of this fishery with a crushing debt.

I am strongly against any changes to this exemption. I highly urge this body to vote NO!

Sincerely,

Ray Caudill



Serving the fisheries of the Bering Strait Region

Brevie Misson Diomede Idim Gambell Golovin Koyuk Nome Suru Michael Savoonga Shuktoolik Steldins Teller Unalakleet Wiles White Manmara

NPFMC to examine participation in Norton Sound red king crab fishery

The upcoming North Pacific Fishery Management Council (NPFMC) meetings will be held from June 2-10 in Nome. While many residents are aware that the NPFMC will again discuss salmon bycatch at this meeting, Norton Sound Economic Development Corporation's (NSEDC) Board of Directors would like to make sure residents are also aware of another agenda item that could eventually impact the region's fisheries.

On the agenda is a discussion paper on participation in the Norton Sound red king crab commercial fishery. The discussion paper comes in response to a commercial fishery participant citing concerns over whether the fishery was becoming over-capitalized (too many fishermen for the size of the fishery). When a fishery is over-capitalized, participants, on average, may have difficulties paying off their investment to participate in the fishery and earning income. The fisherman's testimony asked the NPFMC to consider eliminating the exemption that allows boats 32 feet and under in length to participate without a license, commonly known as an 'LLP' (one issued under the federal 'License Limitation Program'); and to consider reducing the number of current LLP licenses by requiring them to have been fished in recent years to be kept.

At this point, the NPFMC will not be making any decisions at this meeting on the LLPs or the 32-foot exemption. The NPFMC, however, could start a decision-making process by asking for an analysis which could potentially examine somehow reducing the number of LLPs or limiting (or eliminating) the 32-foot exemption. Any final decision to change the management approach, if one were to be made, would take several meetings to reach and would span a timeline of at least a half a year, at the shortest. Residents should be aware they have an opportunity to comment now.

NSEDC's Board of Directors has not taken any stance on potential changes to the fishery. However, it is recognized that fishermen in the region will have differing opinions on whether changes should be made to the regulations detailing who can participate in this fishery. NSEDC's Board wants to be sure residents are notified that they have an opportunity to give input. In the NPFMC discussion paper, it says that public input will be valuable in guiding the Council's course of action on the issue of over-capitalization.

The Norton Sound Red King Crab LLP discussion paper and the North Pacific Fishery Management Council meeting agenda can be found on the NPFMC (<u>www.npfmc.org</u>) and NSEDC (<u>www.nsedc.com</u>) websites.

Testimony can be given either in person during the June NPFMC meetings in Nome or in writing. Public comment is limited to three minutes to individuals and six minutes for group representatives. Written comments and materials must be received at the Council office by 5 p.m. on Tuesday, May 17. Comments can be sent by mail, fax or email.

Email: npfmc.comments@noaa.gov

Fax: 907-271-2817

Mail: North Pacific Fishery Management Council

605 West 4th Avenue Anchorage, AK 99501 Merle Towarak
Box 273
Unalakleet, AK 99684
(907) 625-1218
Merle 530@yahoo.com
May 27, 2014

North Pacific Fishery Management Council 605 West 4th Avenue Anchorage, AK 99501

Dear North Pacific Fishery Management Council:

I am writing this letter in regards to the Norton Sound Red King Crab Fishery requirements to the LLP. I feel this would be unfair to A lot of fisherman like myself. So I am oppose to this idea, because I just go into the fishery. Therefor I'd like a few years before this takes into effect.

Sincerely,

Merle Towarak

Ray Caudill Box 172 Unalakleet, AK 99684 May 20, 2014

North Pacific Fishery Management Council 605 West 4th Avenue Anchorage, AK 99501

9076243183

Dear Council:

I have been a local fisherman in Unalakleet for many years and have been slowly investing in pursuing the Norton Sound Red King Crab Fishery under the 32 foot exemption. Currently, I have a large investment at stake with considerable debt. If this exemption is eliminated, I would be completely shut out of this fishery with a crushing debt.

I am strongly against any changes to this exemption. I highly urge this body to vote NO!

Sincerely,

Ray Caudill Rang Crohal



NPFMC comments - NOAA Service Account <npfmc.comments@noaa.gov>

Llp

2 messages

Silas Paniptchuk <silasp27@gmail.com>

Wed, May 28, 2014 at 11:26 AM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Hi, I realize I am two days late. My letter says respond by May 29. This is about the 32 foot exemption deal for the LLP. I currently have a 28 foot skiff which I use for crab and herring operation in the norton sound. I would like to see that exemption continue. There are only two or three boats in the norton sound fleet that are under 32 feet. That does not have a significant impact on the amount of crab catch. The nome guys are pushing to eliminate us smaller boats in hopes to increase their catch. A lot of them have two boats and operate both in the fishery. Us small boats do not get a lot of the gouta. For one, our boats are too small to haul loads therefor, we use small pots. We use the fishery as our main source of income. And even though we don't catch much, we still make money and that keeps us working. This potential change could have a huge impact on us small boats who were told by our loan providers, (Norton sound economic development corporation) that since our boats are under 32 feet we are exempt from buying a LLP. So we excluded that from out loans. Currently I still am paying for my boat and could not afford an LLP. Especially since I set a gouta for myself and that is a small one. Just enough to pay the bills. So, I hope the 32 foot exemption stays as is. There aren't too many boats under 32 feet that are in the fleet. I feel like because they know who we are they are targeting us specifically. It's almost personal. Here's a suggestion, because they think our fleet is too big. Maybe make it a little harder to get a loan through our fishing company. Right now anyone, even with a poor credit score can get a loan. I wouldn't be for it but since they feel were growing to rapidly. Why not that? Thank you and sorry I am late.

Silas Paniptchuk

Sent from my iPhone

NPFMC comments - NOAA Service Account <npfmc.comments@noaa.gov>To: silasp27@gmail.com

Wed, May 28, 2014 at 11:26 AM

Thank you for your comment, if this comment was received after May 27, 2014 5:00pm, it is considered a late comment and will not be posted/copied for June meeting.