

NORTH PACIFIC FISHERY MANAGEMENT COUNCIL
June 6-14, 2016 — 229th Plenary Session
Kodiak Harbor Convention Center

Public Comment of Ludger W. Dochtermann, F/V NORTH POINT, STORMBIRD
Email submittal — npfmc.comments@noaa.gov

RE: C-3 BSAI CRAB RATIONALIZATION 10-YR. REVIEW

Secretary Pritzker, Chairman Hull & NPFMC Members:

I'm Ludger W. Dochtermann of Kodiak, Alaska – owner and captain of two fishing vessels for Crab, Halibut, and salmon tendering operations.

The 10-year review gives you an opportunity to cap the quota lease rates (rents) at no more than 35% to 40%. That's fair. 70%-75% is unfair.

I do not charge anywhere near that for my own quota, against my crewmen, and abhor the practices of other quota holders, many of whom do not even go to sea anymore. At 73, I still tendered for salmon, fished Kodiak tanner crab, can go to the BSAI for crab; and I just returned from fishing my halibut 3A quota.

Other than restricting the cap on rents, I'd rather that you **DO NOT MAKE ANY NON-CAP CHANGES to Crab Rationalization that will affect my business interests.**

I'd long ago protested the IFQs, but you insisted I live under and forced me to adapt to that depraved system. And, I and my crew have.

Please don't jerk us around anymore!

Respectfully yours,



Ludger W. Dochtermann; POB 714; Kodiak, AK 99615 Tel: 907-486-5450

May 31st, 2016

Darren Platt

F/V Agnes Sabine, Kodiak

To the North Pacific Fishery Management Council

ITEM Crab 16-020

The Bering Sea crab program has almost entirely deprived Alaskans of one of the most valuable in important fisheries in the state. As the industry appears to thrive, no new entrants are able to access this fishery, crew shares have been slashed, jobs have been lost, and the market for king crab is run by only a handful corporations. Even if one could afford quota, it rarely enters the open market, so it's difficult to imagine how economically efficient this industry really is without meaningful competition and innovation that would accompany greater access. Not only have we lost jobs and the cultural heritage of the crab fishery, but the value of the fishery itself is likely highly depressed by inhibiting free enterprise and risk taking that accompanies the ambitions of smaller businesses which are effectively locked out of BSAI crab fisheries.

The council should reconsider and reconstruct this program to return to ordinary americans access to BSAI crab fisheries.

I am a commercial fishermen in Kodiak, Alaska.



ALASKA

Bering Sea Crabbers

May 31, 2016

Mr. Dan Hull, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, Alaska 99501-2252

Re: June 2016 Council Meeting – Agenda
Item C-3, Bering Sea/Aleutian Islands
Crab Rationalization Program 10-Year
Review



Dear Chairman Hull and members of the North Pacific Fishery Management Council:

This comment letter is submitted on behalf of Inter-Cooperative Exchange (“ICE”), a Crab Rationalization program cooperative whose members harvest approximately 75% of the Bering Sea and Aleutian Island crab allocated under the program, and Alaska Bering Sea Crabbers (“ABSC”), a trade association whose members hold approximately 70% of the harvester quota shares issued under the program.

ICE and ABSC commend the Council staff for providing a remarkably comprehensive, thorough, and balanced review of the program. The staff has done an extraordinary job of comprehending one of the most complicated fishery rationalization programs in existence, and describing it in a clear and accessible manner. Throughout the process of preparing the report, the staff has been open, transparent and responsive in its communications with program stakeholders, and that is deeply appreciated.¹

The 10-Year Review report reflects the program’s many successes in addressing the eight issues identified by the Council at the inception of the Crab Rationalization program. The BS/AI crab resources are being harvested and processed on a safe and sustainable basis; excess production capacity has been reduced; previously overfished stocks have been rebuilt; efficiency and resource utilization have improved; delivery term negotiation has stabilized; and community stability has been enhanced.

Items of concern highlighted by the Council during the program’s 5-Year Review have been, and continue to be, addressed through stakeholder collaboration and co-management. ICE has adopted a “right of first offer” to provide crew members and vessel owners with better access to the quota share market, and voluntary lease rate caps have been implemented to address Council concerns regarding

¹ Please note that our comments concerning the Ten-Year Review report only extend to the document prepared by the Council staff, and not to Appendices A, B or C. ICE and ABSC representatives are still in the process of reviewing the Appendices, and will provide comments on them at the meeting.

the distribution of fishery revenues. Cooperative reports and Council feedback regarding active participation, lease rates, and crew compensation mark a unique and innovative approach to addressing some of the most complex aspects of fishery rationalization.

Given the multitude of program successes and the flexibility available to address potential concerns in the future, ICE and ABSC do not believe any Crab Rationalization program revisions are warranted.

We appreciate the opportunity to comment, and look forward to participating in the program review at the upcoming meeting.