

- The majority of the catch will occur in State water

The May report of the Crab Plan Team recommends: *"The 2015/16 specification is unchanged from the 2014/15 specification (an OFL of 123,867 lbs and an ABC of 74,000 lbs) that was recommended for the 2013/14 season by the SSC as a value that would "be sufficient to allow for bycatch and groundfish prohibited species catch in non-directed fisheries and the proposed test fishery catch."*

There is no survey done in Area O to provide the basis for revising the Aleutian wide OFL. As a tier 5 species, the OFL is a function of average historic catch. With no directed fishery, the 'historic' catch never changes, so the basis for calculating the OFL won't change.

There is no more basis for an OFL that combines Adak RKC with Petrel Bank RKC than there would be for combining Dutch Harbor RKC with Bristol Bay RKC.

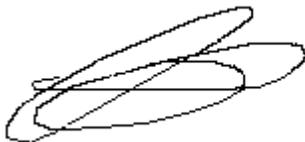
ADF&G is the appropriate agency to take full responsibility for management of a small scale RKC in the Adak District in a manner that is calibrated to the local crab abundance.

The analysis in Amendment 24 for the removal of the twelve crab stocks (including Dutch Harbor RKC) was very succinct. It consisted of just 2 pages in section 2.6 of that document (attached).

We request that the Council initiate a discussion paper, focusing on the criteria identified in Amendment 24, to consider removing RKC in the Adak District of Area O from the BSAI Crab FMP.

Thank you for your consideration of our request.

Sincerely,

A handwritten signature in black ink, appearing to read "dave fraser". The signature is stylized and somewhat cursive, with overlapping loops.

dave fraser
ACDC

