



ALASKA
Bering Sea Crabbers

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January 27, 2015

Mr. Dan Hull, Chairman
Mr. Chris Oliver, Executive Director
North Pacific Fishery Management Council
605 W. 4th Avenue, Suite 306
Anchorage, Alaska 99501-2252

Re: Public Comment on February 2015 NPFMC Meeting, Agenda Item D-2

Dear Chairman Hull and Mr. Oliver,
Alaska Bering Sea Crabbers (ABSC) is a trade association representing approximately 70% of the Quota Share (QS) in the Bering Sea/Aleutian Islands (BSAI) King & Tanner crab fisheries. As fishermen with a vested interest in the sustainable management of the BSAI crab resource, we appreciate the opportunity to provide you with comments regarding the Draft Work Plan for the BSAI Crab 10 Year Review.

As mentioned in the Draft Work Plan, the BSAI Crab Rationalization Program was reviewed 18 months after implementation, 3 years after implementation, and then again 5 years after implementation. In short, this program has been thoroughly reviewed and analyzed since its implementation. These reviews have shown the Program has met and/or exceeded the expectations and objectives that were established by the Council during its development. The resource is abundant and in most cases the biomass is increasing; bycatch and associated mortality (including deadloss) are at manageable levels and do not appear to be negatively impacting the overall health of the resource; there is enough flexibility in the Program such that harvesting and processing capacity can be aligned to the appropriate level of effort necessary to prosecute the fishery; the economic stability brought about by this Program ensures that harvesters, processors, and coastal communities are all able to benefit financially from the fishery and make long-term investments with an eye to the future; and probably most importantly for fishermen and their families, the fishery is safer than ever, with very low levels of occupational loss of life and injury. With respect to the implied goals of the Program, as described in the Draft Work Plan, we contend these goals have also largely been met and initial expectations have been greatly exceeded as well.

Not only has the BSAI Crab Rationalization Program met and/or exceeded the original expectations of the Council, the Program should also be viewed favorably when reviewed according to the goals and requirements of a LAPP as defined under the MSA. Additionally, the Program is consistent with the 10 National Standards in the MSA. And we believe the Program largely adheres to the principles described in the NOAA Catch Share Policy, despite the fact that the Program was initiated several years prior to the publication of the Catch Share Policy document.

Given that the BSAI Crab Rationalization Program “stands up” well when considering the aforementioned review criteria, the frequency with which the Program has been reviewed in the past, and the multiple other issues the Council currently has “on its plate,” we urge the Council to prioritize its time and resources carefully when finalizing this Draft Work Plan.

The 10 Year Review should limit its scope to issues that meet the following criteria:

- The Council should put particular focus on changes and impacts that have occurred within the past 5 years of the program, as per staff recommendation (p. 9).
- We agree with staff (p. 9) that it is important to not re-open issues for which the Council has determinedly decided action (or no action).
- We agree that it makes a great deal of sense to highlight the adaptive management process that has become a hallmark of this Program.

Moving forward, we welcome the opportunity to work with the Council and staff to finalize this Draft Work Plan. Furthermore, we look forward to December 2015 when the initial 10 Year Review is scheduled for Council consideration. We feel this review will show the Program has met or exceeded all of the objectives identified in the original Problem Statement. We feel the review will show this Program, as measured by any other criteria including the MSA and the NOAA Catch Share Policy, is a model that other catch share programs should seek to emulate.

We feel the 10 Year Review will demonstrate that co-management of the crab fishery works. Particularly in the last five years, the Council seems to have moved towards a model of management whereby the Council outlines broad policy objectives, then provides industry with the framework under which to achieve these objectives, then largely tasks the industry with developing the specific management measures to achieve the policy objective within the prescribed framework. We feel this approach offers the most promise in terms of crafting policy that is aligned with the public interest, but also allows for meaningful economic opportunities for participants. We have been highly gratified to see the Council moving in this direction and hope to continue down this road in the future. Please feel free to contact me at the information provided below if you have any questions or need additional information.

Highest Regards,



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VIA ELECTRONIC MAIL

January 27, 2015

Dan Hull
Chairman
North Pacific Fishery Management Council
Npfmc.comments@noaa.gov

RE: E-1 Staff Tasking

Mr. Hull:

On behalf of the City of Adak, Alaska we are requesting the NPFMC to address an issue with CR crab landing requirements as addressed in 680.7(b)(3). The currently written regulation states, in part, that a complete offload must be made before resuming harvesting crab.

We have the distinctive asset of having the only airport in the Aleutians served by a national air carrier, Alaska Airlines, utilizing jet aircraft under the Essential Air Service program. For years the City, community and processing plant have sought ways to maximize the capacity of the jet aircraft, especially on the backhaul capacity from Adak to Anchorage. We seek these capacity utilizations in order to reduce or potentially eliminate the amount of subsidy required from the U.S. Department of Transportation.

Recently the City has become integrally involved with the success of the Adak processing plant, notably with the investment in acquiring the plant's equipment during an auction in 2013. We have recently completed a deal with a new, entrepreneurial processor that has the potential to add significant value to the resources coming across the docks.

The new plant operator successfully completed several test shipments of live crab and is working with Alaska Airlines to ensure essential capacity is maintained and available for this opportunity. Unfortunately, the aforementioned regulation brought to the forefront an issue that will jeopardize the success of this venture and our goal of ensuring the sustainability of the Essential Air Service for Adak. Without the service provided by Alaska Airlines, the community would be irreparably harmed and the costs to both the community and the Essential Air Service program would substantially increase, if bids from 2012 were any indication of cost and impact to Adak.

The current plant operator does not have the capacity to accept a full offload of a crab-harvesting vessel. While this will change as the operator succeeds in their efforts, this investment will be long-term, as it should be. Having seen the impact of the regulation, we find the reasoning difficult to justification for this regulation, for example, a vessel delivering a premium product to Adak, in order to maximize the value of the product would be unable to operate efficiently, as multiple trips would have to be made to Dutch Harbor. This defeats the entire purpose of maximizing the value of the product, especially for the community allocation, managed by the Adak Community Development Corporation.

We hope the NPFMC will take into consideration a regulatory amendment to modify 680.7(b)(3) regulation to allow an exemption to the "prohibition", for WAG crab landed in the west region. The City, in conjunction with the Adak Community Development Corporation, believes by making this adjustment, we will have the flexibility to develop the live crab shipment program that will provide maximum value to the fishery and the community, utilizing the assets Adak has acquired.

We thank you for your time and hope you will consider our request.

Sincerely,

A handwritten signature in blue ink, appearing to read "Layton J. Lockett", with a long horizontal flourish extending to the right.

Layton J. Lockett
City Manager