Mr. Simon Kinneen, Chairman North Pacific Fishery Management Council 1007 West Third, Suite 400 Anchorage, AK 99501

Drs. Sherri Dressel and Franz Mueter, Co-Chairs Scientific and Statistical Committee North Pacific Fishery Management Council 1007 West Third, Suite 400 Anchorage, AK 99501

**RE: C1 BSAI Crab Specifications** 

Dear Council Members and Scientific and Statistical Committee:

At the moment, these are incredibly precarious times for the Alaska crab industry. We are at historical lows on the bottom trawl survey and their lows might continue for a few years. These fisheries were Rationalized in 2005 and reduced the fleet from 225 boats to around 50, this was done to improve the safety and economic stability of the fishery. We keep consolidating as the fishery gets smaller. This is the first collapse of a rationalized fishery since these programs were set up.

With a 200 million loss in revenue ex-vessel price last year alone. This devastation is sending ripples throughout the industry in local Alaskan communities, Processors, support businesses, and banks affecting thousands of people. I am hoping that we find a better solution to this instead of a total shutdown of the fishery.

I ask that you find some flexibility in the system to keep us alive for the future. Even a small directed fishery in King Crab, Snow Crab, and Bairdi crab fisheries. The footprint of these 50 boats fishing 175 pots or so each is pretty small at this stage but could keep us going until the fishery rebounds.

On Bering Sea Snow Crab we ask that you set some level of harvest for the 2022\23 season. Given the uncertainty of the survey and numbers harvested and the uncertainty of crab not captured in the trawl survey, having pots fished will give us a better idea of what is on the grounds. The least we should have is 4.35 million animals, other sectors are allowed that in bycatch, so our sector should have that in line with the Magnuson-Stevens Act requirement to allocate fairly and equitably among sectors and to consider the needs of fishing communities and the vessels.

Bristol Bay King Crab has gotten so close to an opening two years in a row. Since no re-tows were done at the end of the survey, I think it warrants us to set some gear and find out how the stock is doing. Again, the 50-boat fleet fishing is going to have a small impact on the grounds and would give us vital information on what is going on.

We need to have a small fishery to keep our vessels maintained, our crews working, while still being able to support our Alaskan communities, local businesses, and our processors to keep our markets alive across the U.S.A.

This year I saw high numbers of Snow Crab up SW of St Matthew Island in April. Pots had 250-400 crab in them. On April 31<sup>st</sup>, it was like a light switch was thrown and numbers dropped to very low and the fishery rolled like that until closing. With this being said, we towed pots on muddy bottom and got lots of pots with mud mixed with crab. This told me crab was down there but not feeding and going into the gear. Crabs are a strange species and are very susceptible to tides. We are also facing some of the biggest tides in 20 years. It would be interesting if scientsits would look at any correlation with big tides and low survey crab catch. All this being said, there are a lot of anomalies that rule the crab world. So, basing one trawl survey on this crab is not enough. I think we need to get some gear out there and see what we come up with.

The vessels that remain have a strong history in this business. When I bought my first crab boat it was 2011. I have invested heavily in building quota and updating my vessel since then. Two years ago, I purchased another vessel, the Confidence, a long fishing vessel that has been in the Bering Sea fishing since 1969. The Persons we bought the vessel from are still active with quotas and are a vital part of our fishing plan. We have 11 crew working our decks that have families that depend on us. I ask that you take a hard look and come up with a plan to keep us fishing. We are already facing making hard choices on vessel maintenance and spending on upgrades to make our operation better. If we lose our experienced crews and the fishery comes back it's going to be a big safety concern trying to train up new personnel for the Bering Sea. My friends in Dutch Harbor that have businesses there are struggling. Hydraulic work, welding, supply stores all comment that things are not looking good in the town. They count on our business in the fall. Its a team effort on all of us to support each other to survive. I have worked hard and built up a solid business. I'm living "the American dream" as a small, independent family business. I would like to continue operating and see that we rebuild our fisheries back up to where they should be.

At the beginning of rationalization, it was preached to me about how manageable the fisheries would be under this program under NOAA's national policy. Our fishermen, Processors, communities, and support businesses are facing devastation never seen. Another closure will devastate new entrants in the business like myself and the crew that have bought quota. Exactly what Rationalization Programs are supposed to encourage. I am not sure if we can look at the young guys whom we told to invest in this fishery and how they will make payments or see a future, if everything they have worked hard for is closed down. As a fleet, we need around 100 million dollars gross to survive. If we take some action to open up fisheries to make the bare minimum of this gross number to the fleet this would help us.

Please think outside the box and have some flexibility in management and science. A new and creative way forward is needed for a creative solution to the dilemma we are facing.

Sincerely,

Oystein Lone

Owner-operator F/V Pacific Sounder and the F/V Confidence