## RE: C1 BSAI Crab – SAFE report, ABC/OFL; Plan Team report

Mr Chairman and Council members, At the council's October 2013 meeting a request from Norton Sound stakeholders asked the council to consider eliminating latent permits from the Norton Sound Red King Crab fishery. The council heard mixed testimony on that from Norton Sound residents at their June 9, 2014 meeting held in Nome, Alaska. The council asked stakeholders to work together with the CDQ group on possible solutions. No solutions were reached. The council's decision at that time was no action. Since that 2014 meeting a number of participants have purchased latent LLP's, or added additional vessels in an effort to be included in the advent of a rationalization occurrence. The number of Norton Sound vessels revolving in and out of the fishery is growing. An estimated 22 vessels from Norton Sound have come and gone, some successful and some without the ability to meet expenses. Each time a new vessel comes into the fishery another one or two exit. A larger number of participants from the 90's and 2000's are no longer in business. In 2019 the summer commercial NS Red King Crab fishery opened June 25, and closed September 3. A harvest level was set at 150,000 pounds, only 78,000 pounds was reportedly harvested. A disaster declaration was announced for 2019. In past seasons where harvest levels were over 500,000 pounds, the fishery was completed in 3 weeks. ADFG Area management planned to open the Norton Sound Red King Crab fishery in 2020, but at the urgency of a variety of stakeholders the fishery was closed. The fishery was opened in 2021, no harvest took place due to no buyer. Ancillary affects from the closed fishery has created hardships for processors, small businesses, deckhands, and communities who provide support services to the fishery. Over the past 25 years, a number of fishers have heavily invested in people, knowledge, time, and money for their success and the success of the fishery. Fishers are struggling to maintain vessel safety, and all aspects of their operations. Future openings are anticipated and slight rebounds in harvestable quota are expected. Those who have invested fear they may be in the "revolving door", of vessels exiting the fishery. Please consider full rationalization and elimination of the under 32' vessel exemption for Norton Sound's "small boat" super exclusive fishery. Rationalization will eliminate bankruptcy. Rationalization will provide efficiency, cooperation, economic stability, fishing safety, fishery conservation, market development and social benefits. Rationalization is necessary for survival of resources, and struggling operations. Don Stiles F/V Golovin Bay Nome, Alaska 99762