

Aaron Overland
Dock Street Brokers
05/31/2024 11:26 AM AKDT

RE: D2 BSAI Crab Program Review – Review Report

To Whom It May Concern Dock Street Brokers supports council action to ease eligibility requirements for BSAI CVC/CPC ownership and acquisition, and to increase CVC/CPS use caps. As a broker of these harvesting privileges, I have a unique perspective into the unintended consequences of overly burdensome regulations in a struggling fishery. The current requirements are too challenging to satisfy during low harvest levels and ongoing closures. The current state of the fishery has reduced crew participation, opportunity, and wages, resulting in a notable lack of qualified recipients. This issue has been exacerbated by the low use cap levels relative to CVO/CPO. By easing the criteria for eligibility and increasing CVC/CPC use caps, the council will provide stability to the c-share market, for individuals both exiting and entering the fishery. Thank you for your consideration. Sincerely Aaron Overland Dock Street Brokers