



May 3, 2021

Mr David Witherell
Mr Simon Kineen
North Pacific Fishery Management Council

Re: Eastern Aleutian Islands Golden King Crab Facility Use Cap

Dear Council Members;

We are writing today to request that the Council initiate an action to remove the Eastern Aleutian Islands golden king crab ("EAI GKC") facility use cap. It constrains competition, it's an obstacle to the industries efforts to develop the Live king crab market, and it has created some unanticipated risk for at least one independent PQS holder; without any discernible benefit to EAI GKC processors, harvesters or communities.

Royal Aleutian Seafoods ("RAS") and GKC Holdings have been working together to develop Live king crab markets, based on the EAI GKC fishery. At the same time, Ocean2Table Alaska ("O2T") has been working with Golden Harvest Alaska Seafood (now defunct) in a similar effort to develop Live markets.

O2T would like to have the option of collaborating with RAS and GKC Holdings in the further development of these markets; but is unable to because of the facility use cap. O2T has a ROFR with Unalaska Crab; and with RAS unavailable it leaves only one other alternative for processing in Unalaska Dutch Harbor in accordance with the facility cap and ROFR regulations.

It is worth noting that approximately 25% of the EAI GKC PQS is now held by independent entities whom are not processing plant owners. These PQS holders play an important role in insuring that there is a vibrant, competitive market amongst processing plant owners; yet this entire group of processing quota holders are constrained by the cap.

Every other Crab Program fishery has custom processing exemptions that allow processing plants to operate without a facility cap. EAI GKC is the sole exception. As our later analysis will show, the RIR/IRFA never addressed how this sole exception helped advance the Council's goals (Amendment 27) or what benefits were expected by restricting this single fishery.

Please initiate an action to remove this cap, consistent with the regulatory requirements established in the other Crab Program fisheries.

Sincerely,

A handwritten signature in black ink, appearing to be "S. Minor", written over a light blue horizontal line.

Steven K Minor
Ocean2Table Alaska, LLC