



December 1, 2023

Ms. Angel Drobnica, Chair
North Pacific Fishery Management Council
1007 West Third, Suite 400
Anchorage, AK 99501

RE: Comment on Agenda Item C2 (Crab Facility Use Caps – Final Action)

Dear Chair Drobnica and Council Members:

The Alaska Bering Sea Crabbers (ABSC) is a trade association representing the majority of independent crab harvesters who commercially fish for king, snow (opilio), and Tanner (bairdi) crab with pot gear in the Bering Sea and Aleutian Islands (BSAI) Crab Rationalization Program. We appreciate the opportunity to comment on Agenda Item C2 – Crab Facility Use Caps – Final Action.

ABSC supports Alternatives 2 and 3. These alternatives would provide more flexibility and efficiency for crab processors, especially in times of low quotas. As we saw during the most recent Bristol Bay red king crab season, few processors wanted to handle small volumes of crab which risked stranding available harvest. This was exacerbated by the dwindling number of processors available that are affiliated with a facility. Alternatives 2 and 3 would add much needed flexibility to the facility use caps in the Crab Rationalization Program and allow more custom processing and development of new products and markets.

Thank you for considering our comments.

Sincerely,

A handwritten signature in blue ink, appearing to be "J. Goen", is written over a horizontal line.

Jamie Goen
Executive Director
Alaska Bering Sea Crabbers