

March 13, 2017

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VIA U.S. MAIL & EMAIL

Mr. Glenn Haight
Executive Director
Alaska Board of Fisheries
P.O. Box 115526
Juneau, Alaska 99811

Re: Board of Fisheries Proposals 250, 255 and 256

Dear Mr. Haight:

The North Pacific Crab Association (NPCA) is comprised of all the crab processing entities that operate in the Bering Sea Aleutian Islands (BSAI) crab fisheries. We appreciate the opportunity to comment on proposals 250; 255; and 256 before the Board of Fisheries.

Each of these proposals would enact operative changes in the commercial crab fisheries that would allow for potentially significant processing issues due to mixed species loads of crab being delivered at the same time. Because the seasons for these crab fisheries are short and intense, mixed loads of crab can and have presented difficulties with processing. In the past mixed loads of crab, arriving at the same time, resulted in processing problems that included deadloss and delays to harvesters caused by having to manage such mixed loads. Under the new rationalized crab program, processors are matched with harvesters creating a binding contractual relationship. Once matched with a harvester the processor is obligated to purchase all delivered crab. If that crab dies due to delay and problems associated with mixed loads the processor is required to make the harvester whole. That is a very significant problem.

The NPCA has supported and continues to support the Board of Fisheries and the Department revising its harvest strategy to allow for discrete commercial seasons for crab species harvest. We have provided the Board of Fisheries with testimony supporting a small discrete bairdi tanner crab harvest. We remain hopeful that the Board and Department will continue to consider such harvest strategy changes. We are certain that allowing distinct and separate crab fisheries are

Mr. Glenn Haight
March 13, 2017
Page 2

superior management tools to the proposals that will allow for contemporaneous mixed load fisheries.

Thank you for considering our views on these proposals.

Sincerely,

NPCA

A handwritten signature in blue ink, appearing to read "L. John Iani", is written over the typed name.

L. John Iani

LJI:tm