

**PACIFIC NORTHWEST CRAB INDUSTRY ADVISORY
COMMITTEE (PNCIAC)
8941 179th PL SW
Edmonds WA 98026**

March 05, 2018

Mr. David Witherell
Executive Director
North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252

Agenda Item B2: NMFS Management, PNCIAC

Request for an FMP Amendment to Allow for Partial Deliveries of BSAI CR Program Crab

Dear Mr. Witherell,

Recently, the Pacific Northwest Crab Industry Advisory Committee (PNCIAC) unanimously approved a motion asking the North Pacific Fishery Management Council to consider an FMP amendment that would allow partial deliveries of all BSAI CR species.

When the BSAI Crab Program was implemented, a regulation was put in place that requires a vessel to off-load all of its crab before returning to fishing; even if it means that the vessel must call on several processors or ports to complete its off-load (aka a “split delivery”). In 2016 the NPFMC approved an amendment that allows partial deliveries in the Western Golden King Crab fisheries, but the prohibition remains in effect for all other CR Program species.

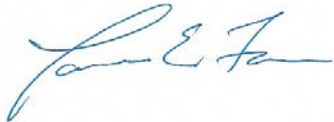
Now that the Program is more than ten years old, this rule does not seem to address any existing or perceived problem and in fact creates some inefficiencies and potential problems for both harvesters and processors. We request that the NPFMC consider an FMP amendment that would allow partial deliveries for all CR Program species. Such an amendment would give the fleet and processors some additional flexibility and address the following concerns:

1. This amendment could help further address the North Region problems anticipated in the “Emergency Relief” regulations by allowing harvesters to deliver partial loads to processors during a processors slow periods; thus shortening the time needed to prosecute the fishery (and increasing both harvesters and processor efficiency).

2. This amendment could help in the development of new product forms by allowing harvesters to deliver partial loads to meet flight schedules (in the case of live or fresh cooked crab) or particular market opportunities.

3. Under the current regulations, a harvester who wants to deliver a partial load to St. Paul (as an example) may be required to travel all of the way to Akutan or Dutch to complete the off-load before the vessel can return to the grounds. This is not only inefficient for the harvester, it leaves his/her gear on the grounds untended for an unreasonable length of time, with the attendant resource consequences.

Thank you for your consideration,

A handwritten signature in blue ink, appearing to read "Lance Farr". The signature is fluid and cursive, with the first name "Lance" and last name "Farr" clearly distinguishable.

Lance Farr, Chairman
PNCIAC