My name is Howard Rau. I've been a golden crab fisherman for 25 years and a member of the Golden Crab AP for 15. First thing on the ACL, I'd like to comment action 26, establish annual catch limits and optimum _____ for golden crab. I would like to recommend the council adopt alternative number two, ACL=OY=ABC=two million pounds. By adopting this value coupled with the introduction of the RSW systems, this should allow the golden crab fishery to finally develop to the point that golden crab can now stand on its own and not be used as a substitute for other species. This product may be sought after worldwide.

In action 27, I believe both two and three need some change, some correction. First, in alternative number three, "If the ACL is exceeded, the regional administrator shall publish a notice to reduce the ACL or ACT in the following season by the amount of the overage," I think what should be added to this would be – added to this alternative – the word "or increased" so it would read, "If the ACL is exceeded or not exceeded, the regional administration shall publish a notice to either reduce or to increase the ACL or the ACT in the following season by the amount."

Okay, that was three. Now, alternative two, I think this needs to be corrected. "After all the ACL is projected to be met, all harvest purchased and sale of golden crab is prohibited." I think this needs to be corrected to, "After the ACL is projected to be met, all harvest of golden crab is prohibited within the jurisdiction of the South Atlantic Council." Changing alternative two would protect future landings from the Gulf of Mexico and areas beyond EEZ and to process crab from the frozen fisheries.

I think an electronic monitoring process should be used in a weekly manner instead of a monthly manner. This would allow fishermen to better know when the closure of a quota may occur as to not be penalized in the following year.

And I'd like to comment on amendment five. I'm not in favor of catch shares for every fishery, but when certain unique circumstances occur within that fishery, a new management approach needs to be taken. With the implementation of RSW systems, a new higher price structure has developed in the last year. This has caught the attention of people on the outside looking in on a very attractive developing fishery. If you look at the two gold rushes that occurred in the fishery in the 90's, new entrance came in and left leaving their traps in the ocean for one reason or another. These fishermen were unfamiliar with the fishing hard bottom and a five knot gulfstream. We now know the fishery is located within a fragile habitat that needs fishermen with experience and knowledge to work these areas without incidence. Historical participants who have been in favor for many years would be best able to perform these operations. By instituting a catch share program, I believe a great deal of stability can be gained, not only in the fishery, but also in the marketplace, therefore I would like to recommend the council continue to pursue the development of the amendment five. Establish a catch share program for the golden crab fishery.

As being a member of the Golden Crab AP who helped along with staff put this document together, it is an extremely complex document for me and others to understand,

and therefore I request a complete analysis as soon as possible of all 23 actions. I would also like to see an analysis done on catch history using permit history as a criteria.

[End of Audio]