


MEMORANDUM

TO: Council, SSC and AP Members

FROM: Clarence G. Pautzke
Executive Director 

DATE: April 15, 1999

SUBJECT: Crab License Limitation (LLP) Eligibility

ESTIMATED TIME
2 HOURS

ACTION REQUIRED

Consider revising October 1998 action for recent participation requirements.

BACKGROUND

During their June 1995 meeting in Dutch Harbor, the Council adopted a license limitation program for the Bering Sea/Aleutian Islands crab fisheries. That program was accepted by the Secretary of Commerce, and was expected to be implemented on January 1, 2000. However, prior to the original program being implemented the Council voted, in October 1998, to amend the qualification criteria. That amendment reduced the number of vessels that would qualify for a license by adding a new recent participation requirement.

The original crab data set developed for the Council indicated that 365 vessels would qualify for a crab license, when the Norton Sound summer red king crab fishery was excluded. Those vessels were expected to be issued the endorsements listed in the text box to the right under the Original column heading. When the Council selected alternative 9 the numbers of vessels were expected to be reduced to 298, including the <60' exemptions. The number of endorsements expected to be issued for each species are included in the Alt. 9 column of the box. These numbers show that the number of vessels that would qualify for the program are reduced by 67 under alternative 9.

Species/Areas	LLP Endorsements	
	Original	Alt 9
Tanner crab	323	279
Adak brown king	27	23
Adak red king	31	29
Bristol Bay red king	336	279
Dutch Harbor brown king	21	18
Pribilof red/blue king	175	155
St. Matthew blue king	201	183
Total Number of Vessels	365	298

NMFS is currently developing a data base to implement the LLP program. That source is considered the best information available. Preliminary estimates indicate that the numbers of vessels and endorsements will be lower than those reported in the text box above. Hopefully those estimates will be available by the Council meeting.

The data to determine eligibility for the crab LLP is based on fish tickets collected and compiled by ADF&G. Discrepancies between estimates are likely due to ongoing changes and updates to the fish ticket data sets as ADF&G continues to improve the quality of those files. We have not requested independent estimates of eligible

vessels from ADF&G , rather, responsibility will lie with NMFS to determine the list of eligible vessels based on the criteria chosen by the Council. While the exact number of eligible vessels remains in question, our best current information indicates that the estimates provided in this April 1999 action memo likely overestimates the number of eligible vessels and endorsements.

Taking no further action at this meeting will reaffirm the Council's intent to adopt Alternative 9. If the Council does wish to amend the October action they may select an alternative from the August 1998 LLP package (summarized under Item C-4(a)), or direct staff to develop additional alternatives for a final decision at a future meeting. Delaying a final decision on the LLP package will likely impact NMFS ability to have the program in place by January 1, 2000. As discussed in October, interim licenses could be issued in the year 2000.

The AP took action on this issue in November 1998. They requested that the Council take no further action on this issue, under the LLP heading. Their minutes state:

"The AP believes that ... elimination of latent capacity in the crab fisheries was adequately dealt with by Council action in October 1998, and that further catcher vessel restrictions for vessels fishing in co-ops shall also restrict their catch from exceeding the aggregate of their traditional catch as far as SB 1221 is concerned. Motion carries 10/8/2."

The AP then went on to request that the Council direct staff to develop an amendment package looking at measures to mitigate the impacts of S1221 on the crab fisheries. Those measures were further revised in February and are incorporated in the AFA sideboards analysis you are considering under Item C-3.

Summary of Licenses Under Various Crab LLP Alternatives

Table 1 contains a summary of the number of licenses and endorsements that are projected to be issued under Alternative 9. If the Council takes no action on crab LLP at this meeting, these are the crab licenses that are expected to be issued in 2000.

The number of vessels and endorsements are slightly different from those reported in October. The changes are primarily due to exemptions included within the Council's preferred alternative and updates to the vessel transfer information. Excluding vessels that were added to the list of qualifiers through an exemption, the number of qualified vessels increased by 13 over those reported in October. Four vessels were added because of corrections to the qualification data base. The remaining additions were made because of updates to the transfer data.

Table 1. Number of Crab Licenses and Endorsements Under Alternative 9

Vessel Length	Number of Vessels	BSAI Tanner	D.Harbor Brown	St.Matt. Blue/Red	Prib. Blue/Red	Adak Brown	Adak Red	B.Bay Red
<60'	14	2	-	-	12	-	-	4
60-124'	199	193	10	126	105	12	21	192
≥125'	84	83	8	57	37	11	8	82
Total	297	278	18	183	154	23	29	278

Note: Excludes vessels only qualified for a Norton Sound endorsement, vessels under construction, and the 1998 landings exemption.

Table 2 shows the number of vessels and endorsements that were expected to be issued under the original crab LLP passed by the Council in June 1995. A total of 365 vessels were projected to have qualified under this alternative. This is 68 more vessels than would qualify under Alternative 9.

Table 2. Number of Crab Licenses and Endorsements Under the Original (June 1995) LLP Program.

Length Class	Number of Vessels	BSAI Tanner	D.Harbor Brown	St.Matt. Blue/Red	Prib. Blue/Red	Adak Brown	Adak Red	B.Bay Red
<60'	14	2	-	-	12	-	-	4
60-124'	253	226	11	137	122	16	22	239
≥125'	98	95	10	64	41	11	9	93
Total	365	323	21	201	175	27	31	336

Note: Excludes vessels only qualified for a Norton Sound endorsement, vessels under construction, and the 1998 landings exemption.

Tables 3 and 4 are updated summaries of the number of vessels that are projected to qualify under Alternatives 2 through 11, and the number of endorsements issued by fishery within each alternative. The Table reporting

the number of vessels is broken out by the three vessel length classes. This format of reporting vessel classes is slightly different from that used in the LLP EA/RIR document reviewed at the October meeting. Recall in that document the vessel classes provided more detail on the characteristics of the vessels that would qualify. For example, there were categories including Factory Trawlers, Pot Cvs 60'-124', and Trawl Cvs 60'-124'. However, it was not possible to determine exactly how many vessels were in each of the three length classes.

Table 3. Number of Vessels Under Alternatives 2 through 11

Alternatives	Qualified				Not Qualified			
	0-59'	60-124'	125'+	Total	0-59'	60-124'	125'+	Total
Alt. 2: 1996	14	175	74	263	0	68	34	102
Alt. 3: 1995 & 96	14	169	67	250	0	74	41	115
Alt. 4: 1996 & 97	14	169	68	251	0	74	40	114
Alt. 5: 1997 & 98	14	143	63	220	0	100	45	145
Alt. 6: 1995-97	14	163	61	238	0	80	47	127
Alt. 7: 1996-98	14	142	60	216	0	101	48	149
Alt. 8: 1995-98	14	141	55	210	0	102	53	155
Alt. 9: Once, 1996-98	14	199	84	297	0	44	24	68
Alt. 10: Once, 1995-98	14	209	87	310	0	34	21	55
Alt. 11: Twice, 1995-98	14	188	80	282	0	55	28	83

Note: Excludes vessels only qualified for a Norton Sound endorsement, vessels under construction, and the 1998 landings exemption.

Table 4. Number of Endorsements Under Alternatives 2 through 11

Alternatives	BSAI Tanner		Adak Brown		Adak Red		Bristol Bay Red		D. Harbor Brown		Pribilof Blue/Red		St. Matt. Blue/Red	
	Q	N	Q	N	Q	N	Q	N	Q	N	Q	N	Q	N
	Alt. 2: 1996	244	79	23	4	27	4	244	92	18	3	145	30	170
Alt. 3: 1995 & 96	231	92	20	7	26	5	232	104	16	5	143	32	165	36
Alt. 4: 1996 & 97	233	90	22	5	27	4	233	103	17	4	139	36	164	37
Alt. 5: 1997 & 98	203	120	18	9	24	7	204	132	16	5	132	43	156	45
Alt. 6: 1995-97	220	103	19	8	26	5	221	115	15	6	137	38	159	42
Alt. 7: 1996-98	199	124	18	9	23	8	200	136	16	5	129	46	152	49
Alt. 8: 1995-98	193	130	16	11	23	8	194	142	14	7	128	47	149	52
Alt. 9: Once, 1996-98	278	45	23	4	29	2	278	58	18	3	154	21	183	18
Alt. 10: Once, 1995-98	288	35	24	3	29	2	289	47	19	2	159	16	185	16
Alt. 11: Twice, 1995-98	263	60	23	4	29	2	263	73	18	3	153	22	179	22

Note: Excludes vessels only qualified for a Norton Sound endorsement, vessels under construction, and the 1998 landings exemption.

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From: Mobile 430347910
Sent: Mar 19 03:59 UTC
LES Ref: 563740

Rick Lauber, Chairman

I strongly endorse the ACC's standard of no more than 250 boats in
the Berings Sea crab fisheries

Jostein J. Karlsen
F/V Aleutian No.1

RECEIVED

MAR 19 1999

N.P.F.M.C

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Chairman NPFMC
3/17/99

RE: AFA PLLOCK TRAWLERS

Chairman Lauber : I am sending you this fax form the Bering Sea as the Opilio fisheries is winding down. I don't think that the quota is going to be caught this year now that ADFG has made a clouser announcement for the 22nd of March. With so many boats in the fisheries the management of the fisheries is becoming a impossible job. The weather is going to be terrible the last week of the season and the catch rate will not preform at the rate ADFG predicted so they will come up short. They have to make the early clousure announcement because there are to many boats in the fisheries. They have to project the catch rate out to far to account for weather or the slowing of the catch rate of the vessels. The catching efficiency of the crab fleet has increased dramaticly in the last ten years. Our electronics have improved, our boats have gotten bigger and the race for the crab has gotten faster. A 250 boat fleet today probaly has the fishing power of a 300 boat fleet 7 years ago. Yet the council refuses to put a resonable cap on the LLP for crab. ADFG has said that they can't manage the fisheries efficienly with over 250 boats. I would think that 250 is too large a number I believe a number significantly lower than 250 is the ideal number. The first step the council needs to take is eliminate the crossover boats from the pollock fisheries that had a recent participation in the opilio fisheries. The pollock trawler's a had a big windfall with the American Fisheries Act, now some of them are trying to get a history in the opolio fisheries, which they haven't had any economic dependancy on in the past. The opilio fisheries is already overcapitalized and unmamagable with the , present number of boats. The council has to start cutting the number of boats elgible to fish crab to make it economicly feasable for the boats that have been dependent on the crab fisheries to stay crab boats. The American Fisheries Act took away my option to go pollock fishing if the crab stock went away. I would hope that the council take action on the LLP for Crab that would reduce the number of licenses to somewhere under 250.

Sincerely,
Lance E. Farr
Kevleen K

cc: Steve Pennoyer
John White

ALASKA CRAB COALITION

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Chief
Financial Services Division
NMFS
1315 East-West Highway
Silver Spring, MD 20910

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APR - 7 1999

N.P.F.M.C

Dear Mike:

The Alaska Crab Coalition ("ACC"), a trade association representing over 50 Bering Sea crab fishing vessels, as well as processors and service suppliers to the fleet, provides this comment on the proposed rule, published in the Federal Register on February 11, 1999, in implementation of 16 U.S.C. 1861a (b)-(e) and 46 App. U.S.C. 1271 et seq. ACC members have a strong interest in reducing overcapacity in the Bering Sea crab fisheries, for the purpose of improving both conservation of valuable resources and the safety of fishermen who depend upon these fisheries for their livelihoods.

The ACC is grateful for the enormous effort that you and your colleagues dedicated to the preparation of the proposed rule. However, the concern of the ACC with respect to the proposed rule is both fundamental and practical. We believe that the procedure provided in the proposed rule, while technically elegant, will seriously deter fishery management councils and the potentially interested industry from proceeding with buybacks of licenses to reduce excess fishing capacity. The proposed rule would require that virtually all of the time-consuming and costly procedures for implementation of a buyback be completed before an industry referendum has been conducted. We believe that, until and unless referenda demonstrate the requisite industry support for buybacks, the councils will not commit the human and financial resources to preparing FMP amendments and related draft regulations, and the vessel owners will not be willing to expend the considerable time and energy required to respond prudently and irrevocably to invitations for buyback bids.

We well understand that the procedure set forth in the proposed rule is calculated to provide, for the benefit of referenda participants, absolute certainty concerning the outcome of a prospective buyback. However, we submit that sufficient certainty would be achieved by describing for referenda participants the parameters within which a buyback would, with the requisite industry approval, be conducted. Through close consultations with the councils, hearings open to industry witnesses, surveys of industry opinion, and careful development of business plans, a high enough degree of confidence could be achieved to justify proceeding with referenda.

The NMFS is aware of the burdens confronting the councils to provide for effective fisheries management, and of the demands upon vessel owners to survive, under the extremely adverse conditions of overcapitalized fisheries. We would urge that the NMFS reflect this sensitivity in the proposed rule. By the same token, the councils and the industry are aware of the burdens imposed on the NMFS. The ACC does not believe that its suggested procedure would add substantially to the demands upon the agency.

The ACC also suggests that the rule be prospective in application, insofar as that would obviate the necessity of councils revisiting and reapproving buyback requests already transmitted to NMFS, and amending FMPs and preparing related draft regulations in advance of the industry referenda. Please remember that the councils, industry, and Members of Congress were repeatedly and categorically promised by Commerce Department officials, including the Secretary, that buyback efforts underway following the enactment of the Sustainable Fisheries Act would not be delayed by the subsequent framework regulations. We refer you to letters attached hereto, and ask that they be included in the administrative record of this rulemaking. We submit that the proposed rule would, at a minimum, greatly delay the proposed buyback for Bering Sea crab fisheries, and could even defeat it.

We agree that it would be unreasonable and impracticable for buyback participants to be required to pay for the retirement of licenses other than those in the buyback fisheries. We also agree that vessels should be permitted to continue to operate, where otherwise lawful, in fisheries other than those for which the licenses for those vessels have been retired.

The ACC strongly urges the NMFS to reflect upon the correspondence attached hereto, and accept the suggestions set forth in this comment. It would be extremely detrimental to both conservation and safety, if this rulemaking were to defeat the very purpose toward which Congress, the interested councils, and the affected industry have already dedicated such great efforts.

Sincerely,

Arni Thomson
Executive Director

Attachments.

RECEIVED

DRAFT

AGENDA C-4

APRIL 1999

Supplemental

SEP 04 1997

BOARDS

FINDINGS

The Board of Fish met in Anchorage, Alaska for three (3) days from August 25th through August 28th, 1997. Six of the seven board members were in attendance, Grant Miller having been excused by the Chairman. The meeting was scheduled in response to a Petition filed by the Alaska Department of Fish and Game (ADF&G) resulting from the 1996 harvest of Bristol Bay Red King Crab exceeding the guideline harvest level by seventy percent (70%). The meeting was originally scheduled for March, 1997 but, due to notice problems and the need for an economic report relative to the effects of pot limits, the meeting was postponed until August 25-28, 1997.

During the course of the meeting, the Board received oral and written reports from the staff of ADF&G (stock status, prior years fisheries, pending fisheries, management considerations), from Professors Greenberg and Herrmann (economic implications of pot limits), from the department of law (legal issues), from staff of the National Marine Fisheries Service (NMFS) (stock status and compliance with federal requirements under the Fisheries Management Plan (FMP) and Magnuson-Stevens), from the department of public safety (enforcement), from the United States Coast Guard (safety) and received both oral and written testimony both advisory committees and members of the general public.

At the beginning of the meeting, the Board received a briefing from both the staff of ADF&G and the department of law on the criteria of the Fisheries Management Plan, the Magnuson-Stevens Act national standards, the Regulatory Flexibility Act and Executive Order 12866. Throughout the meeting, the Board regularly referred to the standards and criteria set forth by these statutes, regulations and orders. The Board members were presented with a synopsis prepared by the Vice Chairman and reviewed and approved by the department of law, outlining the various criteria and standards to be applied in their decision making process (See RC 16).

At the conclusion of the public testimony, the Chairman appointed a committee of three (3) Board Members (Larry Engel, committee chairman, Ed Dersham and Dan Coffey). The committee conducted a three (3) hour public discussion/meeting with thirteen (13) advisors selected by the Chairman and approved by all in attendance at the meeting. The charge of the committee was to determine what regulations would be required by the Department and would be acceptable to the industry which would allow in season management of the harvest. The committee made recommendations to the full Board (See RC 26).

At the conclusion of the committee report, the Board began deliberations. Initial, the Board brought Proposal 3 to the table, substituted the committee recommendations portion of RC 26 for proposal 3 and entered into deliberations.

During deliberations, the following issues were considered.

1) Voluntary daily reporting by department selected fishermen at maximum intervals of 12 hours.

The Board's discussion centered on the issue of voluntary versus mandatory reporting. The industry favored mandatory reporting by all fishers with some time allowed to "gear up" with the proper equipment. The ADF&G staff and enforcement favored the voluntary system currently in effect.

It was noted that for a mandatory reporting system to work, it would take at least one (1) year for the entire fleet to obtain the necessary equipment. Thus, even if mandatory reporting were required, it could not, as a practical matter, go into effect until after the 1997 fishery. The Board expects that over the next two (2) years, the Department and the industry will develop a system which can be presented to the Board at its regular meeting in the 1998-99 cycle at which time the voluntary system will be reviewed. * It was further stated that if voluntary reporting proves to be inadequate to allow for in season management, the Board expects an Agenda Change Request (ACR) from the Department.

The Board opted for voluntary reporting based upon the Department's representations that it has an excellent reporting system in place and based upon the Department's experience during the 1996 fishery where the reports of the catch under the voluntary system were extremely accurate.

2) Change the running time to and from the grounds from 24 hours to 30 hours. These changes is primarily for safety reasons. They are supported by the industry, the department and public safety. The changes were acceptable to public safety, which had enforcement concerns, but felt that the safety considerations outweighed the enforcement consideration. The department noted that these changes will necessitate some changes in the department's practices and in the opening hour of the season, but these are acceptable to the department because of the importance of the safety concerns. The department stated that these changes, if adopted by the Board, can be accomplished without further regulatory action by the Board.

The Board adopted the changes in the running time to and from the grounds from 24 to 30 hours.

3) Allow the department to provide the fleet with notices of closure of the fishery with no minimum time being set for such notice. If notice of closure is less than 24 hours, baited gear can remain on the grounds after the closing of the fishery for ten (10) days (240 hours) after the closure. After closure and prior to delivery of product no vessel shall be permitted to have a line in the block and crab on board.

These changes were supported by the industry, the department and public safety. Again, these changes address safety concerns, but there are in season management considerations, by-catch considerations and enforcement considerations as well. All of these issues were discussed by the Board during its deliberations.

Allowing a late closure notice and pot storage on the grounds after the season, makes it possible for the department to manage in season more effectively. At the same time, it allows fishers to leave gear on the grounds rather than be forced to pick gear in bad weather. By prohibiting any pulling of gear after closure, but prior to delivery of product, the department of public safety's concerns were addressed.

The question of by-catch and by-catch mortality was discussed by the Board in the context of mortality during the fishery season arising from increased pot pulls and the mortality which might occur from allowing baited gear storage on the grounds. Also, in the Board's discussion was a recognition that exceeding the guideline harvest level by seventy percent (70%) is also a by-catch mortality which needs to be avoided. Unfortunately, there is not sufficient data upon which to base any firm conclusions. The Board did consider and discuss in detail the little by-catch and by-catch mortality information which it did have. Based upon that data, which is the best scientific information available to the Board, it was concluded that there would be by-catch from leaving unbaited gear on the grounds after the season, but that the by-catch mortality would not occur to such an extent so as to exceed the benefits of this practice. Also, the department will, during the course of the next two (2) years, through an on-board observer program developed with industry's cooperation, obtain additional by-catch and by-catch mortality data for consideration by future Boards.

4) Provide for sun setting of any new regulation adopted by the Board at this meeting. This proposal will insure that the new regulations are reviewed in two years as much of what may be adopted here is new and is designed to allow as much adaptive management as possible. This concept was supported by industry, the department, public safety and adopted by the Board.

It is the Board's intent that, during the course of the next two (2) years, the fishery will be conducted in such a manner so as to gather important fishery and management practices information so as to allow future Boards to better manage the fishery. The sunset provision was adopted by this Board so that this entire fishery would be examined at the next regularly scheduled meeting on this fishery.

5) The Board then considered pot storage on the grounds at locations further to the east of current pot storage locations. This proposal was favored by the industry as a way of helping the acknowledged re-allocation against small boats resulting from short seasons and low guideline harvest levels (GHLs). However, enforcement concerns, the possibility of creating a re-allocation in favor of smaller vessels and the increased efficiency of the fleet resulting from pots being stored closer to the grounds all resulted in this part of the proposal not be adopted by the Board.

6) Next, the Board considered closing the fishery when the GHL is less than 4 million pounds. The support and opposition to this proposal in the industry was split between those who felt a fishery could be allowed below this level (e.g. 2 million pounds) and those that thought that a fishery below 4 million pounds was too risky for a fishery in the rebuilding mode. The department supported a closure of the fishery when the GHL falls below 4 million pounds because the department feels that it cannot manage this fishery given the level of participation and the uncertainty of the information which creates a high risk of over fishing a depressed fishery.

In its discussion, the Board noted that the concept of optimum yield is not an annualized optimum yield. While a fishery with a 4 million pound GHL could, at current prices, be worth at much as \$16,000,000.00, the long term optimum yield from this fishery in its current rebuilding mode, is best met by not allowing a fishery at low levels of GHL.

The Board also considered that the department has modeled the fishery in the range of a 4 million pound GHL and concluded that it could manage such a fishery with pre-announce seasons, pot limits of 60-75 and vessel participation in the range of 225. At GHLs lower than this the "size of the bite" is too great and the risk of exceeding the GHL is too great. Thus, based upon the lack of knowledge of the fishery at low levels of GHL, inexperience with the new "tools" which are being provided to the department, the fears of the department as to its ability to manage the fishery at low levels of GHL and the risks of over-fishing, the Board adopted the portion of the proposal which closes the fishery if the GHL is less than 4 million pounds.

7) Tom Casey filed a proposal requesting the harvest rate be increased to 20% (its prior level before adoption of the rebuilding plan).

The majority of industry did not favor this part of the proposal. During its deliberations, the Board noted that this proposal was short sighted, could lead to over-fishing, could result in a loss of optimum yield over the long term and could be detrimental to fishing communities over time. Based on the fact that the rebuilding plan is now one year old, the cautions received from the staff of the department and the National Marine Fisheries Services (NMFS) as to what the trawl survey reveals and the fact that the rebuilding plan will be reviewed in two (2) years, the Board did not adopt this part of the proposal.

8) Finally, the Board considered the question of pot limits which was the most hotly contested issue before the Board. During its deliberations, the FMP criteria were reviewed and discussed in detail. In addition, the report from the University of Alaska professors was discussed. There was criticism of this report based upon the absence of information relative to fixed costs associated with the vessels of various sizes and how the absence of this information prevented the Board from doing an adequate economic analysis and thus being precluded from imposing new pot limits. These concerns were addressed in a series of questions to Professors Greenberg and Herzmann and to staff of ADF&G And NMFS so that the Board was satisfied that it did, in fact, have sufficient information to make an appropriate decision as to additional pot limits.

The reasons for pot limits, as discussed by the Board, are as follows:

A) Short seasons with low GHL re-allocate the fishery resource to the larger vessels which are able to carry their full complement of pots. Smaller vessels cannot do this. Thus, given the current situation in the Bering Sea Bristol Bay red king crab fishery, there has been a re-allocation of the fishery to the larger vessels. Further pot limit restrictions at low levels of GHL will address this re-allocation.

B) The fishery is in a rebuilding mode. While there is dispute as to the conservation value of pot limits and issues of handling mortality (see discussion below), the department maintains that pot limits do reduce harvest capacity and thus can be an effective management tool. The Board also believes that pot limits can be an effective management tool to prevent over fishing and to allow for in season management of the fishery.

C) To the extent practical, in season management is preferable to a pre-announced season because in season management is more likely to result in the Guideline Harvest Level (GHL) being attained. The department informed the Board that it cannot manage in season at lower levels of GHL without a reduction in the number of pots on the grounds. Without pot limits, a real danger exists that excessive amounts of gear coupled with a small guideline harvest level and a depressed (rebuilding) stock could result in over fishing.

D) As to by-catch issues, the pot limit may cause an increase in the number of pot pulls and thus cause an increase in by-catch. However, in season management with the other tools being provided to the department may cause a decrease in the handling mortality. The net effect on by-catch mortality is not known. The department will, over the course of the next two (2) years, conduct research into mortality thru a program of on board observers in the fishery. Thus, the net effect of these changes will be better known in two (2) years.

The Board, during its deliberations, stated its preference for in season management over a pre-announced season for the reason that the GHL is more likely to be reached with in season management and the risk of over-fishing of depressed stocks due to lack of knowledge and lack of control over the participation is greater with a pre-announced season. There was substantial debate over whether or not the department, with the new tools being provided to it by the Board, would be able to manage in season without pot limits. While this is an open question, the Board felt that the more conservative approach was one which imposed pots limits and allowed for in season management. In two years it may be apparent that the department can manage for low levels of GHL without these pot limits. It is this Board's stated intention that the department use the next two (2) years to develop information and management strategies that will answer these unknowns.

During deliberations, it was noted that the Board cannot, with any degree of precision, determine the catch per unit effort (CPUE), the number of pot pulls and the number of vessels which will participate in the fishery. Therefore, if pot limits are to be adopted by the Board, it is necessary to consider three variables: the GHL, the number of vessels and the number of pots. There are an infinite number of variations using these three considerations. After lengthy discussion, application of the principles set forth in the FMP as to pot limits, the Board adopted the following pot limits:

<u>Number of Vessels</u>	<u>GHL Range</u>	<u>Number of Pots</u>
less than 200 between 200 & 250	4-6 million	80-100 60-75
less than 200 between 200 & 250	6-9 million	120-150 100-125
less than 200 between 200-250	9-12 million	200-250 160-200

In circumstances where the number of participating vessels exceeds 250, the pot limits set for the 200-250 vessel range in the appropriate GHL range will be used, but there will be a pre-announced season (See also RC 26 and RC 27).

The Board then considered two additional matters:

1) With the pot limit structure outlined above, there must be early registration. The Board adopted as part of the proposal, a requirement that vessels register by the close of business on the first Friday in October.

2) In the event of a pre-announced season with the adequate reporting, the department currently has the authority and will, in the appropriate circumstances, consider exceeding the season if the GHL is not met during the period of the pre-announced season and if, in the discretion of the department, considering all of the factors which it deems appropriate, such extension is warranted.

During Board discussions, it was repeatedly noted that the rebuilding plan adopted by the Board at its 1996 meeting has only been through one (1) season. The actions which the Board took at this meeting were designed to strengthen the rebuilding plan and, at the same time, adopt new management tools and practices and increase the safety of a very dangerous fishery. The Board noted that its primary concern in its March, 1996 meeting was conservation of the resource. At this meeting, its focus, while still on the conservation actions taken previously, were more concerned with the economic and social objectives of the FMP, vessel safety concerns and the research and management objectives of the department. Further, the Magnuson-Stevens act national standard which require regulators to avoid over-fishing and to achieve on a continuing basis, optimum yield from the fishery resource, was discussed and considered by the Board in its deliberations, along with other standards such as safety of human life at sea, allowance for variations in the fishery, minimization of costs, minimization of by-catch and by-catch mortality and the effects of various aspects of the proposals on fishing communities.

In conclusion, the Board intends that these new regulations be in place for two (2) years to allow the department to manage the fishery in season and gather the necessary experience to enable it to manage this type of fishery. It is expected that there will be a complete review of the new regulations and the rebuilding plan in cycle in 1998-99.

ADOPTED by the Board of Fish at Girdwood, Alaska this _____ day of October, 1997.

John White, Chairman

RC26

COMMITTEE RECOMMENDATIONS

The committee, consisting of Larry Engel (chair), Ed Dersham, and Dan Coffey met with the appointed advisors (see attached list) from 10:30 a.m. until 1:30 p.m. The matters outlined in the Board prepared "Discussion Points" (see attached) were discussed in detail. Minutes of the committee meeting were prepared and are attached to these recommendations.

Consensus was reached on the following issues and the committee recommends adoption of these issues:

1) Voluntary daily reporting by department selected fishermen at maximum intervals of 12 hours.

-it is anticipated that over the next two (2) years, the department and the industry will develop a system which can be presented to the Board at its regular meeting in the 1998-99 cycle at which time this system will be reviewed.

-if voluntary reporting proves to be inadequate to allow for in season management, the Board expects an Agenda Change Request (ACR) from the department.

2) Change the running time to and from the grounds from 24 hours to 30 hours.

-this is primarily a safety issue which will necessitate some changes in the department's practices and in the opening hour of the season, but these can be accomplished without specific regulatory action by the Board.

3) Allow the department to provide the fleet with notices of closure of the fishery with no minimum time being set for such notice. If notice of closure is less than 24 hours, baited gear can remain on the grounds after the closing of the fishery for ten (10) days (240 hours) after the closure. After closure and prior to delivery of product no vessel shall be permitted to have a line in the block.

-this is a safety issue, but there are by-catch and enforcement considerations.

-allowing a late closure notice and pot storage after the season, makes it possible for the department to manage in season more effectively.

4) Provide for sun setting of any new regulation adopted by the Board at this meeting.

-this will insure that the new regulations are reviewed in two years as much of what may be adopted here is new and is designed to allow as much adaptive management as possible.

Change time opening time to 4:00 am

Nov-1

Inspection times delivery times

There was no consensus on the following issues:

1) Pot storage on the grounds at locations further to the east. While the industry favored this as a way of helping the acknowledged re-allocation against small boats resulting from short seasons and low GHLS, enforcement concerns, the possibility of creating a re-allocation in favor of smaller vessels and the increased efficiency of the fleet resulting from pots being stored closer to the grounds all result in the committee recommending that this part of the proposal not be adopted by the Board.

2) Closing the fishery when the GHL is less than 4 million pounds. The support and opposition to this proposal was split with those who felt a fishery could be allowed below this level (e.g. 2 million pounds) and those that thought that a fishery below 4 million pounds was too risky.

-based upon the lack of knowledge of the fishery at low levels of GHL, inexperience with the new "tools" which are being provided to the department and the risks of over-fishing, the committee recommends adopting a regulation which closes the fishery if the GHL is less than 4 million pounds.

-the committee also considered that the department has modeled the fishery in the range of a 4 million pound GHL and concluded that it could manage such a fishery with pre-announce seasons, pot limits of 60-75 and vessel participation in the range of 225. At GHLS lower than this the "size of the bite" is too great and the risk of exceeding the GHL is too great.

-Finally, the committee recognized that we are in the first year of a rebuilding plan. That requires us to be conservative in our approach to this fishery.

3) Tom Casey filed a proposal requesting the harvest rate be increased to 20%. The advisors to the committee did not favor this proposal on a vote of 10 against, 3 in favor.

-based on the fact that the rebuilding plan is now one year old, the cautions received from the staff of the department and the National Marine Fisheries Services (NMFS) as to what the trawl survey reveals and the fact that the rebuilding plan will be reviewed in two (2) years, the committee recommends against this proposal.

4) Pot limits was the most hotly contested issue before the committee. While there was some movement toward consensus among the various users, no consensus was reached. The proponents of pot limits raised their proposed limits. The opponents of pot limits moved toward some pot limit at lower levels of GHL. All parties were candid in their discussions and respectful of other parties'

positions. Given enough time (which the committee did not have) it is conceivable that a consensus could be reached. Since no consensus was reached, the committee makes the following recommendations for the reasons stated.

REASONS

1) Short seasons with low GHL re-allocate the fishery resource to the larger vessels which are able to carry their full complement of pots. Smaller vessels cannot do this.

2) To the extent practical, in season management is preferable to a pre-announced season because in season management is more likely to result in the Guideline Harvest Level (GHL) being attained. The department has informed the committee that it cannot manage in season at lower levels of GHL without a reduction in the number of pots on the grounds.

3) The fishery is in a rebuilding mode. While there is dispute as to the conservation value of pot limits and issues of handling mortality (see discussion below), the department maintains that pot limits do reduce harvest capacity and thus can be an effective management tool.

4) As to by-catch issues, the pot limit may cause an increase in the number of pot pulls. However, in season management with the other tools being provided may cause a decrease in the handling mortality. The net effect on by catch mortality is not known. The department will, over the course of the next two (2) years, conduct research into mortality thru a program of on board observers in the fishery. Thus, the net effect of these changes will be better known in two (2) years.

5) The committee cannot with any degree of precision determine the CPUE, the number of pot pulls and the number of vessels which will participate in the fishery. Therefore, if pot limits are to be adopted by the Board, it is necessary to consider three variables: the GHL, the number of vessels and the number of pots.

The committee recommends as follows:

<u>Number of Vessels</u>	<u>GHL Range</u>	<u>Number of Pots</u>
less than 200	4-6 million	80-100
between 200 & 250		60-75
less than 200	6-9 million	120-150
between 200 & 250		100-125

less than 200	9-12 million	200-250
between 200-250		160-200

In circumstances where the number of participating vessels exceeds 250, the pot limits set for the 200-250 vessel range in the appropriate GHJ range will be used, but there will be a pre-announced season.

There are two additional matters which need to be considered.

1) With the pot limit structure outlined above, there must be early registration. The committee supports a registration by the close of business on the first Friday in October.

2) In the event of a pre-announced season with the adequate reporting, the department currently has the authority and will consider exceeding the season in the appropriate circumstances.

In conclusion, the committee wants the full Board to know that its recommendations are intended to be in place for two (2) years to allow the department to manage the fishery in season and gather the necessary experience to enable it to manage this type of fishery. It is expected that there will be a complete review of the new regulations and the rebuilding plan in cycle in 1998-99.

Vessels	4 - 5.9 million	6 - 8.9 million	9 - 11.9 million	>= 12 million
>250	Pre-announced 60-75	Pre-announced 100-125	Pre-announced 160-200	200 - 250
200-250	60-75	100-125	160-200	200 - 250
<200	80-100	120-150	200-250	200 - 250

ADVISERS TO BOARD COMMITTEE

Tom Casey, Alaska Fisheries Conservation Group.

Arni Thompson, Alaska Crab Coalition

Jeff Stephan, UFMA

Garry Loncon, Royal Aleutian Seafoods, Inc.

Dick Powell

Henry Mitchell, Tyson Seafoods

Maria Painter

Greg Alexander

Gary Painter

Gordon Blue

Leonard Herzog

David Wilson

Lu Dochtermann

DISCUSSION POINTS

If we can assume we have met the first criteria of the FMP (Biological Conservation Objective) with our rebuilding plan, then the next criteria which we must address is the economic and social objective. It seems to me that the closer we get to the GHL, the better the economic and social objectives are met.

In season management versus pre-announced closure:

-the consensus seems to be that in season management is more likely than a pre-announced closure to meet the GHL

-with pre-announced closures, the likelihood of significantly exceeding or failing to meet the GHL is greater than with in season management.

The problem is that with current pot levels (and fleet efficiencies), the fishing effort is so great as to make in season management difficult, if not impossible, for the Department. The Board has the following tools which might permit in season management to take place:

- 1) Pot limits set at a level which permits in season management.
 - tiering a pot limit at various GHLs.
- 2) Reporting every 8 or 12 hours.
 - phase in (one/two years)
- 3) Allow baited pots to remain on the grounds after the end of season.
 - safety of the vessels and crews.
 - reduces time needed for in season management.
 - enforcement issues.
 - handling mortality (uncertainty).
- 4) Allow before season pot storage at the 163 degree line (currently at 164 degree).
- 5) Shorter notice for closure of the season coupled with the right to leave baited gear on the grounds for 7/10/14 days. Leaving baited pots on the grounds is not necessary with longer notice.
- 6) Increased running time to and from the grounds.

The Board also needs to decide the following aspects of various proposals:

- 1) The issue of a minimum GHL below which there will be no fishery.

- 2) The issue of increasing the harvest rate to 20%.
- 3) In the event the Board decides not to have in season management then the Board should also consider a "mop-up" fishery, if the GHL is not met during the pre-announced season. Another alternative is to allow the Dept E.O. authority to extend the season if the GHL is not being met in the pre-announced fishery.

This fishery shall be before the Board in the regular cycle in 1999. Thus, there will be two (2) more seasons before this fishery is considered again. Applying principles of adaptive management, the Board might consider adopting a menu of management tools which includes all of the options listed above and phase in the management plan over the next two (2) years.

The Board might also consider sun setting.

The Board should also make extensive findings to support its decisions. In this regard, please see RC 16.

COMMITTEE REPORT

Initially, the Chairman, stated that the committee consists of the Board members. Further, the committee's charge is to find a basis for in season management.

The Chairman then asked for the department's position. Pete Probasco stated the department's position.

- 1) Pot limit: 100-125
- 2) Vessel registration less than 250
- 3) Voluntary 12 hour reporting
- 4) If less than 24 hour closure notice, on grounds baited pot storage
- 5) 30 hour delivery window
- 6) 30 hour tank inspection window

If GHJ between 5-12 million lbs, and registration is 250 or more vessels.

If GHJ less than 5 million lbs but more than 4 million lbs, then pre-season announced season, but pot limits 60-75. No in season management.

No fishery if less than 4 million lbs.

Pete advised of the research plan involving on board observers and about the safety issues which outweigh the enforcement issues which led to the 30 hour delivery and tank inspection window.

Al Spalinger then advised the committee about the 30 hour tank inspection and the regulatory and operational changes which will enable people to get to the grounds.

Pete said we must be conservative because we lack knowledge and because the stock is in a rebuilding mode.

Rance Morrison stated that there will be no line in the block at the time of closure.

Then the chairman asked for comments on reporting. Henry Mitchell suggested we need a better reporting system. The Board should mandate a reporting systems. Suggested that the industry, the staff and the Board reach an agreement on how reporting will be done.

Everyone agreed that this is essential.

The discussion was then whether reporting should be mandatory.

The options discussed were:

- 1) Voluntary until 1999 because of gear up time and staff burden.
- 2) Industry and staff develop system for the 1999 meeting of the board.

The advisors to the committee and the staff had a round table discussion as to voluntary/mandatory. For the small boats, they would need a year to get the equipment. Rance was concerned about the quality of the data. This is a learning experience. He is worried that forced reporting may affect the quality of the data. It was agreed that we all need to be flexible and adaptive about this system of reporting.

The chairman then asked about the 30 hour delivery and tank inspection periods. Alexander noted that the 6 hour extension was very helpful. The Coast Guard also commented favorably.

This concept was unanimously endorsed.

Alexander asked for an inspection point at Point Moeller. Pete advised that he had insufficient staff to do this. Rance reported as to changes made to the system which improved the system.

The chairman then asked if the department can have authority to close the season with shorter notice. The problem is a by-catch issue based on leaving baited gear on the grounds. The department's proposal was to allow storage of baited gear on the grounds if the closure notice is less than 24 hours. The advisors then discussed and clarified this concept.

This concept was unanimously endorsed.

Next, the committee discussed the number of vessels which would preclude in season management. The department's position is that if 250 or more vessels register for the season, in season management is not possible. *

Comments were made that it is possible that more than 250 vessels would register and that the Board might want to consider a tiered pot limit about 250 vessels. Tom Casey handed out RC 18. Pete responded to the tiered pot limit concept.

Mitchell stated that pre-announced closures are in season management. He referred the committee and its advisors to RC 18. Henry stated that the department could open the season for X hours and then close early if necessary based on 24 hour reporting.

Jeff Stephens then endorsed the concept of a pot limit being tiered as the number of vessels registered for the fishery. Avoids a pre-announced fishery.

Gary Lankan stated that the elimination of the 48 hour closure gets the department out of the box. There are now new tools for the department to use and that pot limits are not necessary.

Then the committee and the advisors discussed the concept of tiered pot limits as vessel registrations exceed 250. Jeff Stephens said that we need to remember that this issue will be reviewed in two years by the full Board.

Next, the committee discussed whether or not there should be a minimum GHL below which no fishery should occur. The department's position is that this is a GHL of less than 4 million lbs. Henry and Arni supported this concept. Maria, Jeff and Tom are opposed based in part because we are at a 10% exploitation rate rather than a 20% plus exploitation rate. The discussion continued among the advisors to the effect that below 4 million lbs GHL there is too great a risk of over exploitation. The committee then heard from Gordon Blue and Gordon Kruse from the department as to the risk of over exploitation given the confidence level and the variations in the data.

After the break, Henry Mitchell made the following proposal:

- 1) Above 6 million GHL, current pot limit allowed
- 2) Between 4 and 6, move down to 100-125 pots
- 3) Below 4 million, no fishery
- 4) If more than 250 vessels, staff can reduce pots by 10% at each level.
- 5) Includes the other "bells and whistles".

Dave Wilson agrees with what Henry proposed generally.

Leonard believes that we are mandated to harvest crab and that we can do this a 3-4 million lbs GHL. Does not agree to elimination of the fishery at below 4 million lbs GHL.

Greg supports the threshold of 4 million lbs GHL. Tom does not support this threshold. Crab coalition agrees with the threshold. Gary Loncon says we need to allow the fishery to recover. Pete says we cannot compare the Pribolofs with Bristol Bay.

There is no consensus on the 4 million lb threshold. The LBA, the female threshold, the harvest rate, etc says we can go below the 4 million lb GHL. Conservation argues the other way. No consensus.

The committee then considered Henry Mitchell's proposal was considered. Henry restated his proposal for the committee and its advisors. The staff responded and then the chair solicited comments from all of the advisors. Some objected. Some approved. It was generally agreed that the proposal might be a starting point.

Jeff Stephens: Tiered pot system

- 1) more than 9 million GHJ 200-250 pots.
- 2) 6-9 million GHJ 100-125 pots.
- 3) 4-6 million GHJ 80-100 pots.
- 4) less than 4 million GHJ number of pots to be determined.

Jeff also discussed handling mortality. Henry had also mentioned this concerns for handling mortality.

Again, the Chairman went around the table. Dave Wilson changed the proposal 4-6, 6-8, over 8. Arni: its not an improvement. Dick: its an improvement over Henry's. Leonard was worried about in season management. Greg thought that 9 million should be the break. Maria was concerned about in season management. Tom prefers Henry's proposal. Lu thinks that 9 million is too low.

Peter does not believe that it can manage in season because he does not know.

Sun setting was acceptable-unanimously.

The committee and the advisors then engaged in a lengthy discussion relative to pot limits, vessel participation and GHJ.

Some advisors state that the tools (baited pots and short closures and 12 hour reporting) will do it. Others say that the pre-announced season is very allocative to bigger boats. There are also safety issues with short seasons. The new tools do not add all that much in a short season.

There is concern that a large reduction from 200-250 to 100-125 is too drastic. Gary Painter proposed 160-200 as a middle ground. This was discussed as were other variables around which the fishery might be managed in season.

The chair then moved the committee to a discussion of pot storage re-location. The department felt that any move would lead to pot storage on crab stocks. Enforcement made comments as to its position on changing the gear storage location.

Safety issues, grounds pre-emption issues, enforcement issues, log book usage required, early fishing, rate of harvest, allocation issues. The advisors engaged in a round-table discussion.

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A pre-season announced closure versus an in season management. Gary L thought that the pre-season announced period can be extended. The department does not think this is what will happen.

Then the committee discussed the 20% proposal by Casey. There were 3 advisors in favor of this proposal. All other advisors were opposed.

Leonard then came back to the issue of pot storage and whether or not the Board will address it. The chair assured him that the Board would.

Then the chair asked for final comments.

Gordon: the board has enough info to decide.

Tom: we want 21 million dollars. Need to be reviewed again in one year.

Greg: review in one year.

Leonard: without pot limit the small boats are disadvantaged

Jeff: made progress on many issues.

Lu: pre-registration

Gary P: everyone compromised but the department. Cut pots by a lesser amount

Arni: pot storage-limit it and this solves the problem and answers enforcement. Also, have fishing periods which would allow extension of the season. Minimum GHJ

Gary L: Lowering pot limits is not effective. Supports Henry's proposal. Threshold.

Dave: Small lowering of pot limits is really necessary. Agreed with Henry generally.

Henry: The new tools will let the department manage close to the GHJ without a pot limit. Significant lowering of pot limits is not necessary.

DRAFT

Prepared: 4/20/1999
NMFS/AKR/RAM

License Limitation Program NMFS Preliminary Qualifying Crab Vessels and Endorsements under Original Criteria

Owners Residence Designations	Alaska				Other States				All Vessels			
	0-59'	60-124'	125'+	Total	0-59'	60-124'	125'+	Total	0-59'	60-124'	125'+	Total
All Catcher Vessels	11	79	12	102	5	150	74	229	16	229	86	331
All Catcher processors	0	0	1	1	0	0	25	25	0	0	26	26
Grand Total	11	79	13	103	5	150	99	254	16	229	112	357

Owners Residence Designations	Alaska				Other States				All Vessels			
	0-59'	60-124'	125'+	Total	0-59'	60-124'	125'+	Total	0-59'	60-124'	125'+	Total
Endorsements												
BSAI Tanner												
Catcher Vessels	4	69	11	84	3	136	73	212	7	205	84	296
Catcher Processors	0	0	1	1	0	0	25	25	0	0	26	26
Total BSAI Tanner	4	69	12	85	3	136	98	237	7	205	110	322
AI Brown												
Catcher Vessels	0	2	1	3	0	12	8	20	0	14	9	23
Catcher Processors	0	0	1	1	0	0	4	4	0	0	5	5
Total AI Brown	0	2	2	4	0	12	12	24	0	14	14	28
AI Red												
Catcher Vessels	0	5	0	5	0	19	4	23	0	24	4	28
Catcher Processors	0	0	1	1	0	0	1	1	0	0	2	2
Total AI Red	0	5	1	6	0	19	5	24	0	24	6	30
B. Bay Red												
Catcher Vessels	3	73	12	88	0	141	73	214	3	214	85	302
Catcher Processors	0	0	0	0	0	0	25	25	0	0	25	25
Total B. Bay Red	3	73	12	88	0	141	98	239	3	214	110	327
Prib. Blue/Red												
Catcher Vessels	7	39	3	49	3	66	27	96	10	105	30	145
Catcher Processors	0	0	0	0	0	0	2	2	0	0	2	2
Total Prib. Blue/Red	7	39	3	49	3	66	29	98	10	105	32	147
St. M. Blue/Red												
Catcher Vessels	0	36	8	44	0	91	51	142	0	127	59	186
Catcher Processors	0	0	1	1	0	0	13	13	0	0	14	14
Total St. M. Blue/Red	0	36	9	45	0	91	64	155	0	127	73	200

Sources: Preliminary NMFS License Limitation Program Qualification database, derived from ADF&G, CFEC, and NMFS data. State of Alaska Fish Tickets for 1988 - 1998 were provided by CFEC in October, 1998 and 1998 data were updated in February, 1999.

Notes: 1. Vessels qualifying for Norton Sound permits and endorsements are not included.

2. Owner and length class data reflect the best available data as of the date of this document. The Length is the length overall as of June 17, 1995.

DRAFT

Prepared: 4/20/1999
NMFS/AKR/RAM

License Limitation Program NMFS Preliminary Qualifying Crab Vessels and Endorsements under Alternative 9

Owner's Residence Designations	Alaska				Other States				All Vessels			
	0-59'	60-124'	125'+	Total	0-59'	60-124'	125'+	Total	0-59'	60-124'	125'+	Total
All Catcher Vessels	11	58	10	79	5	127	57	189	16	185	67	268
All Catcher processors	0	0	1	1	0	0	15	15	0	0	16	16
Grand Total	11	58	11	80	5	127	72	204	16	185	83	284

Owner's Residence Designations	Alaska				Other States				All Vessels			
	0-59'	60-124'	125'+	Total	0-59'	60-124'	125'+	Total	0-59'	60-124'	125'+	Total
Endorsements												
BSAI Tanner												
Catcher Vessels	4	58	10	72	3	123	56	182	7	181	66	254
Catcher Processors	0	0	1	1	0	0	15	15	0	0	16	16
Total BSAI Tanner	4	58	11	73	3	123	71	197	7	181	82	270
AI Brown												
Catcher Vessels	0	2	1	3	0	11	6	17	0	13	7	20
Catcher Processors	0	0	1	1	0	0	2	2	0	0	3	3
Total AI Brown	0	2	2	4	0	11	8	19	0	13	10	23
AI Red												
Catcher Vessels	0	5	0	5	0	18	3	21	0	23	3	26
Catcher Processors	0	0	1	1	0	0	1	1	0	0	2	2
Total AI Red	0	5	1	6	0	18	4	22	0	23	5	28
B. Bay Red												
Catcher Vessels	3	57	10	70	0	122	56	178	3	179	66	248
Catcher Processors	0	0	0	0	0	0	15	15	0	0	15	15
Total B. Bay Red	3	57	10	70	0	122	71	193	3	179	81	263
Prib. Blue/Red												
Catcher Vessels	7	31	3	41	3	59	24	86	10	90	27	127
Catcher Processors	0	0	0	0	0	0	2	2	0	0	2	2
Total Prib. Blue/Red	7	31	3	41	3	59	26	88	10	90	29	129
St. M. Blue/Red												
Catcher Vessels	0	34	8	42	0	86	40	126	0	120	48	168
Catcher Processors	0	0	1	1	0	0	9	9	0	0	10	10
Total St. M. Blue/Red	0	34	9	43	0	86	49	135	0	120	58	178

Sources: Preliminary NMFS License Limitation Program Qualification database, derived from ADF&G, CFEC, and NMFS data. State of Alaska Fish Tickets for 1988 - 1998 were provided by CFEC in October, 1998 and 1998 data were updated in February, 1999.

Notes: 1. Vessels qualifying for Norton Sound permits and endorsements are not included.

2. Owner and length class data reflect the best available data as of the date of this document. The Length is the length overall as of June 17, 1995.

3. Some Fish Tickets for 1997 Adak Brown King Crab Fishery are unavailable at this time.