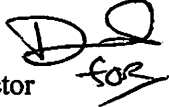


MEMORANDUM

TO: Council, SSC and AP Members
FROM: Chris Oliver 
Executive Director
DATE: January 23, 2012
SUBJECT: Protected Resources Report

ESTIMATED TIME 4 HOURS All B Items
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ACTION REQUIRED

Receive report on Protected Resources issues and take action as necessary.

BACKGROUND

Upper Willamette River and Lower Columbia River salmon

On January 9 2012, the Alaska Region of NOAA Fisheries received a Supplemental Biological Opinion from the Northwest Region regarding authorization of the Gulf of Alaska Groundfish Fisheries. The Supp. BiOp stated that exceeding the Chinook salmon by-catch limit in the GOA groundfish fisheries is not a chronic situation, and that recent actions by the NPFMC to reduce Chinook salmon bycatch in the GOA groundfish fisheries substantially reduce the likelihood that it will happen again. NMFS concluded that the effects of the GOA groundfish fisheries are not likely to jeopardize the continued existence of either the Upper Willamette River (UWR) or Lower Columbia River (LCR) Chinook salmon Evolutionary Significant Units (ESUs). The Supp. BiOp further concluded that because the proposed action occurs outside of designated critical habitat, there will be no effect on designated critical habitat for the UWR and LCR Chinook salmon ESUs. Therefore, NMFS reaffirmed the provisions of the Incidental Take Statement in the 2007 Supp. BiOp, including a bycatch limit of 40,000 Chinook salmon in the GOA groundfish fisheries (Attachment B-8(a)).

Ice Seal ESA listing decision

The National Marine Fisheries Service is extending by up to six months the final decisions on listing four subspecies of ringed seals and two distinct population segments (DPS) of bearded seals as threatened under the Endangered Species Act (ESA). This extension moves the deadline by which final listing actions must be taken from December 10, 2011, to June 10, 2012.

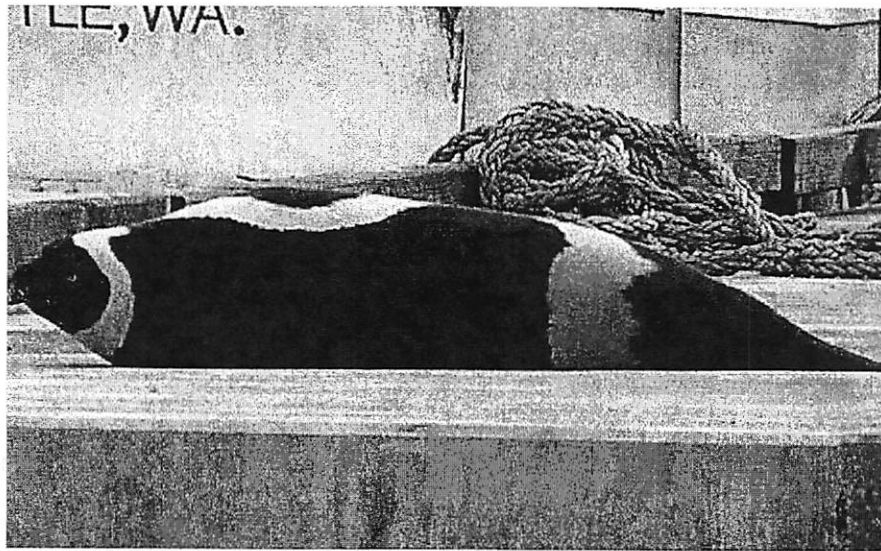
NOAA Fisheries first proposed to list as threatened four subspecies of ringed seals—Arctic, Ladoga, Okhotsk, and Baltic—and two distinct population segments of bearded seals—Beringia and Okhotsk—in December 2010. The proposed listings cited threats posed to these populations from climate model projections of diminishing sea ice, and for Arctic ringed seals, reduced snow cover.

The agency is extending the final decision on listing for up to six months because of a substantial disagreement for Arctic ringed seals and the Beringia DPS of bearded seals, both of which occur in U.S. (Alaska) waters. The disagreement stems from the analysis of model projections of future sea ice habitat,

in particular for Arctic ringed seals on-ice-snow cover, and related impacts. This disagreement extends to the magnitude and immediacy of the threats posed to these populations by the projected habitat changes. NOAA Fisheries is conducting special independent peer reviews of the ringed and bearded seal status review reports to address the scientific disagreement, and better inform the final listing decisions. Reopening of the public comment periods will be announced in the Federal Register to accept comments on the resulting peer review reports when they become available.

Ribbon seal in Seattle

A ribbon seal was seen on a dock in Seattle, WA, about a mile from the mouth of the Duwamish River. The male seal appeared to be in good condition. This is the second southern-most record of ribbon seals. In 1962 a ribbon seal showed up on a beach near Morro Bay, CA.



Cook Inlet Beluga Whales

The Alaska Fisheries Science Center announced the 2011 abundance estimate for the endangered Cook Inlet beluga whale population is 284 animals, almost 20 percent lower than the 2010 estimate of 340. This year's estimate stays within the range of the ten-year population trend for Cook Inlet belugas, which shows an average annual decline of the population of 1.1 percent.

The Cook Inlet beluga whale, one of five beluga stocks recognized within U.S. waters, was listed as endangered under the Endangered Species Act in 2008. NOAA designated critical habitat for the species in April 2011, enabling consultations to reduce negative impacts the federal or federally-funded projects could have on the species' recovery. NOAA is currently developing a recovery plan for the species and continues to fund research on the species.

Population estimates for the last ten years are:

2001: 386	2007: 375
2002: 313	2008: 375
2003: 357	2009: 321
2004: 366	2010: 340
2005: 278	2011: 284
2006: 302	

Eastern DPS Steller sea lions

The 12-month finding on the petition to delist the Eastern DPS (eDPS) of Steller sea lions, originally due on 8-31-2011 is not yet completed. According to NMFS PR staff "NMFS is continuing to work toward completion of the draft Status Review for the eDPS Steller sea lion with an anticipated publication date of sometime in March".

Western DPS Steller sea lions

a) State of AK et al. vs. Lubchenko et al.

Judge Timothy Burgess released his decision on the State of Alaska lawsuit against NMFS regarding the BSAI groundfish biological opinion. In his decision, Judge Burgess stated that he "must defer to the technical expertise of the agency as long as there is a rational connection between the evidence and its conclusions." Judge Burgess found that NMFS did not apply improper ESA standards and that evidence was sufficient to support its conclusions that the fisheries were likely to jeopardize the continued existence of the WDPS and adversely modify its critical habitat. The judge further concluded that although NMFS' procedures to comply with its obligations under the Administrative Procedures Act (APA) Magnuson-Stevens Fishery Management and Conservation Act (MSA) were far from ideal, they were adequate under the law. Judge Burgess, however, did find that NMFS violated the National Environmental Policy Act (NEPA) by preparing an Environmental Assessment (EA) and Finding of no Significant Impact (FONSI) rather than an Environmental Impact Statement. Judge Burgess indicated he is inclined to remand the matter to NMFS to prepare a full EIS and provide the public with opportunity to participate, but he also allowed the Biological Opinion and Interim Final Rule to stand. Judge Burgess is allowing parties an opportunity to submit further briefing before settling on the proper remedy.

b) CIE Terms of Reference

At the December 2011 Council meeting, action on the Terms of Reference (ToR) for a Center for Independent Experts (CIE) review of the 2010 Groundfish BiOp was delayed until this meeting. A draft ToR and Statement of Work (SOW) were developed cooperatively at a meeting on November 8, 2011 by representatives of NMFS, the Council, and the states of AK and WA (**Attachment B-8(b)**). The SOW and ToR would result in a production of a report with two chapters: (1) a CIE desk review of the Final BiOp using data and materials available to NMFS as of the close of public comment (9/3/10), and (2) a review of the BiOp following a one-day public panel, including public testimony and information available to NMFS after publication of the Final BiOp. The first chapter of the review would provide NMFS the peer-review of the BiOp to determine whether they have met their requirements under the U.S. ESA. The second chapter of the review would allow for a broader, more inclusive assessment of the BiOp and RPA, including information and data available after the publication of the Final BiOp. Due to contracting timelines and ongoing litigation, the review would likely be initiated in the second or third quarter of 2012. At this meeting the Council may choose to endorse the draft ToR, reject the draft ToR, or suggest modifications to the draft ToR.

Recently published papers on Steller Sea Lions

- Horning, M, and J-A. E. Mellish. 2012. Predation on an upper trophic marine predator, the Steller sea lion: Evaluating high juvenile mortality in a density dependent conceptual framework. *PLoS One* 7(1):e30173. Available online at <http://www.plosone.org/article/info%3Adoi%2F10.1371%2Fjournal.pone.0030173>
- Waite, J.N., V.N. Burkanov, R.D. Andrews. 2012. Prey competition between sympatric Steller sea lions (*Eumetopias jubatus*) and northern fur seals (*Callorhinus ursinus*) on Lobushki Island, Russia. *Canadian Journal of Zoology* 90(1):110-127.
- Hobbs, R.C., C.L. Sims, K.E.W. Shelden. 2011. Estimated abundance of belugas, *Delphinapterus leucas*, in Cook Inlet Alaska, from aerial surveys conducted in June 2011. NMFS, National Marine Mammal Laboratory report.
- Walker, K.A., J.E. Mellish, D.M. Weary. 2011. Effects of hot-iron branding on heart rate, breathing rate and behavior of anaesthetized Steller sea lions. *Veterinary Record* 169:363.
- Riemer, S.D., B.E. Wright, R.F. Brown. 2011. Food habits of Steller sea lions (*Eumetopias jubatus*) off Oregon and northern California, 1986-2007. *Fishery Bulletin* 109:369-381.
- Phillips, C.D., T.S. Gelatt, J.C. Patton, J.W. Bickham. 2011. Phylogeography of Steller sea lions: relationships among climate change, effective population size and genetic diversity. *Journal of Mammalogy* 92(5):1091-1104.
- Matthews, E.A., J.N. Womble, G.W. Pendleton, L.A. Jemison, J.M. Maniscalco, G. Streveler. 2011. Population growth and colonization of Steller sea lions in the Glacier Bay region of Southeast Alaska: 1970s – 2009. *Marine Mammal Science* 27(4):852-880.
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- Lander, M., M.L. Logsdon, T.R. Loughlin, G.R. VanBlaricom. 2011. Spatial patterns and scaling behaviors of Steller sea lion (*Eumetopias jubatus*) distributions and their environment. *Journal of Theoretical Biology* 274:74-83.
- Hui, T.C.Y. 2011. Steller sea lions and fisheries: Competition at sea? Master of Science Thesis. University of British Columbia.
- Hastings, K.K., L.A. Jemison, T.S. Gelatt, J.L. Laake, G.W. Pendleton, J.C. King, A.W. Trites, K.W. Pitcher. 2011. Cohort effects and spatial variation in age-specific survival of Steller sea lions from southeastern Alaska. *Ecosphere* 2(10):111
- Ghai, R., S.J. Insley. 2011. Probable effects of resident and transient killer whales (*Orcinus orca*) on the activity levels of Steller sea lions (*Eumetopias jubatus*) at Carmanah Point, British Columbia. *Marine Mammal Science* 27(3):E227-E233.
- Carrasco, S.E., K.A. Burek, K.B. Beckmen, J.L. Oaks, M.A. Davis, K.N.K. Baker, J.A.K. Mazet. 2011. Aerobic oral and rectal bacteria of free-ranging Steller sea lion pups and juveniles (*Eumetopias jubatus*) in Alaska. *Journal of Wildlife Diseases* 47(4):807-820.
- Burkanov, V., E. Gurarie, A. Altukhov, E. Mamaev, P. Peryakov, A. Trukhin, J. Waite, T. Gelatt. 2011. Environmental and biological factors influencing maternal attendance patterns of Steller sea lions (*Eumetopias jubatus*) in Russia. *Journal of Mammalogy* 92(2):352-366.
- Bowles, E., P.M. Schulte, D.J. Tolit, B.E. Dagle, A.W. Trites. 2011. Proportion of prey consumed can be determined from faecal DNA using real-time PCR. *Molecular Ecology Resources* 11:530-540.



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Northwest Region
7600 Sand Point Way N.E., Bldg. 1
Seattle, WA 98115

January 9, 2012

James W. Balsiger, Ph.D.
Regional Administrator, Alaska Region
National Marine Fisheries Service
P.O. Box 21668
Juneau, AK 99802-1668

Re: Re-initiation of Endangered Species Act (ESA) section 7 consultation on incidental catches of Chinook salmon in the Gulf of Alaska (GOA) groundfish fisheries

Dear Mr. Balsiger:

On November 17th, 2010, the Northwest Region of NOAA Fisheries received a request from the Alaska Region to re-initiate consultation on the effects to listed ESA salmon in the Gulf of Alaska (GOA) groundfish fishery (Balsiger 2010). The reason for the request was that in 2010, the fishery exceeded the amount of Chinook salmon by-catch authorized for the GOA in the applicable biological opinion. NOAA Fisheries reviewed the best available information regarding catch of listed salmon in the GOA fishery as well as actions taken by the North Pacific Fishery Management Council (NPFMC) to further reduce Chinook by-catch and to improve monitoring and sampling. After considering the available information, we concluded that the proposed action is not likely to jeopardize the continued existence of the listed salmon ESUs. Since the proposed action occurs outside of designated critical habitat, NMFS also concludes that the proposed action will have no effect on designated critical habitat for the listed salmon ESUs.

Exceeding the Chinook by-catch limit in the GOA groundfish fishery is not a chronic situation. Even so, the Chinook by-catch caps that the NPFMC has recently adopted substantially reduce the likelihood that it will happen again. However, even if the authorized by-catch limit is exceeded on occasion, by-catch of listed Chinook ESUs in the GOA groundfish fisheries continues to be extremely low. In fact, by-catch rates are lower than at the time of the original consultation.

Recently adopted NPFMC management measures should further reduce Chinook by-catch, improve by-catch estimation, monitoring and sampling, and increase the likelihood of remaining below the incidental take limit. NMFS encourages the NPFMC to continue to improve observer coverage and address the uncertainties identified for CWT expansions in order to continue to improve by-catch estimation. This guidance is consistent with the conservation recommendations in the 2007 supplemental biological opinion.



In conclusion, Chinook by-catch and the effect on listed salmon ESUs in the GOA groundfish fishery are likely to remain within the take limits proscribed in the supplemental 2007 biological opinion. Therefore, the provisions of the incidental take statement in the supplemental 2007 biological opinion including a by-catch limit of 40,000 Chinook salmon remain in effect for the GOA groundfish fishery.

If you have questions regarding the ESA consultation, please contact Peter Dygert of the Salmon Management Division at (206) 526-6736, or by electronic mail at peter.dygert@noaa.gov.

Sincerely,

A handwritten signature in black ink that reads "William W. Stelle, Jr." in a cursive style.

William W. Stelle, Jr.
Regional Administrator

Endangered Species Act Section 7(a)(2) Supplemental Biological Opinion

NMFS Consultation Number: F/NWR/2010/06825

Action Agency: National Marine Fisheries Service (NMFS)

Affected Species and Determinations:

Species	Status	Is Action Likely to Adversely Affect Species or Critical Habitat?	Is Action Likely to Jeopardize the Species?	Is Action Likely to Destroy or Adversely Modify Critical Habitat?
Lower Columbia River Chinook Salmon (<i>Oncorhynchus tshawytscha</i>)	Threatened (reaffirmed)	Yes	No	No
Upper Willamette River Chinook Salmon (<i>Oncorhynchus tshawytscha</i>)	Threatened (reaffirmed)	Yes	No	No

Activities Considered: Endangered Species Act (ESA) Section 7 Consultation – Supplemental Biological Opinion. Supplemental Biological Opinion Reinitiating Consultation on the January 11, 2007 Supplemental Biological Opinion Regarding Authorization of the Gulf of Alaska (GOA) Groundfish Fisheries.

Consultation Conducted by: NMFS, Salmon Management Division, Northwest Region

Date Issued: January 9, 2012



Issued by:

William W. Stelle, Jr.,
Regional Administrator

Introduction

On November 17th, 2010, NMFS NWR received a request from the Alaska Region to re-initiate consultation on the effects to listed ESA salmon in the Gulf of Alaska (GOA) groundfish fishery (Balsiger 2010). The reason for the request was that in 2010, the fishery exceeded the amount of salmon by-catch authorized for the GOA in the applicable biological opinion. Re-initiation of formal consultation is required where discretionary federal agency involvement or control over the action has been retained (or is authorized by law) and if (1) the amount or extent of taking specified in the incidental take statement is exceeded; (2) new information reveals effects of the action that may affect listed species or critical habitat in a manner or to an extent not previously considered; (3) the identified action is subsequently modified in a manner that causes an effect to listed species or critical habitat that was not considered in the biological opinion; or (4) a new species is listed or critical habitat designated that may be affected by the identified action.

Background and Consultation History

NMFS previously issued two biological opinions that considered the effect of GOA groundfish fisheries on listed salmonids. NMFS consulted on the take of listed salmon in the groundfish fisheries conducted under the Bering Sea/Aleutian Islands (BSAI) Groundfish Fishery Management Plan (FMP) and the GOA Groundfish FMP in a 1999 biological opinion (NMFS 1999). NMFS then issued an opinion on groundfish fisheries conducted under the BSAI FMP and GOA FMP, dated November 30, 2000, that considered the effects on ESA-listed marine mammals, and other non-salmonids (NMFS 2000). The 2000 biological opinion also summarized considerations for listed salmonids from the 1999 biological opinion, and reiterated the Chinook salmon by-catch limits and other terms and conditions contained therein in the incidental take statement. Both biological opinions include the same annual incidental take limit of 40,000 Chinook salmon for all sectors of the GOA groundfish fishery.

From 2004-2006, Chinook salmon by-catch in the BSAI fishery exceeded the allowable incidental take limit. In 2007, the 2000 biological opinion was supplemented to address Amendment 84a to the BSAI FMP, which changed salmon by-catch management in the Bering Sea pollock fishery to reduce salmon by-catch (NMFS 2007a). The 2007 supplemental biological opinion included a new incidental take statement for the BSAI fishery and carried forward the by-catch limits and terms of the 1999 and 2000 biological opinions for the GOA fishery. The 2007 supplement to the 2000 biological opinion, therefore, provides the operative incidental take limits for the GOA FMP.

In 2009, NMFS again reinitiated consultation on the 2000 opinion because of a proposed change in the action associated with the BSAI component of the opinion and issued a supplemental opinion (NMFS 2009). Amendment 91 to the BSAI FMP proposed actions designed to minimize the by-catch of Chinook salmon in the Bering Sea pollock fishery. Although the 2009 supplemental opinion focused on the BSAI groundfish fishery, it updated status information on the listed salmon Evolutionarily Significant Units (ESUs) also affected in this consultation. For purposes of this reinitiated consultation, the 2009 supplemental opinion provides the best

available information regarding the status of the affected species. The proposed action, the action area and cumulative effects for this reinitiated consultation are consistent with those described in the 1999 and 2000 biological opinions. Information regarding the environmental baseline is discussed in a Final Environmental Impact Statement on the Alaska Groundfish Harvest Specifications (NMFS 2007b). Reviews of the harvest specifications in subsequent years (through 2011-2012) concluded the effects were within those evaluated and described in the 2007 FEIS. The information from these documents is incorporated by reference herein.

Endangered Species Act Biological Opinion

Chinook salmon by-catch in the GOA groundfish fishery has been below its incidental take limit except in 2007 (40,540) and 2010 (54,559)(M. Grady, pers. com, 10/6/11). The high Chinook salmon by-catch in 2010 led to the request to reinitiate consultation (Balsiger 2010).

Designated critical habitat for UWR and LCR Chinook salmon does not include offshore marine areas, including the Gulf of Alaska. As a consequence, implementation of the GOA groundfish fisheries as managed under the GOA Groundfish FMP has no effect on designated critical habitat for UWR and LCR Chinook salmon.

NMFS previously consulted on Essential Fish Habitat (EFH) under the Magnuson-Stevens Fishery Conservation and Management Act (MSA) as part of its annual approval of the North Pacific Fishery Management Council (NPFMC) harvest specifications for groundfish (NMFS 2011a). There would be no measurable impacts on EFH beyond those already identified and consulted on under the harvest specifications consultation for EFH.

Background

Chinook salmon by-catch in the GOA groundfish fisheries

A detailed description of Chinook salmon by-catch in the GOA groundfish fisheries is provided in Balsiger 2011a. The most relevant points are presented in the following discussion. Prior to 2011, no salmon by-catch control measures were implemented in the GOA groundfish fisheries. Salmon retention in the GOA groundfish fisheries was prohibited although non-retention mortality was likely very high. However, retention of salmon in the pollock fishery was a longstanding practice because large volumes of pollock are brought onboard and rapidly stowed below decks making it impractical to sort out the salmon by-catch.

Since 1999 when the take limit was put in place, Chinook salmon by-catch in the GOA groundfish fisheries averaged 24,045 and has been below its incidental take limit except in 2007 (40,540) and 2010 (54,559)(M. Grady, pers. com, 10/6/11). As of November 4, 2011, the Chinook salmon by-catch in the 2011 GOA groundfish fisheries was 22,492 (NMFS 2011). With approximately 99 percent (2003-2010 average) of the year's by-catch reported, the 2011 Chinook salmon by-catch is well below the incidental take limit. Therefore, exceeding the Chinook salmon by-catch limit of 40,000 does not appear to be a chronic situation. However, the average Chinook salmon by-catch during 2006-2010 is higher (27,750) than the long term 1991-2010 average (21,986). The two highest by-catch years (which also exceeded the

authorized by-catch limit) occurred in that period (Balsiger 2010, Balsiger 2011a), therefore some additional caution is warranted.

It is important to note that by-catch estimates are based on extrapolations of catch from observed pollock catcher vessels. The majority of the catch (70%) is taken by larger vessels that are systematically sampled at a relatively modest rate of 30 percent through the observer program. Vessels less than 60 feet do not require observer coverage. The number of vessels <60' has increased in recent years resulting in a lower proportion of the catch observed (Balsiger 2010). The overall low observer coverage was cited as problematic for by-catch estimation and the use of by-catch caps for the fishery (see Attachment 10 in Balsiger 2011a) because of the substantial extrapolation needed. Improving observer coverage would reduce the uncertainty in by-catch estimation.

Impacts to listed Chinook salmon ESUs

Information on the composition of salmon by-catch is reviewed in detail in prior biological opinions (NMFS 1999, NMFS 2007a) and fishery reports (Balsiger 2011a). By-catch of listed Chinook salmon ESUs in the GOA groundfish fisheries is extremely low. Coded wire tags (CWTs) recovered in the trawl fishery are currently the data used to assess stock-origin in the GOA groundfish fisheries, although limited genetic sampling occurred in 2010 and 2011. Since 1995, 85% of the expanded CWTs recovered in the fishery were from Alaska and British Columbia Chinook salmon stocks (Balsiger 2011a) which are not listed under the ESA; suggesting that encounters with listed Chinook salmon would be low. It is apparent from reports of CWT recoveries, that the only ESA listed salmon or steelhead species likely to be affected by the GOA groundfish fisheries are Upper Willamette River (UWR) Chinook and Lower Columbia River (LCR) Chinook (NMFS 1999, NMFS 2007a, Balsiger 2010). The most recent information does not indicate a change in that conclusion (Balsiger 2011a). CWT recoveries in the GOA groundfish fisheries over the last 27 years have been limited to the LCR, Upper Columbia River (UCR) spring, and UWR Chinook salmon ESUs (Balsiger 2010, 2011a). The majority of recoveries have been UWR Chinook salmon. Encounters of UCR spring Chinook salmon are rare. Only one CWT was recovered in the fishery between 1984 and 2010. While CWTs of other salmon ESUs have been recovered in research cruises operating in the same general area as the GOA groundfish fisheries, the research cruises target salmon not groundfish, use a different gear type and fish at shallower depths than the groundfish fisheries (M. Grady pers. comm., 10/13/2011), and for these reasons would be expected to encounter a different mix of salmon stocks. In addition, the research cruises do not occur concurrently with the groundfish fisheries. Since 1991, besides LCR, UWR and UCR Chinook salmon, research cruises have also recovered an estimated 1 Puget Sound, 9 Snake River spring/summer Chinook salmon, and 1 Snake River Basin steelhead indicating rare encounters with these ESUs even in the salmon directed cruises.

The number of annual recoveries from the LCR and UWR Chinook salmon ESUs associated with the GOA groundfish fisheries was highest during 1991-2000 and has declined significantly since then, with no recoveries of LCR Chinook salmon observed since 2004 (Balsiger 2010)(Table 1). The by-catch rate¹ for listed Chinook salmon in the GOA groundfish fisheries

¹ By-catch rate of listed Chinook is defined as the number of listed Chinook caught/total Chinook by-catch in the GOA groundfish trawl fishery.

has been negligible for the last 10 years (2001-2010), averaging 0.0000 and 0.0002 listed Chinook salmon caught per Chinook salmon caught for the LCR and UWR Chinook salmon ESUs, respectively (Table 2). In addition, although recent years have seen some of the highest overall Chinook salmon by-catch, the by-catch rate of the two listed ESUs in the GOA groundfish fisheries has declined substantially compared with the rates observed during the period on which the original Chinook salmon by-catch limit was established (Figure 1).

Additionally, although all the fish in both ESUs are listed, the ESA protective 4(d) regulations for these species prohibit take only for natural and hatchery fish with an intact adipose fin (70 FR 37160). The intent of the regulation is to enable hatchery fish produced for harvest (adipose fin clipped) to be caught and to provide additional protection for natural-origin Chinook salmon and hatchery Chinook produced for conservation purposes (adipose fin intact). Eighty to 90 percent of the Chinook salmon in the UWR and LCR Chinook salmon ESUs are hatchery-origin fish and almost all have the adipose fin removed (Balsiger 2011b). Therefore ESA take prohibitions only apply to a low percentage of the Chinook salmon in these ESUs. So, in the GOA groundfish fisheries, the likelihood of catching a listed UWR or LCR Chinook salmon for which take has been prohibited during the last 10 years is even lower (0.0000 to 0.00003 take prohibited listed Chinook salmon caught per Chinook salmon caught, i.e., 1 or less per year)(Table 2). Although there are some uncertainties associated with estimating catch of listed fish using CWT data (Balsiger 2011a), it is the best available information to approximate the take of listed Chinook salmon ESUs in the GOA groundfish fisheries. The consistent pattern of low recoveries of listed Chinook salmon ESUs over the last 20 years and particularly the last 10 years (Table 1) supports the conclusion that take of ESA listed Chinook salmon in the GOA groundfish fisheries is at most an occasional event.

Although the by-catch of Chinook salmon in the GOA fisheries has generally been low relative to the 40,000 by-catch limit, the North Pacific Fishery Management Council (NPFMC) took actions to further reduce Chinook salmon by-catch and improve monitoring. In June 2011, the NPFMC adopted several management measures designed to reduce Chinook salmon by-catch overall and to improve monitoring and sampling. The NPFMC:

- Adopted a 25,000 Chinook salmon by-catch cap on the GOA pollock fishery divided between the central and western fishing areas. NMFS will manage the by-catch caps inseason and close the fishery when the cap is reached. Adding the by-catch cap in the pollock fishery to the highest catch observed in the GOA non-pollock groundfish fisheries in recent years indicates overall Chinook salmon by-catch in the GOA groundfish fisheries should remain below the 40,000 Chinook salmon incidental take limit;
- Extended the 30% observer coverage requirement for vessels 60'-125' to pollock trawl vessels less than 60' by January 2013²;

² Observer restructuring is also being implemented and is expected to occur in January 2013. Observer restructuring is a randomized deployment of observers to yield unbiased estimates of total catch and catch composition. Under the restructuring program, the sampling percentage/coverage rates won't be in regulations but initially will be about 30% coverage, which will be subject to change year to year based on data needs. In order to lessen the complication of putting two new programs into place, the NPFMC decided that if observer restructuring is implemented in 2013, the increased coverage under this action will not go into effect. If observer restructuring is delayed until 2014, then this coverage will go into effect. All vessels will have some level of observer coverage.

- Required full retention of all salmon in pollock trawl fisheries. The retention will increase the number of genetic samples and CWTs recovered since the samples will be from both observed and unobserved vessels.
- The NPFMC also recommended that NMFS work with processors to improve the quality of accounting of salmon by-catch at the plants.

Conclusion

In light of the above information, it is apparent that exceeding the Chinook salmon by-catch limit in the GOA groundfish fisheries is not a chronic situation. Even so, the Chinook salmon by-catch caps that the NPFMC recently adopted substantially reduce the likelihood that it will happen again. However, even if the authorized by-catch limit is exceeded on occasion, by-catch of listed Chinook salmon ESUs in the GOA groundfish fisheries continues to be extremely low. By-catch rates of listed Chinook salmon have declined since the period of time NMFS used to establish the by-catch limit reflected in the 2007 opinion. In fact, based on the available data, it is apparent that by-catch rates of listed fish are now lower than they were at the time of the original consultation. Therefore, after consideration of all the information discussed above, NMFS concludes that the effects of the proposed action are not likely to jeopardize the continued existence of either the UWR or LCR Chinook salmon ESUs. Since the proposed action occurs outside of designated critical habitat, NMFS also concludes that the proposed action will have no effect on designated critical habitat for the UWR and LCR Chinook salmon ESUs.

Recently adopted NPFMC management measures should reduce Chinook salmon by-catch, improve by-catch estimation, monitoring and sampling, and increase the likelihood of remaining below the incidental take limit. NMFS encourages the NPFMC to continue to improve observer coverage and address the uncertainties identified for CWT expansions in order to improve by-catch estimation and reduce concerns that the recently adopted by-catch caps for the GOA pollock fishery might result in some unobserved vessels discarding Chinook salmon by-catch. This guidance is consistent with the conservation recommendations in the 2007 supplemental biological opinion.

Based on the information presented above, Chinook salmon by-catch in the GOA groundfish fisheries and its effect on listed salmon ESUs are likely to remain within the take limits prescribed in the supplemental 2007 biological opinion. Therefore, the provisions of the incidental take statement in the supplemental 2007 biological opinion (NMFS 2007a), including a by-catch limit of 40,000 Chinook salmon, remain in effect for the GOA groundfish fisheries. This concludes NMFS' reinitiation of the section 7 consultation.

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- Balsiger, J.W. 2011a. Memorandum from James W. Balsiger to William W. Stelle, Jr. 2010 Annual Report for the Alaska Groundfish Fisheries Salmon Incidental Catch and Endangered Species Act Consultation. March 3, 2011.
- Balsiger, J.W. 2011b. Memorandum from James W. Balsiger to William W. Stelle, Jr. Endangered Species Act (ESA) Section 7 Consultation on the Effects of Issuing a Salmon Excluder Device Exempted Fishing Permit in the Bering Sea Pollock Fishery on Threatened and Endangered Chinook Salmon and Endangered Southern Resident Killer Whales. June 3, 2011.
- NMFS (National Marine Fisheries Service). 1999. ESA Reinitiated Section 7 Consultation Biological Opinion. Take of Listed Salmon in Groundfish Fisheries Conducted under the Bering Sea and Aleutian Islands and Gulf of Alaska Fishery Management Plans. December 22, 1999. NMFS Northwest Region.
- NMFS. 2000. Section 7 consultation of the authorization of the Bering Sea and Aleutian Islands groundfish fishery under the BSAI FMP and the authorization of the Gulf of Alaska groundfish fishery under the GOA FMP. Office of Protected Resources, NMFS. November 30, 2000. p. 352.
- NMFS. 2007a. Endangered Species Act (ESA) Section 7 Consultation – Supplemental Biological Opinion. Supplemental Biological Opinion Reinitiating Consultation on the November 20, 2000 Biological opinion regarding Authorization of Bering Sea/Aleutian Islands Groundfish Fisheries. NMFS, Northwest Region. January 11, 2007. 25 pp.
- NMFS. 2007b. Alaska Groundfish Harvest Specifications Final Environmental Impact Statement. NMFS Alaska Region. January 2007. 455 pages.
- NMFS. 2009. Endangered Species Act (ESA) Section 7 Consultation – Supplemental Biological Opinion. Supplemental Biological Opinion Reinitiating Consultation on the January 11, 2007, Biological opinion regarding Authorization of Bering Sea/Aleutian Islands Groundfish (BSAI) Fisheries. NMFS, Northwest Region. December 2, 2009. 45 pp.
- NMFS. 2011. Chinook Salmon Mortality in Gulf of Alaska Groundfish Fisheries (Table 1) <http://alaskafisheries.noaa.gov/sustainablefisheries/inseason/goasalmonmort.pdf>. Data updated through November 4, 2011. Website accessed November 18, 2011.

Table 1. Mark Expansion of ESA-listed CWT salmon by ESU and GOA Chinook salmon by-catch by year captured in the GOA trawl fishery, 1991-2010.

GOA Chinook By-catch	Expanded Estimate	Recovery/Chinook By-catch	Pre-listing			Post-listing				
			LCR CWT	UW CWT	LCR CWT	UW CWT	LCR CWT	UW CWT		
38,894	0	13	0.0000	0.0003	1991	16,787	2	29	0.0001	0.0017
19,260	60	52	0.0031	0.0027	1993	13,615	3	9	0.0002	0.0006
14,652	0	5	0.0000	0.0003	1995	15,761	0	1	0.0000	0.0001
15,230	0	8	0.0000	0.0005	1997	16,984	19	31	0.0011	0.0018
30,600	6	49	0.0002	0.0016	1999	26,729	2	17	0.0001	0.0006
15,104	2	7	0.0001	0.0005	2001	12,920	0	1	0.0000	0.0001
15,396	0	5	0.0000	0.0003	2003	17,777	1	6	0.0001	0.0003
17,777	1	6	0.0001	0.0003	2004	31,270	0	0	0.0000	0.0000
19,004	0	1	0.0000	0.0001	2006	40,540	0	0	0.0000	0.0000
16,166	0	7	0.0000	0.0004	2008	8,480	0	2	0.0000	0.0002
8,480	0	2	0.0000	0.0002	2009	54,559	0	5	0.0000	0.0001
21,986	5	12	0.0002	0.0006	Average 1991-2010	20,851	9	21	0.0005	0.0010
23,122	0	3	0.0000	0.0002	Average 2001-2010					

Figure 1. Trends in Chinook bycatch and the bycatch rate of listed Chinook salmon ESUs caught in the GOA groundfish fishery

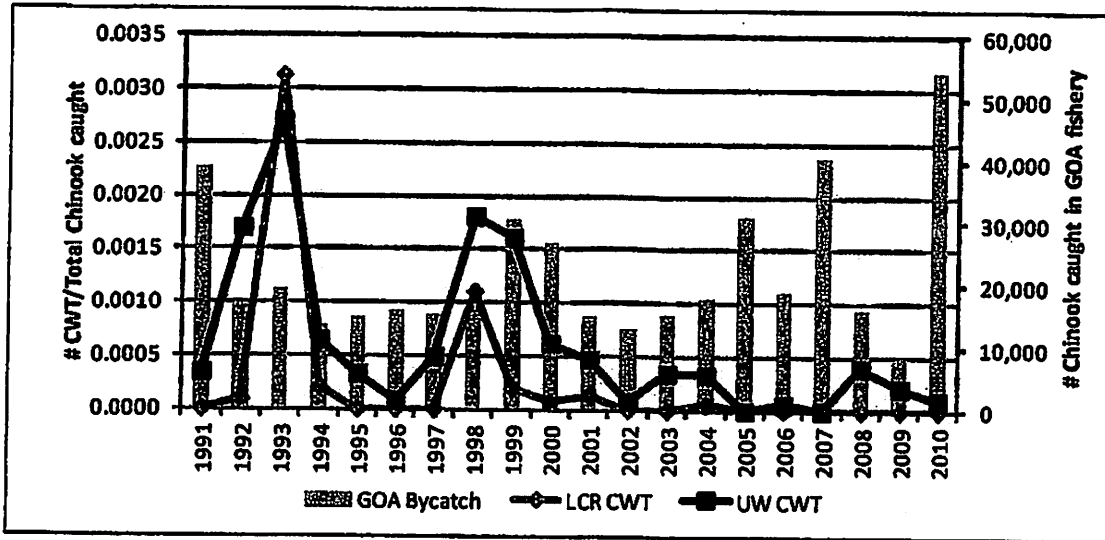


Table 2. Chinook bycatch and catch of listed Chinook salmon ESUs in the GOA groundfish fishery

	GOA Chinook Bycatch	Expanded CWT		CWT/Chinook Bycatch		Avg est. # of each ESU taken/per yr		Avg est. # undipped of each ESU taken/per yr	
		LCR CWT	UW CWT	LCR CWT	UW CWT	LCR CWT	UW CWT	LCR CWT	UW CWT
1991-2000	20,851	9.14	21.3	0.0005	0.0010	10	22	2	4
2001-2010	23,122	0.3	3.4	0.0000	0.0002	0	5	0	1

Draft – November 29, 2011

Statement of Work

External Independent Peer Review by the Center for Independent Experts

Biological Opinion on the Effects of the Federal Groundfish Fisheries and State Parallel Fisheries on listed species in Alaska, including Steller sea lions

Scope of Work and CIE Process: The National Marine Fisheries Service's (NMFS) Office of Science and Technology coordinates and manages a contract providing external expertise through the Center for Independent Experts (CIE) to conduct independent peer reviews of NMFS scientific projects. The Statement of Work (SoW) described herein was established by the NMFS Project Contact and Contracting Officer's Technical Representative (COTR), and reviewed by CIE for compliance with their policy for providing independent expertise that can provide impartial and independent peer review without conflicts of interest. CIE reviewers are selected by the CIE Steering Committee and CIE Coordination Team to conduct the independent peer review of NMFS science in compliance with the predetermined Terms of Reference (ToRs) for the peer review. Each CIE reviewer is contracted to deliver an independent peer review report to be approved by the CIE Steering Committee and the reports to be formatted with content requirements as specified in **Annex 1**. This SoW describes the work tasks and deliverables of the CIE reviewer for conducting an independent peer review of the following NMFS project. Further information on the CIE process can be obtained from www.ciereviews.org.

Project Description: NMFS Alaska Region has issued a Final Biological Opinion (November 24, 2010) under the ESA on the effects of the current fishery management regime for federal groundfish fisheries on listed species. The main listed species of concern is the endangered western distinct population segment (WDPS) of the Steller sea lion; the threatened eastern distinct population segment (EDPS) of Steller sea lions was also considered. In addition, the effects on listed humpback whales (Central Pacific and Western Pacific populations), fin whales and sperm whales were considered. The basis for the consultation is the new information available to the agency as a result of almost 10 years of intensive research on Steller sea lions in Alaska. The new information pertains to the status of the species, population and sub-regional trends in abundance, and the impacts of the existing conservation measures as well as the prosecution of the federal fisheries and the State of Alaska parallel groundfish fisheries. The focus species for this CIE review is the western distinct population segment of the Steller sea lion.

The review will consist of two parts: (1) conducting a desk review of the Final BiOp including information available to NMFS through the end of the public comment period (September 3, 2010) and (2) convening as a panel to consider new information (e.g. available subsequent to issuance of the Final BiOp) and to hold one public session (in ----, AK?) to receive presentations regarding the BiOp analysis and related scientific information from the public, including experts in environmental organizations, scientific groups, the fishing industry, and affected communities. The reviewers will produce a report consisting of two chapters: Chapter 1 will describe findings based on the desk audit and will be produced prior to the public panel session; Chapter 2 will evaluate new scientific and commercial information, describe findings from the public panel

session, and provide commentary on the Final Biological Opinion, its findings, and potential next steps as described in Annex 2. The completed report will be issued as a single document at the end of the review process.

In Chapter 1 (the desk review), the panel shall be specifically tasked to review and comment on the rationale, and subsequent findings contained in the Biological Opinion regarding factors affecting Steller sea lion population status, their critical habitat, and recovery including, in particular, the findings regarding the effects of fisheries on Steller sea lion population status, vital rates, and critical habitat. The reviewers are asked to comment on the adequacy of the best available science and of the appropriate use of that science to reach the conclusions presented in the BiOp.

In Chapter 2, reviewers shall, as practicable, review, evaluate, and consider the Final Biological Opinion, its findings, and scientific and commercial information made available since issuance of the Final BiOp through the date of the panel session. As they construct Chapter 2, reviewers shall, as practicable, provide additional commentary on the findings of Chapter 1 that arises from input received through the public panel session. The Terms of Reference (ToRs) of the peer review are attached in Annex 2.

Requirements for CIE Reviewers: Three CIE reviewers shall be provided with adequate time to conduct a thorough, impartial and independent peer review in accordance with the SoW and ToRs herein. Each CIE reviewer's duties shall not exceed a maximum of 20 days to complete all tasks of the desk peer review and an additional 20 days to conduct the panel peer review public session and evaluate new information provided through that process, as described herein. CIE reviewers shall have the expertise, background, and experience to complete an independent peer review in accordance with the SoW and ToRs herein. CIE combined reviewer expertise should strive to include marine fisheries management, marine fish biology, ecology and stock assessments, marine mammal population biology and foraging ecology, and familiarity with the standards of the Endangered Species Act section 7 in relation to conservation biology.

Location of Peer Review: Each reviewer shall conduct the peer review as a desk review and will participate in a public meeting in Alaska. Therefore travel will be required.

Statement of Tasks: Each CIE reviewer shall complete the following tasks in accordance with the SoW and Schedule of Milestones and Deliverables herein.

Prior to the Peer Review: Upon completion of the CIE reviewer selection by the CIE Steering Committee, the CIE shall provide the CIE reviewer information (full name, title, affiliation, country, address, email) to the COTR, who forwards this information to the NMFS Project Contact no later the date specified in the Schedule of Milestones and Deliverables. The NMFS will provide the list of proposed CIE reviewers to the North Pacific Fishery Management Council (Council) for comment within 7? days. Should the Council or NMFS, AKR, have any comments on reviewers proposed, they will be provided to AKR for forwarding to the CIE within 7? days. The CIE is responsible for providing the SoW and ToRs to the CIE reviewers. The NMFS Project Contact is responsible for providing the CIE reviewers with the background

documents, reports, and other pertinent information. Any changes to the SoW or ToRs must be made through the COTR prior to the commencement of the peer review.

Pre-review Background Documents: Two weeks before the peer review, the NMFS Project Contact will send (by electronic mail or make available at an FTP site) to the CIE reviewers the necessary background information and reports for the peer review. In the case where the documents need to be mailed, the NMFS Project Contact will consult with the CIE Lead Coordinator on where to send documents. CIE reviewers are responsible only for the pre-review documents that are delivered to the reviewer in accordance to the SoW scheduled deadlines specified herein. The CIE reviewers shall read all documents in preparation for the peer review. A list of specific background documents that should either be reviewed or may provide additional information is provided at the end of the ToR.

Peer Review: Each CIE reviewer shall conduct the independent peer review in accordance with the SoW and ToRs, and shall not serve in any other role unless specified herein. **Modifications to the SoW and ToRs cannot be made during the peer review, and any SoW or ToRs modifications prior to the peer review shall be approved by the COTR and CIE Lead Coordinator.** The CIE Lead Coordinator can contact the Project Contact to confirm any peer review arrangements.

Panel Review Meeting: Each CIE reviewer shall conduct the independent peer review in accordance with the SoW and ToRs, and shall not serve in any other role unless specified herein. **Modifications to the SoW and ToRs cannot be made during the panel review, and any SoW or ToRs modifications prior to the panel review shall be approved by the COTR and CIE Lead Coordinator.** Each CIE reviewer shall actively participate in a professional and respectful manner as a member of the meeting review panel, and their peer review tasks shall be focused on the ToRs as specified herein. Working with the Council, the NMFS Project Contact is responsible for any facility arrangements (e.g., conference room for panel review meetings or teleconference arrangements). The NMFS Project Contact is responsible for ensuring that the Chair understands the contractual role of the CIE reviewers as specified herein. The CIE Lead Coordinator can contact the Project Contact to confirm any peer review arrangements, including the meeting facility arrangements.

[From CIE guidance (?): Please provide a brief description of the CIE peer reviewer's role on the panel. Briefly describe or provide a link of the established guidelines for conducting the panel review meeting. Describe if and how a panel Chair will be selected/identified, the role of the panel Chair in relation to the CIE reviewer's responsibilities in the peer review. Describe any additional roles (e.g., contribution to an Executive Summary report) of the CIE reviewers](Note: This section will require a bit more work as we get greater clarity and agreement in the process.)

Contract Deliverables - Independent CIE Peer Review Reports:

Desk review: Each CIE reviewer shall complete an independent peer desk review report in accordance with the SoW. Each CIE reviewer shall complete the independent peer review

according to required format and content as described in Annex 1. Each CIE reviewer shall complete the independent peer review addressing each ToR as described in Annex 2 pertinent to Chapter 1. The desk review will be produced prior to the onset of the public panel review.

Public panel review: Each CIE reviewer shall complete an independent peer review report subsequent to the desk review and the public panel session in accordance with the SoW. Each CIE reviewer shall complete the independent peer review according to required format and content as described in Annex 1. Each CIE reviewer shall complete the independent peer review addressing each ToR as described in Annex 2 as specified for Chapter 2.

Other Tasks – Contribution to Executive Summary: In addition to each reviewer’s individual peer review reports, CIE reviewers may assist the Chair with contributions to an Executive Summary to the Report (see Annex I). CIE reviewers are not required to reach a consensus and should provide a brief summary of the reviewer’s views on the summary of findings and conclusions reached by the review panel in accordance with the ToRs.

Specific Tasks for CIE Reviewers: The following chronological list of tasks shall be completed by each CIE reviewer in a timely manner as specified in the **Schedule of Milestones and Deliverables**.

- 1) Conduct necessary pre-review preparations, including the review of background material and reports provided by the NMFS Project Contact in advance of the peer review;
- 2) Conduct an independent peer desk review in accordance with the ToRs (Annex 2, Chapter 1);
- 3) No later than _____, each CIE reviewer shall submit an independent Desk Review report addressed to the “Center for Independent Experts,” and sent to Mr. Manoj Shivlani, CIE Lead Coordinator, via email to shivlanim@bellsouth.net, and CIE Regional Coordinator, via email to Dr. David Die ddie@rsmas.miami.edu. Each CIE report shall be written using the format and content requirements specified in Annex 1, and address each ToR in Annex 2
- 4) Participate during the panel review meeting at the {insert location} during {insert date}. LOCATION and DATE as specified herein, and conduct an independent peer review based on the information obtained through the public panel process in accordance with the ToRs (Annex 2, Chapter 2).
- 5) No later than _____, each CIE reviewer shall submit an independent Panel Review report addressed to the “Center for Independent Experts,” and sent to Mr. Manoj Shivlani, CIE Lead Coordinator, via email to shivlanim@bellsouth.net, and CIE Regional Coordinator, via email to Dr. David Die ddie@rsmas.miami.edu. Each CIE report shall be written using the format and content requirements specified in Annex 1, and address each ToR in Annex 2;

Schedule of Milestones and Deliverables: CIE shall complete the tasks and deliverables described in this SoW in accordance with the following schedule.

Month/DD/Yr	CIE sends reviewer contact information to the COTR, who then sends this to the NMFS Project Contact
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	NMFS Project Contact sends the CIE Reviewers the BiOp and background documents
	Each reviewer conducts an independent peer review as a desk review.
	CIE reviewers submit CIE independent peer review reports (Chapter 1) to the CIE Lead Coordinator and CIE Regional Coordinator.
A few days/weeks later	CIE reviewers convene as a panel in a public session
	CIE reviewers prepare and submit additional reviews based on the information received in the public panel session, along with their analysis of information subsequent to the BiOp and recommendations (Chapter 2).
	CIE compiles Chapters 1 and 2 and submits CIE independent peer review reports to the COTR
	The COTR distributes the final CIE reports to the NMFS Project Contact and Administrator, Alaska Region.

Modifications to the Statement of Work: Requests to modify this SoW must be made through the Contracting Officer's Technical Representative (COTR) who submits the modification for approval to the Contracting Officer at least 15 working days prior to making any permanent changes. The Contracting Officer will notify the CIE within 10 working days after receipt of all required information of the decision on substitutions. The COTR can approve changes to the milestone dates, list of pre-review documents, and Terms of Reference (ToR) of the SoW as long as the role and ability of the CIE reviewers to complete the SoW deliverable in accordance with the ToRs and deliverable schedule are not adversely impacted. The SoW and ToRs cannot be changed once the peer review has begun.

Acceptance of Deliverables: Upon review and acceptance of the CIE independent peer review reports by the CIE Lead Coordinator, NMFS Regional Coordinator, and Steering Committee, these reports shall be sent to the COTR for final approval as contract deliverables based on compliance with the SoW. As specified in the Schedule of Milestones and Deliverables, the CIE shall send via e-mail the contract deliverables (the CIE independent peer review reports) to the COTR (William Michaels, via William.Michaels@noaa.gov).

Applicable Performance Standards: The contract is successfully completed when the COTR provides final approval of the contract deliverables. The acceptance of the contract deliverables shall be based on three performance standards: (1) each CIE report shall have the format and content in accordance with Annex 1, (2) each CIE report shall address each ToR as specified in Annex 2, (3) the CIE reports shall be delivered in a timely manner as specified in the schedule of milestones and deliverables.

Distribution of Approved Deliverables: Upon notification of acceptance by the COTR, the CIE Lead Coordinator shall send via e-mail the final CIE reports in *.PDF format to the COTR.

The COTR will distribute the approved CIE reports to the NMFS Project Contact and will notify the Executive Director, North Pacific Fishery Management Council of availability of the report.

Support Personnel:

William Michaels, Program Manager, COTR
NMFS Office of Science and Technology
1315 East West Hwy, SSMC3, F/ST4, Silver Spring, MD 20910
William.Michaels@noaa.gov Phone: 301-713-2363 ext 136

Manoj Shivlani, CIE Lead Coordinator
Northern Taiga Ventures, Inc.
10600 SW 131st Court, Miami, FL 33186
shivlanim@bellsouth.net Phone: 305-383-4229

Key Personnel:

Dana J. Seagars NMFS Project Contact:
Protected Resources Division
NMFS, Alaska Region, 222 West 7th Avenue, Anchorage, AK, 99513-7577
Dana.Seagars@noaa.gov Phone: 907-271-5005

Melanie Brown, Action Agency Contact:
Sustainable Fisheries Division
NMFS, Alaska Region, 709 W.9th Street, Juneau, AK 99802
Melanie.brown@noaa.gov Phone: 907-586-7006

Douglas DeMaster, Director
Alaska Fisheries Science Center
National Marine Fisheries Service,
17109 Pt Lena Loop Road, Juneau, AK 99801
Douglas.Demaster@noaa.gov Phone: 206-399-1431

Annex 1: Format and Contents of CIE Independent Peer Review Report

1. The CIE independent report (Report) shall be prefaced with an Executive Summary providing a concise summary of the findings and recommendations.
2. The Report will include two chapters. The first chapter will be based on each reviewer's independently conducted desk review. The second chapter will be based on each reviewer's evaluation of the full scientific record including scientific information available after September 3, 2010 through information presented at the public session conducted by the review panel process.
3. The main body of each chapter shall consist of a Background, Description of the Individual Reviewer's Role in the Review Activities, Summary of Findings for each ToR, and Conclusions and Recommendations in accordance with the Terms of Reference (ToRs).
 - a. Reviewers should describe in their own words the review activities completed during the panel review meeting, including providing a brief summary of findings, of the science, conclusions, and recommendations.
 - b. Reviewers should discuss their independent views on each ToR even if these were consistent with those of other panelists, and especially where there were divergent views.
 - c. Reviewers should elaborate on any points raised in the Summary Report that they feel might require further clarification.
 - d. The CIE independent report shall be a stand-alone document for others to understand the weaknesses and strengths of the science reviewed, regardless of whether or not they read the summary report. The CIE independent report shall be an independent peer review of each ToRs, and shall not simply repeat the contents of the summary report.
4. The reviewer report shall include as separate appendices as follows:
 - Appendix 1: Bibliography of materials provided for review
 - Appendix 2: A copy of the CIE Statement of Work
 - Appendix 3: A list of persons and organizations participating in the public panel session and other pertinent information from the panel review meeting.

Annex 2: Terms of Reference

Background and Context:

The purpose of this CIE Review is to evaluate a Final Biological Opinion issued by NOAA Fisheries November 24, 2010. The Endangered Species Act (ESA) requires the NOAA Fisheries Service to consult with federal agencies proposing actions that may affect ESA listed species. The consultation results in a Biological Opinion that describes the action, reviews species biology, and makes a conclusion as to whether or not the action is likely to jeopardize the continued existence of the listed species or to adversely modify its designated critical habitat. Adverse modification is determined to occur when the direct or indirect effects of an action "appreciably diminishes the value of critical habitat for both the survival and recovery of a listed species" (FWS/NMFS 1998). The consultation process is not required to employ a "prove or disprove" or statistical evaluation process, but instead may evaluate the best available information in a "weight of evidence approach" to make a determination. The process follows the ESA statute, related regulations, and case law, and, as guidance, the 2008 NMFS Steller Sea Lion Recovery Plan; with guidance to authors provided within the Endangered Species Consultation Handbook (FWS/NMFS 1998).

Tasks specific to developing Chapter 1 (conducting the desk review):

1. Read the Final Biological Opinion (November 24, 2010) on the BSAI and GOA groundfish fisheries; and state waters parallel fisheries for groundfish fisheries, and as needed, review the related background documents (list of documents provided is attached).
2. Provide peer review and comment on the final BiOp, including information available to NMFS through the end of the public comment period (Sept. 3, 2010) for the Draft BiOp, evaluate the rationale developed, and the subsequent findings regarding factors potentially affecting Steller sea lion population status, vital rates, critical habitat, risk of extinction, and recovery including in particular the findings regarding the effects of fisheries on Steller sea lion population status, vital rates, and critical habitat. Address the following:
 - a. Does the Biological Opinion thoroughly and accurately (i.e. using the best available scientific information) describe what is known about the status of the listed species?
 - b. Does the Biological Opinion thoroughly and accurately describe what is known about groundfish fishery practices and catch statistics under the current ongoing "status quo" action, as defined in the Biological Opinion?
 - c. While the agency is directed to evaluate the effects of the action on listed species and critical habitat, does the Biological Opinion also adequately address alternative scientific explanations to the apparent population dynamics of the WDPS of Steller sea lion, such as explanations involving, but not limited to, predation, disease, ecosystem/carrying capacity, or emigration?
 - d. Does the Biological Opinion thoroughly and accurately assess the effects (direct and indirect) of the action on the listed species and its critical habitat?
 - e. Evaluate the scientific weight of the evidence presented in the BiOp (e.g., does the evidence provide strong, moderate or weak support for the discussion, findings and conclusions made in the document?).

3. Reviewers shall evaluate the quality and completeness of the scientific and commercial information used in the BiOp analysis, and identify if the BiOp analysis is comprehensive or if there are relevant scientific or commercial data or information that was not used in the BiOp analysis.
4. Reviewers are specifically asked to evaluate the scientific basis for the nutritional stress findings of the final 2010 BiOp. Reviewers shall evaluate and comment on the strength of the linkages among fish biomass estimates, fishery removals, Steller sea lion reproductive rates, and recovery of the WDPS. Does the Biological Opinion accurately evaluate the inter-relationships between Steller sea lion population status and trends, foraging ecology, and groundfish fisheries effects across broad geographic areas (ecosystems to highly localized regions) and temporal scales (years to seasons)?
5. Reviewers will determine if there is any additional literature, assessments, or analyses that should have been considered in this Biological Opinion (as of the end of the public comment period for the Draft BiOp, September 3, 2010).
6. In making these evaluations, reviewers shall consider and address the following questions:
 - a. Are the findings of the BiOp contradicted by any scientific information available as of Sept 3, 2010 presented in, or omitted from, the BiOp?
 - b. As part of this consideration, reviewers shall also assess the scientific record to determine whether adequate consideration has been given to the likelihood that factors other than fishing are negatively affecting the population status, critical habitat or recovery of the WDPS including predation, changes in the ecosystem/carrying capacity, emigration, exposure to contaminants, or other factors.

Tasks specific to Chapter 2:

1. Reviewers will convene as a Panel and will hold a one-day public session in Alaska to receive presentations (presentations shall constitute half of this day) regarding the BiOp analysis and related scientific information including presentations by experts from environmental organizations, the fishing industry, and affected communities. The Panel will consider all relevant information available up to the date of the Panel meeting.
2. Following the ToR identified above for Chapter 1, the reviewers shall, as practicable, reexamine the Final BiOp, its scientific record, and any new information available subsequent to the issuance of the Final BiOp and shall, as practicable, provide additional commentary on the findings they made in Chapter 1 based on information that arises from public input. This re-visitation of Chapter 1 shall be, as practicable, part of Chapter 2 of the report. As part of this commentary the reviewers are tasked to reevaluate, as practicable, the scientific basis for the conclusions of the final 2010 BiOp, including the linkages among

reproductive rates, nutritional stress, fishery removals, and the recovery of the western distinct population segment of Steller sea lions.

3. The Reasonable Prudent Alternative (RPA) presented in the BiOp and implemented through an Interim Final Rule (75FR77535; December 13, 2010) may present an opportunity for an adaptive management experiment. Reviewers will be asked to (1) evaluate the utility of this opportunity, (2) evaluate the metrics identified in the BiOp (e.g., trends in Steller sea lion abundance, trends in biomass of Atka mackerel and other groundfish, etc.) and (3) suggest other metrics not described in the BiOp that could be used to evaluate the efficacy of the RPA in ensuring the groundfish fisheries are not likely to adversely affect the survival and recovery of the western distinct population segment of the Steller sea lion.

DRAFT

LIST of DOCUMENTS TO BE PROVIDED to the reviewers by NMFS prior to the review.

Key Documents

1. Final Biological Opinion on the authorization of Groundfish Fisheries under the Fishery Management Plans for the Bering Sea and Aleutian Islands Management Area and the Gulf of Alaska, November 2010. 472p + 224p. Available at:
<http://www.alaskafisheries.noaa.gov/protectedresources/stellers/esa/biop/final/1210.htm>

Background Documents

2. Fisheries of the Exclusive Economic Zone off Alaska: Steller sea lion protection measures for the Bering Sea and Aleutian Islands Groundfish fisheries off Alaska. Interim Final Rule (75FR77535; December 13, 2010). 26p.
3. Fishery Management Plan for Groundfish of the Bering Sea and Aleutian Islands Management Areas. North Pacific Fishery Management Council. April 2009.
<http://alaskafisheries.noaa.gov/npfmc/fmp/bsai/bsai.htm>. 165p.
4. Fishery Management Plan for Groundfish of the Gulf of Alaska. North Pacific Fishery Management Council. April 2009. Available at:
<http://alaskafisheries.noaa.gov/npfmc/fmp/goa/goa.htm>. 149p.
5. Aleutian Islands Fishery Ecosystem Plan. North Pacific Fishery Management Council. December 2007. Available at:
<http://www.fakr.noaa.gov/npfmc/currentissues/ecosystem/AIFEPbrochure1207.pdf>. 24p.
6. 2000 Endangered Species Act Section 7 Consultation Biological and Incidental take Statement. Authorization of Bering Sea/Aleutian Islands groundfish fisheries based on the Fishery Management Plan for the Bering Sea/Aleutian Islands Groundfish; and Authorization of Gulf of Alaska groundfish fisheries based on the Fishery Management Plan for Groundfish of the Gulf of Alaska. November 2000. National Marine Fisheries Service. 2000. Available at: <http://fakr.noaa.gov/protectedresources/stellers/section7.htm>. 588p.
7. 2001 Biological Opinion and Incidental Take Statement. October 2001. Authorization of Bering Sea/Aleutian Islands groundfish fisheries based on the Fishery Management Plan for the Bering Sea/Aleutian Islands Groundfish as modified by amendments 61 and 70; and Authorization of Gulf of Alaska groundfish fisheries based on the Fishery Management Plan for Groundfish of the Gulf of Alaska as modified by amendments 61 and 70. Parallel fisheries for pollock, Pacific cod, and Atka mackerel, as authorized by the State of Alaska within 3 nm of shore, plus selected supporting documents. National Marine Fisheries Service. 2001. available at:
<http://fakr.noaa.gov/protectedresources/stellers/section7.htm>. 201p.

8. 2003 Supplement to the Endangered Species Action Section 7 Biological Opinion and Incidental take statement of October 2001, plus appendices. National Marine Fisheries Service. 2003. available at: <http://fakr.noaa.gov/protectedresources/stellers/section7.htm>. 183p.
9. Endangered Species Act (available at: <http://www.nmfs.noaa.gov/pr/pdfs/laws/esa.pdf>) and implementing regulations (available at: <http://www.alaskafisheries.noaa.gov/protectedresources/esa/>).
10. Endangered Species Consultation Handbook. US Fish and Wildlife Service and the National Marine Fisheries Service. Final 1998. Available at: http://www.fws.gov/endangered/esa-library/pdf/esa_section7_handbook.pdf
11. Historical and current fishery stock assessment data relevant to wDPS Steller sea lion prey species including but not limited to pollock, Atka mackerel, and Pacific cod, population assessment data for Steller sea lion predators by area, Steller sea lion population survey data for the entire wDPS, the portion of the wDPS in US waters, and by sub-region and RCA in US waters.
12. Additional scientific and commercial information relevant to this review, including scientific information presented to the Council's Steller sea lion Mitigation Committee, pertinent scientific comments received as part of the review process for the BiOp, and the review prepared by the States of Alaska and Washington (Bernard et al. 2011).
13. Recovery Plan for Eastern and Western Distinct Population Segments of Steller Sea Lion *Eumetopias jubatus*. March 2008. (add full reference). 325p.

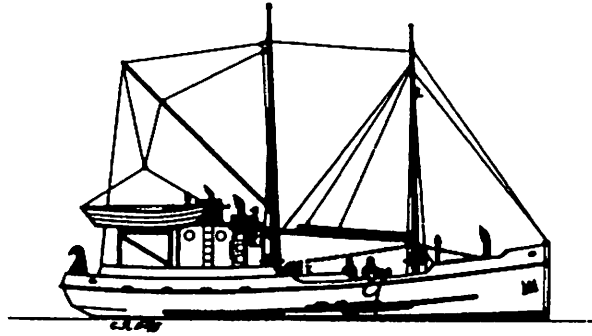
NOTE: A listing of all background documents and information provided to the reviewers by NMFS shall be made available to the public at the time the documents are made available to the CIE reviewers.

PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: B- Reports

	NAME (PLEASE PRINT)	TESTIFYING ON BEHALF OF:
1	Bob Alverson	FVOA - Seattle
2	Larry Colter, John Bauwin, Kenny Down	ASL, F2L et al
3	Jeff Osborn	Dock Street Builders
4	Simon Swetzoff JR.	SELF
5	Julie Bonny / Bob Krueger / Glenn Reed	AGPB / AWT / PSPA
6	Paul Clappitt	FVOA - Augustum
7	George Hutchins	Myself
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NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person "to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act.



January 31, 2012

Eric Olson, Chairman
NPFMC
605 W. 4th
Suite 306
Anchorage, AK 99501-2252

Dear Mr. Olson,

I am writing regarding the control date that was established restricting the use of the hired skipper privilege by initial issues of halibut and sablefish quota for newly acquired quota share. I believe there were unexpected consequences suffered by some people as a result of the February 12, 2010 control date. Therefore, I suggest a review of the current control date by the North Pacific Fisheries Management Council is warranted and the date should be changed.

As a broker of quota share at Dock Street Brokers since 1995, I'm very involved in the mechanics of the various dimensions of quota transfers. Without arguing for or against the merits of the rule change, in my opinion the control date placed an egregious set of circumstances on certain buyers of quota share.

For virtually all intents and purposes, the effect of the February 12, 2010 control date was to create a control date of December 31, 2009. The reason for this revolves around the way the Restricted Access Management Division of the National Marine Fisheries Service completes transfers.

Every year RAM ceases any transfers of halibut or sablefish on January 1 and does not resume until after annual fishing permits for the upcoming season have been issued. In 2010, the annual QS:IFQ ratios were issued on Friday, February 5. Subsequent to the announcement of the ratios RAM issued the annual permits. Only after that did they resume transfers. I do not recall the exact date that NMFS resumed transfers in 2010, but it was likely only around the 11th of February at the earliest. RAM states that buyers and sellers of QS should allow 10 working days to complete a transfer. Therefore, even the best-planned transaction would not have been transferred by the control date had it not been completed in 2009.

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(206) 789-5101 Fax (206) 789-5103 www.dockstreetbrokers.com

There are a variety of factors that complicate transactions that occur during that time of year. When completing a transaction that is negotiated on the basis of an upcoming change in TAC, a number of issues need to be resolved. A simplified version of a typical transaction may occur as follows:

- a) An agreement is reached to purchase a number of quota share units on the basis of the not yet established pounds to be issued for the upcoming season. Such agreements are reached anytime after a season and prior to the issuance of the new QS:IFQ ratios. They normally include non-refundable earnest money.
- b) After RAM issues the QS:IFQ ratios (February 5, 2010 in this case) the actual number of pounds that are involved in the transfer are calculated. Only then can the actual dollar amount of the transaction be determined.
- c) If a lender is involved, whether it be NMFS Financial Services, CFAB, the State of Alaska, or a private bank, the lender needs to adjust loan documents to reflect the actual dollar amount that needs to be disbursed and have the borrower sign relevant documentation. Then, the buyer and/or the lender deposits the funds in escrow.
- d) Only after the funds are placed in escrow can a transfer be submitted. RAM does not accept electronically delivered transfer applications, so the original document needs to be submitted. Using expedited mail this takes one to two days.
- e) Upon receipt of the transfer papers, RAM puts the transfer in a queue to be processed in the order received.

As noted earlier, RAM states that it may take as many as 10 working days to complete a transfer. So, even if a buyer in this situation had been able to anticipate upcoming rule changes, the chances of having a transfer completed by February 12 were slim to none.

Obviously I cannot speak on behalf buyers or sellers of all transactions that occurred during this time period. But, I was personally involved in transactions involving some initial issues as buyers that occurred during this time period and went through such a process. Having committed to the deal with non-refundable earnest money, no realistic option existed for the buyers other than to go through with the transaction or lose earnest money.

Frequently many transactions are negotiated in the time period immediately following the issuance of the new QS:IFQ ratios. This was the case in 2010 as well. Absent diligent attention to the Council process, people were likely unaware of the proposed control date. I am aware of several initial issues that purchased or sold QS around the control date without knowledge of the impact their decisions would have on their fishing operations.

Extending beyond the time period around the February 10, 2010 meeting of the NPFMC,

many initial issues of QS engaged in other transactions as both buyers and sellers. I know that many of them were unaware of the pending rule change and certainly had no idea of a proposed control date. Some of the buyers would not have completed their purchases, and many of the sellers would not have sold, given their inability to replace sold shares with other shares, perhaps in a different area, that could have been harvested with a hired skipper. This is evidenced by the remarkable reduction in the number of QS/IFQ transactions since the establishment of the control date on March 8, 2011. This is highlighted by the new lack of participation in the QS/IFQ market by initial issues.

I'm certain that the control date impacts various participants in the fishery in a variety of different ways. But, I do feel it is important to point out that the existing control date made it impossible for some buyers, without warning, to complete their transfers in time to allow the continued use of the hired skipper privilege.

I hope the NPFMC takes the initiative to review its control date decision and ultimately extend the date. In my opinion a new control date of no earlier than March 8, 2011 would eliminate harm that may have been inadvertently caused by the existing date of February 12, 2010.

Thank you very much for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeff Osborn', with a long horizontal line extending to the right.

Jeff Osborn
Dock Street Brokers

Owner on board

From: **polar2843** (polar2843@gmail.com)

Sent: Tue 1/17/12 6:31 PM

To: robertalverson@msn.com (robertalverson@msn.com)

To: Robert Alverson

I, to was disappointed in the councils decision to retrospect a date without appropriate warning to stake holders.

I, am well acquainted with the proposers of this change and I think they thought that there was too much quota being consolidated into too few hands and not enough available on the open market, however, the exact opposite has occurred. Very few initial IFQ recipients would sell quota with these new rules.

Something else that should be mentioned, I believe Jan. 24 is the deadline for comments on trawl by catch (halibut). That by catch quota has to be lowered. Those council members are the so-called stewards of the North Pacific. It's time they act like it.

I'll write in support of both.

Regards Patrick Pikus

January 18, 2012

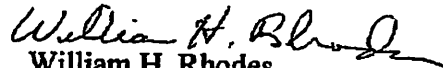
Dear Mr. Robert D. Alverson,

I purchased a small IFQ of 3A halibut after the control date. This year I'm having shoulder replacement surgery on April 2. It would place a hardship on me to change this date.

Next year I'm planning knee replacement and would not be able to fish. I'm 65 years old and use the Halibut and Sablefish to supplement our income.

Please reconsider this control date as I was not made aware of the date.

Thank you,



William H. Rhodes
F/V Charleen
P.O. Box 2215
Gearhart, Or. 97138
503-717-1068

Telephone call for you

From: **Carol Batteen** (cmbatteen@hotmail.com)

Sent: Fri 1/20/12 9:33 AM

To: Robert Alverson (robertalverson@msn.com)

Bob:

A Capt. Ray or Roy Welsh left a message yesterday indicating "that our time is running". He would like to talk to you. Received your email but no phone number. Was going to send a note off to the Council. His number is (907) 235-5412.

Carol M. Batteen

Fishing Vessel Owners' Association

Marine Safety Reserve

Eat on the Wild Side!

Cargo Reserve Pool

4005 - 20th Ave. West, Room 232

Seattle, WA 98199

(206) 283-7735 phone

(206) 283-3341 fax

Fairweather Fish, Inc.
Lisa Newland, President
P.O. Box 1729
Gig Harbor, WA 98335

North Pacific Fisheries Management Council
605 West 4th Ave.
Anchorage, Alaska 99501

January 23, 2012

Dear chairman Olsen and council members.

I am the President and 100% owner Fairweather Fish, Inc., a small business that is an initial recipient of IFQ in the Halibut and Sablefish program.

The business is severely harmed by your proposed amendment to limit the use of hired skippers. The business has always hired a master and since 1995 it is mandatory that the business hire a master. I do not have, nor do I qualify for a Transfer of Eligibility Certificate (TEC) that would allow transfer of quota personally. Fairweather Fish, Inc. has the Transfer of Eligibility Certificate which was issued back in 1995, and this proposed regulation rescinds and terminates the Businesses TEC.

Through the use of backdating you have effectively harmed these small businesses and individuals without the approval of the secretary of commerce. You have skipped the regulatory process entirely.

The Halibut and Sablefish IFQ market is stagnant since this council action and due to this council action. The only authority on the market that commented to the council at final action, cautioned that proposed amendment would have the opposite effect of the stated purpose. The price of quota has increased not decreased, and the amount of quota on the market has drastically reduced. The affected individuals and small businesses can't sell or trade any quota owned before 2-12-2010. All quotas owned by these individuals and businesses, prior to the posted control date, are in a class of their own now. That quota cannot be transferred, or it could be lost forever. This very predictable action by the initial recipients should have been further analyzed, as it is having a huge impact on the IFQ market.

The purpose of the hired skippers program was to not harm small businesses in this manner, and that was the intent of the original council and it is the intent of the U.S. Congress. This proposed regulation is redundant and overlapping. It harms small businesses and it overlaps the program by creating arbitrary ownership caps in a program where ownership caps were established with inception. This proposed regulation is discriminatory and biased.

I am asking you to reconsider this proposed amendment entirely. It is stated that this use of the hired skipper program will decrease without further amendment to the program, and therefore no basis is found for the damage it does to the program, the IFQ Market, and the small businesses involved.

Thank You for your consideration of these comments.

Sincerely,

Lisa Newland, President

Fairweather Fish, Inc.

February 12, 2010

COMPANY_OR_LAST_NAME	FIRST_NAME	SPECIES	IFQ_TRANS	QS_TRANS
JOHNSON	KARL	Halibut	40	490
CALDWELL	GLENN	Halibut	23	287
GRAUVOGEL	CARL	Halibut	257	2,146
ANDREWS	JON	Halibut	5,074	65,339
ANDREWS	JON	Halibut	26	51,838
AYERS	ROBERT	Halibut	-54	21,368
AYERS	ROBERT	Halibut	0	38,990
BAHRT	JOHN	Sablefish	22,045	226,932
BAHRT	JOHN	Sablefish	21,756	226,024
BAKOVIC	RICHARD	Sablefish	8,687	90,757
BALDWIN	ROBERT	Halibut	4,436	60,030
BALDWIN	ROBERT	Halibut	11,713	156,938
BALDWIN	ROBERT	Halibut	0	84,266
BARBER	SAM	Halibut	2,793	38,464
BARKHAU	KENT	Halibut	4,923	62,570
BARTELD	DALE	Sablefish	15,245	207,811
BASARGIN	NIKITA	Sablefish	35,467	255,468
BASARGIN	IVAN	Halibut	10,011	67,404
BASARGIN	IVAN	Halibut	7,716	49,819
BEAM	MARTIN	Sablefish	3,712	40,683
BELL VI	ORLANDO	Halibut	11,763	119,655
BENTON	HUGH	Halibut	2,154	27,733
BENTON	HUGH	Halibut	5,627	70,127
BOCCI	JOHN	Halibut	0	67,760
BODDING	JIM	Sablefish	0	42,123
BOWEN	DOUGLAS	Halibut	15	92
BOWEN	DOUGLAS	Sablefish	724	8,307
BOWEN	DOUGLAS	Sablefish	22	286
BOWEN	DOUGLAS	Halibut	32	181
BOWEN	DOUGLAS	Halibut	291	2,201
BOWEN	DOUGLAS	Halibut	235	1,301
BOWEN	DOUGLAS	Sablefish	25	329
BOWEN	DOUGLAS	Sablefish	4	1,186
BOYCE	RICHARD	Halibut	794	17,501
CALDWELL	GLENN	Halibut	72	873
CALDWELL	GLENN	Halibut	197	2,401
CALDWELL	GLENN	Sablefish	101	947
CALDWELL	GLENN	Halibut	26	220
CALDWELL	GLENN	Halibut	59	504
CALDWELL	GLENN	Halibut	30	367

CALDWELL	GLENN	Sablefish	18	211
CALDWELL	GLENN	Sablefish	151	2,332
CALDWELL	GLENN	Halibut	191	2,329
CALDWELL	GLENN	Halibut	287	2,399
CALDWELL	GLENN	Halibut	173	1,954
CALDWELL	GLENN	Halibut	19	249
CALDWELL	GLENN	Halibut	118	1,333
CALDWELL	GLENN	Halibut	34	389
CALDWELL	GLENN	Halibut	91	1,969
CARLSON	ROBERT	Halibut	3,267	29,307
CARLSON	ROBERT	Halibut	3,833	44,381
CARSON	LAWRENCE	Halibut	286	3,869
CASTILLO	JOSE RAUL	Halibut	865	4,191
CASTILLO	JOSE RAUL	Halibut	2,692	14,701
CHARTIER	DAVID	Halibut	0	37,001
CLAMPITT	PAUL	Sablefish	-1,842	491,062
CLARKE	DAVID	Halibut	171	16,031
COOPER	DARRYL	Halibut	2,612	24,166
CRAIG	JOE	Halibut	0	20,979
CRESAP	KIM	Halibut	9,186	69,492
CURRAN	RICHARD	Sablefish	247	3,822
CURRAN	RICHARD	Sablefish	26	137,273
CURRAN	RICHARD	Sablefish	46	602
CUSHING	DANIEL	Halibut	758	16,346
DARIENZO	JOSEPH	Halibut	903	12,215
DAVIS	STEVEN	Halibut	6,795	91,043
DOCHTERMANN	LUDGER	Halibut	6,409	31,046
DRENNAN	THOMAS	Halibut	25	307
DRENNAN	THOMAS	Sablefish	17	166
DRENNAN	THOMAS	Halibut	325	7,015
ECKLEY	ROBERT	Halibut	-65	92,502
ENDERLE	DENNIS	Halibut	706	21,052
FELLOWS	ROBERT	Halibut	11,628	69,492
FINDLEY	KEITH	Halibut	4,133	53,218
FISH	STEVEN	Sablefish	8,733	120,989
FISH	STEVEN	Sablefish	6,605	90,916
FISH	STEVEN	Halibut	-36	57,215
FROLOV	FRED	Sablefish	6,000	80,159
GRAUVOGEL	CARL	Halibut	14,177	80,462
GRAUVOGEL	CARL	Halibut	5,561	34,818
GRAUVOGEL	CARL	Sablefish	10,528	78,601
GRAUVOGEL	CARL	Sablefish	7,871	53,413
GRAUVOGEL	CARL	Halibut	6,157	29,267
GRAUVOGEL	CARL	Halibut	8,163	43,456
GRAUVOGEL	CARL	Sablefish	30,783	229,841
GRAY	STEVE	Halibut	2,272	27,805
GROSS	ROGER	Halibut	1,739	41,226
GRUNERT	MICHAEL	Halibut	649	5,418
GRUTTER	THEODORE	Sablefish	4,338	50,428
GRUTTER	THEODORE	Halibut	1,205	14,641
HANSON	ROBERT	Halibut	12,005	51,014

PO BOX 2308		HOMER	AK	99603
PO BOX 2308		HOMER	AK	99603
PO BOX 2308		HOMER	AK	99603
PO BOX 2308		HOMER	AK	99603
PO BOX 2308		HOMER	AK	99603
PO BOX 2308		HOMER	AK	99603
PO BOX 2308		HOMER	AK	99603
PO BOX 2308		HOMER	AK	99603
PO BOX 2308		HOMER	AK	99603
9010 SHAUN LANDING CIRCLE		ANCHORAGE	AK	99502
9010 SHAUN LANDING CIRCLE		ANCHORAGE	AK	99502
11 POTTER RD NTG		KETCHIKAN	AK	99901
PO BOX 568		UNALASKA	AK	99685
PO BOX 568		UNALASKA	AK	99685
PO BOX 153		SELDOVIA	AK	99663
7721 168TH PL SW		EDMONDS	WA	98026
1225 E SUNSET DR #727		BELLINGHAM	WA	98226
PO BOX 4566		PALMER	AK	99645
PO BOX 1939		PAHOA	HI	96778
5300 DEARMOUN ROAD		ANCHORAGE	AK	
PO BOX 1336		SITKA	AK	99835
PO BOX 1336		SITKA	AK	99835
PO BOX 1336		SITKA	AK	99835
703 PRIEST POINT DRIVE NW		TULALIP	WA	98271
2219 SAWMILL CREEK HWY		SITKA	AK	99835
PO BOX 1554		PETERSBURG	AK	99833
PO BOX 714		KODIAK	AK	99615
PO BOX 823		PETERSBURG	AK	99833
PO BOX 823		PETERSBURG	AK	99833
PO BOX 823		PETERSBURG	AK	99833
PO BOX 1274		CORDOVA	AK	99574
PO BOX 10		ELFIN COVE	AK	99825
266 E BAYVIEW		HOMER	AK	99603
805 NW BUCKEYE AVE		EARLHAM	IA	50072
PO BOX 6448		SITKA	AK	99835
PO BOX 6448		SITKA	AK	99835
PO BOX 6448		SITKA	AK	99835
PO BOX 720		PLAMONDON	AB	T0A 2T0
PO BOX 1062		PALMER	AK	99645
PO BOX 1062		PALMER	AK	99645
PO BOX 1062		PALMER	AK	99645
PO BOX 1062		PALMER	AK	99645
PO BOX 1062		PALMER	AK	99645
PO BOX 1062		PALMER	AK	99645
PO BOX 1062		PALMER	AK	99645
PO BOX 209		KODIAK	AK	99615
172 LIBBY ST		SEQUIM	WA	98382-9532
PO BOX 1165		SEWARD	AK	99664
106 OCEAN VIEW ST		SITKA	AK	99835
106 OCEAN VIEW ST		SITKA	AK	99835
PMB 2086	3705 ARCTIC BLVD	ANCHORAGE	AK	99503

HANSON	ROBERT	Halibut	6,486	28,126
HARRIGAN	JAMES	Halibut	699	8,497
HARVEY	DENNIS	Halibut	5,136	44,690
HARVEY	DENNIS	Sablefish	0	22,342
HARVEY	DENNIS	Halibut	230	2,807
HERZOG	LEONARD	Sablefish	42,072	285,973
HERZOG	LEONARD	Halibut	14,462	90,916
HERZOG	LEONARD	Halibut	-606	395,036
HERZOG	LEONARD	Sablefish	81,759	866,033
HERZOG	LEONARD	Sablefish	81,760	866,033
HERZOG	LEONARD	Halibut	25,626	124,128
HERZOG	LEONARD	Halibut	11,125	45,814
HERZOG	LEONARD	Halibut	20,783	110,556
HERZOG	LEONARD	Halibut	30,000	125,739
HOBLET	TOM	Halibut	6,826	39,557
HOFMANN	MARK	Halibut	8,637	79,891
HOFMANN	MARK	Sablefish	5,108	65,444
HOFMANN	MARK	Sablefish	-228	102,252
HOFMANN	MARK	Sablefish	109	1,164
HOGAN	THOMAS	Halibut	12,146	112,353
IVANOFF	STEVEN	Halibut	8,865	100,203
IVANOFF	STEVEN	Sablefish	1,266	16,905
IVANOV	GREGORY	Halibut	0	46,703
JENSEN	JAMES	Sablefish	297	4,592
JENSEN	JAMES	Sablefish	11,950	208,131
JENSEN	JAMES	Sablefish	0	8,351
JOHNSON	KARI	Halibut	1,379	35,240
JOHNSON	RICHARD	Sablefish	15,345	210,618
JOHNSON	RICHARD	Sablefish	0	38,991
JONES	STANLEY	Sablefish	73	14,791
JONES	STANLEY	Halibut	0	54,730
KOHLHASE	ERNEST	Halibut	4,318	55,448
KOJIN	PETER	Halibut	2,190	12,361
KOJIN	PETER	Sablefish	11,014	75,061
KUBIAK	DAVID	Halibut	7,923	43,237
KUZMIN	ALEXEI	Halibut	2,999	13,005
KUZMIN	PAVEL	Halibut	1,482	19,084
KUZMIN	PAVEL	Halibut	1,418	18,892
KUZMIN	VASILY	Halibut	4,371	52,866
KUZMIN	VASILY	Sablefish	3,004	41,620
LANG	MICHAEL	Sablefish	0	33,223
LANG	MICHAEL	Halibut	0	416,260
LANG	MICHAEL	Sablefish	0	131,811
LANG	MICHAEL	Halibut	15,655	106,831
LANG	MICHAEL	Sablefish	33,871	229,841
LANG	MICHAEL	Halibut	27,176	131,260
LANG	MICHAEL	Halibut	6,493	30,861
LARSEN	NORMAN	Sablefish	5,054	57,814
LEWIS	TED	Halibut	0	109,350
LINDOW	ERIK	Halibut	2,081	19,250
LITTLETON	ROCKY	Halibut	0	14,977

PMB 2086	3705 ARCTIC BLVD	ANCHORAGE	AK	99503
1610 DAVIDOFF		SITKA	AK	99835
3707 OLD HIGHWAY 95		WHITE BIRD	ID	83554
3707 OLD HIGHWAY 95		WHITE BIRD	ID	83554
3707 OLD HIGHWAY 95		WHITE BIRD	ID	83554
916 DELANEY ST		ANCHORAGE	AK	99501
916 DELANEY ST		ANCHORAGE	AK	99501
916 DELANEY ST		ANCHORAGE	AK	99501
916 DELANEY ST		ANCHORAGE	AK	99501
916 DELANEY ST		ANCHORAGE	AK	99501
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916 DELANEY ST		ANCHORAGE	AK	99501
916 DELANEY ST		ANCHORAGE	AK	99501
916 DELANEY ST		ANCHORAGE	AK	99501
PO BOX 108		FALSE PASS	AK	99583
1120 E HUFFMAN RD 24-306		ANCHORAGE	AK	99515
1120 E HUFFMAN RD 24-306		ANCHORAGE	AK	99515
1120 E HUFFMAN RD 24-306		ANCHORAGE	AK	99515
1120 E HUFFMAN RD 24-306		ANCHORAGE	AK	99515
PO BOX 1648		HOMER	AK	99603
1327 MOUNTAIN VIEW DR		KODIAK	AK	99615
1327 MOUNTAIN VIEW DR		KODIAK	AK	99615
2789 BROOKLAKE RD N.E.		SALEM	OR	97303-9423
PO BOX 402		PETERSBURG	AK	99833
PO BOX 402		PETERSBURG	AK	99833
PO BOX 402		PETERSBURG	AK	99833
PO BOX 6448		SITKA	AK	99835
1414 SE OAK STREET		PORTLAND	OR	97214
1414 SE OAK STREET		PORTLAND	OR	97214
PO BOX 1249		HAINES	AK	99827-1249
PO BOX 1249		HAINES	AK	99827-1249
PO BOX 240524		DOUGLAS	AK	99824-0524
PO BOX 3264		HOMER	AK	99603
PO BOX 3264		HOMER	AK	99603
PO BOX 193		KODIAK	AK	99615
PO BOX 27		DELTA JUNCTION	AK	99737
PO BOX 1669		KODIAK	AK	99615
PO BOX 1669		KODIAK	AK	99615
16727 LEARY RD		WOODBURN	OR	97071
16727 LEARY RD		WOODBURN	OR	97071
PO BOX 192		MONTESANO	WA	98563
PO BOX 192		MONTESANO	WA	98563
PO BOX 192		MONTESANO	WA	98563
PO BOX 192		MONTESANO	WA	98563
PO BOX 192		MONTESANO	WA	98563
PO BOX 192		MONTESANO	WA	98563
PO BOX 192		MONTESANO	WA	98563
PO BOX 52		SAND POINT	AK	99661
PO BOX 2103		VASHON	WA	98070
51315 SEA QUEST DRIVE		KENAI	AK	99611
PO BOX 1373		PETERSBURG	AK	99833

LITTLETON	ROCKY	Halibut	-1	65,859
MACINKO	JOE	Halibut	6,779	88,578
MALCOLM	DONALD	Sablefish	10,155	75,580
MALCOLM	DONALD	Halibut	7,453	36,861
MALCOLM	DONALD	Halibut	24	202
MALCOLM	DONALD	Halibut	413	4,680
MALCOLM	DONALD	Halibut	17	199
MALCOLM	DONALD	Halibut	72	398
MALCOLM	DONALD	Halibut	16,596	85,363
MALCOLM	DONALD	Sablefish	4,320	45,768
MALCOLM	DONALD	Halibut	108	600
MALCOLM	DONALD	Halibut	33	181
MALCOLM	DONALD	Halibut	196	2,045
MALCOLM	DONALD	Halibut	23	126
MALCOLM	DONALD	Halibut	18	100
MALCOLM	DONALD	Halibut	28	160
MARTUSHEV	PETR	Sablefish	1	89,189
MARTUSHEV	PETR	Sablefish	0	120,662
MARTUSHEV	JOSIPH	Halibut	4,609	59,349
MARTUSHEV	PETR	Sablefish	5,036	67,029
MASON	CHARLES	Sablefish	0	510,343
MCCAY	RODERICK	Halibut	6,392	86,509
MCLEAN	KRISTI	Halibut	0	163,986
MEIER	RANDY	Halibut	68	78,742
MELLING	CLEO	Halibut	2,392	32,373
MELLING	CLEO	Halibut	2,349	32,008
MONKIEWICZ	EDWARD	Halibut	1,988	24,335
MULLAN	NORMAN	Halibut	3,500	19,163
MULLAN	NORMAN	Halibut	3,391	18,567
MULLAN	NORMAN	Halibut	3,514	19,620
MULLAN	NORMAN	Halibut	0	32,850
MULLAN	NORMAN	Halibut	3,008	16,470
NAKADA	MICHAEL	Sablefish	2,089	40,735
NASH	DONALD	Halibut	4,250	54,730
NASH	DONALD	Sablefish	1,523	14,791
NASH	DONALD	Sablefish	3,083	28,925
NESS	DARELL	Halibut	6,894	37,744
NESS	DARELL	Halibut	11,503	74,267
NESS	DARELL	Sablefish	3,811	50,861
NESS	DARELL	Sablefish	31,825	424,686
NICHOLS	RANDALL	Halibut	0	46,407
NOGGLE	CHARLES	Sablefish	0	81,370
NOGGLE	CHARLES	Sablefish	0	128,392
OTNESS	ALAN	Sablefish	9,383	127,912
PERENSOVICH	TERRY	Halibut	2,358	31,910
PETERSON	PAUL	Halibut	1,914	48,425
PFUNDT	BRYON	Halibut	968	21,548
PIKUS	PATRICK	Halibut	16,178	80,006
PIKUS	PATRICK	Halibut	22,189	125,212
POLUSHKIN	DAVID	Halibut	12,692	69,492
POLUSHKIN	ANDREY	Halibut	5,225	28,609

PO BOX 1373		PETERSBURG	AK	99833
2625 SPRUCE CAPE RD		KODIAK	AK	99615
2038 E END RD		HOMER	AK	99603
2038 E END RD		HOMER	AK	99603
2038 E END RD		HOMER	AK	99603
2038 E END RD		HOMER	AK	99603
2038 E END RD		HOMER	AK	99603
2038 E END RD		HOMER	AK	99603
2038 E END RD		HOMER	AK	99603
2038 E END RD		HOMER	AK	99603
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2038 E END RD		HOMER	AK	99603
2038 E END RD		HOMER	AK	99603
2038 E END RD		HOMER	AK	99603
2038 E END RD		HOMER	AK	99603
2038 E END RD		HOMER	AK	99603
2038 E END RD		HOMER	AK	99603
PO BOX 452		ANCHOR POINT	AK	99556
PO BOX 452		ANCHOR POINT	AK	99556
35944 S KROPF RD		WOODBURN	OR	97071
PO BOX 452		ANCHOR POINT	AK	99556
9342 STEPHEN RICHARDS DR		JUNEAU	AK	99801
PO BOX 161		PETERSBURG	AK	99833
4285 TRIAS ST		SAN DIEGO	CA	92103
PO BOX 165		KASILOF	AK	99610
5001 OAKES AVE		ANACORTES	WA	98221
5001 OAKES AVE		ANACORTES	WA	98221
1110 PURTOV ST		KODIAK	AK	99615
PO BOX 92		KODIAK	AK	99615
PO BOX 92		KODIAK	AK	99615
PO BOX 92		KODIAK	AK	99615
PO BOX 92		KODIAK	AK	99615
PO BOX 92		KODIAK	AK	99615
PO BOX 92		KODIAK	AK	99615
PO BOX 1838		HOMER	AK	99603
PO BOX 1167		HAINES	AK	99827
PO BOX 1167		HAINES	AK	99827
PO BOX 1167		HAINES	AK	99827
PO BOX 240454		DOUGLAS	AK	99824-0454
PO BOX 240454		DOUGLAS	AK	99824-0454
PO BOX 240454		DOUGLAS	AK	99824-0454
PO BOX 240454		DOUGLAS	AK	99824-0454
305 ISLANDER DR		SITKA	AK	99835
10724 167TH AVE SE		SNOHOMISH	WA	98290
10724 167TH AVE SE		SNOHOMISH	WA	98290
PO BOX 317		PETERSBURG	AK	99833
506 BARANOF ST		SITKA	AK	99835
PO BOX 23649		KETCHIKAN	AK	99901
PO BOX 1162		PETERSBURG	AK	99833
PO BOX 2843		KODIAK	AK	99615
PO BOX 2843		KODIAK	AK	99615
PO BOX 449		WILLOW	AK	99688
PO BOX 2458		HOMER	AK	99603

PORTER	HENRY	Halibut	3,140	29,046
PORTER	HENRY	Halibut	1,054	22,830
PORTER	HENRY	Halibut	1,679	15,836
PORTER	HENRY	Halibut	203	2,305
POWERS	SANDRA	Halibut	0	25,688
REIMNITZ	ARMIN	Halibut	5,500	70,822
REUTOV	DIONICI	Sablefish	10,000	140,412
REUTOV	NIKOLAI	Halibut	2,601	24,060
REUTOV	TRIFILYI	Halibut	4,280	21,738
REUTOV	TRIFILYI	Halibut	3,008	14,840
REUTOV	YAKOV	Halibut	7,369	39,531
REUTOV	CORNILY	Sablefish	3,154	38,477
REUTOV	DIONICI	Sablefish	7,497	91,457
REUTOV	DIONICI	Halibut	2,819	36,299
REUTOV	DIONICI	Halibut	1,528	19,051
REUTOV	DAVID	Halibut	168	1,075
REUTOV	CORNILY	Sablefish	0	62,555
RHODES	WILLIAM	Halibut	1,107	9,239
ROSENBERGER	GARY	Halibut	1,792	24,433
ROSS	TIMOTHY	Halibut	3,326	27,756
ROSTAD	PAUL	Halibut	4,292	57,580
ROSVOLD	ERIC	Sablefish	0	118,990
ROSVOLD	ERIC	Sablefish	6,712	91,503
RUTTER	SIGURD	Sablefish	0	26,598
RUTTER	SIGURD	Sablefish	0	39,163
SARGENT	STAN	Sablefish	0	76,051
SAVONEN	LYNN	Sablefish	1,953	20,405
SCHWARTZ	ROBERT	Halibut	4,362	61,113
SEE	CHARLES	Halibut	-891	44,152
SHADLE	MATTHEW	Sablefish	8,687	90,756
SHORT	JOSEPH	Sablefish	0	28,418
SHORT	JOSEPH	Halibut	3,700	47,657
SHORT	JOSEPH	Sablefish	135	94,337
SIMPSON	KENNETH	Halibut	0	92,503
SINZ	HARRY	Sablefish	7,451	103,802
SINZ	HARRY	Sablefish	1,190	16,712
SINZ	HARRY	Halibut	4,186	38,721
SINZ	HARRY	Halibut	10,000	92,502
SINZ	HARRY	Sablefish	7,323	90,121
SINZ	HARRY	Halibut	7,053	38,614
SINZ	HARRY	Halibut	21,180	115,962
SINZ	HARRY	Sablefish	0	76,867
SINZ	HARRY	Sablefish	0	74,789
SINZ	HARRY	Sablefish	4,000	53,439
SINZ	HARRY	Sablefish	28,939	354,612
SINZ	HARRY	Halibut	16,023	115,650
SKEELE	JOHN	Halibut	2,349	28,541
SKEENS	RONALD	Halibut	209	4,499
SMATLAN	JOSEPH	Halibut	7,485	40,981
SMITH	PHILLIP	Halibut	221	17,664
SOHRAKOFF	WAYNE	Halibut	4,184	46,383

PO BOX 121		YAKUTAT	AK	99689
PO BOX 121		YAKUTAT	AK	99689
PO BOX 121		YAKUTAT	AK	99689
PO BOX 121		YAKUTAT	AK	99689
PO BOX 1496		SOLDOTNA	AK	99669
9004 191ST PL SW		EDMONDS	WA	98026
PO BOX 4251		HOMER	AK	99603
PO BOX 2342		HOMER	AK	99603
PO BOX 793		HOMER	AK	99603
PO BOX 793		HOMER	AK	99603
PO BOX 2956		HOMER	AK	99603
PO BOX 3523		HOMER	AK	99603
PO BOX 4251		HOMER	AK	99603
PO BOX 4251		HOMER	AK	99603
PO BOX 4251		HOMER	AK	99603
PO BOX 2847		HOMER	AK	99603-2847
PO BOX 3523		HOMER	AK	99603
PO BOX 2215		GEARHART	OR	97138
2760 DOUGLAS HWY		JUNEAU	AK	99801
23522 62ND AVE S L-101		KENT	WA	98032
PO BOX 183		KAKE	AK	99830
PO BOX 1144		PETERSBURG	AK	99833
PO BOX 1144		PETERSBURG	AK	99833
310 TILSON STREET		SITKA	AK	99835
310 TILSON STREET		SITKA	AK	99835
PO BOX 574		KODIAK	AK	99615
PO BOX 172		GUSTAVUS	AK	99826
PO BOX 1533		PETERSBURG	AK	99833
PO BOX 1412		KENAI	AK	99611
PO BOX 312		HOMER	AK	99603
PO BOX 1224		PETERSBURG	AK	99833
PO BOX 1224		PETERSBURG	AK	99833
PO BOX 1224		PETERSBURG	AK	99833
13238 KONRAD DRIVE		EAGLE RIVER	AK	99577
PO BOX 110985		ANCHORAGE	AK	99511
PO BOX 110985		ANCHORAGE	AK	99511
PO BOX 110985		ANCHORAGE	AK	99511
PO BOX 110985		ANCHORAGE	AK	99511
PO BOX 110985		ANCHORAGE	AK	99511
PO BOX 110985		ANCHORAGE	AK	99511
PO BOX 110985		ANCHORAGE	AK	99511
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PO BOX 110985		ANCHORAGE	AK	99511
PO BOX 110985		ANCHORAGE	AK	99511
PO BOX 110985		ANCHORAGE	AK	99511
PO BOX 110985		ANCHORAGE	AK	99511
PO BOX 110985		ANCHORAGE	AK	99511
PO BOX 110985		ANCHORAGE	AK	99511
262 KAAGWAANTAN ST		SITKA	AK	99835
27720 315 AVE		WINNER	SD	57580
PO BOX 69		COLBERT	WA	99005
13273 CENTERVILLE RD		CHICO	CA	95928
20 SILVERTIP LANE		EUREKA	CA	95503

SOMERVILLE	DAVID	Halibut	1,423	19,469
SONEN	WALTER	Halibut	2,111	27,183
THOMPSON	PETER	Sablefish	1,301	17,796
THOMPSON	PETER	Halibut	0	39,562
TURNER	PEDR	Halibut	-27	40,877
TVENSTRUP	STEVE	Halibut	5,784	74,479
VEERHUSEN	DANIEL	Halibut	8,121	123,627
WAGNER	MARK	Halibut	8,898	43,899
WALLING	JAY	Halibut	0	117,939
WALLING	JAY	Halibut	321	27,255
WALLING	JAY	Halibut	203	4,371
WELSH	RAY	Sablefish	11,212	137,986
WELSH	RAY	Sablefish	357	3,644
WILKIE	TIMOTHY	Halibut	11,539	44,173
WILL	CRAIG	Halibut	7,717	105,032
WILSON	RILEY	Halibut	858	7,954
WILSON	DANNY	Halibut	647	5,400
WOLLIN	KIRK	Sablefish	2,315	23,613
BIG BLUE, INC.		Sablefish	5,692	76,051
DECADE, INC.		Halibut	5,059	46,800
DECADE, INC.		Sablefish	1,693	30,725
DECADE, INC.		Halibut	250	144,090
FAIRWEATHER FISH, INC.		Sablefish	3,978	55,855
FAIRWEATHER FISH, INC.		Sablefish	5,466	61,219
FAIRWEATHER FISH, INC.		Sablefish	8,266	101,618
FAIRWEATHER FISH, INC.		Halibut	2,361	11,675
GULF MAIDEN CORP.		Halibut	20,000	109,502
GULF MAIDEN CORP.		Sablefish	0	140,165
HAIDA WARRIOR, INC.		Halibut	80	918
LONGRICH ENTERPRISES, INC.		Sablefish	6,873	116,691
LONGRICH ENTERPRISES, INC.		Sablefish	20,729	277,082
MAR DEL SUD, LTD.		Halibut	6,927	89,195
RIEDERER ENTERPRISES, INC.		Halibut	2,000	18,500
RUFF & REDDY, INC.		Sablefish	12,596	176,866
RUFF & REDDY, INC.		Sablefish	962	12,324
ARAKELIAN	ALBERT	Halibut	217	2,454
BOWEN	DOUGLAS	Sablefish	131	1,651
BOWEN	DOUGLAS	Halibut	21	1,000
BOWEN	DOUGLAS	Sablefish	83	1,052
BOWEN	DOUGLAS	Sablefish	0	819
BOWEN	DOUGLAS	Sablefish	11	135
BOWEN	DOUGLAS	Halibut	89	1,146
BOWEN	DOUGLAS	Sablefish	4	51
BOWEN	DOUGLAS	Halibut	-114	16,954
BOWEN	DOUGLAS	Sablefish	27	334
BOWEN	DOUGLAS	Sablefish	14	168
BUNESS	MICHAEL	Halibut	541	6,580
CLEMENT	CHARLES	Halibut	0	6,950
ECKLEY	ROBERT	Halibut	841	7,780
GRUTTER	THEODORE	Halibut	1,374	18,601
HARVEY	DENNIS	Sablefish	45	481

PO BOX 163		PETERSBURG	AK	99833
PO BOX 107		SELDOVIA	AK	99663
PO BOX 3037		KODIAK	AK	99615
PO BOX 3037		KODIAK	AK	99615
PO BOX 217		GUSTAVUS	AK	99826
4928 BEAVER LOOP		KENAI	AK	99611
PO BOX 971		HOMER	AK	99603
PO BOX 326		SAND POINT	AK	99661
16765 LENA LOOP RD		JUNEAU	AK	99801
16765 LENA LOOP RD		JUNEAU	AK	99801
16765 LENA LOOP RD		JUNEAU	AK	99801
70309 ORIGINAL DR.		ANCHOR POINT	AK	99556
70309 ORIGINAL DR.		ANCHOR POINT	AK	99556
PO BOX 1726		SEWARD	AK	99664
3545 INDIAN CLIFF DR		HOOD RIVER	OR	97031
17701 SPAIN DR		ANCHORAGE	AK	99516
PO BOX 2697		KODIAK	AK	99615
18356 6TH AVENUE NE		POULSBO	WA	98370
3103 MILL BAY ROAD		KODIAK	AK	99615
PO BOX 572		PETERSBURG	AK	99833
PO BOX 572		PETERSBURG	AK	99833
PO BOX 572		PETERSBURG	AK	99833
PO BOX 1729		GIG HARBOR	WA	98335
PO BOX 1729		GIG HARBOR	WA	98335
PO BOX 1729		GIG HARBOR	WA	98335
PO BOX 1729		GIG HARBOR	WA	98335
PO BOX 17913		SEATTLE	WA	98127-1913
PO BOX 17913		SEATTLE	WA	98127-1913
3401 W LAWTON ST		SEATTLE	WA	98199
PO BOX 2494		KODIAK	AK	99615
PO BOX 2494		KODIAK	AK	99615
PO BOX 1573		KODIAK	AK	99615
22928 SE 406TH ST		ENUMCLAW	WA	98022
PO BOX 69		KODIAK	AK	99615
PO BOX 69		KODIAK	AK	99615
PO BOX 1014		HOMER	AK	99603
PO BOX 1642		HOMER	AK	99603
PO BOX 1642		HOMER	AK	99603
PO BOX 1642		HOMER	AK	99603
PO BOX 1642		HOMER	AK	99603
PO BOX 1642		HOMER	AK	99603
PO BOX 1642		HOMER	AK	99603
PO BOX 1642		HOMER	AK	99603
PO BOX 1642		HOMER	AK	99603
PO BOX 1642		HOMER	AK	99603
PO BOX 1642		HOMER	AK	99603
PO BOX 217		WRANGELL	AK	99929
PO BOX 302		METLAKATLA	AK	99926
PO BOX 1274		CORDOVA	AK	99574
106 OCEAN VIEW ST		SITKA	AK	99835
3707 OLD HIGHWAY 95		WHITE BIRD	ID	83554

HOLCOMB	LES	Halibut	262	2,965
HOLCOMB	LES	Halibut	0	21,939
JOHNSON	JEAN	Halibut	248	2,069
LAPPETITO	TODD	Halibut	670	8,152
LINDOW	ERIK	Halibut	-112	16,954
LINDOW	ERIK	Halibut	1	10,476
MALCOLM	DONALD	Sablefish	279	2,927
MALCOLM	DONALD	Halibut	145	1,647
MALCOLM	DONALD	Sablefish	484	5,130
MARTUSHEV	PETR	Sablefish	904	11,921
MONKIEWICZ	EDWARD	Halibut	1,084	21,067
NESS	DARELL	Halibut	369	4,767
POLUSHKIN	ANDREY	Halibut	2,009	14,516
PORTER	HENRY	Halibut	236	1,970
PORTER	HENRY	Halibut	0	16,836
PORTER	HENRY	Halibut	211	2,399
PORTER	HENRY	Halibut	766	10,080
PORTER	HENRY	Halibut	265	3,003
PORTER	HENRY	Halibut	955	10,799
PORTER	HENRY	Halibut	152	1,722
TURNER	PEDR	Halibut	56	22,400

PO BOX 143		YAKUTAT	AK	99689
PO BOX 143		YAKUTAT	AK	99689
9121 NOBLE CIRCLE		ANCHORAGE	AK	99502
2083 PINE ISLE LANE		NAPLES	FL	34112
51315 SEA QUEST DRIVE		KENAI	AK	99611
51315 SEA QUEST DRIVE		KENAI	AK	99611
2038 E END RD		HOMER	AK	99603
2038 E END RD		HOMER	AK	99603
2038 E END RD		HOMER	AK	99603
PO BOX 452		ANCHOR POINT	AK	99556
1110 PURTOV ST		KODIAK	AK	99615
PO BOX 240454		DOUGLAS	AK	99824-0454
PO BOX 2458		HOMER	AK	99603
PO BOX 121		YAKUTAT	AK	99689
PO BOX 121		YAKUTAT	AK	99689
PO BOX 121		YAKUTAT	AK	99689
PO BOX 121		YAKUTAT	AK	99689
PO BOX 121		YAKUTAT	AK	99689
PO BOX 121		YAKUTAT	AK	99689
PO BOX 121		YAKUTAT	AK	99689
PO BOX 217		GUSTAVUS	AK	99826