



C2 Request to waive halibut and sablefish vessel use caps in Bering Sea and GOA areas

May 2020 Special Council meeting

Action Memo

Council Staff: Anna Henry

Action Required: Determine whether to request that NMFS implement emergency regulations or interim measures in response to an emergency

PROPOSED ACTION

The Council received two separate letters requesting exemptions from vessel limitations (vessel caps) in the IFQ fishery for the remainder of the 2020 season. The first letter was received April 24, 2020 from the Central Bering Sea Fishermen’s Association (CBSFA) requesting a temporary exemption from halibut vessel caps in IPHC regulatory Areas 4B, 4C, 4D and 4E. A second letter was received April 27, 2020 from the Fishing Vessel Owner’s Association (FVOA) and the Deep Sea Fishermen’s Union (DSFU) requesting to waive vessel caps for halibut in IPHC Regulatory Areas 3 and 4 and sablefish in the Bering Sea Area and Gulf of Alaska Sub-areas of the Western Gulf, Central Gulf and West Yakutat. The requests cite a potential lack of harvesting capacity and difficult economic conditions as fewer vessels operate this season due to health concerns and low prices. The letters are posted on the electronic agenda under C2. Both requests are addressed in this document with the first request received listed as Option 1 and the second as Option 2. This memo discusses what the regulatory process would be to make the requested change and provides a brief analysis of impacts.

Option 1 grant a temporary exemption from halibut vessel limitations in IPHC regulatory Areas 4B, 4C, 4D and 4E for the remainder of the 2020 IFQ season.

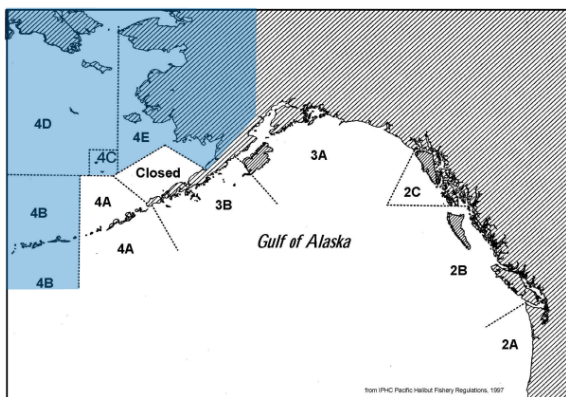


Figure 1. IPHC regulatory areas. Areas included in Option 1 are highlighted in blue.

Option 2 grant a temporary exemption from vessel limitations for halibut in IPHC Regulatory Areas 3 and 4 and sablefish in the Bering Sea area and Gulf of Alaska Sub-areas of the Western Gulf, Central Gulf and West Yakutat for the remainder of the 2020 IFQ season.

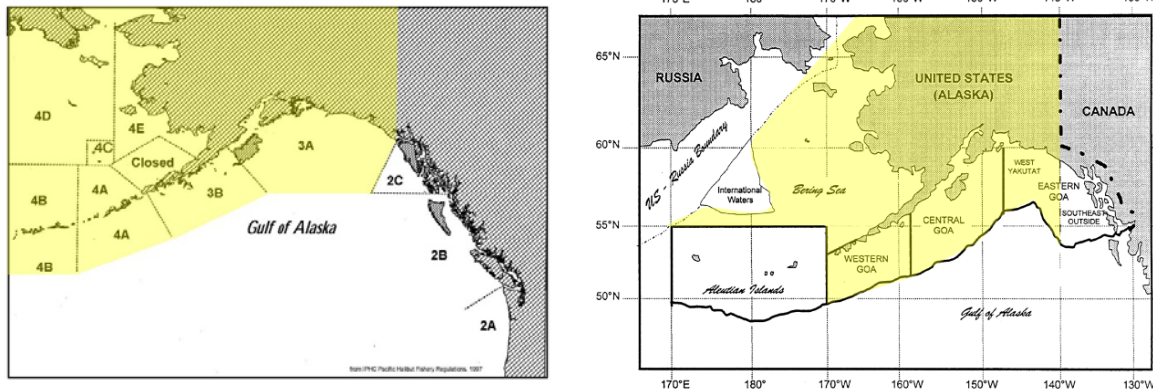


Figure 2. IPHC Regulatory Areas (left) and Sablefish regulatory areas (Right). Areas included in Option 2 are highlighted in yellow.

Regulatory process for change

In federal waters, management of the Alaska sablefish fishery is subject to the Magnuson-Stevens Act (MSA) and corresponding federal regulations. Section 305(c) of the MSA provides authority for rulemaking to address an emergency. Under that section, a Council may request emergency rulemaking if it finds an emergency exists. NMFS's Policy Guidelines for the Use of Emergency Rules provide that **the legal prerequisite for such rulemaking is that an emergency must exist, and that NMFS must have an administrative record justifying emergency regulatory action and demonstrating compliance with the Magnuson-Stevens Act and the National Standards.** Emergency rulemaking is intended for circumstances that are “extremely urgent,” where “substantial harm to or disruption of the fishery would be caused in the time it would take to follow standard rulemaking procedures.” The guidelines include three criteria that define an emergency:

1. Results from recent, unforeseen events or recently discovered circumstances;
2. Presents serious conservation or management problems in the fishery; and
3. Can be addressed through emergency regulations for which the immediate benefits outweigh the value of advance notice, public comment, and deliberative consideration of the impacts on participants to the same extent as would be expected under the normal rule making process.

The Halibut Act of 1982 (Halibut Act) at 16 U.S.C. 773b, provides the North Pacific Fishery Management Council with authority to develop regulations, that are in addition to, and not in conflict with, approved IPHC regulations.

If the Council does not recommend emergency action, the vessel caps as defined under 50 CFR § 679.42(h) (1) and (2) will remain in place. If the Council does recommend emergency action, NMFS would then analyze the action recommended by the Council and draft an emergency rule to create temporary regulations to exempt vessels from the vessel caps for the remainder of the 2020 IFQ season. The Council will choose the scope of the response and make a recommendation to NMFS. If the Council recommends Option 1 or Option 2, there must be sufficient rationale that current circumstances constitute an emergency in specific regulatory areas (IPHC regulatory Areas 4B, 4C, 4D and 4E for Option 1 and IPHC Regulatory Areas 3 and 4 and Sablefish in the Bering Sea area and Gulf of Alaska Sub-areas of the Western Gulf, Central Gulf and West Yakutat for Option 2) and not in others.

ANALYSIS OF IMPACTS

Vessel caps and harvest patterns

The purpose of the IFQ program is to provide for improved long-term productivity of the halibut and sablefish fisheries by further promoting the conservation and management objectives of the Magnuson-Stevens Fishery and Conservation Act (MSA) and the Halibut Act, and to retain the character and distribution of the fishing fleets as much as possible. The Council sought to protect small producers, part-time participants, and entry-level participants who may otherwise be eliminated from the fisheries because of potential excessive consolidation of harvesting privileges under the IFQ program. For this reason, the IFQ Program includes vessel IFQ caps for halibut and sablefish landings intended to prevent large amounts of IFQ from being fished on only a few vessels. Federal Regulations specify that “No vessel may be used, during any fishing year, to harvest more IFQ halibut than one-half percent of the combined total catch limits of halibut for IFQ regulatory areas 2C, 3A, 3B, 4A, 4B, 4C, 4D, and 4E.”

For sablefish, the limit is “one percent of the combined fixed gear total allowable catch (TAC) of sablefish for the GOA and BSAI IFQ regulatory areas” (50 CFR § 679.42(h)). Areas in the southeast have separate limits for both halibut and sablefish. Halibut area 2C and sablefish east of 140 degrees W. long (the SE subdistrict) are subject to vessel caps of one percent of the area TAC. Exemptions have not been requested for vessel caps in the southeast areas however they are included in this analysis for comparison purposes.

If an individual IFQ holder receives IFQ allocation in excess of the vessel cap they may harvest their allocation on one vessel. However, two or more IFQ permit holders may not catch and retain their IFQs with one vessel in excess of these limitations. Because the vessel IFQ cap is specified as a percent of the annual TAC, the number of pounds capped changes annually and varies with the status of the stocks. The exemptions requested would only affect fishing year 2020 however information regarding caps and vessel harvest patterns in previous years are provided to help evaluate the proposed actions. Vessel caps since 2013 are listed in Table 1 for halibut and Table 2 for sablefish. The vessel caps in the regulatory areas for which exemptions have been requested in 2020 is 80,396 lbs. of halibut and 317,088 lbs. of sablefish.

Table 1. Annual catch limits and vessel caps for halibut, 2013-2020.

Year	Halibut	Areas 3A, 4A, 4B, 4CDE	Area 2C	
	Total Catch Limit (lbs)		Vessel Cap (lbs)	Area Catch Limit (lbs)
2013	21,810,800	109,054	2,970,000	29,700
2014	15,954,370	79,772	3,318,720	33,187
2015	17,136,920	85,685	3,679,000	36,790
2016	17,152,320	85,762	3,924,000	39,240
2017	18,295,400	91,477	4,212,000	42,120
2018	16,630,200	83,151	3,570,000	35,700
2019	17,710,000	88,550	3,610,000	36,100
2020	16,079,200	80,396	3,410,000	34,100

Source: NMFS Restricted Access Management (RAM).

Table 2. Annual catch limits and vessel caps for sablefish 2013-2020.

Year	Sablefish Total Catch Limit (lbs)	Areas AI, BS, WG, CG, WY Vessel Cap (lbs)	Area SE	
			Area Catch Limit (lbs)	Vessel Cap (lbs)
2013	28,013,851	280,139	7,032,674	70,327
2014	23,679,609	236,796	5,941,397	59,414
2015	23,569,378	235,694	5,912,737	59,127
2016	20,352,867	203,529	5,108,058	51,081
2017	22,577,309	225,773	5,745,188	57,452
2018	25,800,434	258,004	6,556,480	65,565
2019	25,967,983	259,680	6,578,526	65,785
2020	31,708,762	317,088	8,075,450	80,754

Source: NMFS Restricted Access Management (RAM).

Outside of southeast, vessel caps apply to each vessel regardless of where the IFQ is harvested, however the cap may have different impacts in different regulatory areas based on the number of vessels available to harvest quota and area specific catch limits. Disparate impacts by regulatory area can be exacerbated if the combined catch limit for all regulatory areas moves in one direction, but certain area-specific catch limits follow a different trend. For example, in 2020 the combined total halibut catch limit decreased but the area allocation increased slightly in Area 3B. In this instance the vessel cap may become relatively more constraining even though an individual's Area 3B IFQ may have increased.

Tables 3- 4 display the annual allocations for each regulatory area for halibut and sablefish, the minimum number of vessels required to harvest 100% of the area allocation given vessel limitations, and the percent of the allocation that was harvested, and the number of vessels harvesting IFQ for both the entire fishing year and each fishing year through May 3. From 2015-2019 more vessels than the minimum required under the vessel caps have harvested IFQ in every regulatory area. This suggests that even in years when the entire allocation was not landed, the supply of vessels and vessel cap were not constraining factors. As of May 3, 2020, fewer vessels than the minimum required to harvest 100% of the allocation have harvested IFQ in all halibut areas and in the AI, WG and SE sablefish areas. Conversely, the number of vessels already harvesting sablefish in 2020 in the BS, CG and WY areas meets the minimum number required to harvest 100% of the allocation in these areas.

Comparing the level of vessel activity and landings to date in 2020 to previous fishing years to date shows different trends in different regulatory areas. In most regulatory areas except for halibut Area 4 and sablefish AI and BS, both the number of vessels harvesting IFQ and the percent of allocation landed in the fishery to date is lower for 2020 than the previous five years. For example, in Area 3A, 81 vessels have already harvested 2020 halibut IFQ. This is lower than the average of 151 vessels that have participated year to date in the past five fishing seasons, however only seven more vessels (a total of 88) are needed to meet the minimum threshold to harvest the entire annual allocation in 3A. In halibut Area 4A, only 6 vessels have harvested IFQ in 2020, 12 less than the minimum of 18 vessels required to harvest all IFQ given vessel caps, however the year to date activity in 2020 is comparable to previous years. In areas 4B and 4CDE, although only 3 out of the minimum 11 and 0 out of the minimum 12 vessels required to harvest each area specific allocation have harvested IFQ to date, this participation level is not a marked reduction from previous years. The comparison of landings year to date in area 4B and 4CDE is obscured by the fact that some data cannot be reported due to confidentiality rules however this is not unique to 2020. Southeast areas are not included in this exemption request, however year to date trends in 2C and SE indicate a slower start to the fishing year in 2020 than previous years, with fewer vessels harvesting IFQ and a lower percent of the area catch landed as of May 3rd.

Table 3. Halibut annual area allocation, and minimum number of vessels required to harvest 100% of IFQ in each area under the vessel cap. Annual totals and totals each fishing year through May 3 of percent of allocation landed, and number of vessels harvesting IFQ. Area 2C data are provided for comparison only, as it is not included in this exemption request.

Area	Year	Allocation (pounds)	Minimum no. of vessels to harvest 100%	Annual Total		Fishing Year to Date (May 3)	
				No. of vessels harvesting IFQ	Percent landed	No. of vessels harvesting IFQ	Percent landed
2C	2015	3,679,000	100	439	96%	164	37%
	2016	3,924,000	100	433	97%	173	41%
	2017	4,212,000	100	423	96%	164	36%
	2018	3,570,000	100	402	95%	127	30%
	2019	3,610,000	100	406	94%	146	33%
	2020	3,410,000	100			81	17%
3A	2015	7,790,000	91	441	99%	168	28%
	2016	7,336,000	86	431	99%	164	25%
	2017	7,739,000	85	415	98%	145	25%
	2018	7,350,000	89	401	98%	138	24%
	2019	8,060,000	92	408	98%	142	26%
	2020	7,050,000	88			81	13%
3B	2015	2,650,000	31	196	98%	30	11%
	2016	2,710,000	32	194	97%	41	16%
	2017	3,140,000	35	192	96%	34	12%
	2018	2,620,000	32	182	93%	25	9%
	2019	2,330,000	27	169	94%	37	15%
	2020	2,410,000	30			11	4%
4A	2015	1,390,000	17	68	95%	5	3%
	2016	1,390,000	17	69	97%	2	*
	2017	1,390,000	16	65	91%	5	2%
	2018	1,370,000	17	67	89%	6	4%
	2019	1,650,000	19	63	83%	10	6%
	2020	1,410,000	18			6	2%
4B	2015	912,000	11	33	93%	2	*
	2016	912,000	11	34	94%	4	11%
	2017	912,000	10	30	91%	3	*
	2018	840,000	11	27	98%	6	13%
	2019	968,000	11	24	76%	6	20%
	2020	880,000	11			3	*
4CDE	2015	715,920	9	38	96%	0	*
	2016	880,320	11	36	96%	2	*
	2017	902,400	10	38	96%	1	*
	2018	880,200	11	38	90%	1	*
	2019	1,092,000	13	42	82%	1	*
	2020	919,200	12			0	*

* Data cannot be reported due to confidentiality.

Source: NMFS Restricted Access Management (RAM) division IFQ landings database sourced through AKFIN.

Table 4. Sablefish annual area allocation, and minimum number of vessels required to harvest 100% of IFQ in each area under the vessel cap. Annual totals and totals each fishing year through May 3 of percent of allocation landed, and number of vessels harvesting IFQ. AI and SE area data are provided for comparison only, as they are not included in this exemption request.

Area	Year	Allocation (pounds)	Minimum number of vessels to harvest 100%	Annual Total		Fishing Year to Date (May 3)	
				Number of vessels harvesting IFQ	Percent landed	Number of vessels harvesting IFQ	Percent landed
AI	2015	2,383,173	11	26	37%	2	*
	2016	2,059,096	11	21	32%	3	*
	2017	2,294,989	11	19	30%	5	7%
	2018	2,630,088	11	22	27%	6	7%
	2019	2,656,543	11	21	29%	6	10%
	2020	2,696,226	9			5	14%
BS	2015	1,177,256	5	34	27%	3	*
	2016	1,014,116	5	28	39%	1	*
	2017	1,124,346	5	25	54%	5	12%
	2018	1,291,896	6	26	48%	7	11%
	2019	1,313,942	6	24	60%	10	24%
	2020	1,640,222	6			7	14%
CG	2015	8,214,340	35	157	96%	69	23%
	2016	7,094,403	35	153	98%	67	18%
	2017	7,960,811	36	148	96%	62	19%
	2018	9,096,180	36	145	82%	67	15%
	2019	9,131,453	36	131	87%	64	17%
	2020	11,366,918	36			36	9%
WG	2015	2,599,223	12	54	78%	5	5%
	2016	2,244,283	12	61	89%	10	8%
	2017	2,378,763	11	60	95%	8	10%
	2018	2,722,681	11	60	87%	10	11%
	2019	2,788,819	11	52	86%	9	6%
	2020	3,425,948	11			2	*
WY	2015	3,282,649	14	99	100%	55	57%
	2016	2,832,911	14	103	99%	55	50%
	2017	3,073,212	14	103	99%	45	52%
	2018	3,503,109	14	95	96%	46	39%
	2019	3,498,700	14	90	97%	43	31%
	2020	4,503,998	15			27	29%
SE	2015	5,912,737	100	177	99%	97	41%
	2016	5,108,058	100	176	100%	96	39%
	2017	5,745,188	100	170	99%	85	35%
	2018	6,556,480	100	173	95%	82	29%
	2019	6,578,526	100	168	96%	96	31%
	2020	8,075,450	100			72	23%

* Data cannot be reported due to confidentiality.

Source: NMFS Restricted Access Management (RAM) division IFQ landings database sourced through AKFIN.

Year to date trends may vary annually and/or regionally based on many factors. The seasonal timing of landings and participation in a fishing year may be impacted by weather, vessel repairs, crew and processing availability, dock prices, and other factors. Year to date fishing participation and harvest levels in 2020 may be particularly unique due to the uncertain, dynamic environment associated with COVID-19 including logistical challenges for fishermen, health concerns and depressed markets. Emergency request letters identify low dock prices as a factor causing fewer vessels to participate in the 2020 IFQ fishery. Table 5 displays annual nominal (not adjusted for inflation) price per pound as calculated by the total ex vessel value and total net landed weight. The prices reported in this document are only for the

purpose of estimating annual differences and do not reflect final pricing. Final annual prices are adjusted by Commercial Fisheries Entry Commission (CFEC) to include contracts and Commercial Operator’s Annual Reports (COAR) information at the end of the year. Additionally, because the 2020 prices are calculated year to date they do not capture the entire seasonality of prices throughout an entire fishing year. Prices for both halibut and sablefish have generally declined since 2015. Year to date 2020 prices cannot be reported in BSAI due to confidentiality rules but in the GOA, the first months of the 2020 fishing year show relatively large declines in prices from previous year’s annual average prices. How much these trends persist throughout the 2020 season and to what degree is uncertain.

Table 5. Annual nominal price per pound and percent change of halibut and sablefish prices in the BSAI and GOA region. Prices are only for the purpose of estimating annual differences and do not reflect final pricing. Final prices are adjusted by CFEC to include contracts and COAR information at the end of the year.

Year	Region	Halibut price per pound	% change from previous year	Sablefish price per pound	% change from previous year
2015	BSAI	5.80		4.46	
2016	BSAI	5.98	3%	5.28	18%
2017	BSAI	5.62	-6%	4.41	-16%
2018	BSAI	4.52	-20%	3.33	-24%
2019	BSAI	4.48	-1%	2.81	-16%
2020*	BSAI	**	**	**	**
2015	GOA	6.48		5.71	
2016	GOA	6.72	4%	6.42	12%
2017	GOA	6.34	-6%	7.43	16%
2018	GOA	5.38	-15%	5.41	-27%
2019	GOA	5.51	2%	4.25	-21%
2020*	GOA	4.07*	-26%	2.92*	-31%

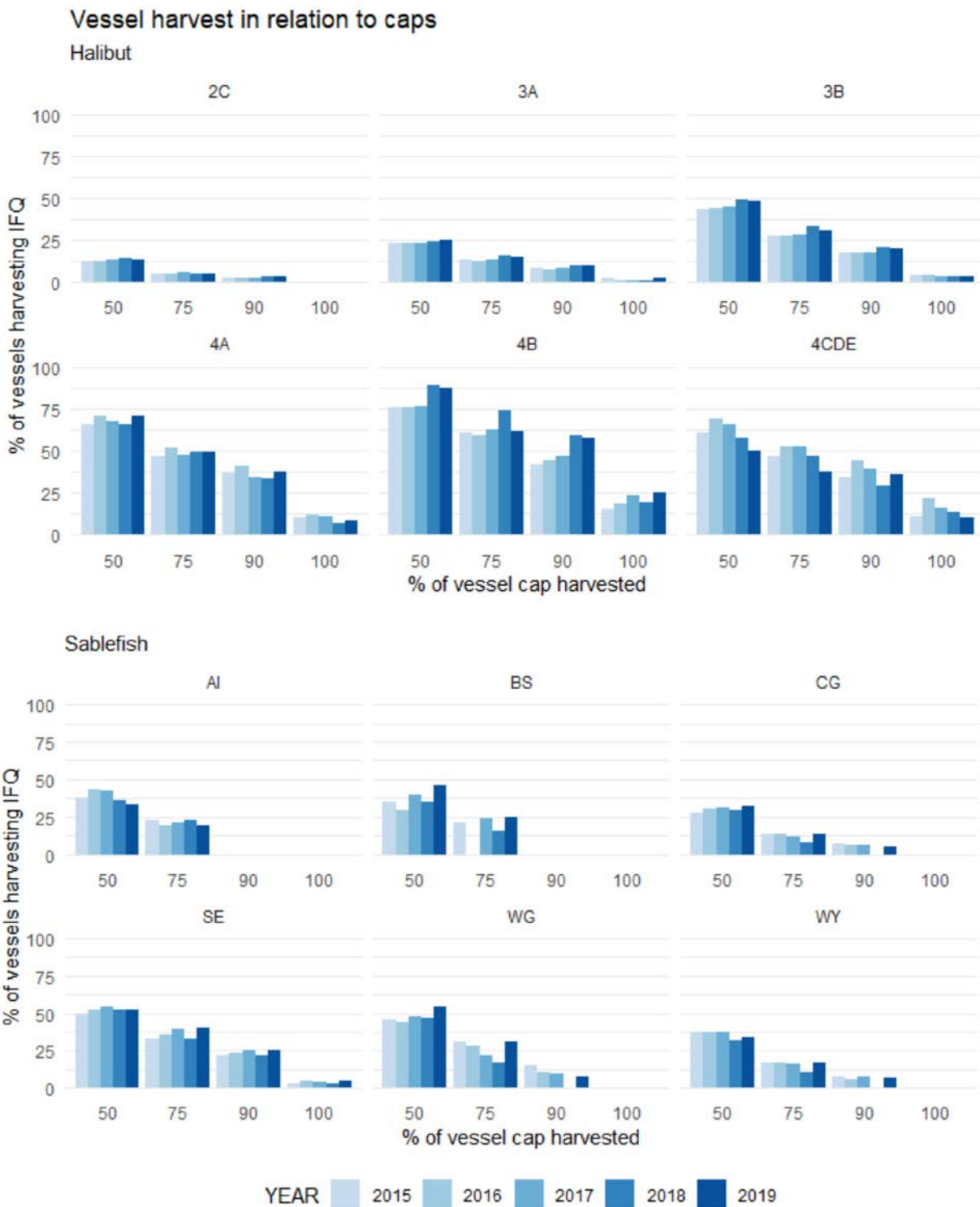
*2020 prices are through May 3.

**data cannot be reported due to confidentiality.

Source: NMFS Restricted Access Management (RAM) division IFQ landings database sourced through AKFIN

One method to examine the effects of vessel caps is to evaluate how many vessels operate at or near the caps. Figure 3 displays the percentage of vessels that have harvested up to 50%, 75%, 90% and 100% of the vessel cap in each regulatory area since 2015. Vessels that harvest IFQ in multiple regulatory areas are included in each area and their percentage of vessel cap is calculated from the total IFQ harvested regardless of area. Vessels are included in each % threshold for which they qualify (a vessel that harvested 100% of the cap is included in the bar graph at 50%, 75%, 90% and 100%).

The percentage of vessels reaching thresholds declines at thresholds closer to 100% of the vessel cap in each regulatory area. In Halibut area 3, less than 25% of vessels have harvested up to 90% of the vessel cap. While in area 4, close to 50% of vessels in 4A and 4CDE and just over 50% of vessels in area 4B in the last two years harvested up to 90% of the vessel cap. In the sablefish fishery, fewer than 25% of vessels have harvested up to 75% of the cap in each regulatory area with the exception of SE. In halibut areas outside of 2C and 4CDE recent year trends show a growing percentage of vessels reaching each threshold.



Source: NMFS Restricted Access Management (RAM) division IFQ landings database sourced through AKFIN.

Figure 3. Percent of vessels harvesting IFQ in each regulatory area with total landings within 100%, 90%, 75% and 50% of the vessel cap. Percent of vessel cap harvested is calculated by total IFQ regardless of area of harvest (with the exception of 2C and SE). Vessels harvesting in multiple areas are included in every area IFQ is harvested.

Impacts of proposal

No Action

If the Council does not recommend emergency action, the existing halibut and sablefish IFQ Program would not be modified and the vessel caps as defined under 50 CFR § 679.42(h) (1) and (2) will remain in place.

The intention of vessel IFQ caps is to limit IFQ consolidation on vessels, which could reduce the number of vessels needed to prosecute the fishery (or the number of trips taken in a season) and subsequently reduce the number (or duration) of available crew jobs as well as opportunities for new entrants. Maintaining vessel caps may help preserve opportunities for smaller operations that would not otherwise participate in the fishery if exemptions from vessel caps are granted. However, it is possible that vessel caps may increase the likelihood that annual allocation is left unharvested if the supply of vessels is decreased in 2020 such that the entire allocation cannot be spread out amongst participating vessels while meeting vessel limitations. The likelihood that the supply of vessels is constrained enough to strand unharvested quota depends on how many vessels do not operate due to health and safety concerns related to COVID-19 or because individual operators cannot justify the costs (e.g. fuel, vessel maintenance, labor, etcetera) produced by operating a vessel given the decline in ex-vessel prices or other changes in profitability related to the global pandemic. The availability of a sufficient number of vessels to harvest the entire allocation may vary by regulatory area. Given year to date IFQ harvest, 2020 participation levels in some areas are not substantially different from previous years, while participation levels in other areas are lower than previous years but closer to the minimum threshold required to harvest 100% of the allocation under vessel caps. Data to compare 2020 vessel activity and harvest patterns year to date to previous years and minimum requirements to harvest 100% of area allocation are displayed in Table 2 for the halibut fishery and Table 3 for sablefish. No action is the only option that maintains consistent application of vessel caps across all IFQ regulatory areas.

Option 1

If the Council determines that this situation warrants emergency action and recommends Option 1, NMFS would analyze the action and draft an emergency rule to create temporary regulations to exempt vessels from the vessel limitations in IPHC regulatory Areas 4B, 4C, 4D and 4E for the remainder of the 2020 IFQ season.

Option 1 would allow vessels in Areas 4B, and 4CDE the flexibility to consolidate IFQ onto fewer vessels making them more likely to achieve economies of scale and harvest IFQ more profitably. This may be particularly helpful for these areas in the BSAI where the costs and risks associated with reaching the fishing grounds and prosecuting the fishery are often higher and the availability of processing facilities are limited. Option 1 may also decrease the participation of smaller scale vessels that would otherwise be necessary to operate to spread out harvest levels under vessel caps. While this may reduce COVID-19 related safety risks associated with the operation of more, likely smaller scale operations, it may also reduce the number of available crew jobs and opportunities for new entrants.

Option 2

If the Council determines that this situation warrants emergency action and recommends Option 2, NMFS would analyze the action and draft an emergency rule to create temporary regulations to exempt vessels from the vessel limitations for halibut in IPHC Regulatory Areas 3 and 4 and sablefish in the Bering Sea area and Gulf of Alaska Sub-areas of the Western Gulf, Central Gulf and West Yakutat for the remainder of the 2020 IFQ season.

Option 2 would allow vessels harvesting halibut in Areas 3 and 4 and sablefish in the Bering Sea area and Gulf of Alaska Sub-areas of the Western Gulf, Central Gulf and West Yakutat the flexibility to consolidate IFQ onto fewer vessels, making some vessels more likely able to achieve the economies of scale needed to make IFQ harvest economically worthwhile. If fewer vessels participate in the fishery, it is possible that landings are also consolidated to fewer processors and communities based on geographic location of vessels and historic relationships or landing patterns.

Option 2 may also decrease the participation of smaller scale vessels that would otherwise be necessary to operate to spread out harvest levels under vessel caps in some areas. While this may reduce COVID-19 related safety risks associated with the operation of more, likely smaller scale operations, it may also reduce the number of available crew jobs and opportunities for new entrants.

Implementation

NMFS Restricted Access Management (RAM) division issues annual IFQ permits. Part of this process includes determining vessel caps based on the TAC published by NMFS. Both Option 1 and Option 2 separate out distinct IFQ regulatory areas and request the removal of vessel caps particular to a subset of regulatory areas. However, existing vessel caps are based on percentages of the total halibut IFQ TAC, total sablefish IFQ TAC, 2C halibut IFQ TAC, and SE sablefish IFQ TAC. The options proposed would entail modifying RAM code to simultaneously exempt specific regulatory areas from vessel caps while maintaining vessel caps in other areas and ensuring their association with IFQ landings recordkeeping and reporting requirements. Council staff are advised that accommodating either proposed option would require NMFS developers approximately four weeks of dedicated time to determine the business requirements, modify existing (antiquated) code, and implement the changes to ensure participants could land IFQ without reporting errors.

Interaction with other emergency rule requests

The Council has received additional emergency rule requests which, depending upon Council recommendations, have the potential to affect the impacts of the option selected under this vessel cap action.

Action Item B1- Request to modify IFQ transfer provisions of the Halibut and Sablefish IFQ Program. If the Council chooses to recommend emergency action under item B1 and increase flexibility to transfer IFQ, QS holders will have more flexibility to select vessels to harvest their IFQ. This would increase the number of potential vessels available to harvest IFQ, reducing the possibility that IFQ is left unharvested due to vessel cap limitations.

Action Item C4- Request to extend the halibut and sablefish season to a year-round fishery. The current commercial IFQ halibut season runs through November 15, 2020. If the Council chooses to recommend emergency action under item C4 and extend the halibut and sablefish fishery through the end of 2020, presumably any action to exempt vessel limitations through the end of the 2020 fishery would also be extended through the end of 2020 (rather than through November 15, 2020, the end of the current IFQ fishing season).

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