DECEMBER 2007
AGENDA ITEM B-2(c)

BSAI Crab Rationalization Loan Program
NMFS Alaska Region & NMFS Financial Services Division
Status and next steps

Overview

Three things must occur for NMFS to establish a loan program for skipper and crew in the BSAI Crab Rationalization Program (Program).

- A statute must authorize either a loan ceiling or appropriate funds to cover the subsidy cost under the Federal Credit Reform Act;
- NMFS Financial Services Division (FSD) must promulgate regulations for a crab loan program; and
- Any loan program must be consistent with the MSA, including requirements that IFQ lending must be made to "fishermen who fish from small vessels" and the "first time purchase of IFQ by entry level fishermen." **The Council may wish to address this issue in staff tasking to begin a public process to define these terms, analyze alternatives, and provide an analysis and recommendation to NMFS FSD for use in their rulemaking process.**

In addition, NMFS FSD and the Alaska Region are reviewing the fees collected under both the halibut and sablefish IFQ Program and the BSAI crab rationalization program to determine the proper amount to set aside to ensure adequate funding for loan programs. If the amounts collected so far for IFQ loan programs, or required to be collected, are greater than the anticipated need, NMFS and the Council may need to consider adjustments to the Program to ensure that excess amounts are not collected. **NMFS will provide an update on this issue in February 2008.**

1. Loan Ceiling Authorization

NMFS requested a $3 million increase in the authority to loan money (i.e., a loan ceiling) from Congress for the crab IFQ loan program. Draft appropriation bills in both the House and Senate include authorization for an increased loan ceiling for the crab IFQ loan program, however it is not certain that this $3 million increase will be reflected in the final appropriation ultimately passed by Congress. Without the additional loan ceiling authority, NMFS will not have the budget authority to provide loans for the purchase of crab QS. IFQ lending for halibut and sablefish has not needed an actual appropriation for subsidy cost, and FSD expects that the crab IFQ loan program will be similar—Congress will need to provide authority, but not appropriation. No action is necessary by the Council on this issue.

2. FSD Regulations

In addition to the loan ceiling, NMFS FSD must also promulgate regulations that govern the crab IFQ loan program. Currently, NMFS FSD is in the process of revising the general regulations for the Fisheries Finance Loan Program. The general regulations are still under development, but NMFS FSD intends to have new regulations in place before the end of FY08 (September 30, 2008). To expedite creation of the crab IFQ loan program, NMFS FSD can include regulations for crab IFQ skipper and crew loans in this revision; however, NMFS FSD would like additional input from the Council in order to do so. NMFS FSD can provide additional updates to the Council as the rulemaking process continues.

3. Consistency with the MSA

Any loan program established must be consistent with MSA IFQ lending requirements. Several provisions of the MSA affect the crab IFQ loan program. Additional input from the Council is necessary to guide the interpretation of these provisions. Following is a brief description of the development of the loan program recommendations made by the Council, the relevant sections of the MSA, and the need for additional Council action.

A. Development of the loan program

The Council included specific provisions to include a loan program for skipper and crew members. Many of the specific recommendations for the loan program were developed through the Council's skipper and crew committee. A discussion of the loan program and its development is provided in the Environmental Impact Statement (EIS) prepared for the Program (see Appendix 1, section 3.8.6, p. 425). These provisions were incorporated in Amendments 18 and 19 to the BSAI crab FMP. Section 1.8.1.8 of the FMP states:

> 1.8.1.8 Loan program for crab QS
>
> A low-interest rate loan program consistent with MSA provisions, for skipper and crew purchases of QS, shall be established for QS purchases by captains and crew members using 25% of the Crab IFQ fee program funds collected. These funds can be used to purchase A, B, or C shares. Loan funds shall be accessible by active participants only. Any A or B shares purchased under the loan program shall be subject to any use and leasing restrictions applicable to C shares (during the period of the loan).
>
> National Marine Fisheries Service (NOAA Fisheries) is directed to explore options for obtaining seed money for the program in the amount of $250,000 to be available at commencement of the program to leverage additional loan funds.

In addition, Clarification 11 in the Clarifications and Expressions of Council Intent section of the FMP states:

> 11. Cost recovery definition - The Council clarified that cost recovery funds would be collected in accordance with the current cost recovery program, which allows for the collection of actual costs up to 3 percent of ex vessel gross revenues. The Council provided that costs would be paid in equal shares by the harvesting and processing sectors (on all landings including landings of crab harvested with Class B IFQs). Catcher/processors would pay the entire 3 percent since catcher/processors participate in both sectors. A loan program for share purchases would be established with 25 percent of the fees collected. The motion authorized the collection of 133 percent of actual costs of management under the new program, which would provide for 100 percent of management costs after allocation of 25 percent of the cost recovery to the loan program.

NMFS published a final rule implementing the BSAI Crab Rationalization Program on March 2, 2005 (70 FR 10174). The Program became effective on April 1, 2005. The final rule establishing the Program did implement regulations necessary to assess fees on the affected industry (see 50 CFR 680.44), but did not implement regulations for IFQ loans to skippers and crew. The final rule noted that the loan program regulations would be developed by NMFS FSD (see 70 FR 10178). The final rule also noted that a loan program could not be effective until authorization for a loan ceiling is provided by Congress (see response to comment 222 at 70 FR 10224). Section 1.8.1.8 of the FMP notes that loans would be made available to "captains and crew members" and would be accessible only by "active participants." The regulations define the term crew (see 50 CFR 680.2) but not captain. Crew is defined as "[a]ny individual, other than the fisheries observers, working on a vessel that is engaged in fishing." Presumably, the term "captain" is captured in the current definition of "crew." The

regulations do define the criteria that are necessary to be considered an "active participant" in the Program for purposes of being eligible to receive crew quota share (i.e., CVC and CPC QS) and CVC or CPC IFQ by transfer under 50 C.F.R. 580.41(c)(1). Specifically, the regulations require that a person must demonstrate participation in one or more crab rationalization fisheries during the 365 days prior to submitting an application to receive crew QS or IFQ by transfer. Presumably, this definition of an "active participant" would be used for purposes of determining eligibility to receive a loan. The Restricted Access Management (RAM) Division issues a Transfer Eligibility Certificate as proof that an applicant is an "active participant" and able to receive crew shares by transfer.

NMFS FSD plans to use existing definitions of eligibility determinations based on the current regulations developed by the Alaska Region unless FSD is presented with specific reason to do otherwise. For example, NMFS FSD plans to accept the Transfer Eligibility Certificate issued by RAM as an appropriate measure of as an "active participant" a crab IFQ loan.

Although the Council clearly noted that the loan program would need to be consistent with the MSA, the Council did not specify how it would interpret terms that affect the eligibility of skippers and crew to receive loans. These terms have not been further defined by NMFS Alaska Region, or NMFS FSD, and some additional Council input would be helpful.

B. The MSA and the loan program

The Program assigned exclusive harvest privileges for a portion of the annual total allowable catch to specific persons. The Program met the definition of an individual fishing quota (IFQ) contained in section 3(21) of the MSA in effect at the time of implementation in 2005. Section 303(d)(4) of the MSA in effect at that time included provisions that pertain to loan programs for IFQ programs. Section 303(d)(4) of the MSA read as follows:

> Section 303
>
> (d) INDIVIDUAL FISHING QUOTAS.--
>
> (4) (A) A Council may submit, and the Secretary may approve and implement, a program which reserves up to 25 percent of any fees collected from a fishery under section 304(d)(2) [fee collection] to be used, pursuant to section 1104A(a)(7) of the Merchant Marine Act, 1936 (46 U.S.C. App. 1274(a)(7)), to issue obligations that aid in financing the–
>
> (i) purchase of individual fishing quotas in that fishery by fishermen who fish from small vessels [emphasis added]; and
>
> (ii) first-time purchase of individual fishing quotas [emphasis added] in that fishery by entry-level fishermen [emphasis added].

Section 303(d)(4) is applicable to the Program even after the recent amendments to the MSA under the Magnuson-Stevens Fishery Conservation and Management Reauthorization Act of 2006 enacted on January 12, 2007 (MSRA; Pub. Law 109-479). Because the Program was effective prior to enactment of the MSRA, section 303A(i)(A) of the MSA as amended by the MSRA applies to the Program:

> Section 303A
>
> (i) TRANSITION RULES.--
>
> (1) IN GENERAL.--The requirements of this section [Section 303A] shall not apply to any quota program, including any individual fishing quota program, cooperative program, or sector allocation for which a Council has taken final action or which has been submitted by a Council to the Secretary, or approved by the Secretary, within 6 months after the date of enactment of the Magnuson-Stevens Fishery Conservation and Management Reauthorization Act of 2006, except that–
>
> (A) the requirements of section 303(d) of this Act [MSA] in effect on the day before the date of enactment of that Act [MSRA] shall apply to any such program.

Although the Council indicated that it intended that loans be provided only to captains and crew who are active participants in the fishery, it did not explicitly define the following terms contained in section 303(d)(4): (1) who is a fisherman who fishes from small vessels?; (2) what constitutes the first-time purchase of individual fishing quotas?; and (3) what is an entry level fisherman? Any loan program implemented by NMFS FSD would need to contain a definition of these terms to be consistent with the MSA. An outstanding question is whether these terms are best defined by the Council or NMFS FSD. Given the extensive involvement in this issue by the Council and fishing industry, it is probably best that these terms be specifically discussed, analyzed, and recommended through the Council process.

4. Next Steps

If the Council agrees that it is the most appropriate forum to develop recommendations to define the terms contained in section 303(d)(4) of the MSA prior to amendment by the MSRA, the Council can provide the public with an opportunity to comment on how best to define "fishermen who fish from small vessels", "first-time purchase of individual fishing quotas", and "entry-level fishermen." The Council could consider a range of alternatives for these terms, analyze the effects of these different alternatives through the use of a draft regulatory impact review (RIR) and initial regulatory flexibility analysis (IRFA), and provide the results of that analysis and the Council's recommendation to NMFS FSD. The process followed by the Council would be similar to that of an FMP amendment, with an initial review and final action, but would not result in a formal amendment to the FMP.

Instead, once the Council had conducted its analysis and recommendation, the draft RIR/IRFA and recommendation would be forwarded to NMFS FSD to be incorporated in the analyses being prepared by NMFS FSD to implement the crab IFQ loan program regulations currently under development. This process would provide the affected public with an opportunity to discuss and recommend alternative interpretations of the necessary provisions in the forum that is most familiar and earlier than through comments on a proposed rule.

NMFS FSD will try to incorporate the Council's recommendations in the general regulations for the Fisheries Finance Loan Program currently under development. If necessary, due to a conflict in timing between Council action and the regulatory process currently under way to revise the Fisheries Finance Loan Program, NMFS FSD could separate crab IFQ lending program provisions from its general regulation revision and delay promulgating them until the Council's recommendations on the BSAI crab rationalization loan program are finalized. However, this approach may require subsequent rulemaking for crab IFQ loan regulations and delay its implementation.

5. Other Issues Raised by Industry

Industry requested feed back from NMFS FSD on what information could be provided about the average size of loans and numbers of loans issued once a loan program is implemented.

NMFS FSD will be maintaining a list of the loans provided under the crab IFQ loan program once implemented, and could provide a summary of the average size of loans at a later date.

Industry requested feedback from NMFS FSD on and whether NMFS FSD could rank loans based on the relative size prior to approving loans.

The short answer is no. Prospective borrowers should be aware that Fishery Finance Program loans may not exceed 80 percent of the purchase price. For example, if crab QS purchases for which loans are sought averaged $100,000,[1] NMFS FSD could only finance up to $80,000 of such an average purchase. With an $80,000 average

1 The $100,000 average loan amount is for illustrative purposes only, and is not meant to reflect the actual average transaction price.

loan amount, and the $3 million loan ceiling authority proposed for crab IFQ loans, this would equate to roughly 37 loans annually. Additionally, NMFS FSD accepts applications on a first-come, first-served basis and makes lending decisions strictly on the strength of a specific loan application. Moreover, loan ceilings are only available for a single fiscal year. If loan authority is not used by the end of the fiscal year, it is lost. Under these conditions, holding applications to determine a "rank" would be impracticable. In order to properly rank applications, NMFS FSD would have to consider an entire pool of applicants before disbursing funds for any single loan. Any such ranking would cause serious administrative difficulties and could delay loan disbursements.

If the Council and prospective borrowers wish to limit the size of loans to better ensure that only relatively small QS purchases are available for a Federal loan, then the Council could recommend a definition of "fishermen who fish from small vessels" and "entry level fisherman" that would exclude those persons who hold more than a specific amount of crab QS. In fact, in section 108(g) of the Sustainable Fisheries Act Congress provided specific definitions of the terms "fishermen who fish from small vessels" and "entry level fishermen" for purposes of loans for the halibut and sablefish IFQ fisheries. Among other things, the definition of these terms by Congress limits the ability to receive a loan to persons:

- Seeking IFQ assigned to specific vessel size categories (i.e., Categories B,C, and D) that are applicable to the halibut and sablefish IFQ program;
- Whose aggregate ownership of IFQ will not exceed the equivalent of a total of 50,000 pounds of halibut and sablefish harvested in the fishing year in which a loan is made;
- Who do not own in whole or in part any Category A or B vessel;
- Who do not own any halibut or sablefish IFQ;
- Who wish to obtain the equivalent of not more than a total of 8,000 pounds of halibut and sablefish harvested in the fishing year in which the loan application is made; and
- Who will participate aboard the fishing vessel in the harvest of fish caught under such quotas.

The Council may consider such criteria as a useful starting point if it chooses to develop recommendations for these terms as they apply to the crab IFQ loan program.

6. Fee Collection and Loan Program Cost Review

Industry inquired if any funds have been collected now for purposes of a crab IFQ loan Program under cost recovery provisions, and if so what is the status of those funds.

NMFS has collected funds for cost recovery under the BSAI crab rationalization program. At this time, NMFS has tentatively designated $1.04M of the $4.27M collected from the 2005/2006 crab fishing year fee collection for use in the crab loan program. Funds for the crab IFQ loan program from the 2006/2007 crab fishing year fee collection have not been set aside at this time, but could be at a later time.

Funds specifically designated for the crab IFQ loan program collection do not provide specific loan authority to NMFS. Only Congress, through an appropriation act may provide loan authority. Loan authority is the amount of money the program can lend. This authority can be a "one year" authority (must be obligated by the end of the fiscal year for which it was authorized) or "no year" authority (the authority can be used until expended regardless of the fiscal year in which it's obligated). IFQ lending authority has always been one year authority.

Funds that are specifically set aside for the crab IFQ loan program can provide for a subsidy cost appropriation, which is required under the Federal Credit Reform Act (FCRA). A subsidy cost for a loan program must be appropriated. This subsidy is essentially a "loss reserve" that earns interest. If the loan performs as expected, when a default does occur the subsidy loss reserve will have grown to an amount equal to the claim payment owed, and the financing account breaks even. FCRA rules govern the amount of subsidy cost that must be provided for a specific amount of loans. Factors such as the default rate, timing of defaults, recovery rate, and

borrower characteristics are considered when determining the amount of subsidy that must be provided for a specific loan amount. For example, if the FCRA subsidy cost of a $5 million loan program was 3 percent, Congress would have to appropriate 3 percent of $5 million or $150,000 for that loan. Once a loan program is started, the FCRA subsidy cost is recalculated annually based on historical performance. If a program has a negative FCRA subsidy (i.e., the cost is zero or less), no FCRA subsidy is required to support loan authority. If such negative subsidy subsequently turns positive (i.e., a cost under FCRA), Congress must then appropriate the cost related to past and future results.

At present IFQ lending under the halibut and sablefish IFQ loan program has a negative subsidy. This could, of course, change in the future. It is not clear if similar loan performance and a negative subsidy cost could be expected of the crab IFQ loan program. At this time, it is difficult to predict how crab loans will perform and whether the credit risk and therefore the subsidy cost will be the same as under the halibut and sablefish IFQ loan program. NMFS FSD and NMFS Office of Management and Budget (OMB) are currently reviewing the amount of funds collected thus far under both the halibut and sablefish and crab IFQ program to determine if adjustments are needed to ensure sufficient, but not excess, funds are assigned to provide for a subsidy cost in the IFQ loan programs. If the funds collected are sufficient for the subsidy costs, NMFS may reduce the amount of money set aside for these purposes.

Under the cost recovery programs, NMFS collects an amount equal to the actual program costs for both the halibut and sablefish IFQ program and the crab IFQ program. NMFS is mandated to "collect a fee to recover the actual costs directly related to the management, data collection, and enforcement" of these IFQ programs under section 304(d) of the MSA. Therefore, even if a smaller portion of the fees collected are assigned for subsidy costs to the loan programs, it is unlikely that the percentage of fees paid under these programs would decrease. However, the apportionment of funds may change.

As an example of the reapportionment of costs, NMFS sets aside 25 percent of the fees collected under the halibut and sablefish IFQ program in an account for subsidy costs. The remaining 75 percent is used to recover program costs. This means that NMFS has only funded 75 percent of the actual program costs through the fee collection program. If the fees currently available for subsidy costs are sufficient for the halibut and sablefish IFQ program, a greater proportion of the fees collected could be used to more fully recover actual costs rather than being reserved for the subsidy cost required under the FCRA.

Under the BSAI crab rationalization program, the Council recommended that NMFS have the explicit authority to collect "133 percent of actual costs of management under the new program, which would provide for 100 percent of management costs after allocation of 25 percent of the cost recovery to the loan program." If the costs assigned to crab IFQ loan program thus far are sufficient to cover subsidy costs, the Council may wish to review the procedure for assigning funds to the crab IFQ loan program, specifically the collection of fees in excess of the actual costs to ensure that funds are not collected and assigned to provide a subsidy cost if they are not needed.

NMFS FSD and the Alaska Region are reviewing fee collection and subsidy costs and will provide update the Council on the amount of funds that may be required for subsidy costs and provide suggestions for any future action if necessary in February, 2008.

AGENDA B-2
DECEMBER 2007
Supplemental

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Silver Spring, MD 20910

OCT - 9 2007

Mr. Chris Oliver,
Executive Director
North Pacific Fishery Management Council
605 West 4th Avenue
Anchorage, AK 99501

Dear Mr. Oliver:

Thank you for your letter regarding the North Pacific Fishery Management Council's interest in the National Bycatch Report. We appreciate your support for the structure and concept of the report, particularly the use of regional teams to compile regional bycatch estimates for inclusion in the report. We understand your concern that the analytical methods used to estimate bycatch are not comparable across regions, but we have determined that it is not necessary to standardize bycatch estimation methods for the purposes of this report. Instead, regional teams will evaluate the quality of regional bycatch data and estimation methodologies within each region based on standard evaluation criteria. A tier classification system has been developed to assist in monitoring improvements to the quality of bycatch data and estimates over time.

Your letter also requested that the North Pacific Council have the opportunity to review a draft copy of the National Bycatch Report. Due to the pre-decisional nature of the draft report, NOAA Fisheries Service will be unable to provide the North Pacific Council with a copy prior to official release. A final version of the report is anticipated in spring 2008, following internal Agency review. Dr. Bill Karp will continue to provide updates on the report's progress to the North Pacific Council. The Council's feedback from these presentations will be important for ensuring that the information contained in the National Bycatch Report is as accurate and useful as possible.

We appreciate the interest and support of the North Pacific Council on the National Bycatch Report Project. If we can provide any additional information please contact Dr. Lisa Desfosse at lisa.desfosse@noaa.gov or 301-713-2363 ext. 145.

Sincerely,

John Boreman, Ph.D.
Director, Office of Science and Technology

UNITED STATES DEPARTMENT OF (
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November 5, 2007

Chair Eric Olson
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, Alaska 99501

Dear Mr. Olson:

On September 19, 2007, we sent a letter to you explaining why we did not implement a Council recommendation that would have narrowed the restrictions on vessel ownership criteria to use a hired master to harvest the individual fishing quota (IFQ) of the vessel owner. In brief, we explained that the Council's original recommendation and the proposed rule that we published on November 1, 2006, raised several questions that required clarification before we could move forward with implementing the proposed ownership criteria (please see our September 19 letter to you for the complete background on this issue and list of questions we posed).

At its next meeting in October 2007, the Council responded in part to our questions and clarified its intent regarding vessel ownership restrictions for purposes of using a hired master to harvest a vessel owner's IFQ. Specifically, the Council clarified that, in addition to the existing requirement for a minimum 20 percent ownership interest in the vessel used by a hired master, ownership documentation must demonstrate ownership in the vessel for at least 12 months before application for IFQ to be used by a hired master. The Council further clarified that its earlier "constructive loss" exemption from the ownership requirements should be construed as follows:

- The exemption for loss of a vessel should apply only to the 12-month ownership requirement, and not the 20 percent ownership requirement;
- A vessel owner would be eligible for the 12-month exemption only if his or her vessel was totally lost, for example by sinking or fire, or temporarily lost as a result of major repair work that requires at least 60 days to complete; and
- In either case, exemption from the 12-month ownership requirement would be limited to a time period from the date of the incident that resulted in the loss or repair of the vessel until December 31 of the following year.

Final rule or new rulemaking?

The Council asked us in October whether we would be able to proceed with a final rule to implement this 12-month ownership requirement or we would need to prepare a new proposed rule. After consulting with NOAA General Counsel, we have determined that implementing the Council's clarifications would require a new proposed rule and final rule publication process. This is due to the new concept of "temporary loss" which is substantively different from

"constructive total loss" as used in the original proposed rule. Although a 12-month ownership requirement was contemplated in the proposed rule, the proposed exemption to this requirement would apply only for the actual loss or constructive total loss of a vessel. A temporary loss of the use of a vessel due to major repair work is not the same as a constructive total loss of a vessel. As we wrote in our September 19 letter (at page 4),

"...the essence of the standard definition of 'constructive total loss' is that the item cannot be repaired economically. To define constructive total loss to include a vessel that is being repaired would be counter intuitive."

Therefore, the Council's clarification of its intent introduces temporary loss for repair as a new concept which would not be seen as a logical outgrowth of the proposed rule and a new proposed rule including this concept should be published to solicit public comment. Of course, a proposed rule and comment period triggers requirements for an analysis of alternatives. We would request Council staff support in preparing this analysis. NMFS staff would prepare the necessary proposed and final rulemaking documents after we receive the supporting analysis.

Sincerely,

James W. Balsiger
Administrator, Alaska Region

NOAA Fisheries
National Marine Fisheries Service

Accomplishments of the Alaska Region's Habitat Conservation Division in Fiscal Year 2007

Sitka Sound – photo courtesy of the ShoreZone project

This report provides highlights of Habitat Conservation Division (HCD) activities in support of the sustainable management of living marine resources from October 1, 2006 through September 30, 2007.

HCD carries out NOAA Fisheries' statutory responsibilities for habitat conservation in Alaska under the Magnuson-Stevens Fishery Conservation and Management Act, Fish and Wildlife Coordination Act, National Environmental Policy Act, Federal Power Act, and other laws. HCD has two principal programs: identification and conservation of Essential Fish Habitat (EFH) through fishery management, and environmental review of non-fishing activities to minimize impacts to EFH or other habitats for living marine resources. HCD also supports habitat restoration projects in conjunction with the NOAA Restoration Center.

HCD has staff located in the Alaska Regional Office in Juneau and a field office in Anchorage. HCD coordinates extensively with other groups to facilitate habitat conservation. Within NOAA such organizations include the Sustainable Fisheries Division and Protected Resources Division in the NOAA Fisheries Alaska Regional Office, the Alaska Fisheries Science Center, NOAA Fisheries Office of Habitat Conservation, NOAA General Counsel, and NOAA Ocean Service's Office of Response and Restoration. HCD also works in close partnership with other agencies and organizations including the North Pacific Fishery Management Council, Army Corps of Engineers, Environmental Protection Agency, U.S. Fish and Wildlife Service, Minerals Management Service, U.S. Forest Service, Bureau of Land Management, Federal Energy Regulatory Commission, Alaska Department of Fish and Game, Alaska Department of Natural Resources, Alaska Department of Transportation and Public Facilities, and a variety of industry and conservation groups.

Essential Fish Habitat and Fishery Management

EFH Protection Measures for State-Managed Fisheries

HCD worked with staff from the Sustainable Fisheries Division, the North Pacific Fishery Management Council, and the Alaska Department of Fish & Game to persuade the Alaska Board of Fisheries to adopt regulations for state managed fisheries that mirror federal regulations to protect EFH in the Aleutian Islands and Gulf of Alaska. Federal regulations issued in 2006 closed substantial portions of the Aleutian Islands and Gulf of Alaska to bottom trawling and closed high-density coral areas and seamounts to all bottom-tending fishing gear. Those regulations applied to federally permitted fishing vessels, but not to state managed fisheries that are prosecuted in state or federal waters. Action by the Board of Fisheries extends the closures to all state managed fishing vessels, increasing the protection of sensitive seafloor habitats.

Habitat Protection Measures for the Bering Sea

HCD helped the North Pacific Fishery Management Council finalize a suite of new measures to minimize the effects of bottom fishing on seafloor habitats in the Bering Sea. These new habitat conservation measures reflect an open-area approach that limits bottom trawling to areas where it has historically occurred, protecting undisturbed habitats from potential expansion of fishing into new areas. The measures include closing about 50,000 square nautical miles in the western portion of the Bering Sea management area and about 85,000 square nautical miles in the northern Bering Sea and nearshore areas around St. Matthew Island, St. Lawrence Island, Nunivak Island, Etolin Strait, and Kuskokwim Bay. The Northern Bering Sea Research Area would be closed pending the development of a research plan that would guide any future experimental or commercial fishing there.

Ecosystem Based Approaches to Management

Over the past year HCD continued to support the North Pacific Fishery Management Council's initiatives to implement ecosystem based approaches to management. HCD served on a team that developed a Fishery Ecosystem Plan for the Aleutian Islands, which the Council approved in June 2007. The Fishery Ecosystem Plan will inform future fishery management decisions by taking fuller account of habitat and ecosystem processes. HCD also represented the Regional Administrator on the Council's Ecosystem Committee and on the Alaska Marine Ecosystem Forum. The Ecosystem Committee advises the Council on matters such as the development of the Fishery Ecosystem Plan and a new Fishery Management Plan for the Arctic. The Alaska Marine Ecosystem Forum is comprised of 14 federal and state agencies that have jurisdiction over various activities that can affect the marine ecosystem. The purpose of the forum is to coordinate and share information to promote the sustainable management of Alaska's marine ecosystems.

Other Fishery Management Actions

HCD staff advised and assisted staff from the Sustainable Fisheries Division regarding a number of other fishery management actions during FY07. HCD contributed to the EIS for the annual harvest specifications for the groundfish fisheries to evaluate potential effects on habitat, and completed an EFH consultation. HCD staff also reviewed analyses and decision memoranda for a variety of regulatory amendments, and recommended modifications in some cases to ensure the analyses clearly reflected consideration of effects on EFH.

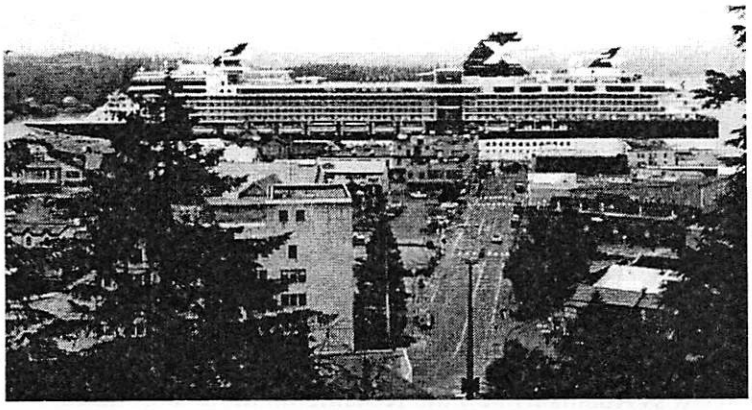
Environmental Review to Minimize Habitat Loss

Cooper Lake Hydropower Project

The Federal Energy Regulatory Commission (FERC) issued a new 50 year license for the Cooper Lake hydropower project in 2007, implementing the terms of a settlement agreement that HCD helped negotiate in 2005 with assistance from NOAA General Counsel. This was the first hydropower license based on a settlement agreement involving NOAA Fisheries Alaska Region since FERC began emphasizing alternative licensing procedures several years ago. The project was first licensed in 1957 and diverts all flow from Cooper Lake through a tunnel/penstock to the project powerhouse, where it is discharged into Kenai Lake (source of the Kenai River). This arrangement reduced stream flows and water temperatures in the 4.8-mile-long bypassed reach of Cooper Creek, greatly diminishing use of the stream by salmon. HCD initially assisted with study development and data analysis, and then participated in settlement negotiations between interested parties and Chugach Electric. The final agreement called for Chugach Electric to spend ~$10 million on project modifications to improve year-round stream flows and increase water temperatures. These modifications should increase the use of Cooper Creek by salmon. The project modifications combined with the 50 year term of FERC's license help illustrate the long term benefits of NOAA Fisheries' role in hydropower licensing.

Ketchikan Cruise Ship Berth IV Mitigation Project

HCD worked with the Corps of Engineers to develop an innovative mitigation project to compensate for habitat loss from the construction of a new cruise ship berth in Ketchikan. The developer will provide $10,000 to support a monitoring program for three species of invasive tunicates – small invertebrates that could spread to Alaska on the hulls or in the ballast water of cruise ships. Non-native tunicates are currently infesting Puget Sound, Washington, and have the potential to alter coastal habitats in Alaska. The monitoring program at the new cruise ship berth will be undertaken by the Smithsonian and represents the first mitigation required by the Corps of Engineers to address the potential impact of aquatic invasive species in Alaska.



Auke Nu Cove Conservation Agreement

The City and Borough of Juneau finalized a conservation easement recommended by HCD to protect 29 acres of intertidal habitat in Auke Nu Cove. The cove, located just north of Auke Bay, has been subjected to cumulative habitat loss and degradation over the years from construction of a ferry terminal, tour boat facilities, a barge wharf, a seafood processing business, and related infrastructure. Most recently, the City and Borough of Juneau applied for a Corps of Engineers permit to build a new dock and float for commercial fishing vessels. That project would have affected eight acres of sensitive habitat including mudflats and eelgrass beds. HCD worked with the applicant to minimize the footprint of fill and redesign the dock and ramp to

avoid most sensitive areas. HCD also recommended that the City and Borough of Juneau acquire all remaining tidelands in the cove and place a third-party conservation easement on this ecologically valuable habitat. The Southeast Alaska Lands Trust accepted the conservation easement and will provide stewardship for this habitat in perpetuity.

Residential Development in Petersburg

HCD's conservation recommendations led a private applicant to modify a proposal to fill intertidal wetlands for a single family residence in Petersburg, and locate the house above the high tide line instead. HCD's comments noted that the nearshore habitat in the project area is used by juvenile salmon, Pacific cod, walleye Pollock, arrowtooth flounder, rockfish, and other species, and less damaging alternatives were available for building a house at the site. The amount of habitat loss averted through our EFH consultation with the permitting agency was relatively small, but the result illustrates that such consultations often lead developers to find ways to build their projects while avoiding impacts to important fish habitats.

Port Heiden Drum Cleanup

HCD's review of an intertidal mining proposal near Port Heiden on Bristol Bay led to the cleanup of numerous deteriorating 55 gallon drums that were becoming visible along an eroding beach. A major anadromous fish stream, the Meshik River, and subsistence-use clam beds were at risk from any leaching contaminants. HCD staff notified the Corps of Engineers' Environmental Resources Division about the drums and requested their assistance, which led to a successful three week cleanup effort.

Forest Service Coordination

HCD worked with Forest Service personnel to update and revise procedures for integrating EFH consultations into Forest Service National Environmental Policy Act analyses. As a result, NOAA Fisheries and the Forest Service signed a new consultation agreement in June 2007. Additionally HCD staff reviewed major Forest Service actions such as proposed amendments to the Tongass National Forest Land and Resource Management Plan and offered recommendations to reduce adverse effects on EFH.

Mining

HCD staff continue to participate in pre-project planning for various mining projects in Alaska including Galore Creek, Tulsequah Chief, and Shaft Creek Mines in British Columbia; Bokan Mountain Mineral Exploration (Ross Adams Mine); the Kensington mine in Southeast Alaska; and the Chuitna coal mine and Pebble gold mine in southwestern Alaska. Our participation in most of these projects involves making sure that the environmental analyses include a thorough assessment of baseline fish habitat conditions and anticipated impacts so that appropriate steps can be taken to minimize adverse effects.

Tesoro Ballast Water Treatment and Monitoring

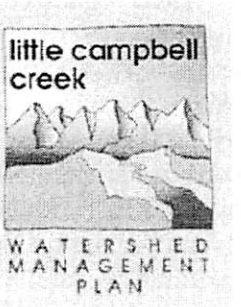
HCD's recommendations led Tesoro Alaska Petroleum Company to begin voluntary monitoring for aquatic invasive species from tanker ballast water discharges at a refinery in Nikiski, approximately 60 miles southwest of Anchorage. The refinery receives petroleum from Cook Inlet and North Slope oil fields via tanker shipments and pipeline, in addition to some tanker shipments of Indonesian crude oil. Tesoro's permit for ballast water treatment and discharge into Cook Inlet was up for reissuance in 2007. HCD staff recognized that ballast water

discharges are a leading vector for the spread of invasive species throughout the world, and recommended that the Environmental Protection Agency (EPA) address the potential for introducing invasive species. As a result EPA requested that Tesoro join the Alaska Invasive Species Workgroup, and Tesoro agreed to do so and began voluntary monitoring.

Habitat Restoration and Protection

Cooperative Habitat Protection Partnership

HCD has been working closely with the Municipality of Anchorage and a variety of partners to implement a pilot grant for a Cooperative Habitat Protection Partnership (CHPP) in Anchorage. The idea behind CHPPs is to use non-regulatory approaches to protect fish habitat at the regional and community levels. HCD secured funding in 2006 from NOAA Fisheries' Office of Habitat Conservation for a watershed planning effort for Little Campbell Creek. The funding for Project COHO (Community Outreach Habitat Operation) allowed us to partner with the municipal government to add vital fish habitat information to a watershed management plan. A draft of the plan was released in October 2007 and it will be finalized in 2008.



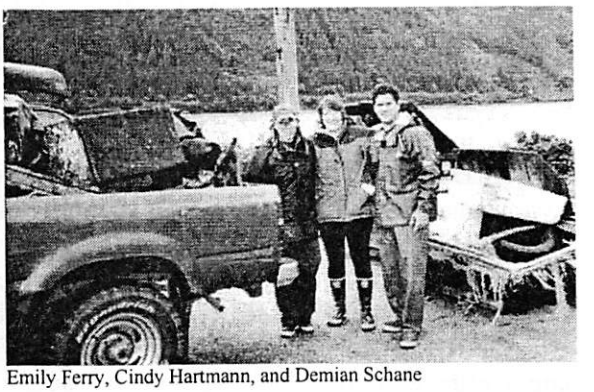
National Fish Habitat Action Plan

HCD worked with several other agencies and non-governmental groups to institute Fish Habitat Partnerships under the National Fish Habitat Action Plan. We helped develop a Strategic Action Plan for the Matanuska-Susitna Basin Salmon Conservation Partnership, one of five national pilot partnerships and one of four that was officially recognized by the National Fish Habitat Board in October 2007. The plan focuses on wild salmon and their freshwater habitats in the Mat-Su Basin and marine habitats in upper Cook Inlet.

Marine Debris Cleanup

HCD staff organized a NOAA Fisheries team to participate in the International Coastal Cleanup. This annual event relies on volunteers and sponsoring organizations to collect and dispose of marine debris. The NOAA Fisheries volunteers from Juneau adopted a section of beach on Douglas Island and filled the bed of a pickup truck to overflowing with trash collected from the beach.

Jon Kurland, Phyllis Hunter, Cindy Hartmann, Stephanie Mooney, Dana Whiteley, Emily Ferry, Julie Scheurer, Demian Schane, Tim Wilkins, and Jimmie Wilkins



Emily Ferry, Cindy Hartmann, and Demian Schane

Marine Debris Workshop

Regional Restoration Center staff applied for and received an internal NOAA grant to hold a workshop on marine debris in Alaska. The workshop, which is being organized jointly with the Protected Resources Division, will present information on funding and coordination opportunities from the NOAA Restoration Center and will formulate criteria for prioritizing cleanups in Alaska. It will be held in conjunction with the 2008 Alaska Forum on the Environment.

Training for Invasive Green Crab Monitoring

HCD organized successful training sessions in southeast and southcentral Alaska to promote early detection of the spread of invasive green crabs. The training resulted from a partnership between NOAA Fisheries, the NOAA invasive species program, Prince William Sound Regional Citizen's Advisory Council, Alaska Invasive Species Working Group, and Alaska Department of Fish & Game. Invasive European green crabs are moving northward along the west coast of North America, most recently occurring in large numbers along the west coast of Vancouver Island, British Columbia. Although monitoring in southcentral Alaska has been ongoing for several years, none has been conducted in southeast Alaska. As a result of the training and coordination, monitoring for the 2008 season will be performed in Whittier, Juneau, Sitka, Gustavus, and Ketchikan by volunteers from a variety of local groups and government agencies.

top row, left to right: Tammy Davis ADF&G; Cindy Hartmann NMFS; Dan Gilson PWSRCAC; Gary Frietag, Ketchikan; Alan Unmack, Sitka Tribe; Heather Meuret-Woody, Sitka Tribe **bottom row, left to right:** Whitney Rapp Glacier Bay NPS Gustavus; Linda Shaw NMFS. Photo by Richard Enriquez, USFWS

Dan Gilson, PWSRCAC

Lynn Canal Artificial Reefs

HCD initiated a project to develop two artificial reefs to enhance nearshore marine habitat in Lynn Canal north of Juneau in partnership with the Alaska Department of Transportation, the Federal Highway Administration, and the University of Alaska Fairbanks. The university designed the project and study plan and completed extensive surveys of the seafloor. NOAA Fisheries reviewed the research proposal and obtained all required state and federal permits. The Alaska Department of Transportation and the Federal Highway Administration provided engineering expertise, funding, and contracting services for the project as partial mitigation for

the planned Juneau Access Improvement Project. The depth and flat top of the reefs are designed to support the growth of kelp and other seaweeds that provide ideal spawning habitat for Pacific herring. Construction is scheduled for late 2007.

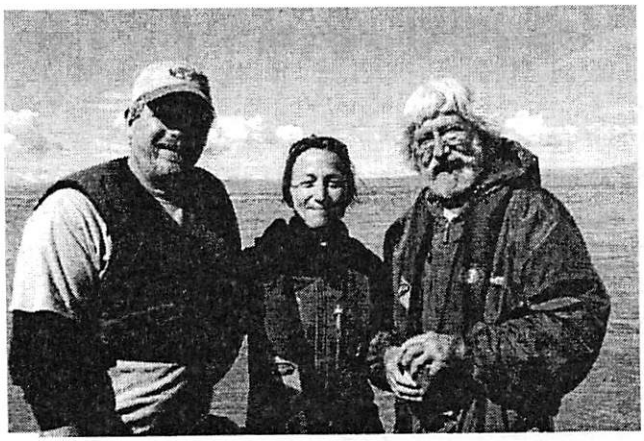
Municipality of Anchorage Watershed Task Force

HCD continued serving on a Salmon Restoration Task Force to assist the Municipality of Anchorage with salmon restoration plans for three watersheds using a grant from the Pacific Coastal Salmon Recovery Fund. HCD helped prioritize projects to maximize improvements to salmon habitat in urban and industrial areas of the city. The Municipality of Anchorage has repeatedly thanked us for our staff's involvement and our contribution of technical expertise.

Outreach and Education

PBS Film Project

In the spirit of "One NOAA" HCD provided coordination and logistical support for Jean-Michel Cousteau's Ocean Futures Society in filming an upcoming PBS special. The film is scheduled to feature Cook Inlet beluga whales, emphasizing important management and development issues. The field effort involved two days of filming and observations from a NOAA small boat piloted by an HCD staffer. This outreach project should lead to a positive showcase of NOAA Fisheries' commitment to investigating Cook Inlet beluga whales, identifying their behaviors and habitats, and professionally describing the threats these whales face near Alaska's largest urban area.



Matthew Eagleton, Celine Cousteau, and Jean-Michel Cousteau

Alaska Oceans Festival

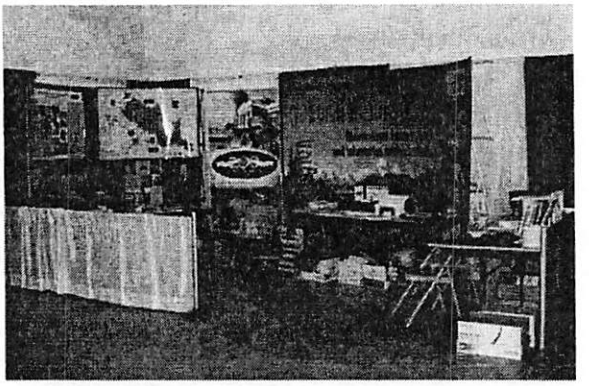
HCD and other Regional Office personnel staffed a booth at the Alaska Oceans Festival in Anchorage. The booth – one of the most successful at the festival – emphasized children's activities and provided material on Alaska habitats and related topics.

Salmon in the City

HCD participated in the Salmon in the City Festival together with the Municipality of Anchorage, other federal and state agencies, and non-governmental organizations. The festival is a two week event centered around the theme of "Celebrating our Creeks, Community and Culture." HCD staff participated in the opening day events with activities and information on salmon habitat protection and restoration projects in the community.

One NOAA

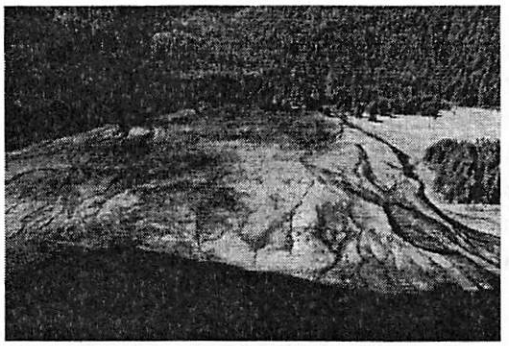
For the second year in a row NOAA Fisheries Anchorage field office staff coordinated with the National Weather Service Alaska Regional Office in putting on an Earth Day event and sharing a NOAA booth at the Alaska State Fair. At both events NOAA employees ensured that the public was provided with a consistent message about NOAA products and services. NOAA staff increased public awareness in areas of involving fishery management, habitat conservation, endangered species, marine mammals, tsunami and earthquake hazards, lightning safety, NOAA weather radio, marine and aviation products and services, and flood preparedness.



Other Noteworthy Activities

ShoreZone Mapping

HCD provided funding and coordination for a fourth field season for the Shorezone mapping project, which inventories coastal habitats using aerial surveys with video, still photos, and classification of habitat features. The 2007 funding enabled mapping of 5,297 kilometers (km) of shoreline on Baranof and Prince of Wales Islands in southeast Alaska, imaging over 1500 km of shoreline from west Cleveland Peninsula to the Wrangell area in the summer of 2008, and conducting a ground verification study. The data will be added to an interactive website (www.alaskafisheries.noaa.gov/maps/szintro.htm) that allows users to "fly" the coast and view video or still images. Organizations working in partnership on the Alaska ShoreZone project include NOAA Fisheries, Alaska Department of Natural Resources, Alaska Department of Fish & Game, Archipelago Marine Research, Coastal and Ocean Resources Inc., Cook Inlet Regional Citizens Advisory Council, Exxon Valdez Oil Spill Trustee Council, National Park Service, Prince William Sound Regional Citizens Advisory Council, Royal Caribbean Cruises Ltd. (The Ocean Fund), The Nature Conservancy, and the U.S. Fish and Wildlife Service.



Habitat Data Workshop

HCD and the Alaska Fisheries Science Center organized a workshop to inventory habitat-related data sets maintained by staff from the Alaska Fisheries Science Center, Alaska Regional Office, North Pacific Fishery Management Council, and the Alaska Department of Fish and Game. The workshop improved understanding of existing habitat data amongst key personnel and resulted in documentation of 22 available data sets using a standard format. The habitat data inventory will be published as an Alaska Fisheries Science Center Processed Report.

Alaska Invasive Species Working Group

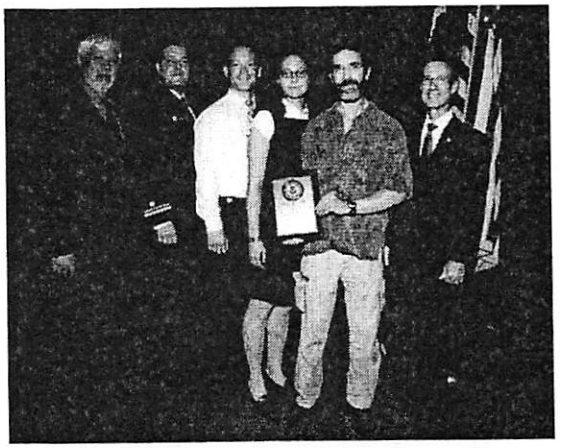
An HCD staffer continued to lead the Alaska Invasive Species Working Group's Marine Subcommittee. This group allows organizations that are interested in issues related to aquatic invasive species in Alaska the opportunity to share information and collaborate on projects of mutual concern. Participants have expressed that the subcommittee under HCD's leadership is highly effective at advancing these goals.

Coastal America

HCD continued to represent NOAA Fisheries in Coastal America, a national interagency partnership coordinated by the White House Council on Environmental Quality that promotes efforts to conserve and restore coastal habitats. HCD co-chaired the Coastal America Alaska Regional Implementation Team and was recognized by the director of the national partnership with a Coastal America Regional Leadership Award. The Alaska team continued work to implement a variety of worthy projects, including some that have received funding from the NOAA Restoration Center.

NOAA Administrator's Award

Several HCD staff were recognized for their groundbreaking efforts in the successful installation of Alaska's first modular artificial reef, demonstrating that this technique, previously used only in warmer climates, can effectively enhance marine habitats in sub-Arctic waters.



NOAA Fisheries Deputy Assistant Administrator John Oliver, LTJG Jonathan Taylor, John Olson, Erika Ammann, Brian Lance, and NOAA Administrator VADM Conrad C. Lautenbacher Jr., USN (Ret.) (not pictured, Matthew Eagleton)

Student Intern

For the second year in a row HCD hosted an intern from the University of Washington DO-IT (Disabilities, Opportunities, Internetworking, and Technology) Program. The student, who is hearing impaired, organized and prepared field sampling kits and also partnered with the U.S. Fish and Wildlife Service Marine Necropsy Lab to dissect and inventory deceased marine mammals. The internship provided her an opportunity to gain additional work experience and learn more about NOAA-related career paths.

Please visit our website:
www.alaskafisheries.noaa.gov/habitat

AGENDA B-2
DECEMBER 2007
Supplemental

Winter King Charters

All Season Salmon and Halibut Charters
Smooth Comfortable Ride • 32' Heated Catamaran

North Pacific Fisheries Management Council
605 W 4th Avenue, Suite 306
Anchorage, AK 99501-2252

November 23, 2007

Members of the North Council:

In June the Council moved to implement a 4 fish annual limit, line limits, no harvest by skipper and crew and a second fish under 32 inches for the 2008 season in area 2C, assuming the GHL is not adjusted downward due to a drop in total CEY. This decision was based on ADF&G preliminary harvest data indicating a 2006 harvest of 2.029 million pounds in area 2C.

In September ADF&G released a 2006 final area 2C harvest estimate of 1.804 million pounds, meaning that the projections used in the Council's decision making were high by 225,000 pounds.

In November Council staff submitted a supplement to the 2C GHL analysis, based on the final 2006 harvest estimate. This supplement indicates that replacing the four fish limit with a six fish limit best matches the original GHL range selected by the Council during final action in June.

In view of the updated harvest data provided in the 2C GHL analysis supplement, and the fact that analysis of a six fish annual limit is already included in the analysis, I ask the Council to consider replacing the four fish limit with a six fish annual limit.

Sincerely,

Rex Murphy

Rex Murphy owner/operator
P.O. Box 3309 • Homer, AK 99603 • 907-235-9113 • www.winterking.com

Capt. Pete's
Alaskan Experience

www.captpete.com

November 28th 2007

Mr. Eric Olson, Chair
North Pacific Fisheries Management Council
605 West 4th Avenue
Anchorage, AK 99501-2252

Dear Mr. Olson:

The proposed measures to restrict halibut harvest in Area 2C were developed with a catch estimate that was over 225,000 pounds high. Given that statistics presented to the Council in October supported this, I think the Council should reconsider those restrictions and allow an annual limit of six fish per angler.

With a permanent solution to guided angler growth on the horizon, I think it only fair that the Council consider some small measures to allow for this industry to harvest as much of this small GHL as possible.

Thank you!

Sincerely,

Pete Wedin

P.O. Box 3353 • Homer, AK 99603 • (907) 235-2911 • Fax (907) 235-2975 • fish@captpete.com

November 26, 2007

North Pacific Fishery Management Council
605 W 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Via fax: (907) 271-2817

Re: Halibut charter four-fish annual limit in Area 2C

Members of the North Council:

As you know, ADF&G has released a 2006 final 2C harvest estimate of 1.804 million pounds which is 225,000 pounds less than the estimate used by the Council when they implemented management measures for 2008 that included an annual limit of four halibut.

Earlier this month, Council staff submitted a supplement to the 2C GHL analysis based on the final 2006 harvest estimate. This new estimate indicates that replacing the four fish annual limit with a six fish limit would best match the original GHL range selected by the Council during its action at the June meeting.

Using low annual limits should be the last resort of the council. It targets two classes of the charter fishery that should be the two most important to protect: Alaska residents using charter boats and mature operators selling multi-day packages. Low annual limits for multi-day operators have virtually the same effect as reducing the bag limit. We rely on a consistent 90 percent repeat/referral rate to remain profitable. Significant changes, such as a four fish annual limit, will have long-term dire economic consequences resulting from our inability to continue to attract repeat clientele. Conversely, annual limits have little or no effect on the single-day and half-day charter businesses, sectors of the charter industry that have recently expanded and have been a major factor in the GHL overage.

The Council staff supplement indicates that replacing the four fish annual limit with a six fish limit will best match the original GHL range selected by the Council during final action in June. I urge you to consider replacing the four fish annual limit with a six fish limit as a management tool for the 2008 season.

Sincerely,

Ken Dole
Managing Member

P.O. Box 6440 • Ketchikan, Alaska 99901 • (907) 225-9461 • Fax (907) 225-8530
1-800-544-5125

PO Box 8331
Ketchikan, AK 99901
(907) 225-1900

North Pacific Fisheries Management Council
605 W 4th Avenue, Suite 306
Anchorage, AK 99501-2252

November 23, 2007

Members of the North Council:

Given the fact that estimates used to make your decision to implement a four-fish annual limit on guided vessels in area 2c were high, I would like to urge that you reconsider that decision and replace it with measures that will keep guided anglers under the GHL and still allow access to fishermen who patronize guided sportfishing businesses.

This is a delicate matter and I appreciate the time you have taken to consider all of the ramifications of this decision, both for the biomass and for our businesses. In light of these new numbers coming from ADF&G, please make changes to your previous decision and allow a six-fish annual limit for those fishing with guided anglers.

Thank you for your consideration.

Sincerely,

Russell Thomas

Petersburg Charter Boat Association
P.O. Box 1507
Petersburg, Alaska 99833

North Pacific fishery Management Council
605 W 4th Avenue, Suite 306
Anchorage, AK 99501-2252
Fax: 907-271-2817

November 26, 2007

RE: 2008 Charter halibut annual limit area 2C

Mr. Chair, Council Members:

In June the Council moved to implement a 4 fish annual limit for the 08 season in addition to the 07 harvest regulations. This decision was based, in part, on ADF&G preliminary harvest data for 2006 of 2.029 million pounds in area 2C. ADF&G released final 2C harvest numbers of 1.801 million pounds in September. The harvest estimates used by the Council to support its' June motion were high by 225,000 pounds.

Unnecessarily low annual limits impact lodge and multi-day operations the most severely while having little or no effect on half-day, single day and cruise ship charters. It is ironic that the Councils proposed course of action impacts the segment of the charter industry responsible for the most recent increase in harvests, the least.

In view of the updated harvest data provided in the 2C GHL analysis supplement and ADF&Gs' preliminary harvest estimates for the 07 season, it seems reasonable and appropriate for the Council to reconsider its' June decision to implement a 4 fish annual limit for the 08 season.

Sincerely,

Stan Malcom

Stan Malcom
President, Petersburg Charterboat Association

KAIN'S FISHING Adventures & LODGE

North Pacific Fisheries Management Council
605 W 4th Avenue, Suite 306
Anchorage, AK 99501-2252

November 26, 2007

Members of the North Council:

In June the Council moved to implement a 4 fish annual limit, line limits, no harvest by skipper and crew and a second fish under 32 inches for the 2008 season in area 2C, assuming the GHL is not adjusted downward due to a drop in total CEY. This decision was based on ADF&G preliminary harvest data indicating a 2006 harvest of 2.029 million pounds in area 2C.

In September ADF&G released a 2006 final area 2C harvest estimate of 1.804 million pounds, meaning that the projections used in the Council's decision making were high by 225,000 pounds.

In November Council staff submitted a supplement to the 2C GHL analysis, based on the final 2006 harvest estimate. This supplement indicates that replacing the four fish limit with a six fish limit best matches the original GHL range selected by the Council during final action in June.

In view of the updated harvest data provided in the 2C GHL analysis supplement, and the fact that analysis of a six fish annual limit is already included in the analysis, I ask the Council to consider replacing the four fish limit with a six fish annual limit.

Sincerely,

Greg Kain
Kain's Fishing Adventures & Lodge

9113-20th Street East • Edgewood, Washington 98371 • 800-926-7932
www.kainsfishingadventures.com • Email - email@kainsfishingadventures.com

North Pacific Fishery Management Council
605 W 4th Avenue, Suite 306
Anchorage, AK 99501-2252
By fax: 907-271-2817

November 26, 2007

RE: Halibut charter four-fish annual limit in Area 2C

Members of the North Council:

In June the Council moved to implement a suite of management measures for the halibut charter fishery in Area 2C for 2008; including line limits, no harvest by skipper and crew, a second fish under 32 inches, and a 4 fish annual limit. This is assuming the GHL is not adjusted downward due to a drop in total CEY. This decision was based on ADF&G preliminary harvest data indicating a 2006 harvest of 2.029 million pounds in area 2C.

In September ADF&G released a 2006 final 2C harvest estimate of 1.804 million pounds. The projections used in the Council's June decision-making were high by 225,000 pounds.

In November Council staff submitted a supplement to the 2C GHL analysis, based on the final 2006 harvest estimate. According to Dr. Balsiger's letter to the Council dated November 5, 2007, the updated analysis suggests that the 2007 charter fishery in Area 2C may not have exceeded the GHL and if the Council's proposed actions are implemented in 2008, the charter harvest would likely fall below the GHL.

Of particular concern to long-time operators and multi-day lodges with established, repeat clientele is the four-fish annual limit. Low annual limits take dead aim at these mature operators and create long-term effects that place them in serious financial jeopardy. Conversely, annual limits have little effect on new, start-up operations or the single-day and half-day charters, the specific sector of the charter industry that is expanding and has caused the GHL overages.

The Council staff supplement indicates that the replacing of the four fish limit with a six fish limit best matches the original GHL range selected by the Council during final action in June. In view of the updated harvest data provided in the 2C GHL analysis supplement, this would appear prudent for the Council to consider.

Sincerely,

Larry McQuarrie

Larry "Mac" McQuarrie,
Owner, Sportsman's Cove Lodge and Charter Halibut Stakeholder Committee member

North Pacific Fishery Management Council
605 W 4th Avenue, Suite 306
Anchorage, AK 99501-2252
By fax: 907-271-2017

November 26, 2007

RE: Halibut charter four-fish annual limit in Area 2C

Members of the North Council:

It has come to our attention that earlier this month Council staff submitted a supplement to the Area 2C GHL analysis, based on the final 2006 harvest estimates. We are also aware of a letter from NMFS's Dr. Balsiger to the Council dated November 5, 2007 expressing concerns that the updated analysis suggests that the 2007 charter fishery in Area 2C may not have exceeded the GHL and if the Council's proposed actions are implemented in 2008, the charter harvest would likely fall below the GHL.

We are very concerned with the long-term consequences of a 4-fish annual limit. Our focus rests not on the 2008 season, but rather on the future. While annual limits are much better than many other restrictions, annual limits that are unnecessarily low cause long-term damage to established operations and do little to affect or curtail fledgling operations that are the growing segment of our industry, and the reason for GHL overages.

Our operation has not grown since 1996, yet established operations like ours will bear the brunt of the implementation of 4-fish annual limit.

- Clients are not like fish. Clients don't stay in the water to be caught next season. When clients' expectations are not fulfilled they don't come back.
- Clients talk, and the media talks, and the word gets out that, like Washington and Oregon, there are no more halibut to be caught in Southeast Alaska.
- It takes years to turn that perception around. Many operations will not recover, because they will not be able to bear the marketing costs to replenish the lost customers.
- If Area 3A and Canada do not have the same restrictions no amount of marketing money will save the 2C operations. We may be one of them.

If we don't make it through 2009, the Interim Plan or any other plan won't matter. We can live with an annual limit of six fish, but four fish will cause long-term damage to the established and multi-day operators and lodges.

Patricia Seaman

Patrica L. Seaman
Operations Manager
Sportsman's Cove Lodge

North Pacific Fisheries Management Council
605 W 4th Avenue, Suite 306
Anchorage, AK 99501-2252

November 28, 2007

Members of the North Council:

In June the Council moved to implement a 4 fish annual limit, line limits, no harvest by skipper and crew and a second fish under 32 inches for the 2008 season in area 2C, assuming the GHL is not adjusted downward due to a drop in total CEY. This decision was based on ADF&G preliminary harvest data indicating a 2006 harvest of 2.029 million pounds in area 2C.

In September ADF&G released a 2006 final area 2C harvest estimate of 1.804 million pounds, meaning that the projections used in the Council's decision making were high by 225,000 pounds.

In November Council staff submitted a supplement to the 2C GHL analysis, based on the final 2006 harvest estimate. This supplement indicates that replacing the four fish limit with a six fish limit best matches the original GHL range selected by the Council during final action in June.

In view of the updated harvest data provided in the 2C GHL analysis supplement, and the fact that analysis of a six fish annual limit is already included in the analysis, I ask the Council to consider replacing the four fish limit with a six fish annual limit.

Sincerely,

Mike Wallisch
Alaska Adventures Unltd. Inc.

North Pacific Fisheries Management Council
605 W 4th Avenue, Suite 306
Anchorage, AK 99501-2252

November 23, 2007

Members of the North Council:

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In September ADF&G released a 2006 final area 2C harvest estimate of 1.804 million pounds, meaning that the projections used in the Council's decision making were high by 225,000 pounds.

In November Council staff submitted a supplement to the 2C GHL analysis, based on the final 2006 harvest estimate. This supplement indicates that replacing the four fish limit with a six fish limit best matches the original GHL range selected by the Council during final action in June.

In view of the updated harvest data provided in the 2C GHL analysis supplement, and that a six fish annual limit is already included in the analysis, I request the Council seriously consider replacing the four fish limit with a six fish annual limit.

Sincerely,

Chris Hashiguchi,
Owner/Operator LegaSea Fishing Charters

SITKA'S SECRETS

www.sitkasecret.com • info@sitkasecret.com

November 28, 2007

Mr. Eric Olson
North Pacific Fisheries Management Council
605 West 4th, Suite 306
Anchorage AK 99501
Fax: 907-271-2817

Dear Mr. Olson,

We are writing in regards to Item C-1 Charter Halibut Management., on your December meeting agenda.

In the past, the Alaska Department of Fish and Game projections have shown an upward trend in the guided sport halibut catch. However, final guided sport catch data for 2006, shows the upward trend has stopped. Preliminary catch data for 2007, indicates another decline. The final guided recreational catch for 2007, may in fact, be below the targeted Guideline Harvest Level for Area 2C.

Before putting more "tools in the toolbox, " such as the four halibut annual limit, with the intent to restrict the recreational harvest, the Council needs to direct its staff to analyze the relationship between the 2007 restrictions and the decrease in the guided sport catch. And again, we request the Council conduct an indepth, economic analysis of the recreational halibut fishing industry, in order to anticipate and understand the impact of Council rulings on recreational fishing.

We believe discussing tools to limit recreational fishing access is premature. However, if the Council desires to fill its toolbox, we suggest the Council direct its staff to also analyze liberalizing measures to increase the recreational harvest in Area 2C, just in case the 2008 guided sport harvest falls below the Council's GHL.

Thank you for your time and attention.

Sincerely,

Beverly P. Minn
Kent F. Hall

Beverly P. Minn • Kent F. Hall • 500 Lincoln St. Unit B-9 • Sitka, Alaska 99835-7655 • (907) 747-5089

Southeast Alaska Fishermen's Alliance
9369 North Douglas Highway
Juneau, AK 99801
Phone 907-586-6652
Fax 907-523-1168 Website: http://www.seafa.org E-mail: seafa@gci.net

November 27, 2008

North Pacific Fishery Management Council
Eric Olson, Chair
605 W 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Fax 907-271-2817

RE: B Reports - NMFS letter to Council on Halibut 2C Management Measures

Dear Eric Olson and Council Members,

SEAFA would like to comment on the letter dated November 5, 2007 submitted from National Marine Fisheries Service (NMFS) to the Council through the Chair Eric Olson. We do not believe that the Council should reconsider the 2C management decisions. The Council's actions were based on the best information to be had at the time of the action, it looked at the trends of what had been occurring and acknowledged that the decision was overdue. For the Council to reconsider any action would likely delay the proposed rule and make it impossible to have management restrictions in place for the 2008 season. The alternative is to review the proposed rule and comment on it, although we understand that you normally only comment when the proposed rule does not meet the intent of the Council action.

Reviewing every proposed rule and debating the issue again with the public will make it difficult to move forward on any issue. On this particular issue, there is always new information coming in whether it is refined preliminary estimates or final numbers.

The letter suggests that 2007 preliminary estimate might be under the GHL. The counter argument is that the preliminary estimate might also be underestimating the catch. The preliminary estimate for 2007 was 15% over the GHL with a deviation of ±15 so while the harvest might be under the GHL, it might also be 30% over the GHL. The Council was unwilling to take action on a trend of increasing preliminary harvest estimates, why should they relax management restrictions on a preliminary estimate.

The Council has the ability to transition into the management suggested by the interim plan by not reconsidering their decision but using the June council meeting actions as the start of a yearly cycle of management measure review.

Sincerely,
Kathy Hansen
Executive Director

Homer Charter Association

P. O. Box 148 Homer, Alaska. 99603 (907) 235-2282 phone/fax.

North Pacific Fishery Management Council
605 W 4th Avenue, Suite 306
Anchorage, AK 99501-2252
fax: 907-271-2817

November 28, 2007

RE: Halibut charter four-fish annual limit in Area 2C

Members of the North Council:

The Homer Charter Association is a trade association of 30 members operating from the port of Homer. We appreciate this opportunity to express our concerns.

In June the Council moved to implement a suite of management measures for the halibut charter fishery in Area 2C for 2008, including line limits, no harvest by skipper and crew, a second fish under 32 inches and a 4 fish annual limit, assuming the GHL is not adjusted downward due to a drop in total CEY. This decision was based on ADF&G preliminary harvest data indicating a 2006 harvest of 2.029 million pounds in area 2C.

In September ADF&G released a 2006 FINAL 2C harvest estimate of 1.804 million pounds. The projections used in the Council's June decision-making were high by 225,000 pounds.

In November Council staff submitted a supplement to the 2C GHL analysis, based on the final 2006 harvest estimate. According to Dr. Balsiger's letter to the Council dated November 5, 2007, the updated analysis suggests that the 2007 charter fishery in Area 2C may not have exceeded the GHL and if the Council's proposed actions are implemented in 2008, the charter harvest would likely fall below the GHL.

The Council staff supplement indicates that replacing the four fish limit with a six fish limit best matches the original GHL range selected by the Council during final action in June. In view of the updated harvest data provided in the 2C GHL analysis supplement, our association requests the council consider replacing the four fish limit with a six fish annual limit.

Sincerely,
Robert Ward - Secretary

KENAI RIVER SPORTFISHING
ASSOCIATION

November 28, 2007

Chairman Eric Olson
North Pacific Fisheries Management Council
605 W 4th Avenue, Suite 306
Anchorage, AK 99501-2252

FAX (907) 271-2817

Dear Chairman Olson:

Based on preliminary ADFG harvest information of the halibut charter for 2006 in area 2C, the Council in June '07 voted to implement a 4 fish annual limit, line limits, no harvest by skipper and crew and a second fish under 32" for the 2008 season in 2C.

Since that decision the final harvest information for the 2006 season became available in September '07, the result of which being a charter harvest of 225,000 pounds less that preliminarily thought. Earlier this month the NPFMC staff provided a supplement to the decision on the 2C GHL analysis that shows adjusting the annual limit from four fish to six fish, while keeping the other aspects intact, best matches the selected GHL range selected in the Council's June decision.

Kenai River Sportfishing Association recommends that the Council move to replace the four fish annual limit with a six fish annual limit for 2C for 2008, in light of the final harvest information from 2006.

We also put forth the recommendation to the Council that the decision making time frame for GHL management measures be adjusted so decisions are based on final harvest information from the prior year instead of preliminary information. To do this a range of options (15% lower, correctly matching up, or 15% higher) may be put forth based on preliminary information with the Council's final management decision based on final harvest information.

Respectfully,

Ricky Gease

Ricky Gease, Executive Director
Kenai River Sportfishing Association

Steve Fish
P.O. Box 6448
Sitka Alaska 99835

Mr. Eric Olson, Chair
North Pacific Fisheries Management Council
Anchorage, Alaska

Re: Charter Halibut

Dear Chair Olson and council members,

I live in Sitka and have fished halibut commercially for over 30 years. In the initial Ifq allocation, I did not receive any 2C quota as I fished elsewhere during the qualifying years. Since then, my wife and I have invested heavily in 2C quota, because we want to be able to fish where we live. Most of the money spent on quota has been borrowed.

I support the work of the IPHC and the occasional quota reductions necessary to assure the continued health of the halibut resource. It is long past time that the halibut charter industry was decoupled from the commercial longline sector, their GHL becoming an allocation which is enforceable and holds the charter industry accountable for their own impact on the resource.

I am encouraged by the work of the council and industry members at the October meeting, and strongly encourage the council to continue to bring about a hard cap/ allocation for the charter sector as a short term solution. Decoupling the charter and commercial sectors and holding the charter sector accountable for their removals is the only honest way to deal with the continuing growth of that industry. Separating and prioritizing short and long term goals is a good way to break the loggerhead which has held us all hostage and prevented the stabilizing of both industries.

Thank You and please forge ahead with a will.

Steve Fish

COMMISSIONERS:

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PORT ALBERNI, B.C.
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INTERNATIONAL PACIFIC HALIBUT COMMISSION

ESTABLISHED BY A CONVENTION BETWEEN CANADA

AND THE UNITED STATES OF AMERICA

DIRECTOR
BRUCE M. LEAMAN

P.O. BOX 95009
SEATTLE, WA 98145-2009

TELEPHONE
(206) 634-1838

FAX:
(206) 632-2983

December 4, 2007

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, AK 99501

Dear Eric,

The staff of the International Pacific Halibut Commission (IPHC) has recently completed the 2007 stock assessment using the approach we introduced last year, which was a coastwide assessment with apportionment of yield to IPHC Regulatory Area using IPHC survey data. This assessment is the basis of the staff's catch limit recommendations for 2008. I want to apprise you of our estimates of Total Constant Exploitation Yield (CEY) for Areas 2C and 3A as they relate to the North Pacific Fishery Management Council's (Council) Guideline Harvest Level (GHL) program for the sport charter halibut fishery in those areas.

For 2008, we are estimating CEY for Area 2C to be 6.5 million pounds, which represents a 30% decline from the 1999-2000 average of 9.34 million pounds using the same assessment. Much of this decline is attributed to the passing of several strong year classes out of the fishery. Both fishery and survey CPUE have shown continued declines in the past few years. Projections of biomass indicate a likely strong upswing within the next five years.

In Area 3A, CEY has been more stable. For 2008, CEY is estimated at 28.96 million pounds, which is a 3.1% decrease from the 1999-2000 average of 29.90 million pounds. Biomass projections for the next five years show continued stability for the area under most recruitment scenarios.

In determining our staff recommendations for 2008 commercial fishery catch limits in Area 2C, we used the GHL of 0.931 million pounds for Area 2C which reflects the IPHC staff's current estimate of the 2008 CEY and what is specified in the GHL regulations. This is not meaning to presuppose what action the Council might take. For Area 3A, the projected harvest supplied by ADF&G (3.40 Mlb) does not indicate a change in the GHL of 3.65 million pounds, as the IPHC staff's current estimate of the CEY is above the point where a change in the GHL is required.

The staff will be discussing the assessment and other matters at its Annual Meeting in Portland, Oregon on January 15-18, 2008. We will inform the Council of any changes from what we have presented here.

Sincerely yours,

Bruce M. Leaman, Ph.D.
Executive Director

cc: IPHC Commissioners

INTERNATIONAL PACIFIC HALIBUT COMMISSION

News Release

December 5, 2007

P.O. BOX 95009, SEATTLE, WASHINGTON 98145-2009

International Pacific Halibut Commission Staff Preliminary Catch Limit Recommendations: 2008

In making catch limit recommendations for 2008, staff has considered the results of the analytic assessment, changes in the commercial and survey indices used to monitor the stock, recruitment of incoming year classes, and a revised harvest policy that reflects coastwide policy goals. The staff also drew on the outcome of both the June 2007 Stock Assessment Workshop and the independent, external peer review of the stock assessment analysis. Detailed results of these additional investigations will be reported in the 2007 Report of Assessment and Research Activity. Ongoing tag returns from the coastwide PIT tagging program continue to demonstrate that regulatory areas cannot be treated as closed management units and this has influenced our choice of assessment models and corresponding harvest policy. Changes in the stock biomass as indicated by our catch at age assessment as well as changes in relative abundance indices from our surveys and the commercial fishery were also influential in our recommendations for 2008.

With the exceptions of Areas 3A and 4B, commercial catch per unit effort (CPUE) in 2007 showed decreases from 2006 values. Commercial CPUE in Area 3A was unchanged, while that in Area 4B showed a notable increase. The 2007 IPHC setline survey CPUE values were largely stable or increasing in the central and eastern portions of the stock (Areas 2A-3B) but lower than in 2006 for Area 4. These fluctuations were generally in the ±10% range, although Area 4A showed a larger decline of over 20%.

The analysis of optimum harvest rates for the coastwide assessment conducted in 2006 resulted in a target coastwide harvest rate of 20% of coastwide exploitable biomass. However, the staff also required a framework to partition the coastwide estimate of exploitable biomass into regulatory areas. The staff examined several alternatives for partitioning the coastwide biomass among regulatory areas and concluded that the use of the IPHC setline survey data offered the most standardized and consistent data to achieve this partitioning. The staff also acted on a recommendation from the June 2007 Stock Assessment Workshop and used depth-stratified means of survey catch data for apportionment. Accordingly, the distribution of biomass, as determined by the three-year average CPUE of legal-sized fish obtained on the stock assessment survey, was used to partition the coastwide exploitable biomass estimate into regulatory area biomass totals. The staff recommends that the 20% harvest rate be applied coastwide, with the exceptions of Areas 4B and 4CDE. For Area 4B, the staff continues to recommend a harvest rate of 15% as indicated by the analysis of productivity conducted in 2005. Similarly for Area 4CDE, the continued decline in survey and commercial catch rates supports the continued use of the 15% harvest rate for this area as well.

Catch Limit Recommendations for 2008

The staff recommendations totaling 59.24 million pounds for 2008 are presented in Table 1. The Area 2A recommendation includes all removals (commercial, treaty Indian, sport) allocated by the Pacific Fishery Management Council's Catch Sharing Plan. Area 4CDE is treated as a

single regulatory unit by the Commission, although the North Pacific Fishery Management Council's Catch Sharing Plan partitions the Commission catch limit into limits for the individual regulatory areas. The Area 2B catch limit recommendation includes totals for the commercial and sport fisheries. The Canadian Department of Fisheries and Oceans will allocate the adopted catch limit between the sport and commercial fisheries. The catch limit recommendations make the assumption that both Canada and the U.S. will manage to their domestic agreements on targets for sport fish catch.

The use of a coastwide assessment and partitioning of coastwide biomass with survey estimates of distribution creates some substantial changes in Total Constant Exploitation Yield (Total CEY) and recommended catch limits among areas, compared to previous assessments. Lower recommended catch limits are identified for Area 2, while portions of Areas 3 and 4 have somewhat higher recommended catch limits. These differences are associated with the different distribution of biomass associated with survey partitioning of a coastwide total biomass, compared with the traditional closed-area biomass distribution, as well as lower CPUE values in both the survey and the commercial fishery. As noted in the 2006 stock assessment, the survey distribution of biomass is more consistent with other estimates of biomass distribution that are not dependent on the stock assessment.

The staff continues to recommend a slow rate of increase in catch limits when estimated CEY is increasing and a more rapid reduction of catch limits when CEY is decreasing (a Slow Up – Fast Down policy). For Areas 2, 3A, and 4CDE the staff recommends catch limits that are lower by one-half of the difference between 2007 catch limits and the estimated fishery CEYs for 2008. For Areas 3B, 4A, and 4B, the staff recommends an increase over the 2007 catch limit equivalent to one-third of the difference between the 2007 catch limit and the estimated 2008 fishery CEY.

The staff has concerns about the exploitable biomass and optimum harvest rate in Area 4A. There are signs that current yields may not be sustainable and the staff believes that a harvest rate of 20% may be too high for this area. Other regulatory areas in the Bering Sea are assigned a harvest rate of 15% based on analysis of life history parameters, productivity, and oceanographic characteristics. The staff has not yet conducted such an analysis for Area 4A. Further, the staff believes that an analysis of productivity and harvest policy for the Bering Sea as a whole is necessary to determine if a modified harvest rate for Area 4A is appropriate. This analysis will be conducted in 2008.

The staff recognizes that adoption of the coastwide assessment and survey apportionment results in a significant shift in the estimated distribution of exploitable biomass. This analysis concludes that exploitation rates on the eastern portion of the stock have been too high in the past decade, resulting in lower biomass in Area 2 than would be realized if harvest rates had been near the target level. In the longer term, a lowered harvest rate will permit rebuilding of the exploitable biomass in Area 2 and an increase in available yield. The pace of that rebuilding will be affected by the strength of year classes recruiting to the fishery over the next several years. However, the staff recognizes that the Commission may wish to transition to these lower harvest rates over a period of time.

These recommendations, along with public and industry views on them, will be considered by IPHC Commissioners and their advisors at the IPHC Annual Meeting in Portland, Oregon USA, during January 15-18, 2007. These recommendations are preliminary and, as final data

are included in the assessment, may be updated for the Annual Meeting but are not expected to change significantly.

Proposals concerning changes to catch limits should be submitted to the Commission by December 31, 2007. Catch limit proposals are available on the Commission's web page (http://www.iphc.washington.edu/halcom/default.htm) or from the Commission's office. Additional details about the Annual Meeting can also be found on the web page.

Table 1. IPHC staff recommended catch limits for 2008, by IPHC regulatory area (million lbs, net weight). The 2007 fishery catch limits are included for comparison.

Regulatory Area	2007 Fishery Catch Limit	2008 IPHC Staff Recommended Fishery Catch Limit
2A[a]	1.34	1.00
2B[b]	11.47	8.06
2C	8.51	6.21
3A	26.20	24.22
3B	9.22	10.90
4A	2.89	3.10
4B	1.44	1.86
4CDE[c]	4.10	3.89
Total	65.17	59.24

[a] Includes sport, tribal, and commercial fisheries.
[b] Includes sport and commercial fisheries.
[c] Individual catch limits for Areas 4C, 4D, and 4E are determined by the North Pacific Fishery Management Council catch sharing plan.

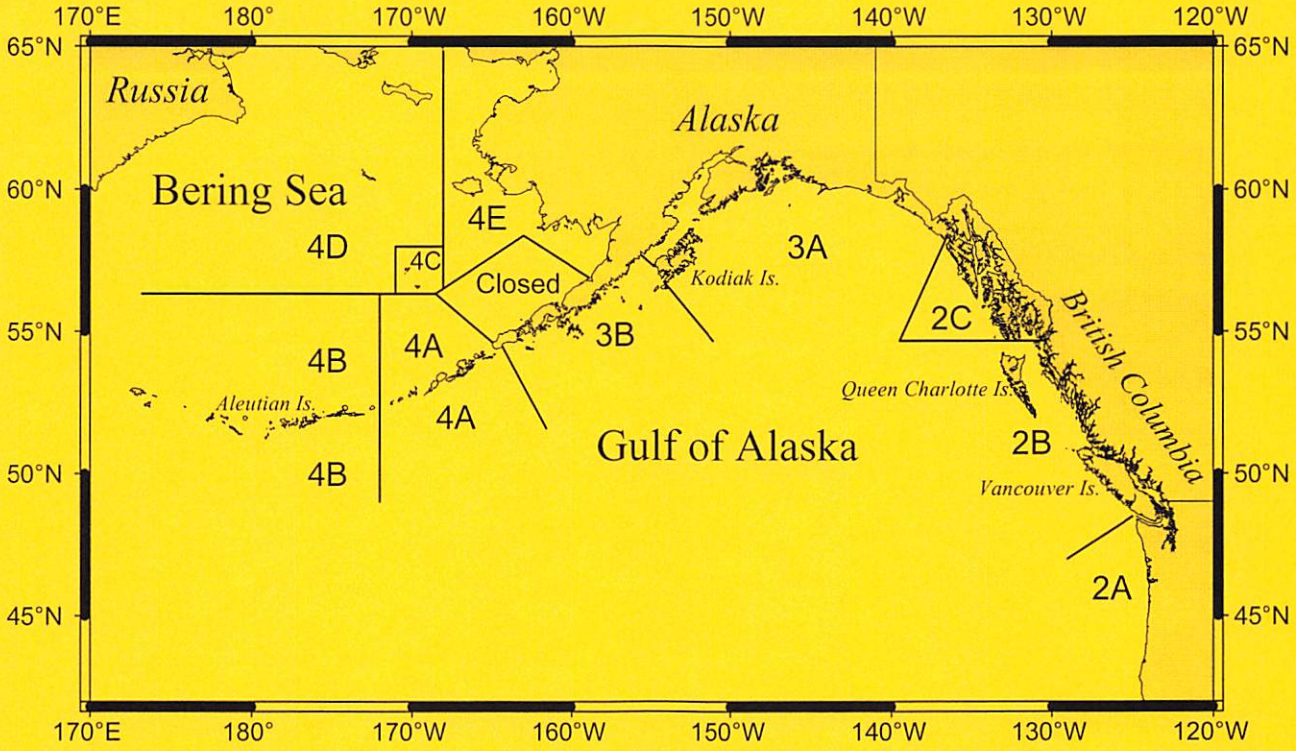


Figure 1. International Pacific Halibut Commission Regulatory Areas.

If the Annual Total Constant Exploitation Yield for Halibut in Area 2C is More Than	Then the GHL for Area 2C will be	If the Annual Total Constant Exploitation Yield for Halibut in Area 3A is More Than	Then the GHL for Area 3A will be
(1) 5,007,000 lbs. (4094.5 mt)	1,432,000 lbs. (649.6 mt)	(1) 21,681,000 lbs (9,835.5 mt)	3,650,000 lbs. (1655.5 mt).
(2) 17,955,000 lbs (8143.9 mt)	2,217,000 lbs. (1005.5 mt)	(2) 29,643,000 lbs (13447.3 mt)	5,103,000 lbs. (2314.9 mt).
(3) 6,903,000 lbs (3131.2 mt)	1,074,000 lbs. (487.2 mt)	(3) 16,634,000 lbs (7,545.3 mt)	2,734,000 lbs. (1240.4 mt).
(4) 8,641,000 lbs (3,919.4 mt)	931,000 lbs (422.3 mt)	(4) 13,664,000 lbs (6,198.0 mt)	2,373,000 lbs. (1,076.5 mt).
(5) 4,779,000 lbs. (2,167.7 mt)	735,000 lbs (333.4 mt)	(5) 11,425,000 lbs (5,182.3 mt)	2,008,000 lbs. (910.9 mt).

Status of FMP Amendments
November 30, 2007

FMP Amendment Status: Actions Since October 2007 Council Meeting	Date of Council Action	Start Regional Review	Transmittal Date of Action to NMFS HQ for Review	Proposed FMP Amendment Notice of Availability Published	Proposed Rule Published in Federal Register	Final Rule Published in Federal Register
Amendment 25 (KTC) - North catcher processor owner quota share Approved: April 12, 2007	MSA Re-auth. Act Jan. 2007	NOA: 1/22/07	NOA – January 29, 2007	February 5, 2007 72 FR 5255 Comment period ended April 6, 2007		
Amendments 62/62: Single Geographic Location and AFA housekeeping	Oct 2002					
Amendment 72 (GOA) Add IR/IU trigger for SWFF	April 2003					
Amendment 84 (BSAI) – Salmon Bycatch ICA Approved: June 22, 2007	October 2005	PR: 2/1/06 FR: 8/15/07	PR: March 19, 2007 FR: October 1, 2007	March 26, 2007 72 FR 14069 Comment period ended May 25, 2007	April 18, 2007 72 FR 19454 Comment period ended June 4, 2007	October 29, 2007 72 FR 61070
Amendment 73/77 Removing Black Rockfish from the BSAI and GOA FMPs	April 2007					
Amendment 88/23/12/9 Aleutian Islands Habitat Conservation Area Revision	April 2007	PR: 9/26/07	PR: 11/6/07	November 13, 2007 72 FR 63871 Comment period ends January 14, 2008	November 21, 2007 72 FR 65539 Comment period ends January 7. 2008	
Amendment 89 (BSAI) Bering Sea Habitat Conservation	June 2007					

Status of Regulatory Amendments
November 30, 2007

Regulatory Amendment Status: Actions Since October 2007	Date of Council Action	Start Regional Review of Rule	Transmittal Date of Rule to NMFS Headquarters	Proposed Rule in *Federal Register*	Final Rule Published in *Federal Register*
Groundfish Regulatory Amendments					
Interagency Electronic Reporting System	NMFS	PR: December 27, 2006 **FR: 11/6/07**	PR: May 4, 2007	June 29, 2007 72 FR 35748	
2008 & 2009 BSAI groundfish harvest specifications	NMFS	**PR: 10/30/07**	**PR: 11/19/07**		
2008 & 2009 GOA groundfish harvest specifications	NMFS	**PR: 10/24/07**	**PR: 11/19/07**		
Revision to 2008 harvest specs to integrate Amds 80/85	NMFS	**FR: 10/22/07**	**FR: 12/3/07**		
Revise MRA accounting period for non-AFA C/Ps	December 2006				
EFH correction (State waters and VMS)	NMFS	PR: 5/4/07 FR: 9/21/07	PR: 5/29/07 **FR: 10/19/07**	6/19/07 72 FR 33732 8/2/07 72 FR 42369	**November 9, 2007** **72 FR 63500** Effective 12/10/07
Repeal of Vessel Incentive Program	December 2006	PR: 9/4/07	**PR: 11/5/07**	**November 30, 2007** **72 FR 67692** **Comment period ends December 31, 2007**	
Remove check in/out for processors w/VMS	NMFS				
Revisions to MRAs in GOA arrowtooth fishery	October 2007				

Status of Regulatory Amendments
November 30, 2007

Regulatory Amendment Status: Actions Since October 2007	**Date of Council Action**	**Start Regional Review of Rule**	**Transmittal Date of Rule to NMFS Headquarters**	**Proposed Rule in *Federal Register***	**Final Rule Published in *Federal Register***
Revise seabird avoidance measures	February 2007	PR: 7/2/07 **FR: 11/5/07**	PR: 8/27/07 **FR: 11/26/07**	September 19, 2007 72 FR 53516 Comment period ended October 19, 2007	
CDQ transfers	NMFS – MSA requirement				
CDQ regulation of harvest	MSA requirement June 2007				
Halibut Regulations					
Subsistence Halibut III	December 2004				
Halibut/Sablefish IFQ: Allow processing of non-IFQ species on a vessel with B, C, or D shares onboard	June 2006	PR: 9/25/07	**PR: 10/22/07**	**November 14, 2007** **72 FR 64034** **Comment period ends December 14, 2007**	
Halibut/Sablefish IFQ: Allow (1) pot longline gear in BS in June for sablefish; (2) temp transfer of IFQs held by mobilized militia; (3) withdraw inactive QS	June 2006				
Charter vessel moratorium	April 2007				
Area 2C charter vessel GHL management measures	June 2007	**PR: 11/29/07**			

BSAI Crab Rationalization Annual Report Overview
2006/07 Crab Fishing Year

Restricted Access Management
Alaska Region, NOAA Fisheries (NMFS)
www.alaskafisheries.noaa.gov

November 2007

Program and Report Authority

- The Crab Rationalization Program: authorized under MSA as amended by Consolidated Appropriations Act of 2004 (Public Law 108-199, section 801)
- Program started in 2005/06 and now governs 9 BSAI king and Tanner crab fisheries including:
  - CDQ, Adak, QS/PQS Fisheries
- An annual Report provides data on Program activities and performance

B-2
NMFS

Report Organization

- Program Overview, Changes, Events
- CDQ and Adak Fisheries
- QS/PQS Fisheries
  - Initial Issuance
  - Seasons, Caps, Permits, Arbitration
  - Transfers and Consolidation
  - Vessel Effort and Landings
  - Community Protection Measures
  - Fishery Summaries
- Safety, Compliance, Catch Monitoring
- Reporting eLandings, EDRs
- Loan Program and Fees

Fishery Highlights 2006/07 crab year

Program Changes

- PQS issued to Blue Dutch (USCG bill)
- BST → EBT, WBT
- Arbitration deadline
- Sideboards:
  - applied to parallel fisheries
  - exempted vessels if no BSS quota
- EDR due date

Significant Fishery Events

- Issuance: New PQS for Blue Dutch forced IFQ, IPQ reissuance
- Cooling Off:
  - RAM approved cooling off exemption to use all St. George BSS IPQ in St. Paul due to damaged breakwater and harbor
  - RAM approved cooling off exemption to use some St. Paul BSS IPQ in St. George due to ice conditions
- Processing: M/V STELLAR SEA fire disrupted N region BSS fishery

CDQ and Adak Fisheries

- Managed by ADF&G under FMP authority
- CDQ:
  - 10% of Program crab other than WAG
  - 3-13 vessels participated (by fishery)
  - Est. harvest: 100%: BBR, BSS
    72-79%: EBT, WBT
    confidential: EAG
- Adak:
  - 10% of WAG allocation to ACDC
  - 2 vessels fished, data are confidential

QS/PQS Fishery - Quota Issuance

- Application period closed June 3, 2005
  - 544 applicants, 509 (94%) issued QS/PQS
  - 18 QS/PQS eligibility-related appeals
    - 1 dismissed
    - 7 decisions (6 affirmed, 1 vacated → PQS)

QS/PQS Fishery - Seasons

* By co-op – not individual

- Six fisheries open in 2006/07:
  - BBR N/S 94 days, 10/15/05 - 1/15/06
  - BSS N/S 229 days, 10/15 - 5/15/06 (E); 5/31/06 (W)
  - EAG N/S 274 days, 8/15/05 - 5/15/06
  - EBT U 168 days, 10/15/05 - 3/31/06
  - WAG W/U 274 days, 8/15/05 - 5/15/06
  - WBT U 168 days, 10/15/05 - 3/31/06
- Three fisheries closed:
  - PIK
  - SMB
  - WAI

QS/PQS Fishery - Permits

Annual permits issued if all EDRs submitted...

- IFQ and IPQ permits (shares/pool size * TAC = pounds):
  - 59 persons received crew IFQ, 39 (66%) fished
  - 31 persons received owner IFQ, 26 (84%) fished
  - 22 persons received IPQ, 17 (77%) fished
- Hired Master permits: 154 (108, 70% fished)
- RCR permits (one per facility):
  - 63 (to 24 persons), 42 (67% used)
- Federal Crab Vessel: 145 (138 for harvesters, 91 (66% used)

QS/PQS Fishery - Arbitration

- QS/PQS and IFQ/IPQ holders participate
- 3 Experts
- 1 third party data provider
- 3 Arbitration Organizations
  - 1 each: unaffiliated, affiliated harvesters, processors
- Results:
  - 4 arbitration proceedings
  - Contract Arbitrator selected harvester's offers

QS/PQS Fishery - Transfers

- Total transfer transactions: 683
  - 51% leases, including inter-cooperative transfers
    - QS/IFQ transfers: 637 (48% leases)
    - PQS/IPQ transfers: 46 (85% leases)
- Weighted avg prices: $/QS unit:
  - BBR: $0.68 - $1.20
  - Tanner: $0.03 - $0.11
  - BSS: $0.19 - $0.26
  - SMB: $0.17

QS/PQS Fishery - Consolidation

- Changes in Quota holders Through 2nd year:
  - 457 of 509 (90%) init.issuees still hold quota
  - 494 all holder types at end of 2006/07: down 3%
- Entrance and Attrition Through 2nd Year:
  - new holders: 32 QS, 5 PQS
  - Init. Issuees leaving: 51 QS, 2 PQS

QS/PQS Fishery - Consolidation

- Vessel Consolidation (pre- vs post-Program)

	Number of vessels used in last pre-Program season	Percent of last pre-Program (number) of vessels used in 1st Program year	Percent of last pre-Program (number) of vessels used in 2nd Program year
BBR	251	35% (89)	32% (81)
BSS (2005)	169	46% (78)	41% (70)
EAG	19	37% (7)	32% (6)
EBT	Closed	n/a (43-BST)	86% (37)
WAG	6	50% (3)	50% (3)
WBT	Closed	n/a (43-BST)	84% (36)

QS/PQS Fishery – Effort

- Participants used Extended Seasons
  - In BBR, EAG: ~ ½ season length fished
  - BSS, EBT, WAG, WBT: 80-93% of the season length fished

QS/PQS Fishery – Landings

	% IFQ TAC Landed	% Sold	% Personal Use	% Deadloss
BBR	99	>99	0.1	0.7
BSS	99	99	0.0	1.2
EAG	100	99	0.0	1.2
EBT	75	>99	0.1	0.7
WAG	82	99	0.0	1.0
WBT	64	97	0.0	2.9

QS/PQS Fishery - Ports

* = confidential

	Rank Yr 1	Rank Yr 2	Number of IFQ Landings	% of Total IFQ Pounds (millions)
Dutch Hbr	1	1	253	44.8
At Sea (SFPs, CPs)	2	2	158	31.7
Akutan *	4	3	*	*
King Cove	5	4	57	9.2
Kodiak	6	5	17	2.5
St Paul *	3	6	*	*
Adak *	7	7	*	*

QS/PQS Fishery - Cooperatives

	Number of Co-ops 1st Year	Number of Co-ops 2nd Year	% of IFQ TAC Assigned to Co-ops 2nd Year	% of Assigned Pounds Landed
BBR	15	19	98	100
BSS	15	19	98	100
EAG	5	6	100	100
EBT	15 (BST)	19	97	76
WAG	5	5	100	82
WBT	15 (BST)	19	97	67

QS/PQS Fishery - Sideboards

- Sideboard Restrictions on GOA Groundfish
  - 227 vessels "directly" sideboarded
  - 57 LLP licenses sideboarded
- LLP licenses are transferable between vessels, so:
  - between 227 and 284 affected vessels, but
  - Not all fish GOA groundfish

Safety and Compliance

- USCG effort, collaboration and costs increased
  - Cutter, aircraft hours, days increased
  - Required Safety Compliance checks, safety decals
  - 18 at-sea boardings,0 significant violations
  - Results: 0 crab SAR cases or deaths (2 years)
- OLE, ADF&G collaborated under JEAs
  - pre-season program education sessions
  - VMS used to locate vessels
  - COPPS helped with questions and compliance
  - inseason focus: weighing, reporting (CMPs, certified scales)
  - Boardings as spot checks, audits as complete accounting
  - Results: overages: few (24) IFQ, 1 IPQ

Reporting - eLandings

- Required Internet System
- 639 total Program landing reports:
  - 75 for Adak, CDQ (100% via eLandings)
  - 564 for IFQ (98% via eLandings)
- eLandings features and use improved through industry and agency feedback
- Better user support, more conveniences underway (and planned)

Reporting - EDRs

- First: historic EDRs (1998, 2001, 2004)
  - Forms sent to State permitholders
  - 284 persons owed EDRs, 275 (97%) submitted
- Next: No crab permits issued if EDRs owed
  - No one was denied a permit for noncompliance
- Next: follow-up; cost, labor intensive
  - EDR requirements and deadline were revised
- Next: 2006 EDRs solicited/collected
- Now: data analysis underway

Loans and Fees

- A future federal loan program requires:
  - Congressional action for a "subsidy cost" and a loan ceiling
  - Regulatory development (NOAA Financial Services Division)
- Cost Recovery Fees (for mgmt, enforcement)
  - RCRs "billed" for fees owed by all sectors
  - 3% limit on ex-vessel value did not cover all costs
    - Costs $3.94 million, collected $3.05 million (23% shortfall)
    - Costs were 1.4% of fishery value more than was collectable
  - Highest costs remain: personnel, contracts & training, travel & supplies for enforcement and public outreach
- No annual permits issued if fees owed
  - No one was denied a permit for nonpayment

Credits

This Report was compiled by NOAA Fisheries, with contributions from:

- ADF&G, Dutch Harbor staff
- NOAA Fisheries, AKR (including AFSC)
- NOAA Office of Law Enforcement
- Crab SAFE (September, 2007)
- USCG

Future Annual Reports

- Comments?
- Suggestions?
- Please contact us...

NOAA/Council Contacts

NMFS, Restricted Access Management

1-800-304-4846 (press "2"), or (Juneau) 907-586-7344

E-mail: RAM.Alaska@noaa.gov

Web Site: www.alaskafisheries.noaa.gov

NMFS, Sustainable Fisheries Division

1-800-304-4846 (press "3"), or Juneau 907-586-7228

Web Site: www.alaskafisheries.noaa.gov

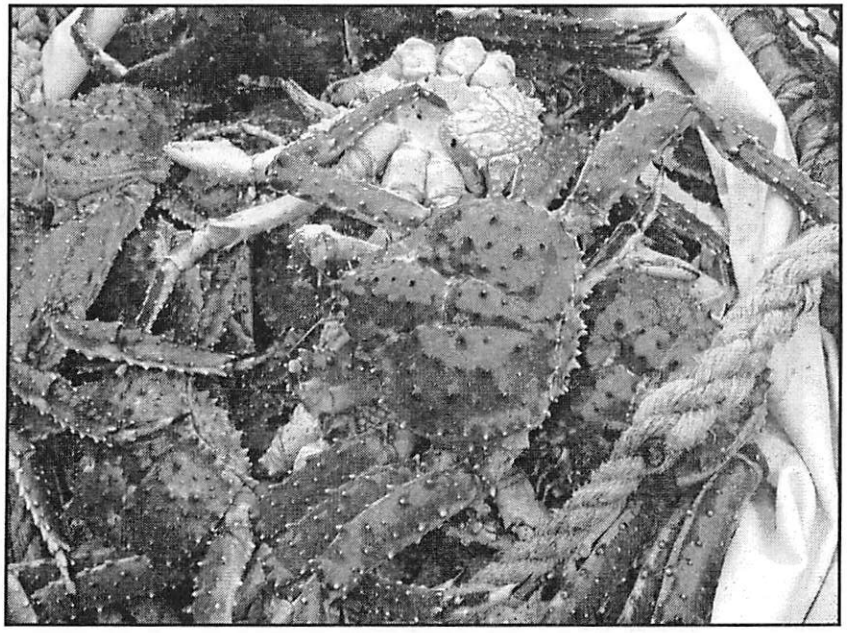
North Pacific Fishery Management Council

907-271-2809

Web Site: www.fakr.noaa.gov/npfmc

Acknowledgment

We wish to acknowledge industry's outstanding patience, support and cooperation



B-2
NMFS

BSAI Crab Rationalization Transfer Update

Restricted Access Management
Alaska Region, NOAA Fisheries (NMFS)
www.alaskafisheries.noaa.gov

November 2007

Number of Transfers (and percent) by Type

Type	Whole Program	Last 6 Months (May-Nov 2007)
Inter-coop Lease	478 (34%)	163 (44%)
Non Coop Lease	277 (20%)	41 (11%)
QS/PQS	628 (45%)	169 (45%)
"Legal"	6 (.4%)	0
"Lease Reversal"	6 (.4%)	0
Total:	1,395	373

Transfer Processing Time (from receipt of complete package)

Days within which transfers completed (includes non-work days)	Whole Program - percent of 1,395 total	May-Nov 2007 - percent of 373 total
1	20.7	19.8
3	73.6	73.7
5	91.4	90.3
7	96.6	97.0
14	99.7	99.5
21	99.9	99.7
25	100.0	100.0

Main Causes of Transfer Delays

- 1. Incomplete application
- 2. Ineligibility (caps, non-active)
- 3. Received Friday or weekend
- 4. Applicant requests hold
- 5. Lender policy (notify person with security interest)

Long Term Transfer Improvements

- Post-delivery transfers
  - Under Council consideration
- On-line (e-transfers): co-ops,IPQ
  - In design/development
    - Both IT and regulatory changes
    - Staff workload and priority
    - IT considerations:
      - technical, security, logistics, convenience

Inter-coops: Best Case for E-Transfers

- Limited number of known entities
- Designated, experienced Reps
- Unrestricted IFQ only transfers
- Few caps, other "business rules"
- No sensitive PII data involved
- High volume

  ➔
- Big potential time/labor savings

E-Transfer Basics

- 1. Log in with ID, password
- 2. "Transfer Key" access
- 3. Transferor initiates, enters data
  - Approvability (lbs, EDR, fees, debts, sanctions)
  - Status = pending
  - Email messaging
- 4. Transferee logs in, enters/submits
  - Approvability (lbs, caps, etc.)
  - Status update
  - Email messaging
- 5. Complete: print receipts, permits

E-Transfer Development

- Done/In progress:
  - IT Security Risk Assessment
  - Working with SF to change regs
  - Basic IT structure designed
- Next steps:
  - Continue reg, IT development and testing
  - Staff feedback -> changes -> testing
  - Industry feedback -> changes -> testing

Interim Improvements (Inter co-op, IPQ leases)

- 1. Changed priorities (peak seasons)
- 2. Accepting faxes
- 3. Simplify lease requirements (simplify price data; drop questions, attachments)
- 4. No originals on board/on site

B-2
NMFS

IFQ Cost Recovery Program Annual Report

Summary of 2006 Activities; Description of 2007 Program

Restricted Access Management
Alaska Region, NOAA Fisheries

December 2007

Background Information

- IFQ Fee is mandated by Magnuson-Stevens Act
- Its purpose is to recover actual costs (expenditures) incurred in managing and enforcing the IFQ program; however,
- Fees may not exceed 3% of the ex-vessel value of IFQ halibut or sablefish
- Fees collected are used to
  - recover costs of management and enforcement (75%)
  - make funds available for Congress to appropriate to support the North Pacific (IFQ) Loan Program (25%)

Year 2006 Program Summary

- At the end of the 2006 IFQ season, the fee was established at 1.0% of the ex-vessel value
  - as premised on identified program expenditures of $2,789,047 and total ex-vessel value of $268,403,752
- 2,398 persons (IFQ permit holders) were billed, including
  - 1,656 with only halibut IFQ landings
  - and 91 with only sablefish IFQ landings
  - and 611 with both halibut and sablefish IFQ landings

Year 2006 Summary (cont'd)

- By September 30, 2007, 2,394 (or 99.8%) of those with 2006 fee obligations had paid
- Accounts of only 4 persons were referred to U.S. Treasury for collection

Determining the 2007 Costs - 1

- RAM sought FY07 cost information from the following:
  - International Pacific Halibut Commission
  - NMFS Office of Law Enforcement
  - NMFS Sustainable Fisheries Division
  - NMFS Restricted Access Management
  - NMFS Office of Management and Information
  - NMFS Office of the Regional Administrator
- Responses included:

Determining the 2006 Costs - 2

• Pacific Halibut Commission	$ 200,757
• NMFS Law Enforcement	1,891,100
• NMFS Sustainable Fisheries	47,809
• NMFS/RAM	430,784
• NMFS/AKR/OMI	121,561
• NMFS/AKR/RA	47,590
TOTAL COSTS:	**$2,739,602**

Determining the 2007 Value - 1

- Registered Buyers provided price data
  - by species, by port, and by month
- RAM compiled data to determine "standard" IFQ value
- Value published by port, group of ports, or "all Alaska"
  - depends on number of observations (confidentiality)
- Value for species/port/month of landing multiplied times pounds yields <u>total</u> value

Determining the 2007 Value - 2

• Halibut pounds	49,330,025
• Halibut value	$172,724,141
• Sablefish pounds	30,074,183
• Sablefish value	$62,681,978
TOTAL VALUE:	<u>$235,406,119</u>

Note: Value is based on all landings reported by the date of the fee percentage calculation

Fee Percentage Formula

[100 x (DPC) /V]

- **DPC = "Direct Program Costs" (including LASAF Balance)**
- **V = Total Ex-Vessel "Value" of IFQ fish**

In September 2006, NMFS published regulations that changed the manner in which the annual fee percentage is calculated.

Specifically, the formula was simplified by eliminating or consolidating some variables:

- The non-payment rate (NPR) was eliminated because of its negligible effect on the overall calculation of the fee percentage since the inception of the program; and
- The LASAF Account Balance (AB) is now automatically incorporated into the DPC rather than treated separately.

Calculating the 2007 Fee Percent

Costs (DPC) of $2,739,602

Multiplied times 100,

Divided by _Value (V)_ of $235,406,119

= 1.2 % (rounded)

Collecting the 2007 Fees

- Each IFQ Permit Holder with recorded landings has been billed; the billing,
  - contained information on pounds, ports, and month of Permit Holders IFQ landings
  - applied the 1.2% fee calculation to "standard" value
  - and showed total amount due to NMFS by 1/31/08
- Permit Holder has a choice:
  - s/he may pay based on "Standard" value as set out on the statement; or,
  - s/he may pay based on "actual" value of IFQ sales (if s/he so chooses, actual value must be proven)

Payment Options

- RAM has developed different options for payment, including:
  - Payment on-line with credit card
  - Payment by telephone with credit card
  - Payment by mail with check, credit card or money order

Allocation of the 2006 Receipts

- 25% will be deposited in US Treasury
  - may be appropriated by Congress to support the North Pacific (IFQ) Loan Program
- 75% will be deposited in the "Limited Access System Administrative Fund" (LASAF)
  - available to the Secretary to offset future costs of managing and enforcing the IFQ program
- Note that no more than 75% of the costs will ever be deposited in LASAF
- Not "new money" -- income from fees will simply offset equivalent annual appropriations

Accountability/Reporting

- Regulations require publication of an Annual Report on Cost Recovery Program

Questions/Comments

Questions and comments about the IFQ Cost Recovery Program are welcome, and should be directed to NMFS/RAM

1-800-304-4846

www.alaskafisheries.noaa.gov

B-2
NMFS

Bering Sea Aleutian Islands Catch Report (includes CDQ)
Through: 24-NOV-07

National Marine Fisheries Service
Alaska Region, Sustainable Fisheries
Catch Accounting

Bering Sea

Sea-sons	Account	Total Catch	Quota	Remaining Quota	% Taken	Last Wk Catch
	Other Rockfish (includes CDQ)	215	383	168	56%	0
	Pacific Ocean Perch (includes CDQ)	868	1,836	968	47%	0
	Sablefish (Hook-and-Line and Pot)	825	1,192	367	69%	0
	Sablefish CDQ (Hook-and-Line and Pot)	258	298	40	86%	0
	Sablefish (Trawl)	67	1,266	1,199	5%	0
	Sablefish CDQ (Trawl)	22	112	90	19%	0
	Greenland Turbot	1,410	1,428	18	99%	0
	Greenland Turbot CDQ	52	126	74	41%	0
X	Pollock, AFA Inshore	572,900	610,736	37,836	94%	0
X	Pollock, AFA Catcher Processor	488,528	488,588	60	100%	0
X	Pollock, AFA Mothership	121,514	122,147	633	99%	0
X	Pollock CDQ	139,196	139,400	204	100%	0
	Pollock, Incidental Catch, non-Bogoslof (includes CDQ)	32,390	33,129	739	98%	0
	Pollock, Incidental Catch, Bogoslof (includes CDQ)	0	10	10	0%	0

Note: All weights are in metric tons.

Report run on: November 30, 2007 5:15 AM

Bering Sea Aleutian Islands Catch Report (includes CDQ) **Through:** 24-NOV-07	**National Marine Fisheries Service** **Alaska Region, Sustainable Fisheries** **Catch Accounting**

Aleutian Islands

Sea-sons	Account	Total Catch	Quota	Remaining Quota	% Taken	Last Wk Catch
	Other Rockfish (includes CDQ)	430	497	67	87%	0
	Pacific Ocean Perch, Eastern	4,781	4,598	-183	104%	0
	Pacific Ocean Perch CDQ, Eastern	335	373	38	90%	0
	Pacific Ocean Perch, Central	4,312	4,672	360	92%	0
	Pacific Ocean Perch CDQ, Central	357	379	22	94%	125
	Pacific Ocean Perch, Western	7,280	7,141	-139	102%	0
	Pacific Ocean Perch CDQ, Western	544	579	35	94%	0
X	Atka Mackerel, Eastern (Other Gear)	21,181	21,795	614	97%	0
	Atka Mackerel, Eastern (Jig)	0	220	220	0%	0
	Atka Mackerel CDQ, Eastern	1,755	1,785	30	98%	0
X	Atka Mackerel, Central	24,523	27,380	2,857	90%	0
	Atka Mackerel CDQ, Central	2,031	2,220	189	91%	219
X	Atka Mackerel, Western	8,410	8,880	470	95%	0
	Atka Mackerel CDQ, Western	692	720	28	96%	0
	Sablefish (Hook-and-Line and Pot)	750	1,686	936	44%	0
	Sablefish CDQ (Hook-and-Line and Pot)	315	422	107	75%	0
	Sablefish (Trawl)	35	597	562	6%	0
	Sablefish CDQ (Trawl)	5	52	47	10%	0
	Greenland Turbot (includes CDQ)	517	646	129	80%	1
X	Pollock	1,429	15,500	14,071	9%	0
X	Pollock CDQ	0	1,900	1,900	0%	0
X	Pollock, Incidental Catch (includes CDQ)	1,096	1,600	504	68%	26

Note: All weights are in metric tons.

Report run on: November 30, 2007 5:15 AM

Bering Sea Aleutian Islands

Sea-sons	Account	Total Catch	Quota	Remaining Quota	% Taken	Last Wk Catch
	Alaska Plaice (includes CDQ)	19,484	21,250	1,766	92%	0
	Arrowtooth Flounder	10,752	17,000	6,248	63%	0
	Arrowtooth Flounder CDQ	1,165	1,500	335	78%	1
	Flathead Sole	18,503	25,500	6,997	73%	0
	Flathead Sole CDQ	1,022	2,250	1,228	45%	0
	Northern Rockfish (includes CDQ)	4,018	7,576	3,558	53%	4
	Other Flatfish	5,840	8,500	2,660	69%	0
	Other Species (includes CDQ)	26,742	31,752	5,010	84%	1
X	Pacific Cod, Catcher Processor (Trawl)	38,339	37,110	-1,229	103%	0
X	Pacific Cod, Catcher Vessel (Trawl)	31,903	34,110	2,207	94%	0
X	Pacific Cod, Catcher Processor (Hook-and-Line)	69,031	68,105	-926	101%	0
X	Pacific Cod, Catcher Vessel (Hook-and-Line)	214	240	26	89%	0
X	Pacific Cod, Catcher Processor (Pot)	2,731	2,668	-63	102%	0
X	Pacific Cod, Catcher Vessel (Pot)	12,061	12,129	68	99%	0
X	Pacific Cod (Jig)	83	126	43	66%	0
	Pacific Cod (Hook-and-Line and Pot < 60 ft)	2,928	2,928	0	100%	0
	Pacific Cod, Incidental Catch (Hook-and-Line and Pot)	256	500	244	51%	0
X	Pacific Cod CDQ	12,048	12,804	756	94%	1
	Rock Sole	33,438	46,750	13,312	72%	0
	Rock Sole CDQ	3,638	4,125	487	88%	0
	Rougheye Rockfish (includes CDQ)	166	187	21	89%	2
	Shortraker Rockfish (includes CDQ)	321	392	71	82%	0
	Squid (includes CDQ)	1,196	1,675	479	71%	0
	Yellowfin Sole	110,900	115,600	4,700	96%	0
	Yellowfin Sole CDQ	9,420	10,200	780	92%	0
Total:		**1,855,221**	**1,969,270**	**114,049**	**94%**	**382**

Other gear in the Atka mackerel fishery includes all authorized gear types except jig.

Other flatfish: all flatfish species, except for Pacific halibut, flathead sole, Greenland turbot, rock sole, yellowfin sole, arrowtooth flounder, and Alaska plaice.

Other rockfish: all Sebastes and Sebastolobus species except for Pacific ocean perch, northern, shortraker, and rougheye rockfish.

Other species: sculpins, sharks, skates and octopus.

Note: All weights are in metric tons.

Report run on: November 30, 2007 5:15 AM

Bering Sea Aleutian Islands Prohibited Species Report (includes CDQ fisheries) Through: 24-NOV-07	National Marine Fisheries Service Alaska Region, Sustainable Fisheries Catch Accounting

Chinook Salmon

Trawl Gear

Sea-sons	Account	Units	Total Catch	Limit	Remaining	% Taken	Last Wk Catch
	BS Pollock (Pelagic)	Count	125,021	26,825	-98,196	466%	0
	BS Chinook Salmon PSQ	Count	5,626	2,175	-3,451	259%	0
	AI Pollock (Pelagic)	Count	260	647	387	40%	0
	AI Chinook Salmon PSQ	Count	0	53	53	0%	0
Total:			**130,907**	**29,700**	**-101,207**	**441%**	**0**

Halibut Mortality

Non-Trawl Gear

Sea-sons	Account	Units	Total Catch	Limit	Remaining	% Taken	Last Wk Catch
X	Pacific Cod (Hook-and-Line)	MT	480	775	295	62%	0
	Non-Pacific Cod (Hook-and-Line)	MT	6	58	52	11%	0
Total:			**487**	**833**	**346**	**58%**	**0**

Trawl Gear

Sea-sons	Account	Units	Total Catch	Limit	Remaining	% Taken	Last Wk Catch
	Pacific Cod	MT	1,042	1,334	292	78%	0
	Rockfish	MT	23	69	46	34%	0
X	Rock Sole, Flathead Sole, Other Flatfish (Trawl)	MT	1,134	829	-305	137%	0
	Pollock, Atka Mackerel, Other Species	MT	503	232	-271	217%	0
X	Yellowfin Sole (Trawl)	MT	660	936	276	71%	0
	Turbot/Sablefish/Arrowtooth Flounder	MT	17	0	-17	0%	0
Total:			**3,380**	**3,400**	**20**	**99%**	**0**

Trawl and Hook-and-Line Gear

Sea-sons	Account	Units	Total Catch	Limit	Remaining	% Taken	Last Wk Catch
	Halibut Mortality PSQ	MT	226	342	116	66%	1
Total:			**226**	**342**	**116**	**66%**	**1**

Report run on: November 30, 2007 5:16 AM

Herring (includes CDQ fisheries)

Trawl Gear

Sea-sons	Account	Units	Total Catch	Limit	Remaining	% Taken	Last Wk Catch
	Pacific Cod	MT	1	27	26	4%	0
	Rockfish	MT	0	10	10	0%	0
	Rock Sole, Flathead Sole, Other Flatfish	MT	3	27	24	9%	0
	Pollock, Atka Mackerel, Other Species	MT	6	194	188	3%	0
	Pollock Pelagic	MT	342	1,364	1,022	25%	0
	Yellowfin Sole	MT	63	153	90	41%	0
	Greenland Turbot, Arrowtooth, Sablefish	MT	0	12	12	4%	0
Total:			**415**	**1,787**	**1,372**	**23%**	**0**

Opilio (Tanner) Crab - COBLZ

Trawl Gear

Sea-sons	Account	Units	Total Catch	Limit	Remaining	% Taken	Last Wk Catch
	Pacific Cod	Count	241,075	120,712	-120,363	200%	0
	Rockfish	Count	0	40,237	40,237	0%	0
	Rock Sole, Flathead Sole, Other Flatfish	Count	250,211	643,800	393,589	39%	0
	Pollock, Atka Mackerel, Other Species	Count	16,177	80,475	64,298	20%	0
	Yellowfin Sole	Count	1,229,005	3,098,288	1,869,283	40%	0
	Greenland Turbot, Arrowtooth, Sablefish	Count	568	40,238	39,670	1%	0
	Opilio Crab PSQ	Count	62,725	326,250	263,525	19%	0
Total:			**1,799,762**	**4,350,000**	**2,550,238**	**41%**	**0**

Bairdi Crab, Zone 1

Trawl Gear

Sea-sons	Account	Units	Total Catch	Limit	Remaining	% Taken	Last Wk Catch
	Pacific Cod	Count	64,145	183,112	118,967	35%	0
	Rock Sole, Flathead Sole, Other Flatfish	Count	67,151	365,320	298,169	18%	0
	Pollock, Atka Mackerel, Other Species	Count	769	17,224	16,455	4%	0
	Yellowfin Sole	Count	26,043	340,844	314,801	8%	0
	Bairdi Crab PSQ	Count	4,892	73,500	68,608	7%	0
Total:			**163,000**	**980,000**	**817,000**	**17%**	**0**

Bairdi Crab, Zone 2

Trawl Gear

Sea-sons	Account	Units	Total Catch	Limit	Remaining	% Taken	Last Wk Catch
	Pacific Cod	Count	65,906	324,176	258,270	20%	0
	Rockfish	Count	0	10,988	10,988	0%	0
	Rock Sole, Flathead Sole, Other Flatfish	Count	125,832	596,154	470,322	21%	0
	Pollock, Atka Mackerel, Other Species	Count	2,247	27,473	25,226	8%	0
	Yellowfin Sole	Count	285,652	1,788,459	1,502,807	16%	0
	Bairdi Crab PSQ	Count	35,137	222,750	187,613	16%	0
Total:			**514,775**	**2,970,000**	**2,455,225**	**17%**	**0**

Red King Crab, Zone 1

Trawl Gear

Sea-sons	Account	Units	Total Catch	Limit	Remaining	% Taken	Last Wk Catch
	Pacific Cod	Count	1,551	26,563	25,012	6%	0
	Rock Sole, Flathead Sole, Other Flatfish	Count	71,533	121,413	49,880	59%	0
	Pollock, Atka Mackerel, Other Species	Count	9	406	397	2%	0
	Yellowfin Sole	Count	10,002	33,843	23,841	30%	0
	Red King Crab PSQ	Count	2,859	14,775	11,916	19%	0
Total:			**85,954**	**197,000**	**111,046**	**44%**	**0**

"Other flatfish" for PSC monitoring: all flatfish species, except for Pacific halibut (a prohibited species), flathead sole, Greenland turbot, rock sole, yellowfin sole, arrowtooth flounder.

COBLZ: C. Opilio Crab Bycatch Limitation Zone. 50 CFR 679.21(e) and Figure 13.

Zone 1: Federal Reporting Areas 508, 509, 512, 516.

Zone 2: Federal Reporting Areas 513, 517, 521.

Data is based on observer reports extrapolated to total groundfish harvest. Estimates for all weeks may change due to incorporation of late or corrected data.

Bering Sea Aleutian Islands Seasonal Prohibited Species Report (includes CDQ fisheries)

Through: 24-NOV-07
Account: ALL

National Marine Fisheries Service
Alaska Region, Sustainable Fisheries
Catch Accounting

Non-Chinook Salmon, CVOA

Trawl Gear

Season	Begin	End	Units	Total Catch	Limit	Remaining	% Taken
Non-Chinook Salmon CVOA	15-AUG-07	14-OCT-07	Count	16,886	38,850	21,964	43%
Non-Chinook Salmon PSQ CVOA	15-AUG-07	14-OCT-07	Count	61	3,150	3,089	2%
Total:				**16,947**	**42,000**	**25,053**	**40%**

Halibut Mortality

Pacific Cod (Hook-and-Line)

Season	Begin	End	Units	Total Catch	Limit	Remaining	% Taken
1st Season	01-JAN-07	10-JUN-07	MT	179	320	141	56%
2nd Season	10-JUN-07	15-AUG-07	MT	4	0	-4	0%
3rd Season	15-AUG-07	31-DEC-07	MT	297	455	158	65%
Total:				**480**	**775**	**295**	**62%**

Rock Sole, Flathead Sole, Other Flatfish (Trawl)

Season	Begin	End	Units	Total Catch	Limit	Remaining	% Taken
..st Season	20-JAN-07	01-APR-07	MT	568	498	-70	114%
2nd Season	01-APR-07	01-JUL-07	MT	156	164	8	95%
3rd Season	01-JUL-07	31-DEC-07	MT	411	167	-244	246%
Total:				**1,134**	**829**	**-305**	**137%**

Yellowfin Sole (Trawl)

Season	Begin	End	Units	Total Catch	Limit	Remaining	% Taken
1st Season	20-JAN-07	01-APR-07	MT	377	312	-65	121%
2nd Season	01-APR-07	21-MAY-07	MT	181	195	14	93%
3rd Season	21-MAY-07	01-JUL-07	MT	88	49	-39	179%
4th Season	01-JUL-07	31-DEC-07	MT	14	380	366	4%
Total:				**660**	**936**	**276**	**71%**

CVOA: Catcher Vessel Operational Area. 50 CFR 679.22(a)(5) and Figure 2.

Other flatfish for PSC monitoring: all flatfish species, except for Pacific halibut (a prohibited species), flathead sole, Greenland turbot, rock sole, yellowfin sole, arrowtooth flounder.

Data is based on observer reports extrapolated to total groundfish harvest. Estimates for all weeks may change due to incorporation of late or corrected data.

Report run on: November 30, 2007 5:16 AM

Bering Sea Aleutian Islands Seasonal Non-Sideboard Prohibited Species Report (excludes CDQ fisheries) Through: 24-NOV-07 Account: ALL	National Marine Fisheries Service Alaska Region, Sustainable Fisheries Catch Accounting

Red King Crab, RKCSS

Trawl Gear

Season	Begin	End	Units	Total Catch	Limit	Remaining	% Taken
Rock Sole, Flathead Sole, Other Flatfish (Non Pelagic)	20-JAN-07	31-DEC-07	Count	83,086	42,495	-40,591	196%
Total:				**83,086**	**42,495**	**-40,591**	**196%**

RKCSS: Red king crab savings subarea. 50 CFR 679.22(a)(3) and Figure 11.

Report run on: November 30, 2007 5:17 AM

Gulf of Alaska Catch Report

Through: 24-NOV-07

National Marine Fisheries Service
Alaska Region, Sustainable Fisheries
Catch Accounting

Western, Central Pollock

Sea-sons	Account	Total Catch	Quota	Remaining Quota	% Taken	Last Wk Catch
X	Pollock, 610 Shumagin	17,953	25,012	7,059	72%	0
X	Pollock, 620 Chirikof	19,360	20,980	1,620	92%	0
X	Pollock, 630 Kodiak	14,400	14,850	450	97%	31

Western Gulf

Sea-sons	Account	Total Catch	Quota	Remaining Quota	% Taken	Last Wk Catch
	Arrowtooth Flounder	3,138	8,000	4,862	39%	0
	Deep Water Flatfish	9	420	411	2%	0
	Shallow Water Flatfish	281	4,500	4,219	6%	0
	Flathead Sole	696	2,000	1,304	35%	0
	Rex Sole	413	1,147	734	36%	0
	Pacific Ocean Perch	4,428	4,244	-184	104%	0
	Rougheye Rockfish	71	136	65	52%	0
	Shortraker Rockfish	193	153	-40	126%	0
	Thornyhead Rockfish	341	513	172	66%	0
	Pelagic Shelf Rockfish	595	1,466	871	41%	0
	Northern Rockfish	1,107	1,439	332	77%	0
	Other Rockfish	251	577	326	43%	0
X	Pacific Cod, Inshore	12,230	18,127	5,897	67%	29
X	Pacific Cod, Offshore	1,097	2,014	917	54%	0
	Sablefish (Hook-and-Line)	1,846	1,976	130	93%	0
	Sablefish (Trawl)	219	494	275	44%	0
	Big Skate	68	695	627	10%	0
	Longnose Skate	47	65	18	72%	0

Note: All weights are in metric tons.

Report run on: November 30, 2007 5:15 AM

Gulf of Alaska Catch Report Through: 24-NOV-07	National Marine Fisheries Service Alaska Region, Sustainable Fisheries Catch Accounting

Central Gulf

Sea-sons	Account	Total Catch	Quota	Remaining Quota	% Taken	Last Wk Catch
	Arrowtooth Flounder	21,946	30,000	8,054	73%	32
	Deep Water Flatfish	253	4,163	3,910	6%	0
	Shallow Water Flatfish	8,308	13,000	4,693	64%	131
	Flathead Sole	2,444	5,000	2,556	49%	21
	Rex Sole	2,433	5,446	3,013	45%	3
	Pacfic Ocean Perch, Incidental Catch	134	330	196	41%	0
	Rougheye Rockfish	177	611	434	29%	0
	Shortraker Rockfish	158	353	195	45%	0
	Pelagic Shelf Rockfish, Incidental Catch	95	100	5	95%	0
	Northern Rockfish, Incidental Catch	99	120	21	82%	0
	Thornyhead Rockfish	182	989	807	18%	0
	Other Rockfish	325	386	61	84%	0
X	Pacific Cod, Inshore	22,832	25,565	2,733	89%	288
X	Pacific Cod, Offshore	1,373	2,840	1,467	48%	5
	Sablefish (Hook-and-Line)	4,788	4,952	164	97%	0
	Sablefish (Trawl)	271	1,238	967	22%	0
	Big Skate	1,393	2,250	857	62%	52
	Longnose Skate	847	1,969	1,122	43%	7

Eastern Gulf

Sea-sons	Account	Total Catch	Quota	Remaining Quota	% Taken	Last Wk Catch
	Rougheye Rockfish	156	241	85	65%	0
	Shortraker Rockfish	247	337	90	73%	0
	Thornyhead Rockfish	185	707	522	26%	0
	Pacific Cod, Inshore	62	3,346	3,284	2%	0
	Pacific Cod, Offshore	4	372	368	1%	0
	Big Skate	8	599	591	1%	0
	Longnose Skate	241	861	620	28%	0

Note: All weights are in metric tons.

Report run on: November 30, 2007 5:15 AM

West Yakutat

Sea-sons	Account	Total Catch	Quota	Remaining Quota	% Taken	Last Wk Catch
	Arrowtooth Flounder	63	2,500	2,437	3%	0
	Deep Water Flatfish	2	2,677	2,675	0%	0
	Shallow Water Flatfish	0	628	628	0%	0
	Flathead Sole	2	2,091	2,089	0%	0
	Rex Sole	1	1,037	1,036	0%	0
	Pacific Ocean Perch	1,242	1,140	-102	109%	0
	Pelagic Shelf Rockfish	293	307	14	95%	0
	Other Rockfish	49	319	270	15%	0
	Pollock	86	1,398	1,312	6%	0
	Sablefish (Hook-and-Line)	1,707	1,997	290	85%	0
	Sablefish (Trawl)	75	283	208	26%	0

Southeast

Sea-sons	Account	Total Catch	Quota	Remaining Quota	% Taken	Last Wk Catch
	Arrowtooth Flounder	68	2,500	2,432	3%	0
	Deep Water Flatfish	10	1,447	1,437	1%	0
	Shallow Water Flatfish	0	1,844	1,844	0%	0
	Flathead Sole	0	57	57	0%	0
	Rex Sole	0	1,470	1,470	0%	0
	Pacific Ocean Perch	0	1,640	1,640	0%	0
	Pelagic Shelf Rockfish	1	444	443	0%	0
	Other Rockfish	45	200	155	23%	0
	Pollock	0	6,157	6,157	0%	0
	Demersal Shelf Rockfish	181	410	229	44%	0
	Sablefish (Hook-and-Line)	3,305	3,370	65	98%	0

Entire Gulf

Sea-sons	Account	Total Catch	Quota	Remaining Quota	% Taken	Last Wk Catch
	Atka Mackerel	1,441	1,500	59	96%	0
	Other Skates	1,127	1,617	490	70%	3
	Other Species	2,667	4,500	1,833	59%	13
Total:		**160,066**	**256,116**	**96,050**	**62%**	**615**

Deep water flatfish: Dover sole, Greenland turbot, and deepsea sole.

Shallow water flatfish: flatfish not including deep water flatfish, flathead sole, rex sole, or arrowtooth flounder.

Note: All weights are in metric tons.

Report run on: November 30, 2007 5:15 AM

Other rockfish in the Western and Central Regulatory Areas and in the West Yakutat District: slope rockfish and demersal shelf rockfish.

Other rockfish in the Southeast Outside District: slope rockfish.

Slope rockfish: aurora, blackgill, bocaccio, chilipepper, darkblotch, greenstriped, harlequin, pygmy, redbanded, redstripe, sharpchin, shortbelly, silvergrey, splitnose, stripetail, vermilion, and yellowmouth.

In the Eastern GOA only, "slope rockfish" also includes northern rockfish.

Demersal shelf rockfish: canary, china, copper, quillback, rosethorn, tiger, and yelloweye.

"Pelagic shelf rockfish" means Sebastes ciliatus (dark), S. variabilis (dusky), S. entomelas (widow), and S. flavidus (yellowtail).

Other species: sculpins, sharks, squid, and octopus.

For changes to the harvest specifications refer to www.fakr.noaa.gov/2007/hschanges.htm

To determine total catch estimates for Central GOA Pacific cod, sablefish, Pacific ocean perch, thornyhead rockfish, northern rockfish, and pelagic shelf rockfish, please add the amounts on this report to the amounts on the GOA Rockfish Program Catch report located at http://www.fakr.noaa.gov/2007/car198_rpp.pdf.

Gulf of Alaska Prohibited Species Report

Through: 24-NOV-07

National Marine Fisheries Service
Alaska Region, Sustainable Fisheries
Catch Accounting

Non-Chinook Salmon

Trawl Gear

Sea-sons	Account	Units	Total Catch	Limit	Remaining	% Taken	Last Wk Catch
	Non Chinook Salmon	Count	3,488	0			0
Total:			**3,488**	**0**			**0**

Chinook Salmon

Trawl Gear

Sea-sons	Account	Units	Total Catch	Limit	Remaining	% Taken	Last Wk Catch
	Chinook Salmon	Count	40,170	0			0
Total:			**40,170**	**0**			**0**

Halibut Mortality

Non-Trawl Gear

Sea-sons	Account	Units	Total Catch	Limit	Remaining	% Taken	Last Wk Catch
	Other Hook-and-Line Fisheries	MT	266	290	24	92%	1
Total:			**266**	**290**	**24**	**92%**	**1**

Trawl Gear

Sea-sons	Account	Units	Total Catch	Limit	Remaining	% Taken	Last Wk Catch
	Trawl Fishery	MT	1,924	2,000	76	96%	23
Total:			**1,924**	**2,000**	**76**	**96%**	**23**

No PSC Limits apply to salmon in the GOA.

Other hook-and-line fisheries means all hook-and-line fisheries except sablefish and demersal shelf rockfish in the Southeast District. The hook-and-line sablefish fishery is exempt from halibut PSC limits.

Halibut mortality for the demersal shelf rockfish fishery. Southeast District is not listed due to insufficient observer coverage.

Data is based on observer reports extrapolated to total groundfish harvest. Estimates for all weeks may change due to incorporation of late or corrected data.

Trawl halibut PSC limit data include catch from Rockfish Pilot Program cooperatives.

Report run on: November 30, 2007 5:16 AM

Gulf of Alaska Halibut Mortality Report

Through: 24-NOV-07

National Marine Fisheries Service
Alaska Region, Sustainable Fisheries
Catch Accounting

Trawl Fisheries

Deep Water Species Complex

Season	Begin	End	Total Catch	Limit	Limit Remaining	% Taken
1st Season	20-JAN-07	01-APR-07	106	100	-6	106%
2nd Season	01-APR-07	01-JUL-07	340	300	-40	113%
3rd Season	01-JUL-07	01-SEP-07	90	224	134	40%
4th Season	01-SEP-07	01-OCT-07	67	0	-67	0%
Total:			**603**	**624**	**21**	**97%**

Shallow Water Species Complex

Season	Begin	End	Total Catch	Limit	Limit Remaining	% Taken
1st Season	20-JAN-07	01-APR-07	366	450	84	81%
2nd Season	01-APR-07	01-JUL-07	155	100	-55	155%
3rd Season	01-JUL-07	01-SEP-07	224	200	-24	112%
4th Season	01-SEP-07	01-OCT-07	262	150	-112	175%
Total:			**1,008**	**900**	**-108**	**112%**

Year-To-Date

Account	Total Catch	Limit	Limit Remaining	% Taken	Last Wk Catch
Trawl Fishery	1,924	2,000	76	96%	23

Other Hook-and-Line Fisheries

Season	Begin	End	Total Catch	Limit	Limit Remaining	% Taken
1st Season	01-JAN-07	10-JUN-07	174	250	76	70%
2nd Season	10-JUN-07	01-SEP-07	0	5	5	1%
3rd Season	01-SEP-07	31-DEC-07	92	35	-57	264%
			266	**290**	**24**	**92%**

Deep-water species complex: sablefish, rockfish, deep-water flatfish, rex sole and arrowtooth flounder. Shallow-water species complex: pollock, Pacific cod, shallow-water flatfish, flathead sole, Atka mackerel, and 'other species'.

No apportionment between shallow-water and deep-water fishery complexes during October 1 to December 31 (300 mt allocated).

Other hook-and-line fisheries means all hook-and-line fisheries except sablefish and demersal shelf rockfish in the Southeast District.

Halibut mortality for the demersal shelf rockfish fishery. Southeast District is not listed due to insufficient observer coverage.

Note: All weights are in metric tons.

Report run on November 30, 2007 5:17 AM

Alaska Region

National Marine Fisheries Service

Inseason Management Report

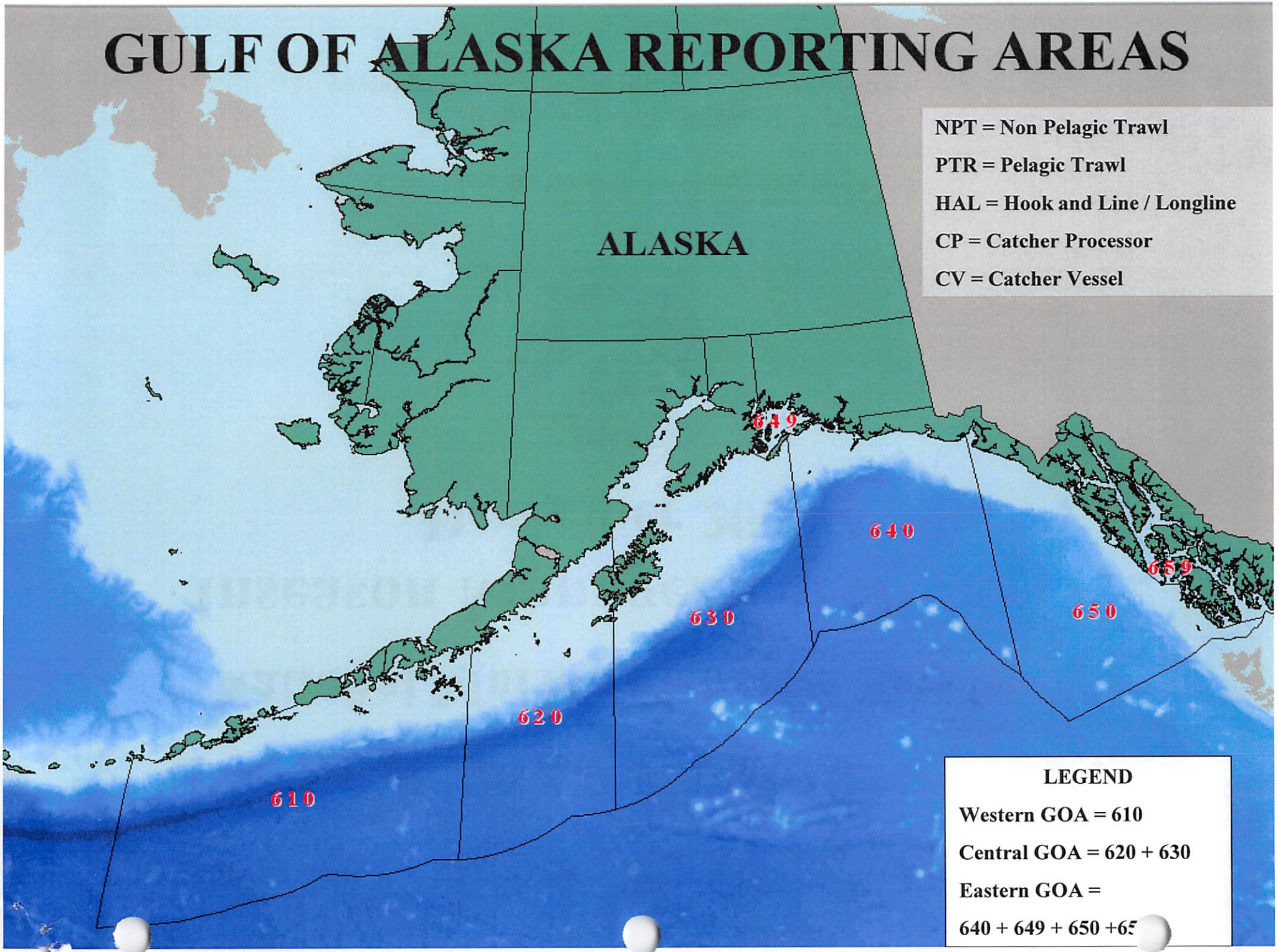
December 2007

Catch data are through November 13, 2007

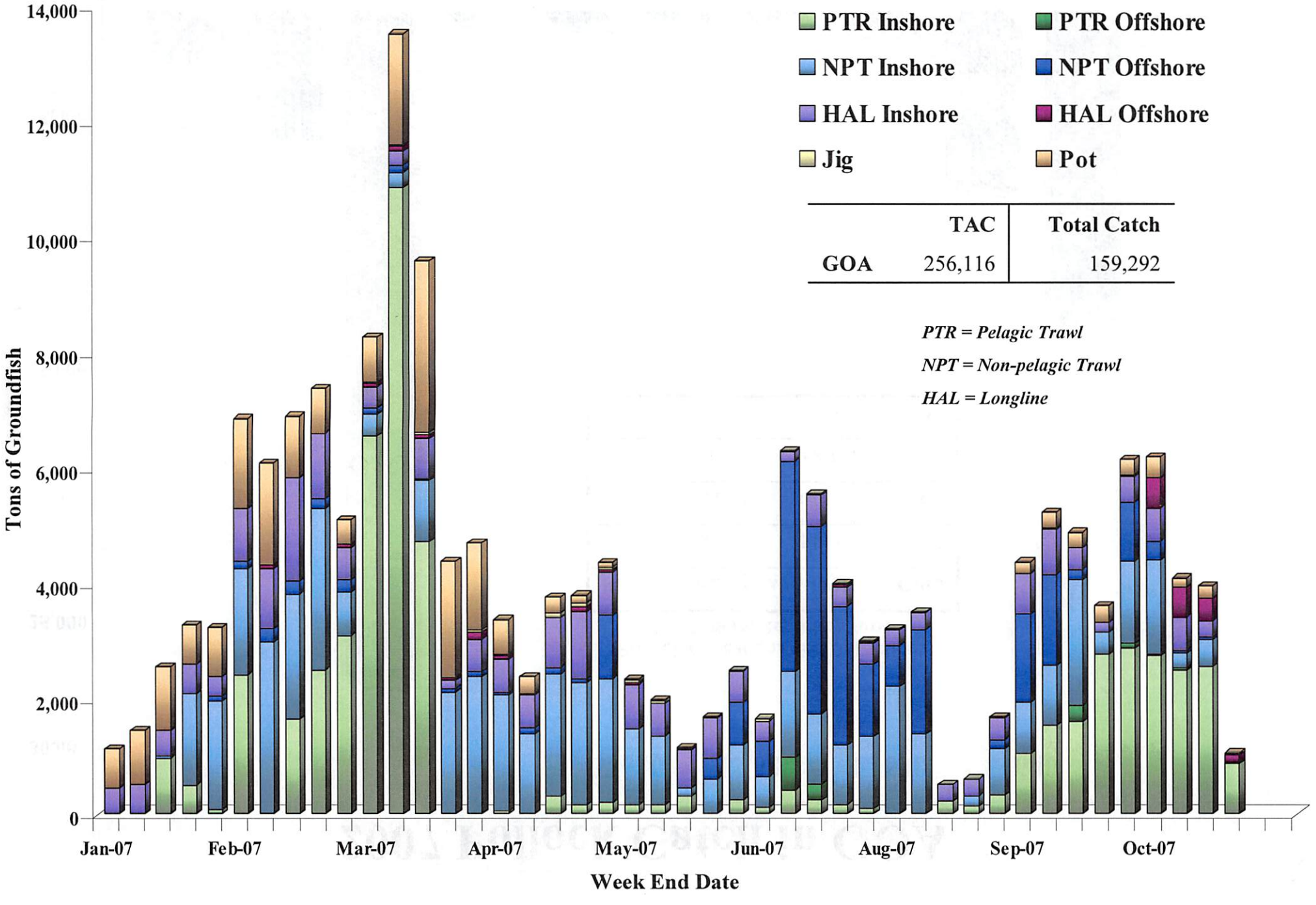
Management reports can be found at:
http://www.fakr.noaa.gov/sustainablefisheries/inseason/default.htm

B-2
NMFS

GULF OF ALASKA REPORTING AREAS



2007 GOA Total Groundfish Catch by Gear & Sector



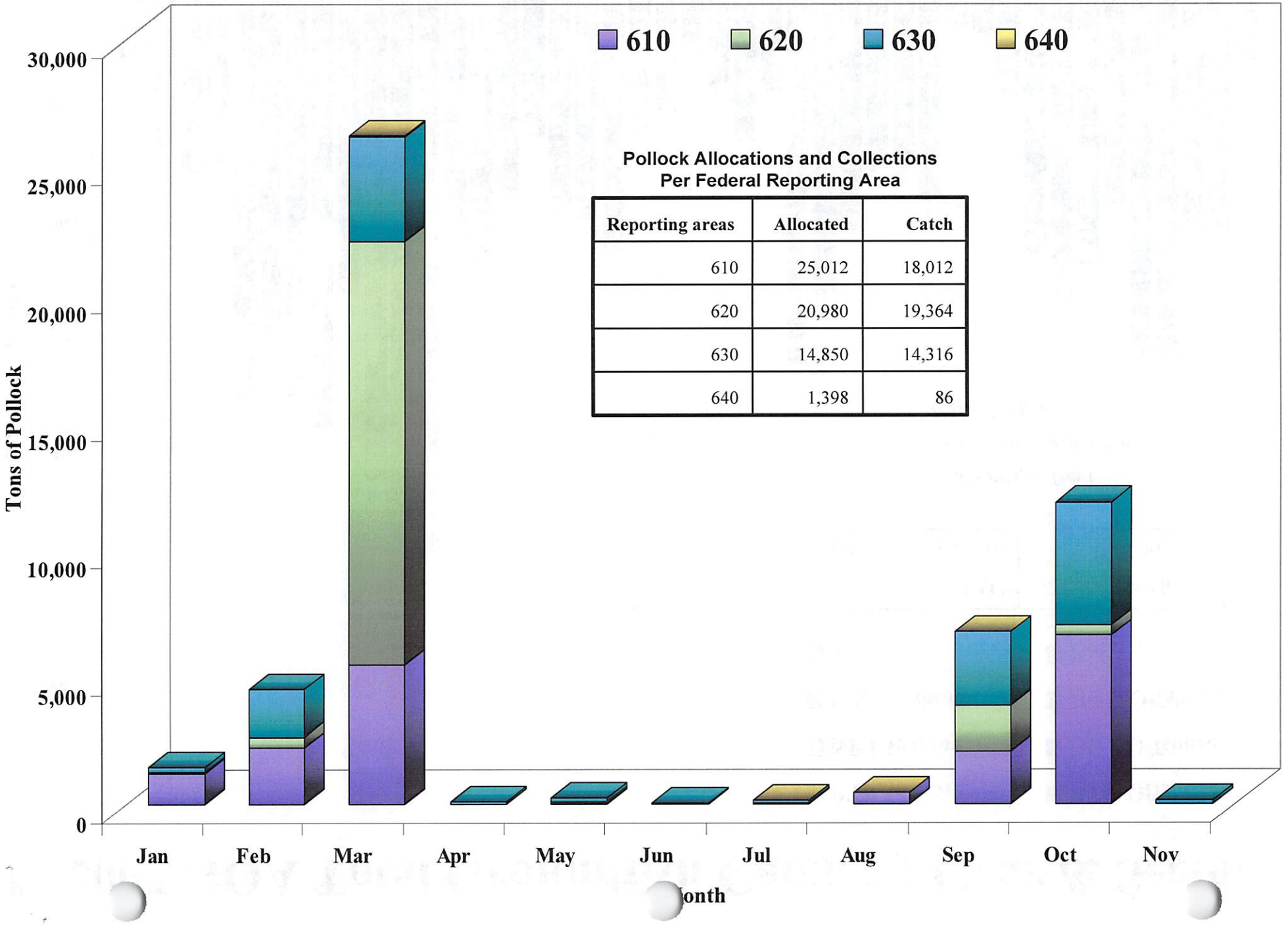
	TAC	Total Catch
GOA	256,116	159,292

PTR = Pelagic Trawl

NPT = Non-pelagic Trawl

HAL = Longline

2007 Pollock Catch in GOA



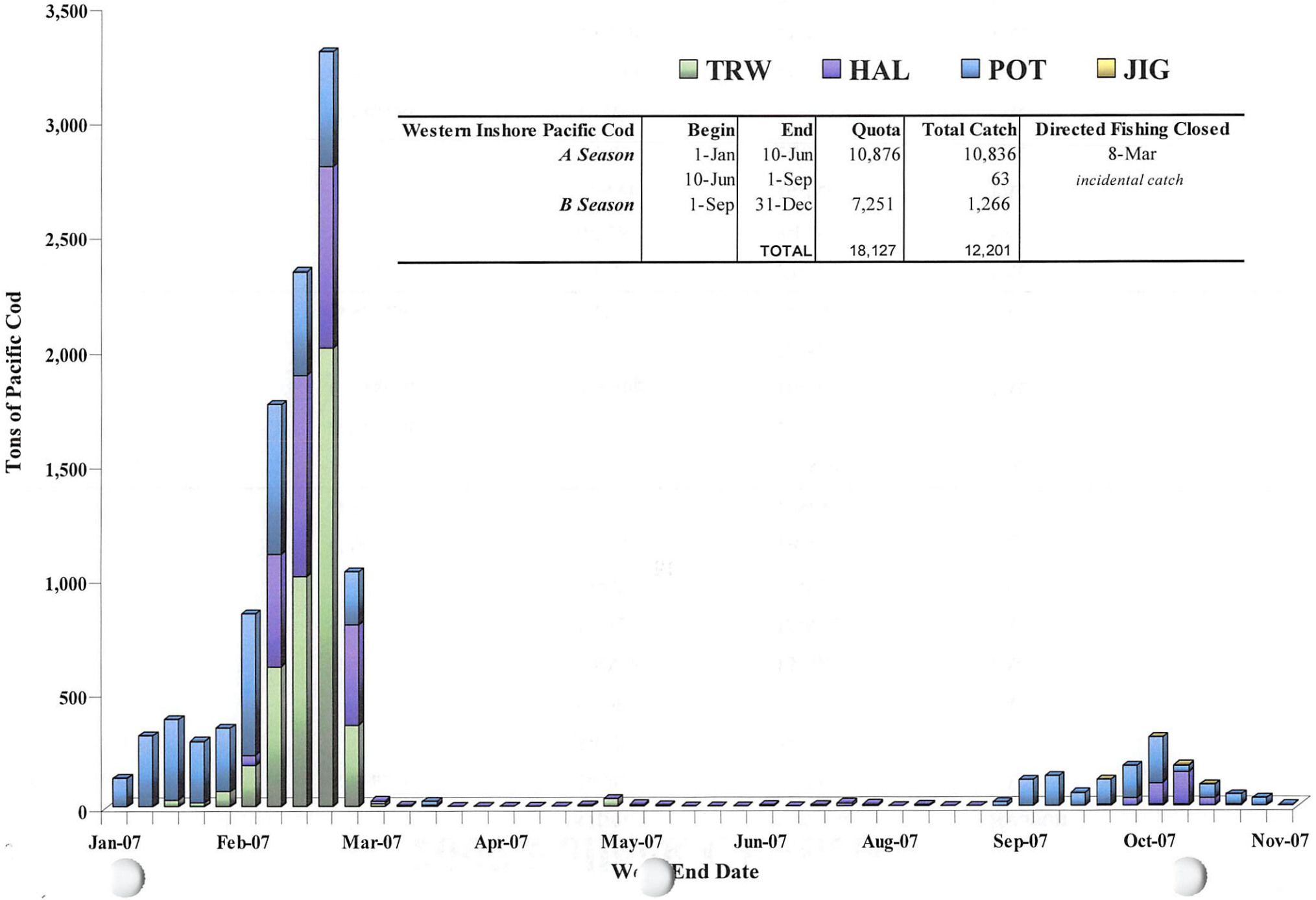
Pollock Allocations and Collections Per Federal Reporting Area

Reporting areas	Allocated	Catch
610	25,012	18,012
620	20,980	19,364
630	14,850	14,316
640	1,398	86

2007 Pollock Closures

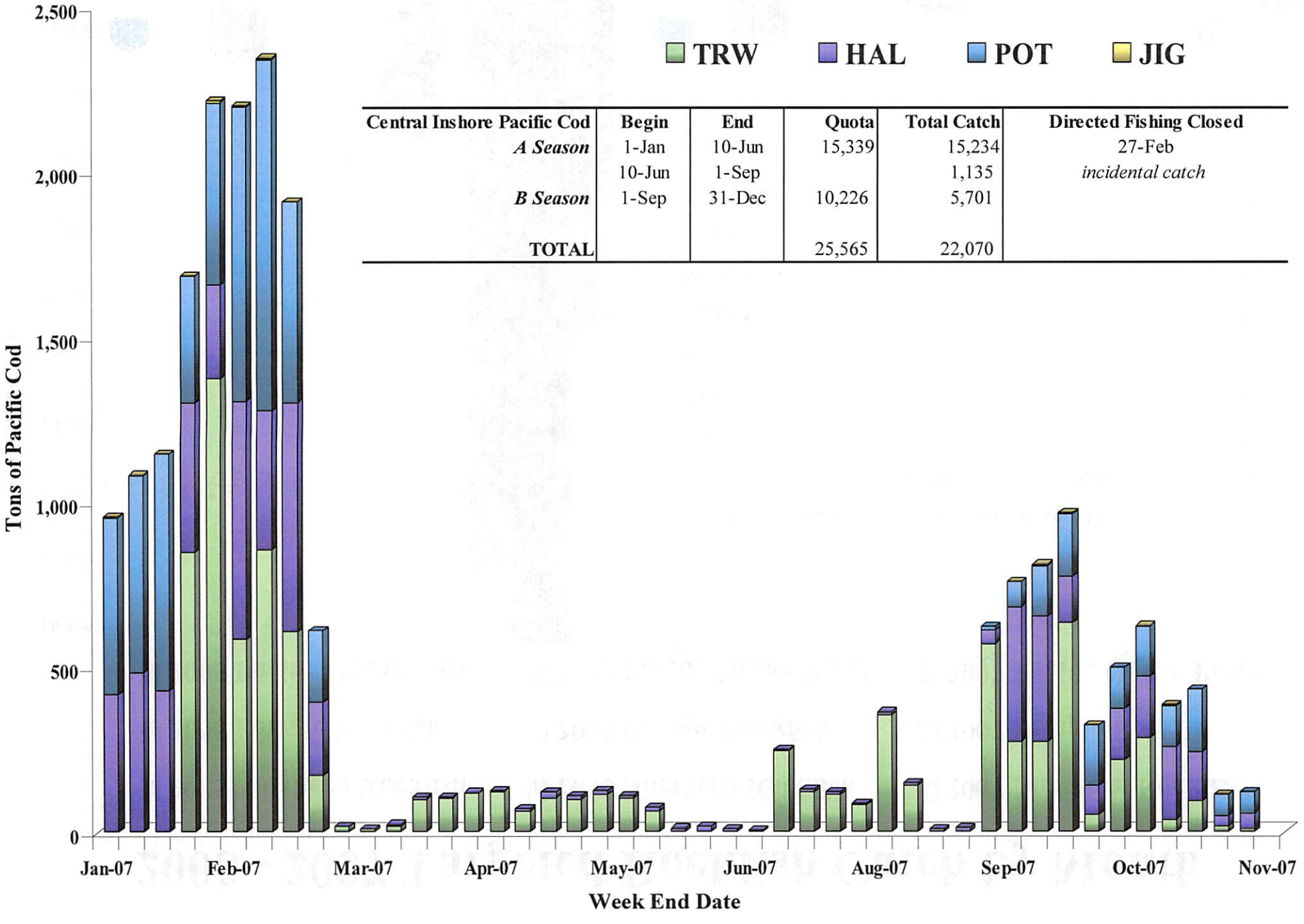
		Open	Closed	Reason
610 Pollock	**A Season**	20-Jan	22-Jan	TAC
		5-Feb	7-Feb	TAC
		8-Feb	10-Feb	TAC
	B Season	10-Mar	13-Mar	TAC
		16-Mar	18-Mar	TAC
		21-Mar	23-Mar	TAC
	C Season	25-Aug	1-Oct	Reg
	D Season	1-Oct	1-Nov	Reg
620 Pollock	**A Season**	20-Jan	10-Mar	Reg
	B Season	10-Mar	27-Mar	TAC
	C Season	25-Aug	10-Sep	TAC
		21-Sep	28-Sep	TAC
	D Season	1-Oct	1-Nov	Reg
630 Pollock	**A Season**	20-Jan	22-Jan	TAC
		6-Feb	8-Feb	TAC
		12-Feb	14-Feb	TAC
		1-Mar	2-Mar	TAC
	B Season	10-Mar	11-Mar	TAC
	C Season	25-Aug	28-Aug	TAC
		15-Sep	18-Sep	TAC
		21-Sep	23-Sep	TAC
		25-Sep	1-Oct	Reg
	D Season	1-Oct	1-Nov	Reg

2007 Western Gulf Inshore Pacific Cod Catch by Week and Gear



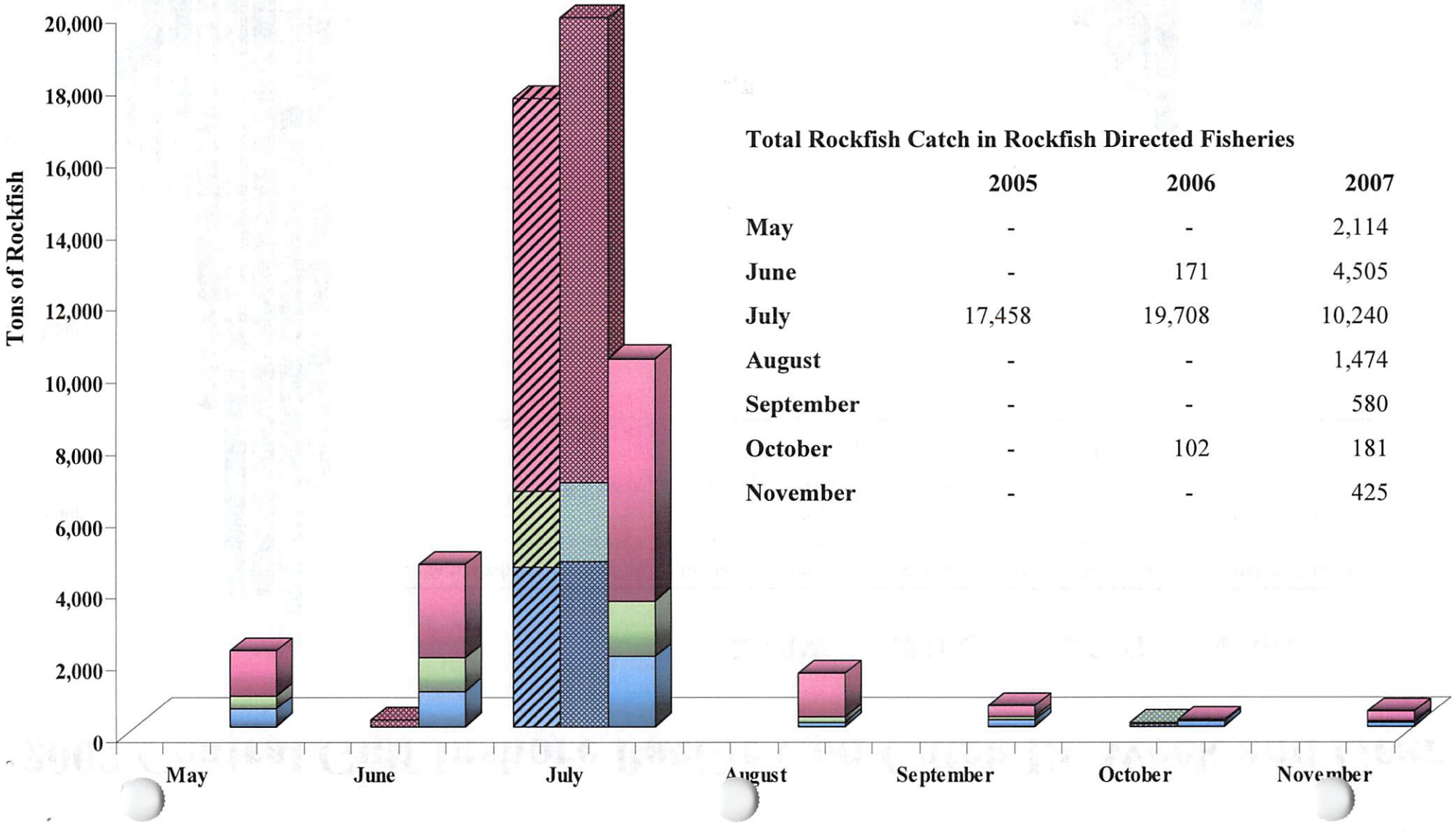
Western Inshore Pacific Cod	Begin	End	Quota	Total Catch	Directed Fishing Closed
A Season	1-Jan	10-Jun	10,876	10,836	8-Mar
	10-Jun	1-Sep		63	*incidental catch*
B Season	1-Sep	31-Dec	7,251	1,266	
		TOTAL	18,127	12,201	

2007 Central Gulf Inshore Pacific Cod Catch By Week and Gear



Central Inshore Pacific Cod	Begin	End	Quota	Total Catch	Directed Fishing Closed
A Season	1-Jan	10-Jun	15,339	15,234	27-Feb
	10-Jun	1-Sep		1,135	*incidental catch*
B Season	1-Sep	31-Dec	10,226	5,701	
TOTAL			25,565	22,070	

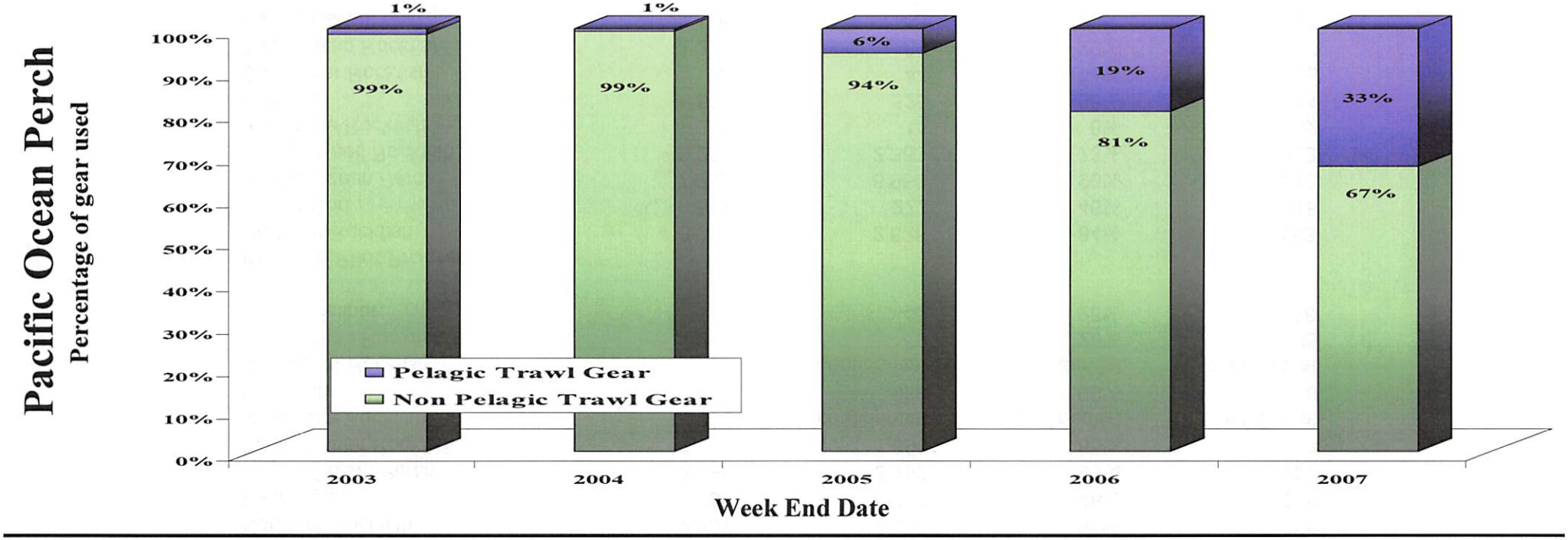
2005 - 2007 Targeted Rockfish Catch by Month

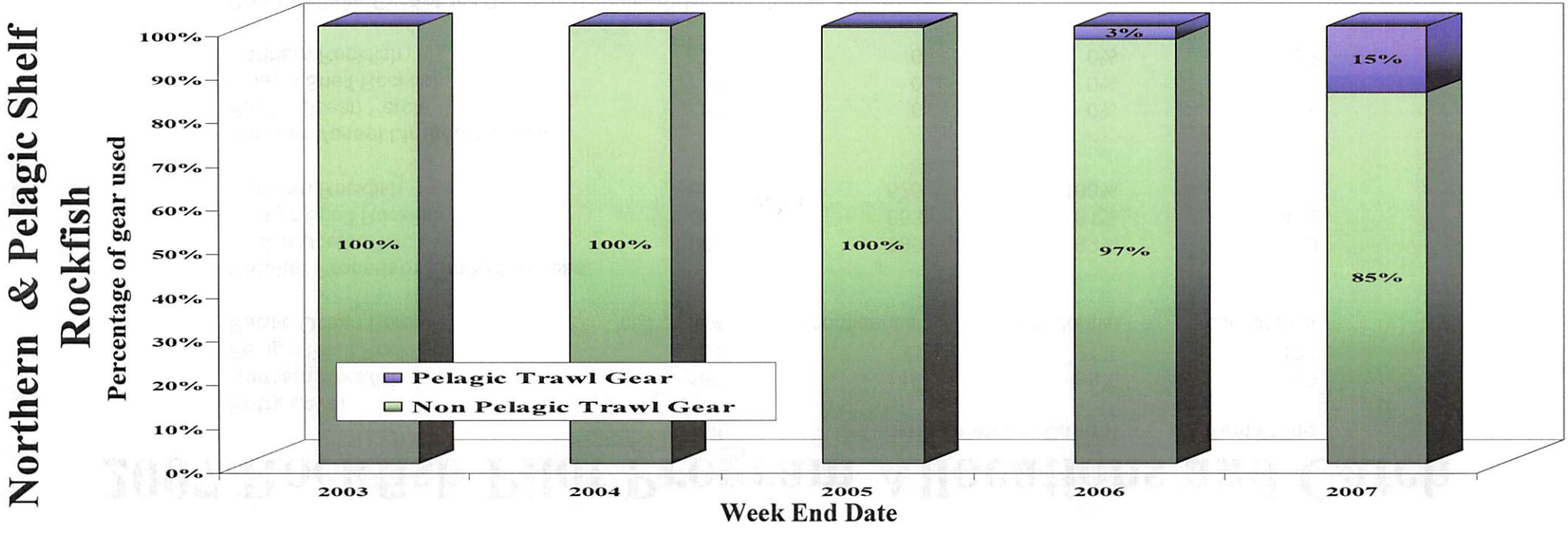


Total Rockfish Catch in Rockfish Directed Fisheries

	2005	2006	2007
May	-	-	2,114
June	-	171	4,505
July	17,458	19,708	10,240
August	-	-	1,474
September	-	-	580
October	-	102	181
November	-	-	425

Central GOA Targeted Rockfish by Trawl Gear Type



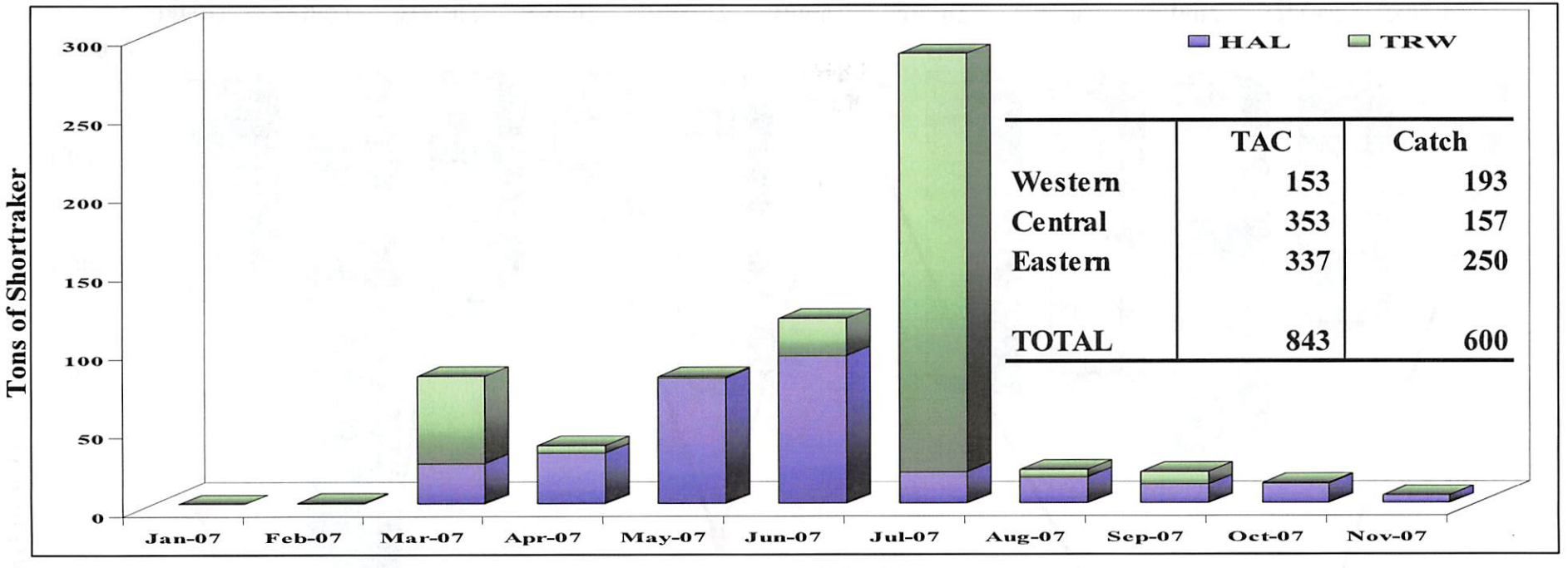


2007 Rockfish Pilot Program Allocations and Catch

	Limit	Catch	Percent Caught	Remaining
Entry Level				
Northern Rockfish	169	149	88%	20
Pelagic Shelf Rockfish	161	34	21%	127
Pacific Ocean Perch	364	confidential	confidential	confidential
Catcher Processor Limited Access				
Pacific Ocean Perch	1,008	999	99%	9
Pelagic Shelf Rockfish	1,065	653	61%	412
Northern Rockfish	675	675	100%	1
Catcher Vessel Limited Access				
Pacific Ocean Perch	37	0	0%	37
Pelagic Shelf Rockfish	8	0	0%	8
Northern Rockfish	29	0	0%	29
Cooperatives Except for Catcher Processor Pacific Ocean Perch				
Northern Rockfish	2,507	2,152	86%	355
Pacific Cod	587	273	46%	315
Pacific Ocean Perch	3,395	3,158	93%	237
Pelagic Shelf Rockfish	1,991	1,690	85%	301
Rougheye Rockfish	203	confidential	confidential	confidential
Sablefish	537	529	99%	8
Shortraker Rockfish	59	confidential	confidential	confidential
Thornyhead Rockfish	235	69	29%	166
Pacific Halibut	176	48	28%	128
Program Pilot Program Totals				
Northern Rockfish	3,380	2,828	84%	553
Pacific Cod	587	272	46%	315
Pacific Ocean Perch	7,283	6,966	96%	318
Pelagic Shelf Rockfish	3,225	2,363	73%	862
Rougheye Rockfish	203	11	6%	192
Sablefish	537	526	98%	11
Shortraker Rockfish	59	44	74%	16
Thornyhead Rockfish	235	69	29%	167
Pacific Halibut	176	48	28%	128

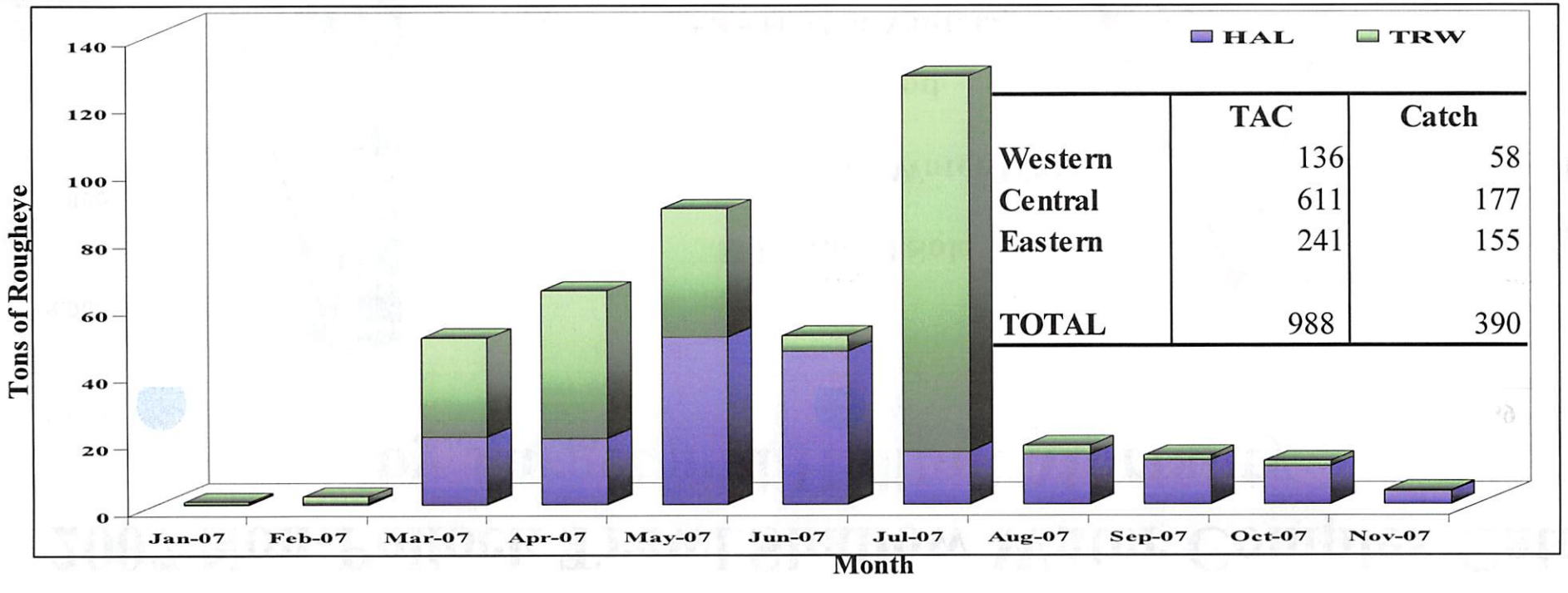
In 2006, five catcher processors and 25 trawl catcher vessels targeted rockfish in the Central Gulf.
In 2007, four catcher processors and 26 catcher ve[illegible] fished in the program.

2007 GOA Shortraker and Rougheye Rockfish Catch



	TAC	Catch
Western	153	193
Central	353	157
Eastern	337	250
TOTAL	843	600

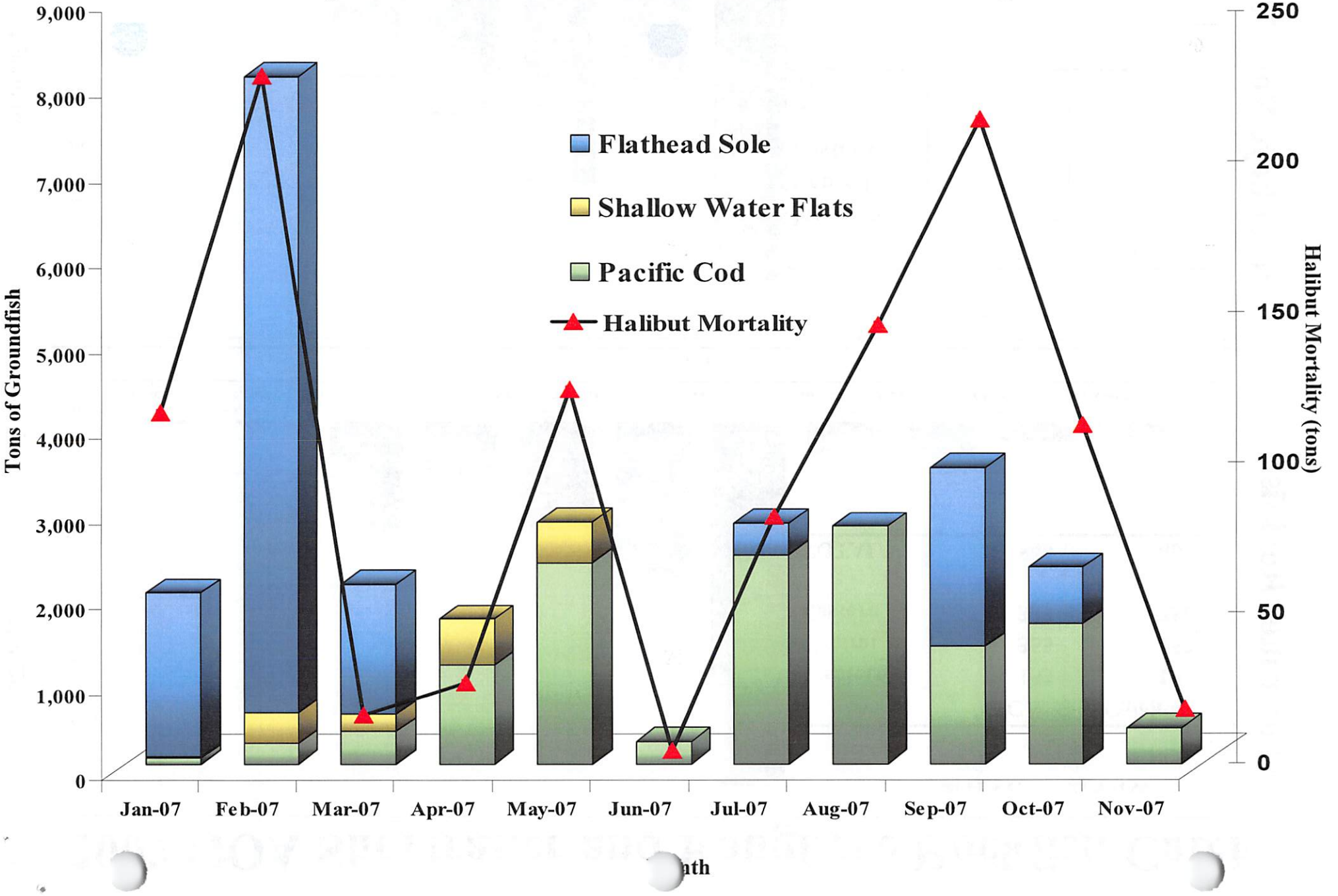
Shortraker Rockfish



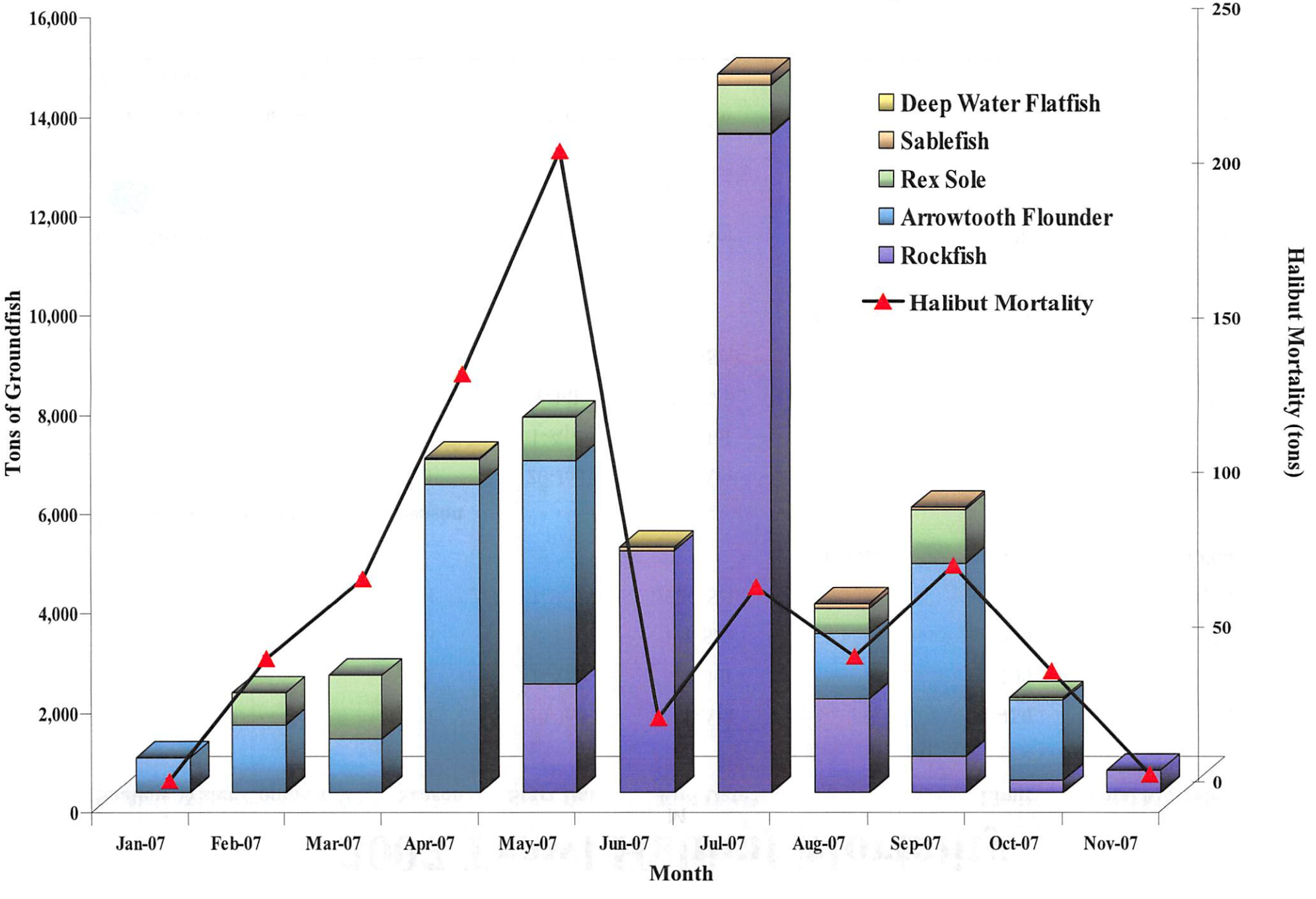
	TAC	Catch
Western	136	58
Central	611	177
Eastern	241	155
TOTAL	988	390

Rougheye Rockfish

2007 Non-Pollock Trawl Shallow Water Complex Catch by Target and Halibut Mortality



2007 Trawl Deep Water Complex Catch by Target and Halibut Mortality



2007 Trawl Halibut Mortality

Shallow Water Complex	Season	Start Date	End Date*		Limit	Total Mortality
	1	20-Jan	1-Apr		450	366
	2	1-Apr	1-Jul		100	155
	3	1-Jul	1-Sep		200	224
	4	1-Sep	30-Sep		150	258
				TOTAL	**900**	**1,004**
Deep Water Complex	**Season**					
	1	20-Jan	1-Apr		100	106
	2	1-Apr	1-Jul		300	340
	3	1-Jul	1-Sep		224	90
	4	1-Sep	30-Sep		0	67
				TOTAL	**624**	**603**
Rockfish Pilot Program**		20-Jan	1-Apr		48	48
Fall Halibut Allocation**		1-Oct	1-Nov		428	230
Total Halibut Mortality					2,000	1,885

** End date is the date specified, not the date of closure. For closures see next slide*

*** Includes the reallocation of halibut mortality from the rockfish pilot program to the fall halibut allocation on Nov 21, 2007*

Trawl Openings in the GOA

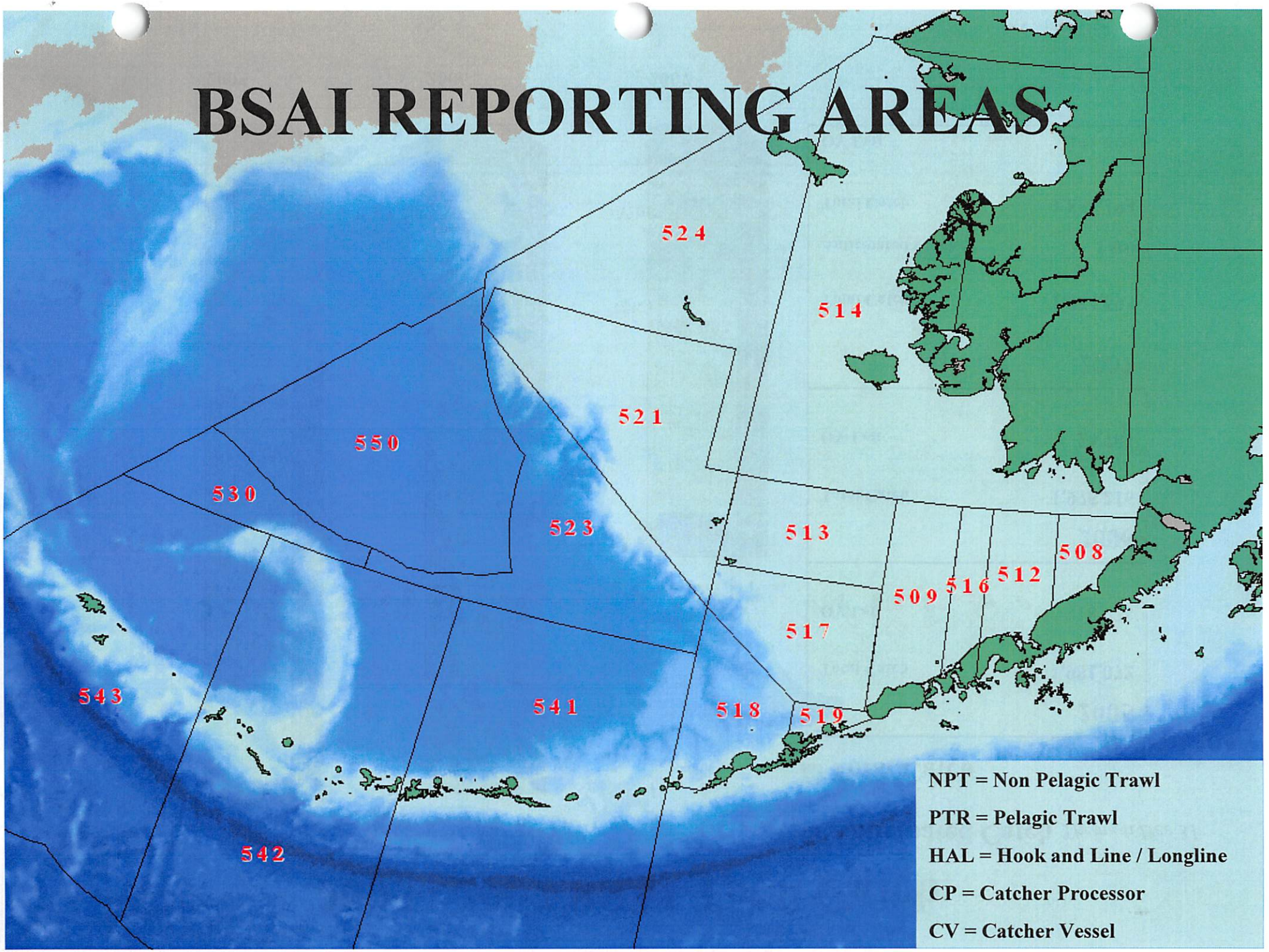
Deep Water Complex

Open	Closed	Note
20-Jan	17-May	
1-Jul	10-Aug	
1-Sep	8-Oct	
10-Oct	15-Oct	
22-Oct		

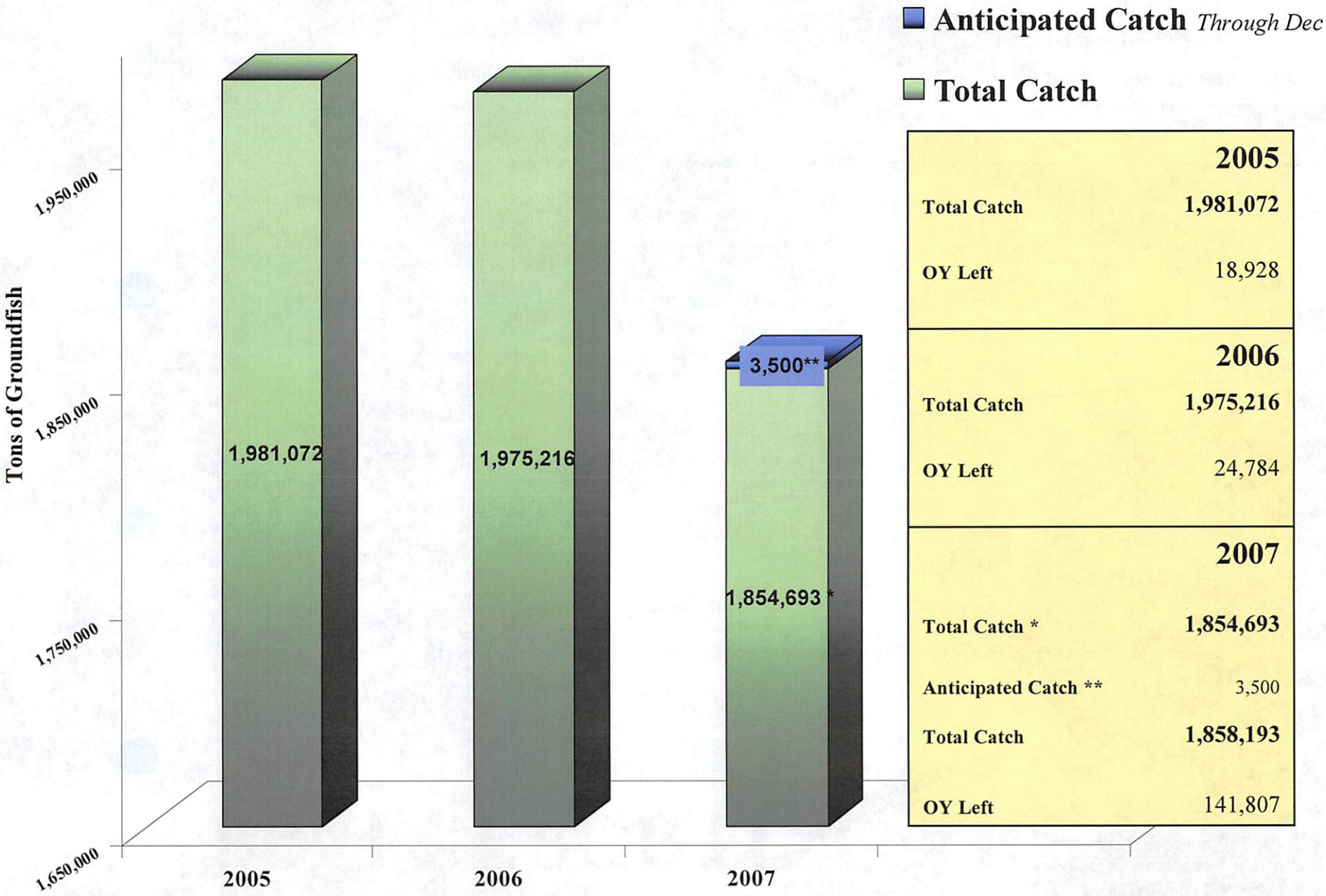
Shallow Water Complex

Open	Closed	Note
20-Jan	4-Jun	
1-Jul	10-Aug	
1-Sep	1-Sep	Closes at midnight
6-Sep	6-Sep	0800-2000
11-Sep	11-Sep	0800-2000
21-Sep	23-Sep	
1-Oct	8-Oct	
10-Oct	15-Oct	
22-Oct		

BSAI REPORTING AREAS



2005 - 2007 BSAI Total Catch

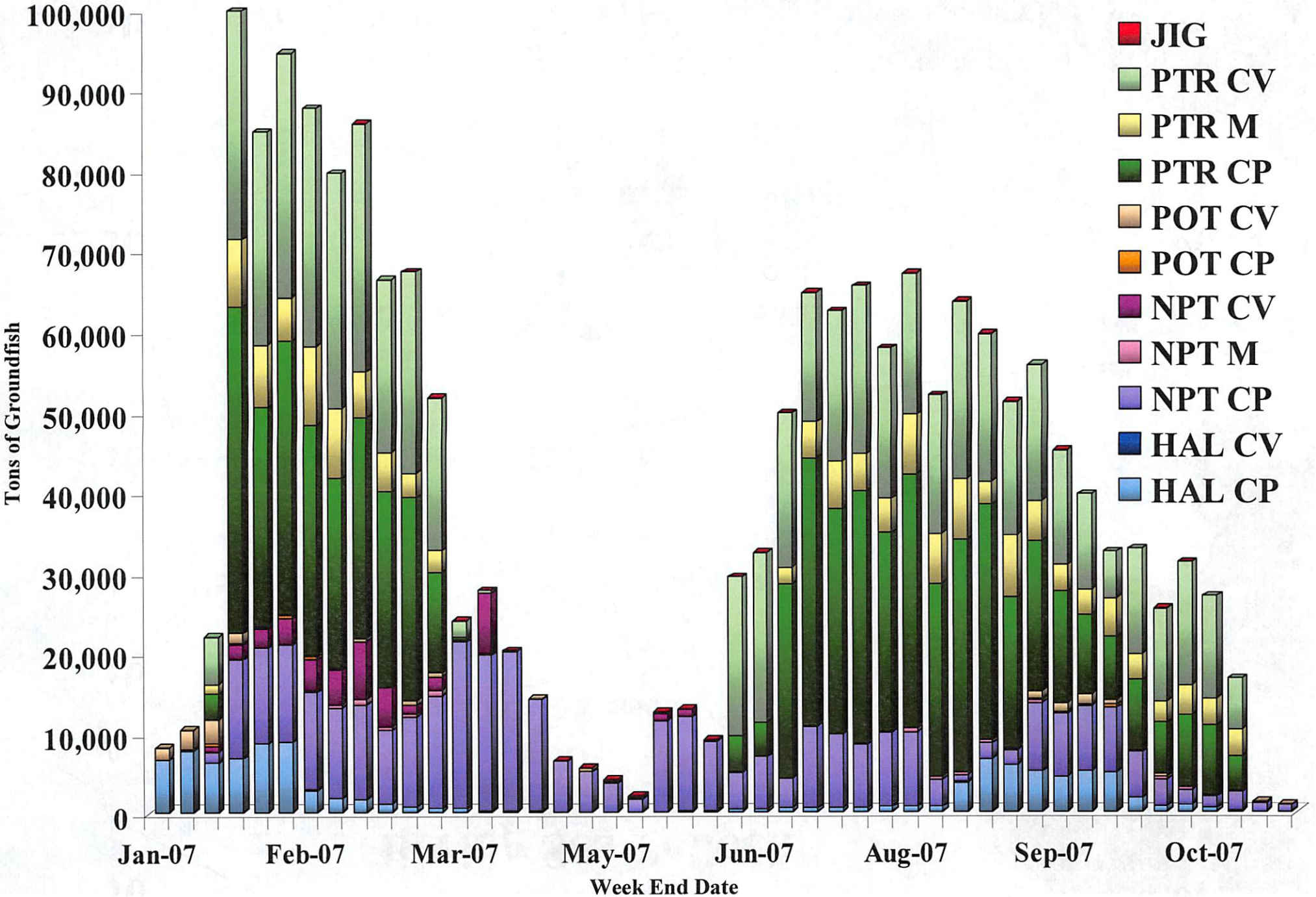


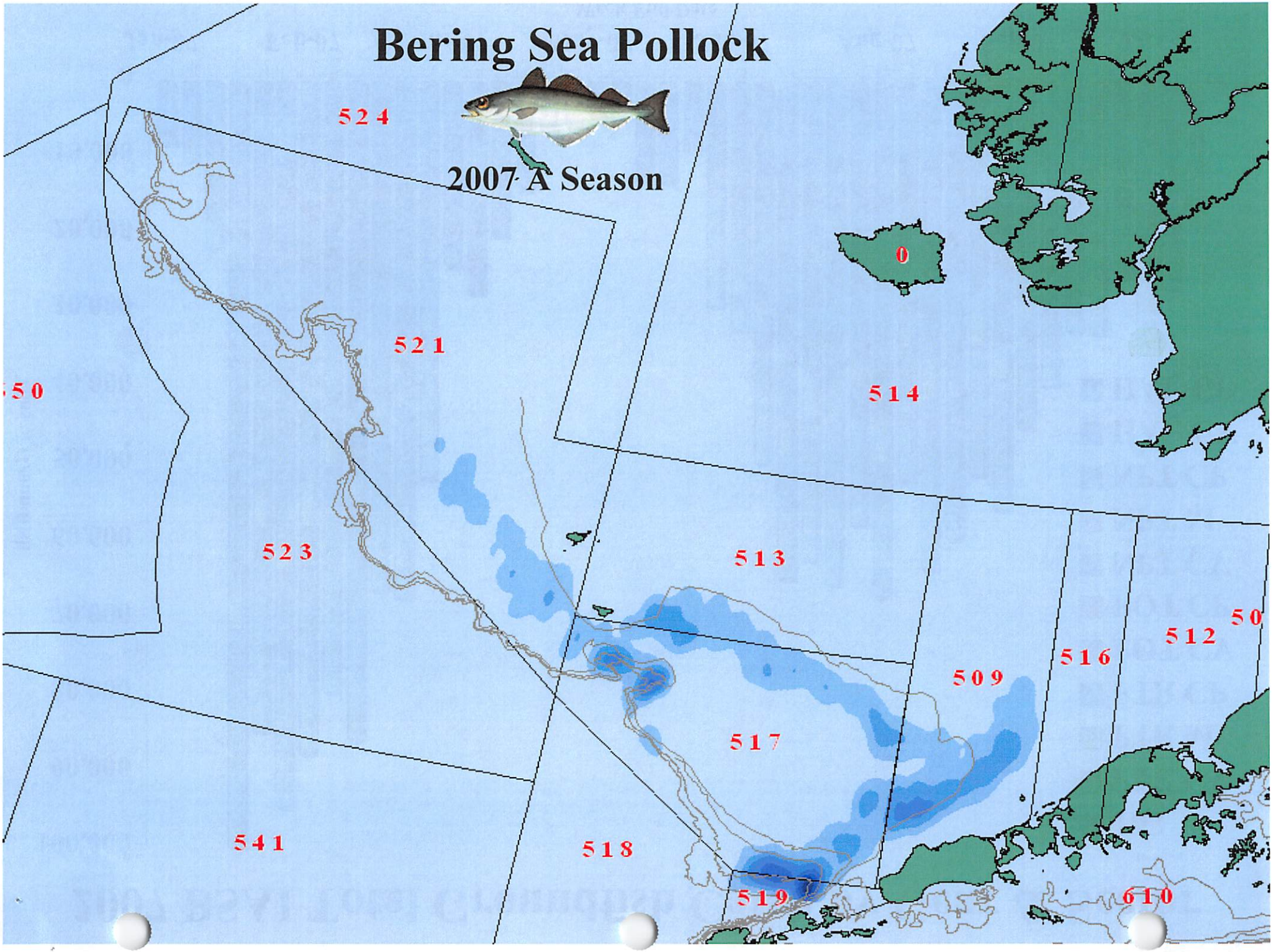
	2005
Total Catch	1,981,072
OY Left	18,928

	2006
Total Catch	1,975,216
OY Left	24,784

	2007
Total Catch *	1,854,693
Anticipated Catch **	3,500
Total Catch	1,858,193
OY Left	141,807

2007 BSAI Total Groundfish Catch by Gear & Sector




Bering Sea Pollock
2007 A Season
524
521
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541
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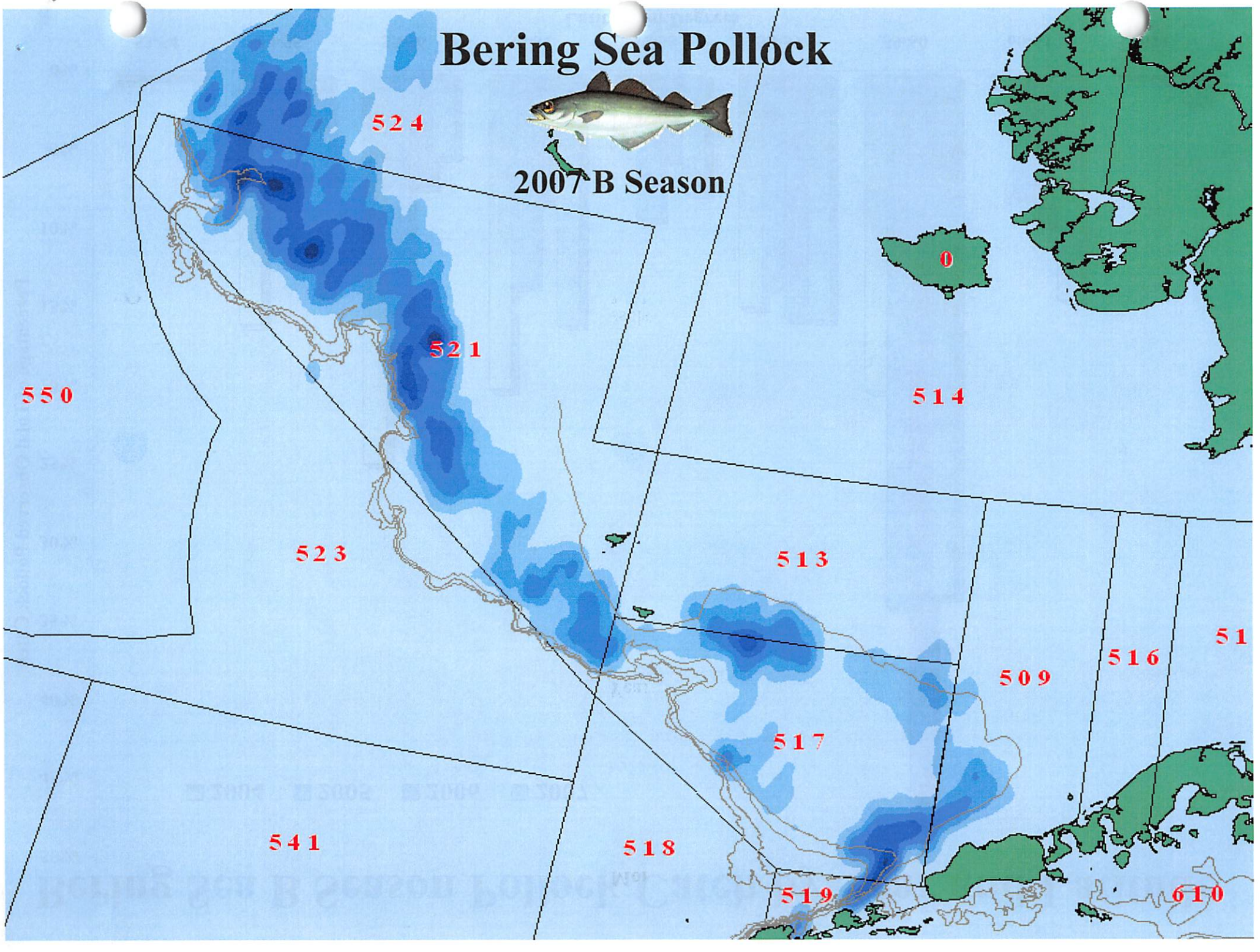
519
610


Bering Sea Pollock
2007 B Season
524
521
550
514
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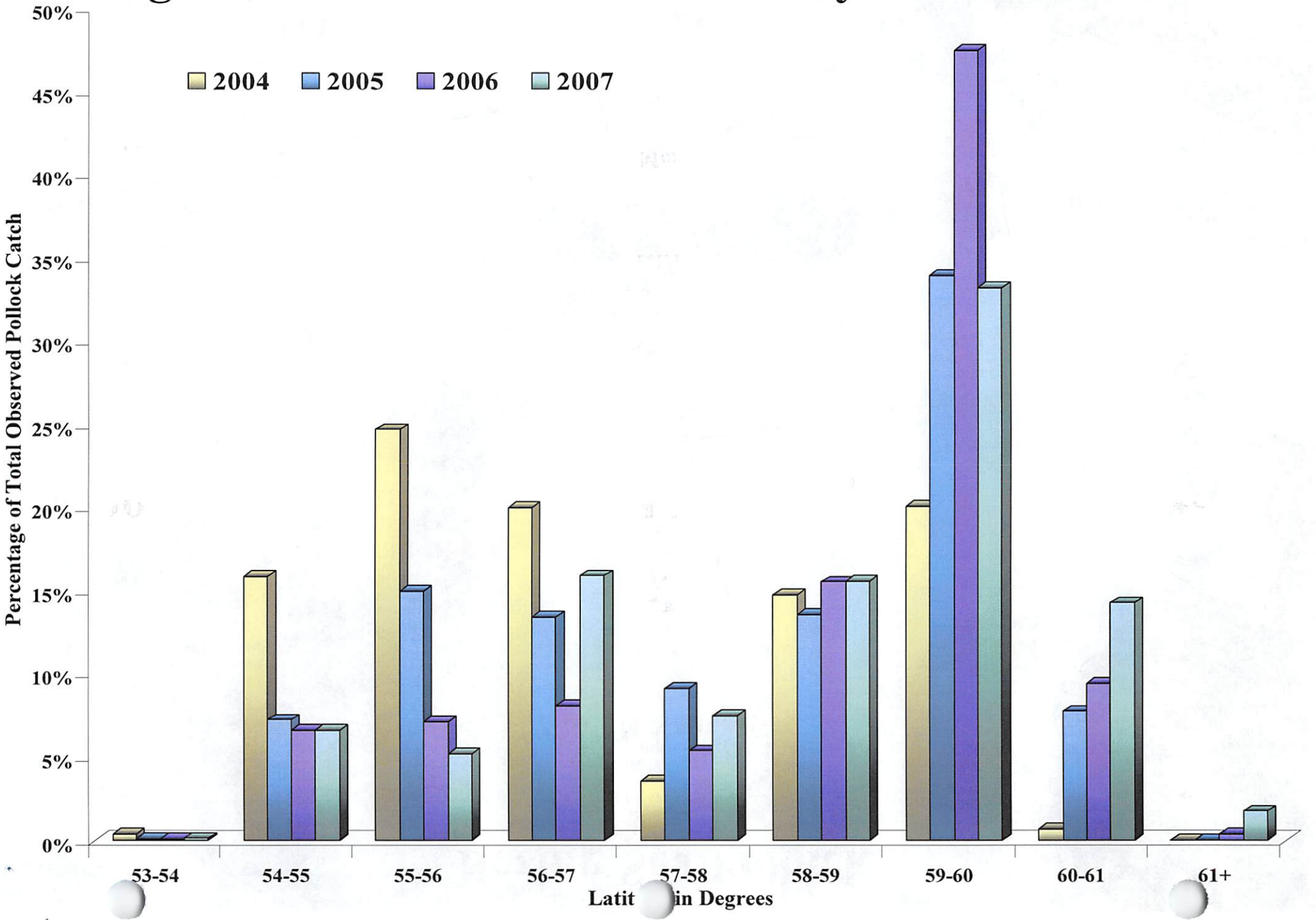
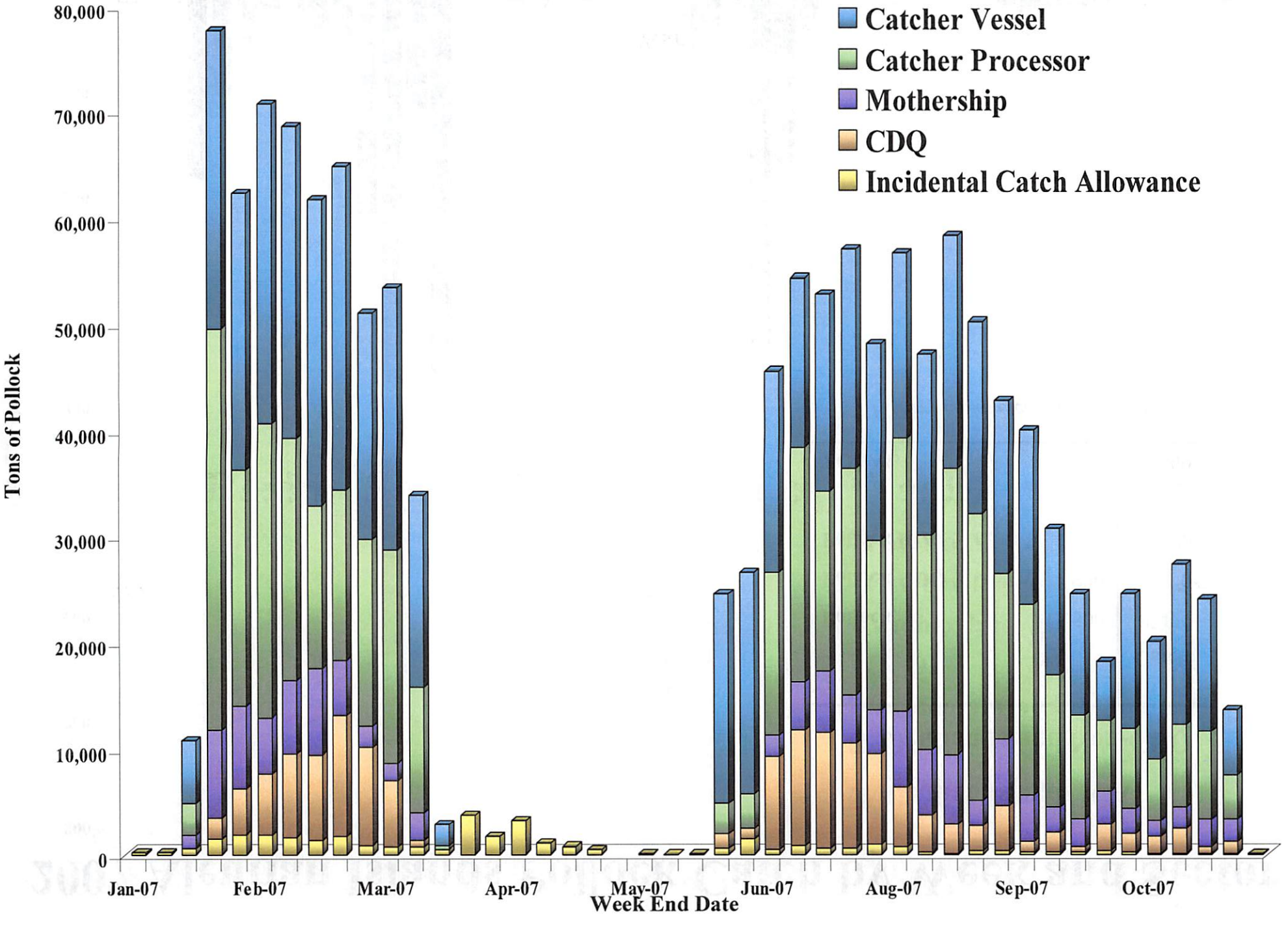
523
513
516
509
517
541
518
519
610

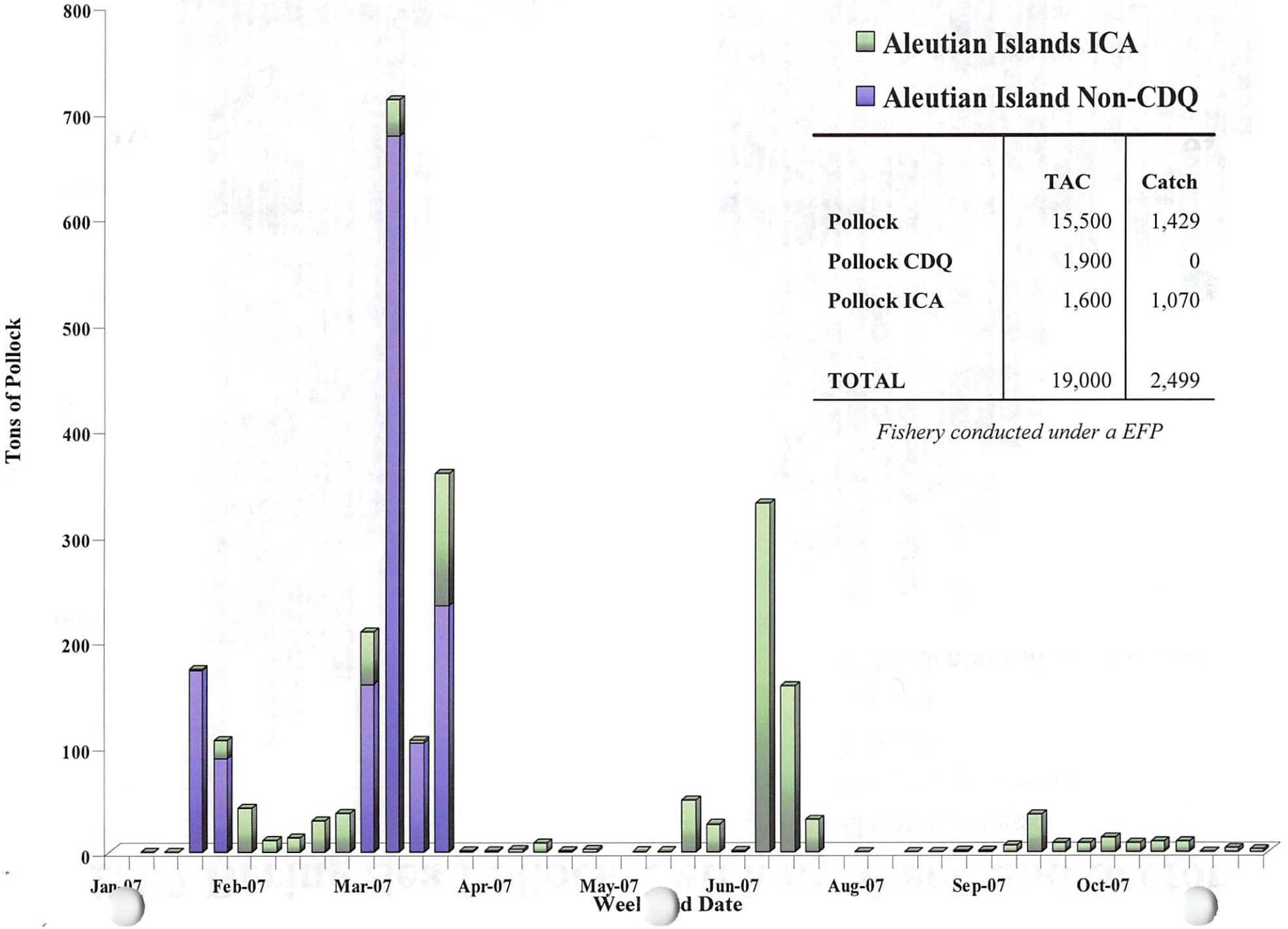
Bering Sea B Season Pollock Catch by Year and Latitude



2007 Bering Sea Pollock Catch by Week and Sector



2007 Aleutian Islands Pollock Catch by Week and Sector



	TAC	Catch
Pollock	15,500	1,429
Pollock CDQ	1,900	0
Pollock ICA	1,600	1,070
TOTAL	19,000	2,499

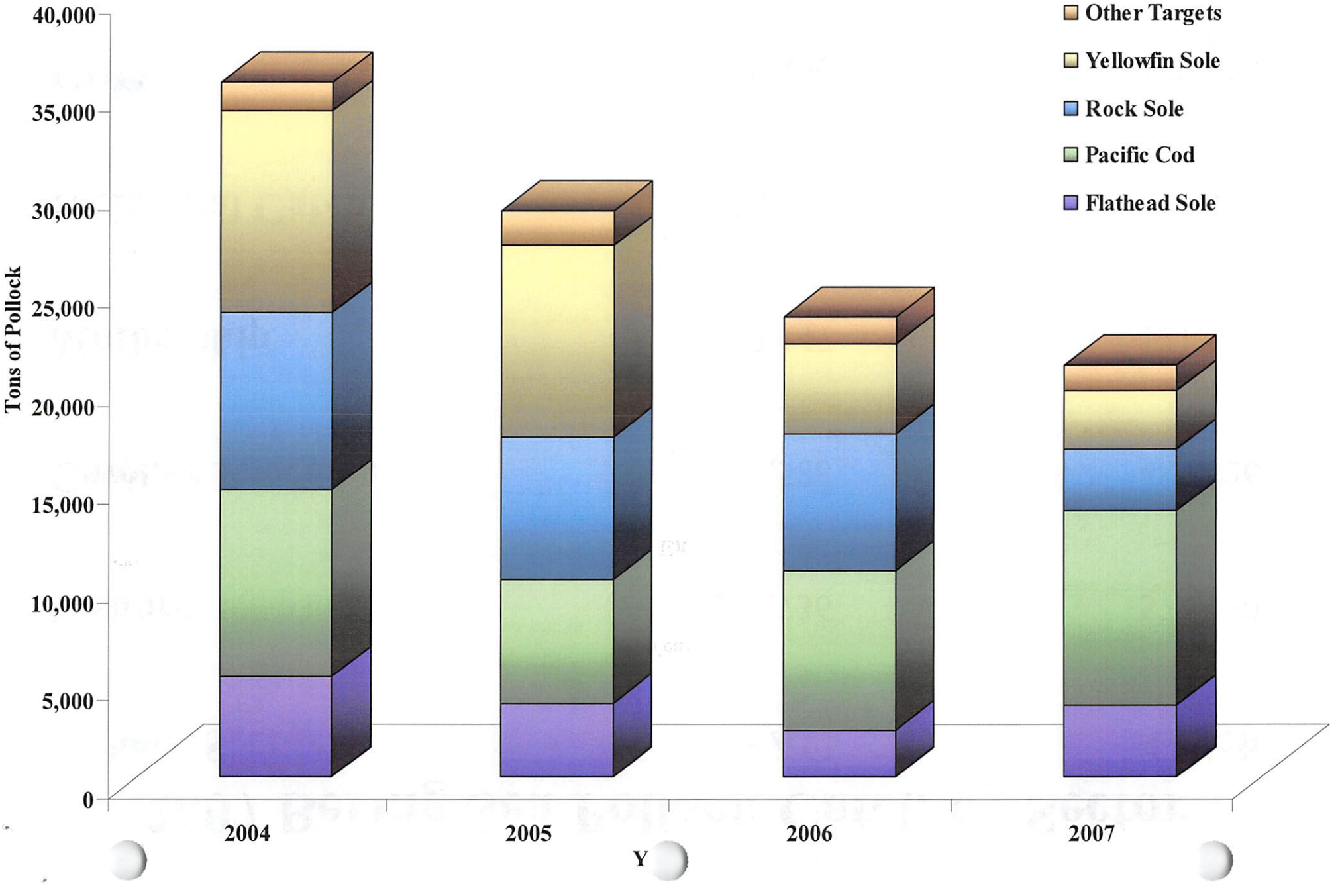
Fishery conducted under a EFP

2007 Bering Sea Pollock Catch by Sector

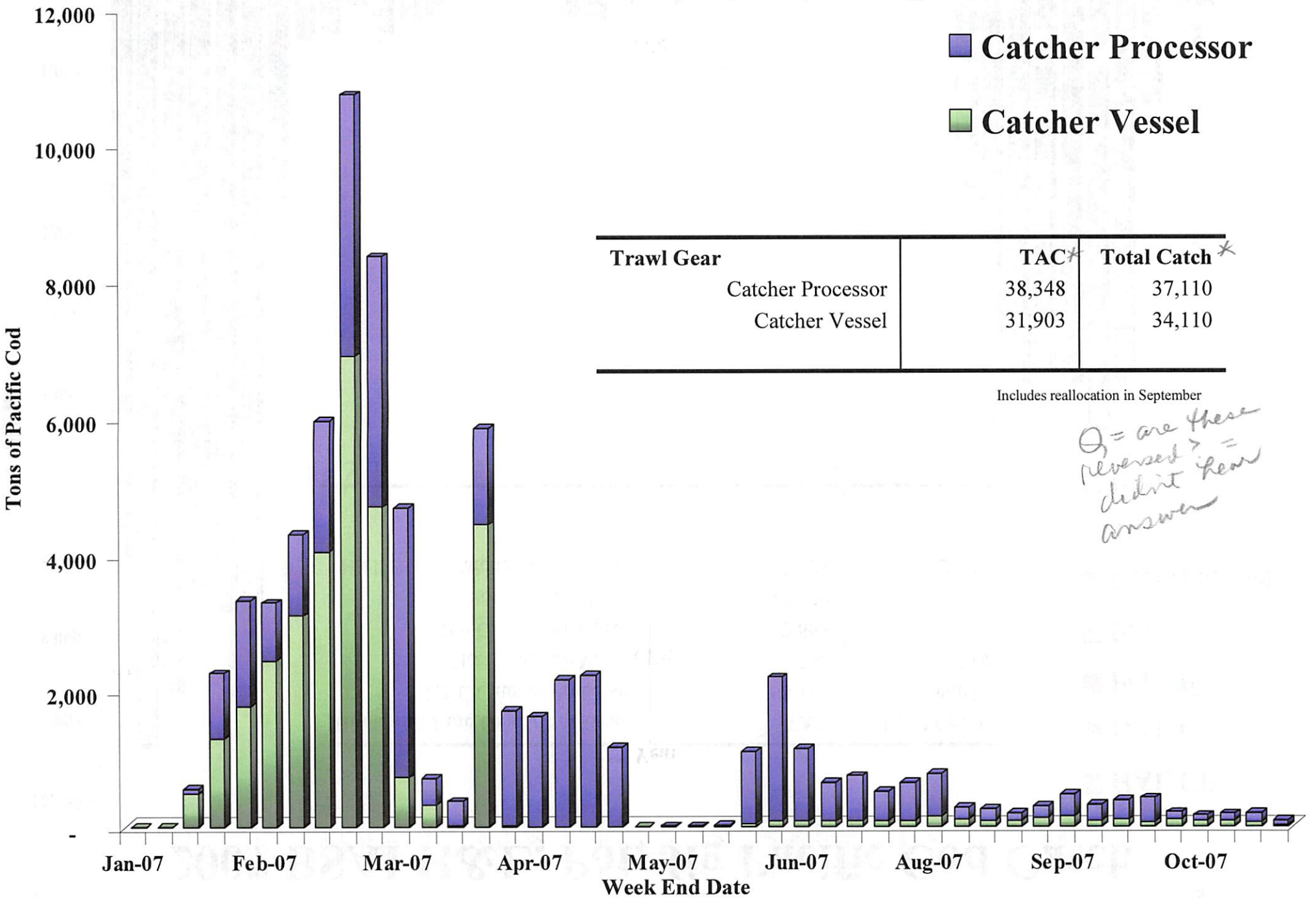
Fishery Sector	TAC	Catch
Inshore	610,736	572,900
Catcher Processor	488,588	488,526
Mothership	122,147	121,514
Incidental Catch	33,129	32,385
CDQ	139,400	139,116
TOTAL	1,394,000	1,354,441

Includes reallocation of 2,000 mt from the Bering Sea ICA in September

2004 - 2007 Non-AFA Trawl CP Pollock Incidental Catch by Year and Target



2007 BSAI Trawl Pacific Cod Catch



Trawl Gear	TAC*	Total Catch *
Catcher Processor	38,348	37,110
Catcher Vessel	31,903	34,110

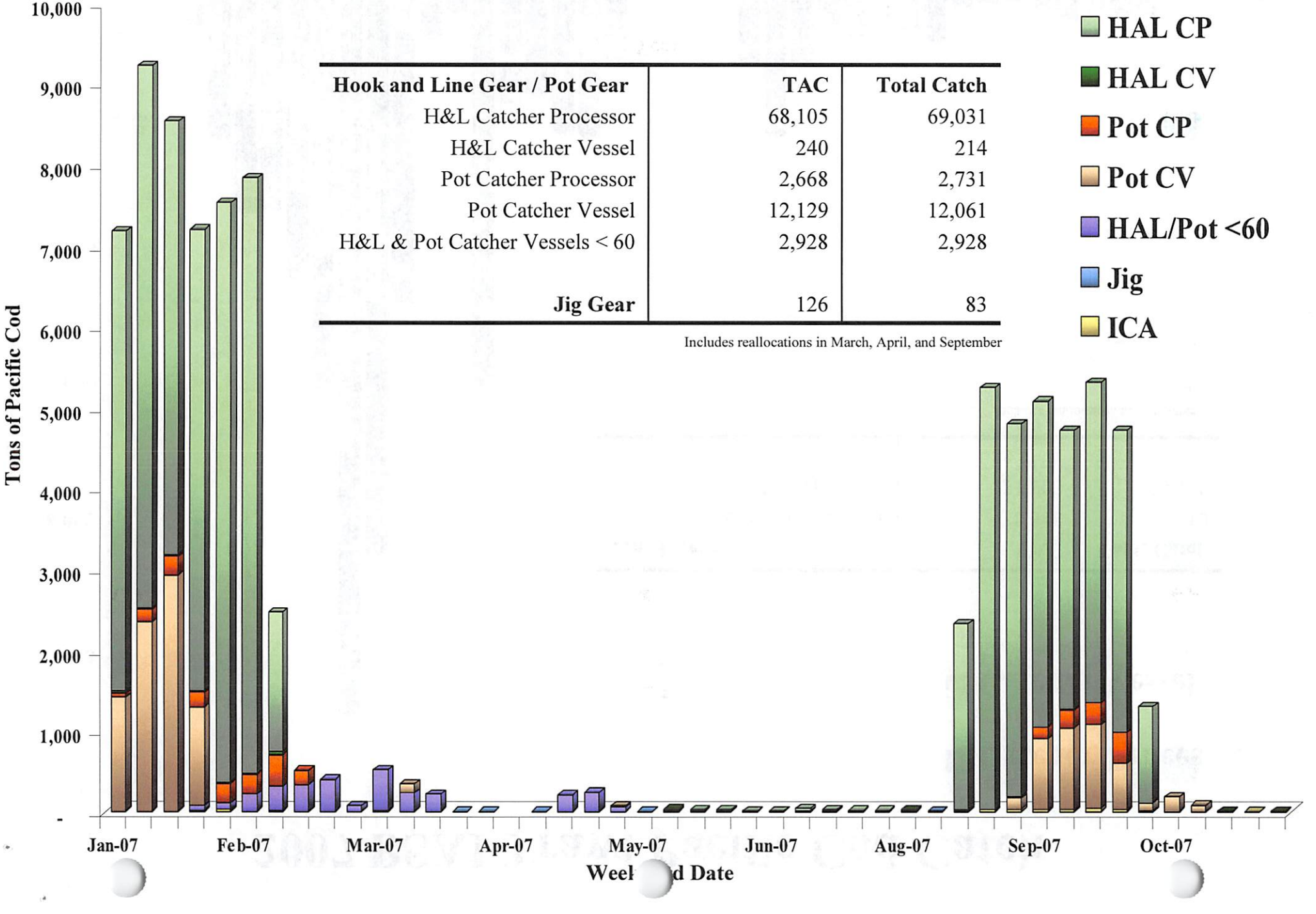
Includes reallocation in September

Θ = are these reversed > = didn't hear answer

2007 BSAI H&L, Pot, Jig Pacific Cod Catch

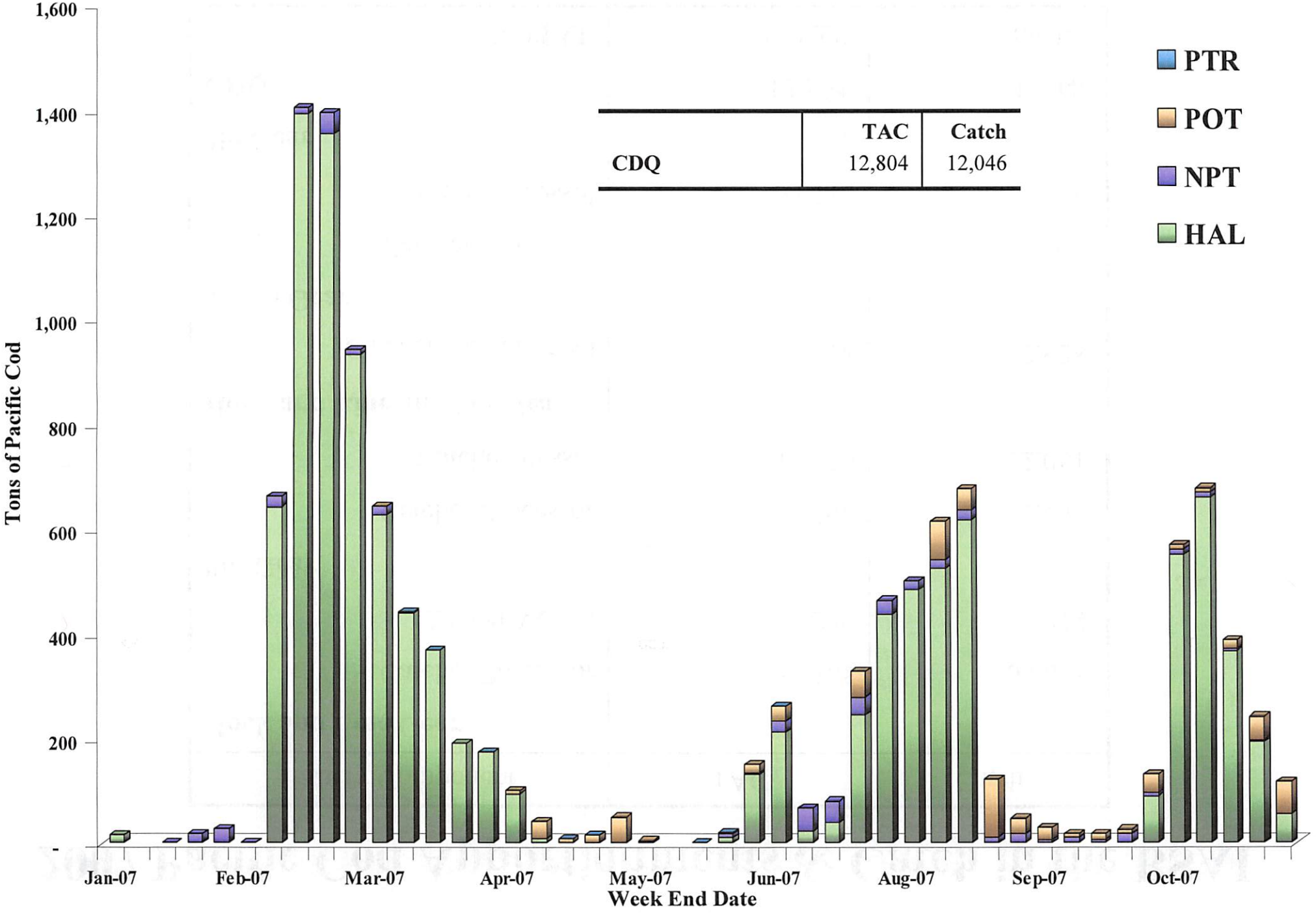
Hook and Line Gear / Pot Gear	TAC	Total Catch
H&L Catcher Processor	68,105	69,031
H&L Catcher Vessel	240	214
Pot Catcher Processor	2,668	2,731
Pot Catcher Vessel	12,129	12,061
H&L & Pot Catcher Vessels < 60	2,928	2,928
Jig Gear	126	83

Includes reallocations in March, April, and September



2007 BSAI CDQ Pacific Cod Catch

	TAC	Catch
CDQ	12,804	12,046

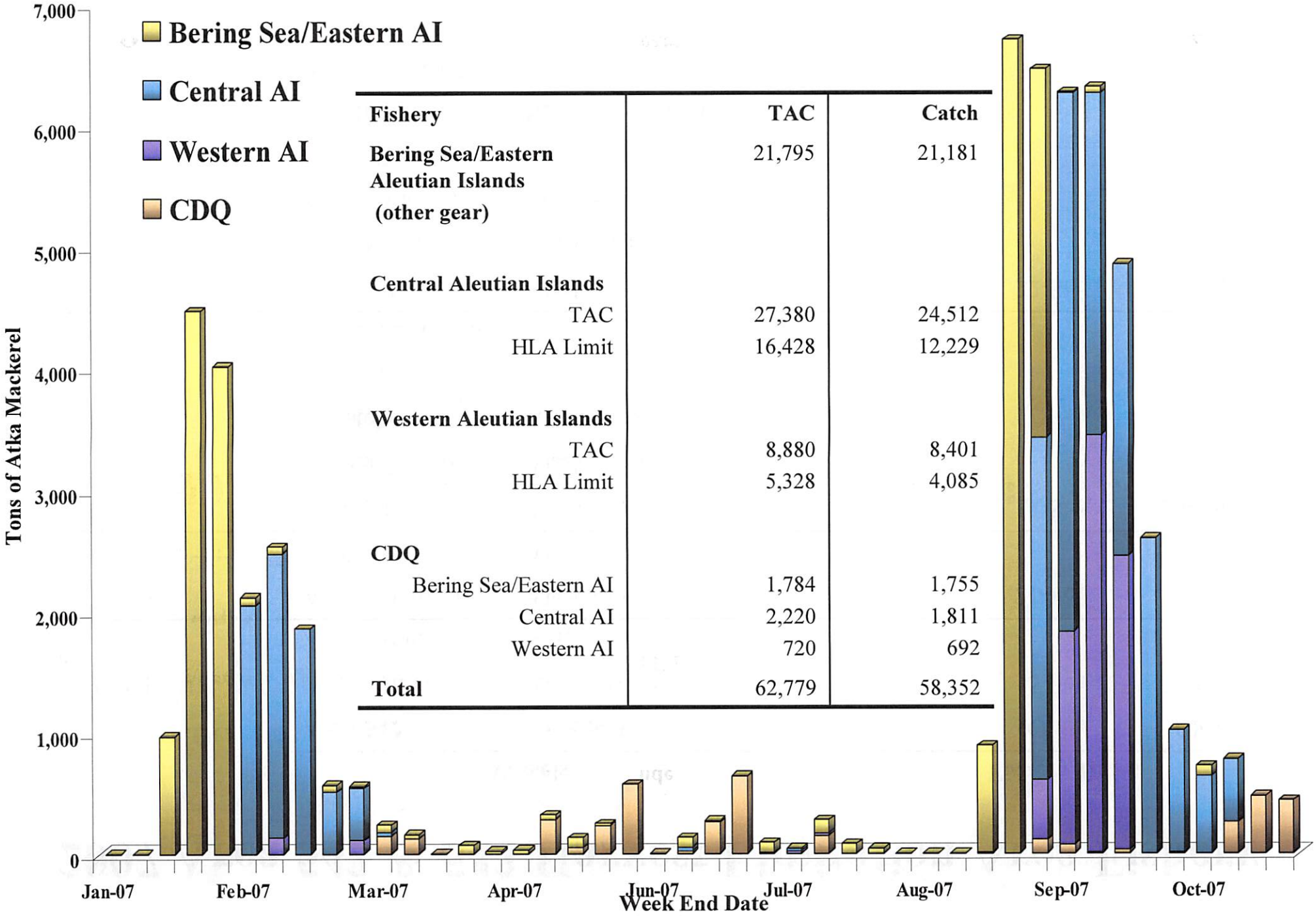


2007 Pacific Cod Apportionments & Catch in the BSAI

Fishery Component	TAC	Catch
Hook and Line Gear		
Catcher Processor	68,105	69,031
Catcher Vessel	240	214
Pot Gear		
Catcher Processor	2,668	2,731
Catcher Vessel	12,129	12,061
Hook and Line and Pot Gear		
Catcher Vessels < 60	2,928	2,928
Trawl Gear		
Catcher Processor	37,110	38,348
Catcher Vessel	34,110	31,903
Jig Gear	126	83
CDQ	12,804	12,046
TOTAL	170,220	169,345

Includes reallocations in March, April, and September

2007 Atka Mackerel Catch by Week and Area

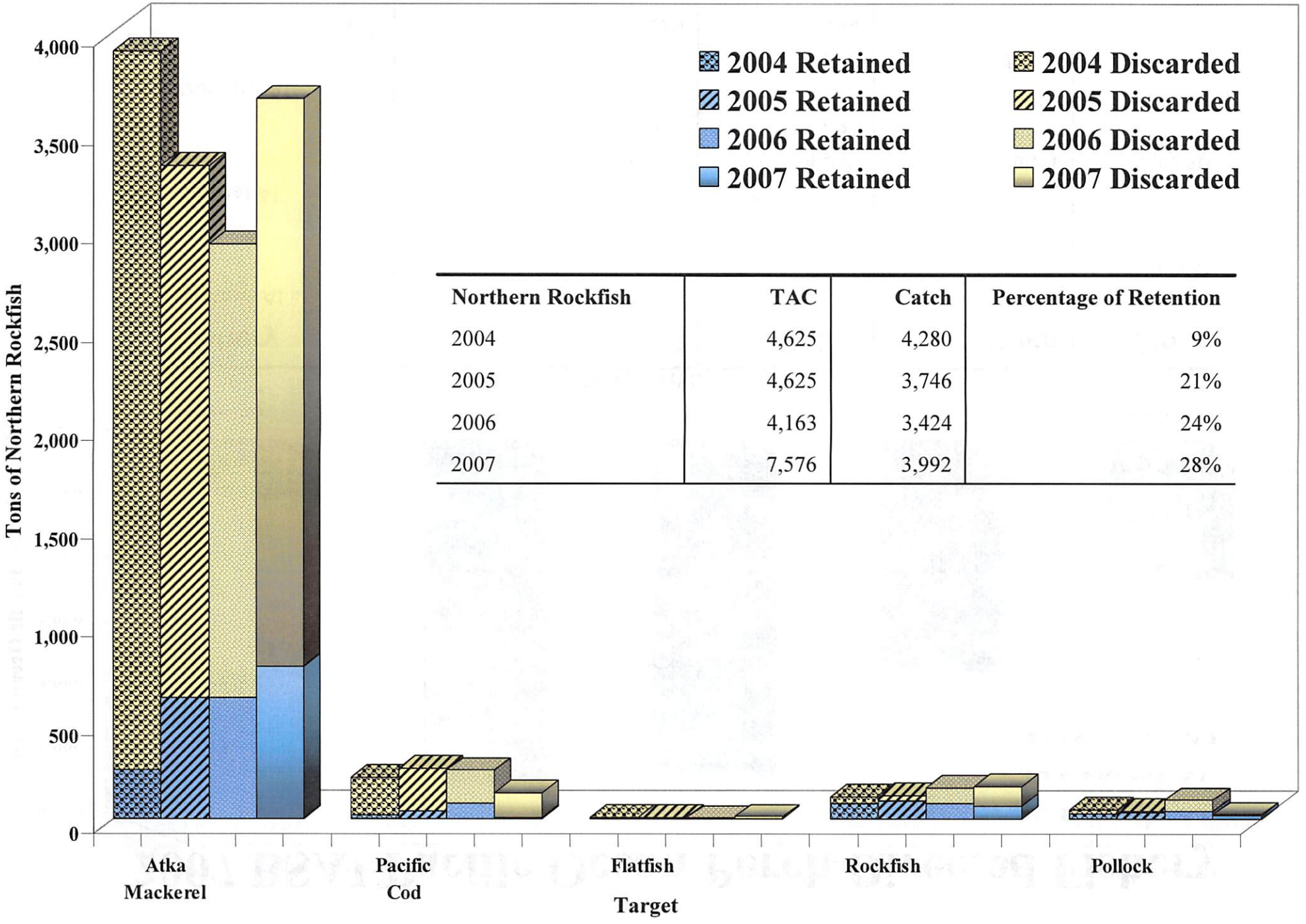


Fishery	TAC	Catch
Bering Sea/Eastern Aleutian Islands (other gear)	21,795	21,181
Central Aleutian Islands		
TAC	27,380	24,512
HLA Limit	16,428	12,229
Western Aleutian Islands		
TAC	8,880	8,401
HLA Limit	5,328	4,085
CDQ		
Bering Sea/Eastern AI	1,784	1,755
Central AI	2,220	1,811
Western AI	720	692
Total	62,779	58,352

2007 Area 542 & 543 Harvest Limitation Area Fishery

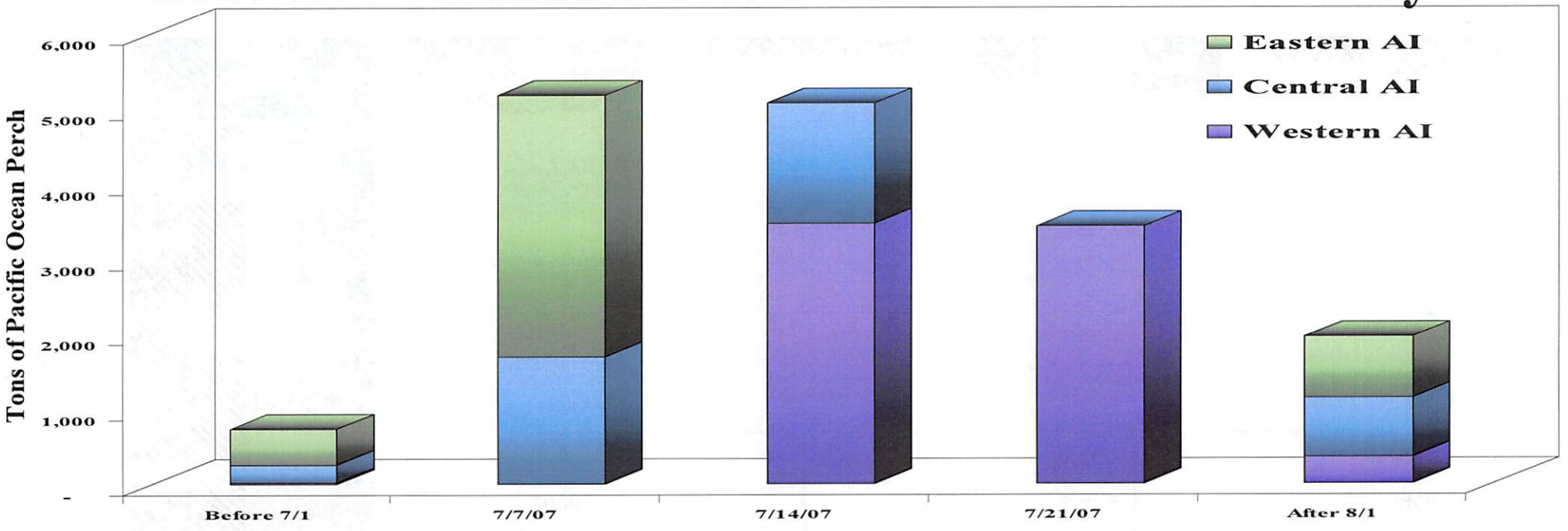
	Vessels		Fishery Dates	
	Area 542	**Area 543**	**Open**	**Close**
HLA 1	Alaska Juris	Alaska Warrior	5-Feb	19-Feb
	Alaska Ranger	Seafisher		
HLA 2	Alaska Warrior	Alaska Juris	21-Feb	7-Mar
	Seafisher	Alaska Ranger		
HLA 1	Alaska Juris	Alaska Ranger	13-Sep	20-Sep
	Alaska Warrior	Alaska Spirit		
	Constellation	Alaska Victory		
	Seafisher	Ocean Peace		
	Seafreeze Alaska			
HLA 2	Alaska Ranger	Alaska Juris	22-Sep	29-Sep
	Alaska Spirit	Alaska Warrior		
	Alaska Victory	Constellation		
	Ocean Peace	Seafisher		
	U.S. Intrepid	Seafreeze Alaska		
	American No. 1			

2004 – 2007 BSAI Northern Rockfish Retention by Target



Northern Rockfish	TAC	Catch	Percentage of Retention
2004	4,625	4,280	9%
2005	4,625	3,746	21%
2006	4,163	3,424	24%
2007	7,576	3,992	28%

2007 BSAI Pacific Ocean Perch Directed Fishery



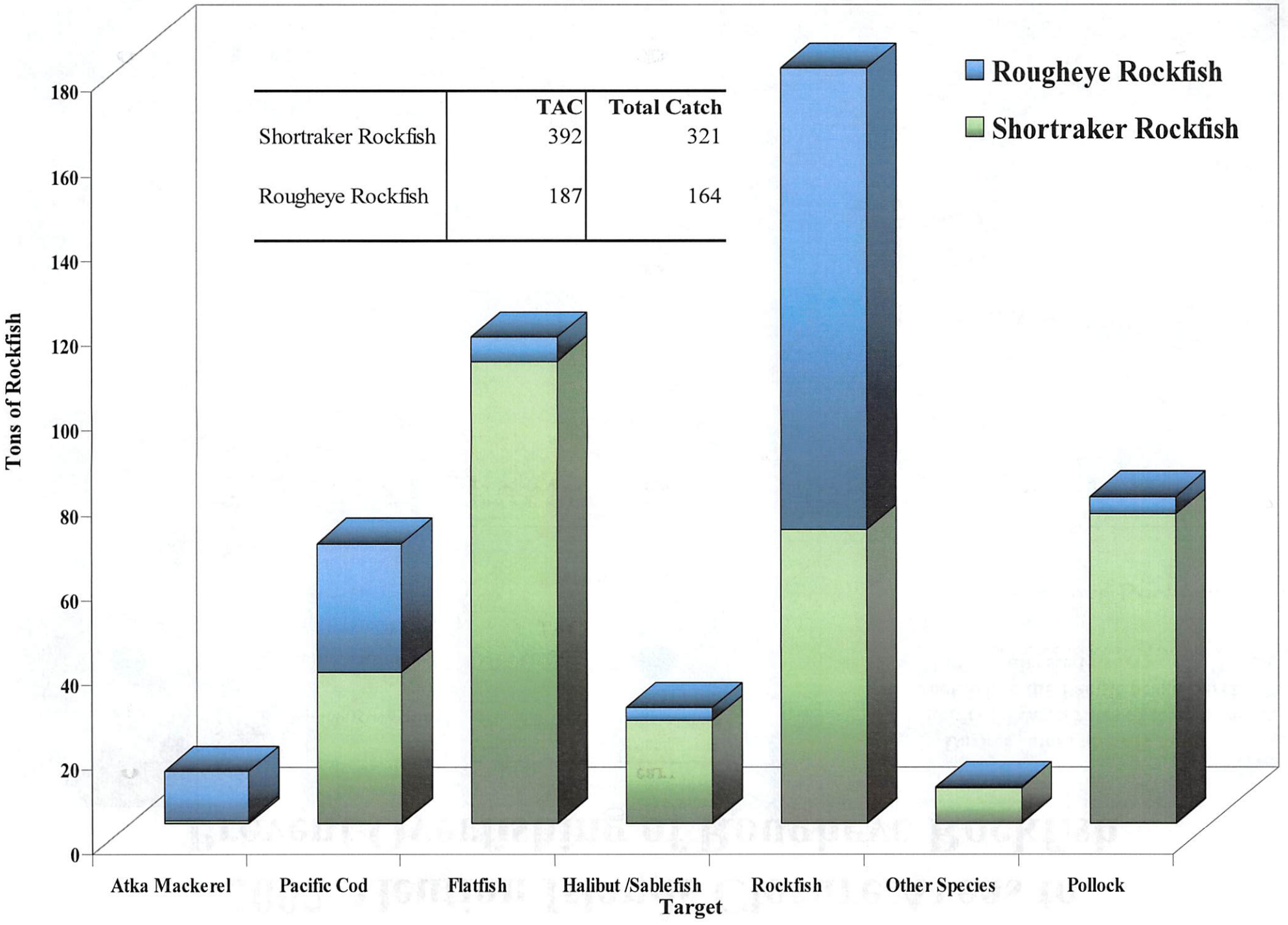
Fishery		TAC	Catch	*Open*	*Close*
Eastern AI					
		4,598	4,781	July 1	July 6
	CDQ	373	335		
Central AI					
		4,672	4,316	July 1	July 10
	CDQ	379	231		
Western AI					
		7,141	7,280	July 1	July 18
	CDQ	579	544		

CDQ catch occurs throughout the year.

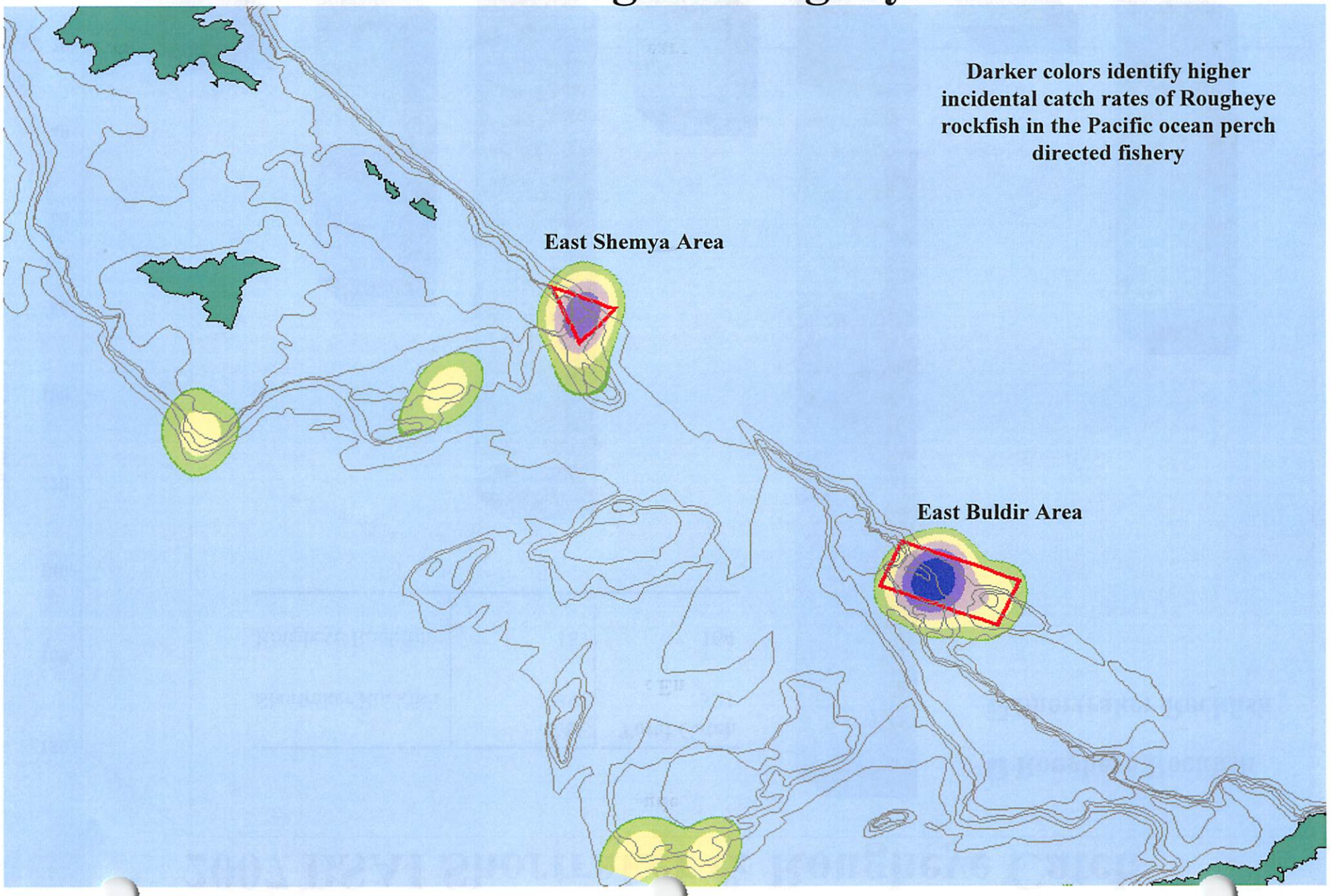
Non CDQ catch includes inc al catch of POP in other targets.

2007 BSAI Shortraker & Rougheye Catch

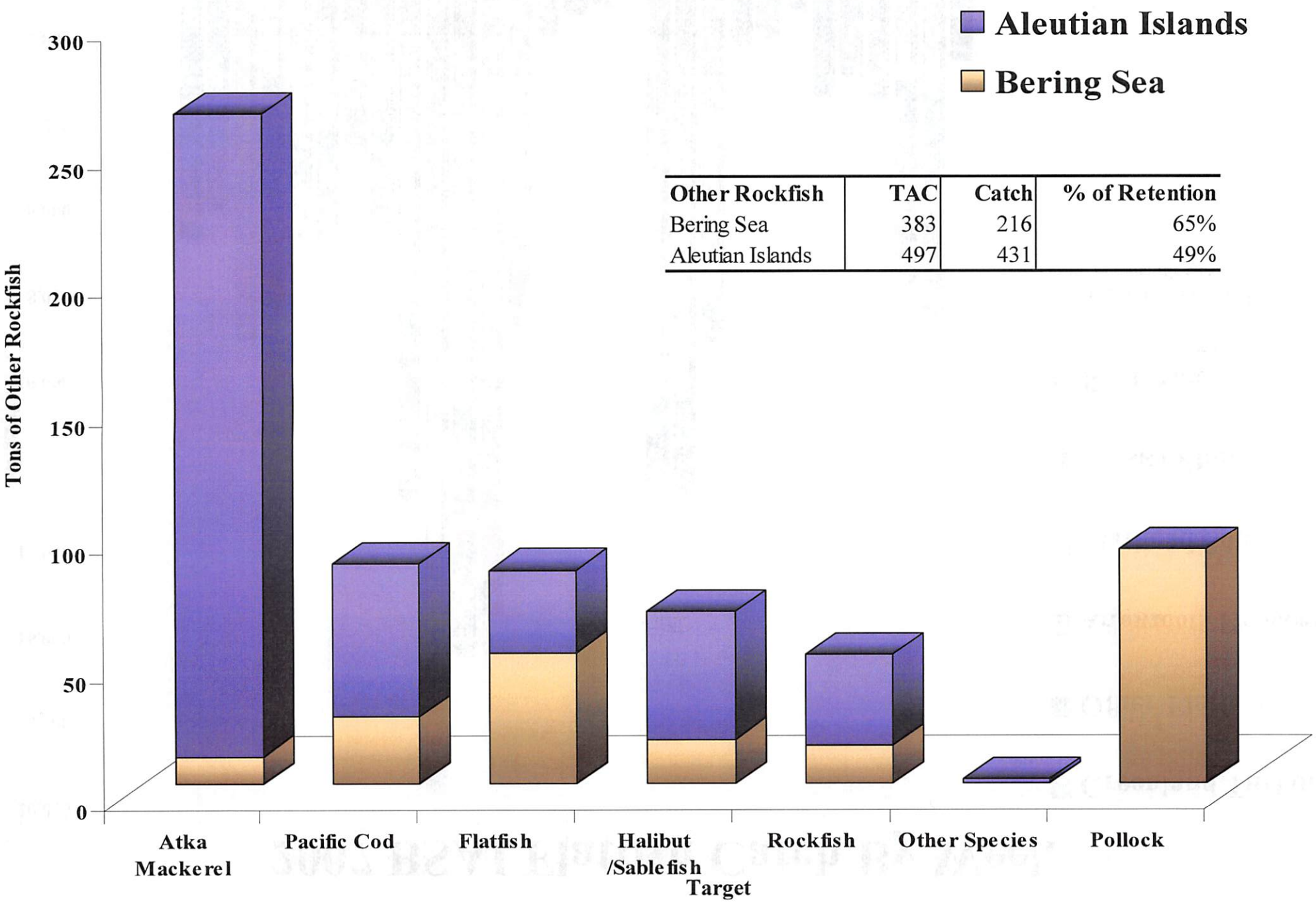
	TAC	Total Catch
Shortraker Rockfish	392	321
Rougheye Rockfish	187	164



2007 Aleutian Islands Closure Areas to Prevent Overfishing of Rougheye Rockfish

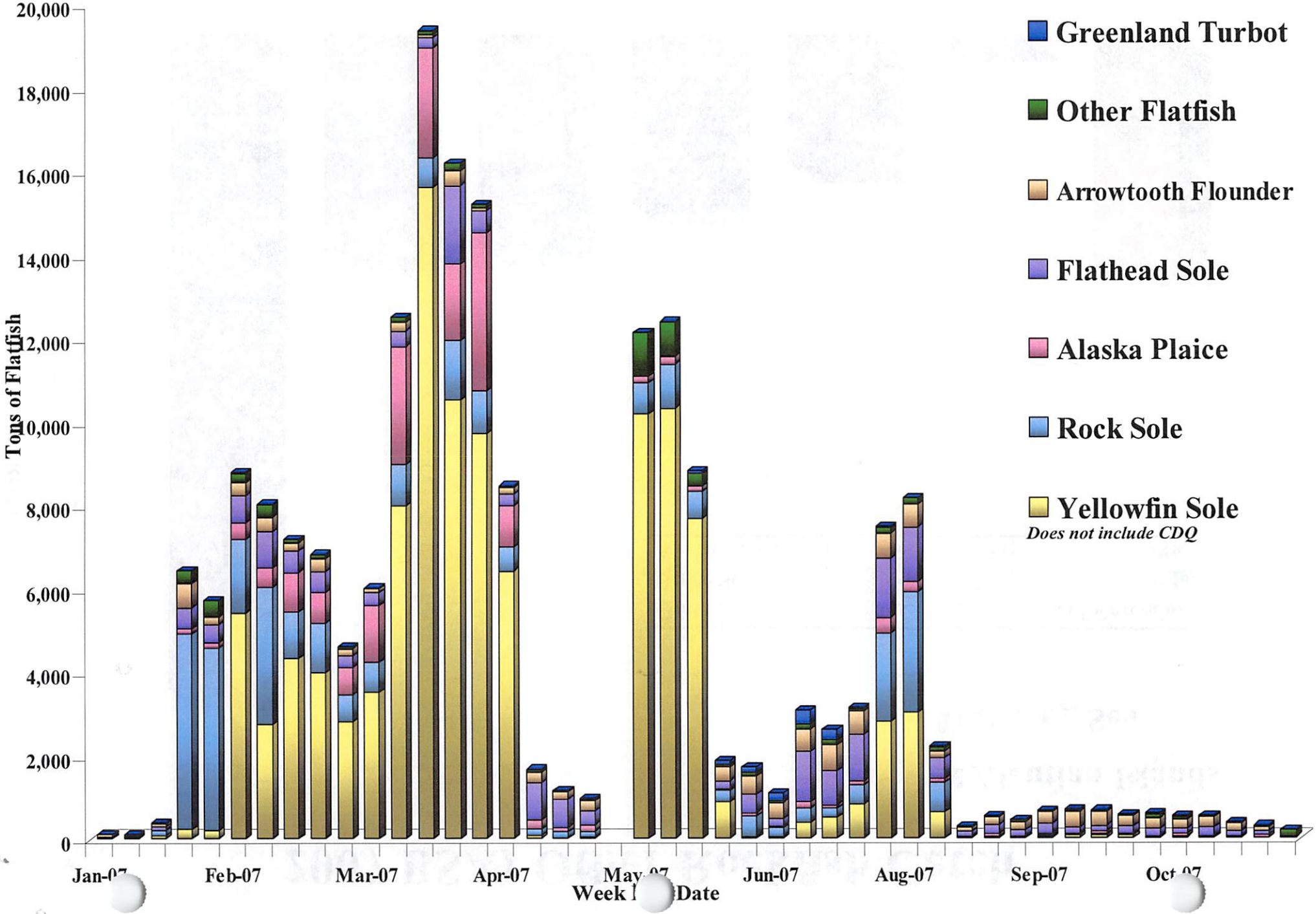


2007 BSAI Other Rockfish Catch



Other Rockfish	TAC	Catch	% of Retention
Bering Sea	383	216	65%
Aleutian Islands	497	431	49%

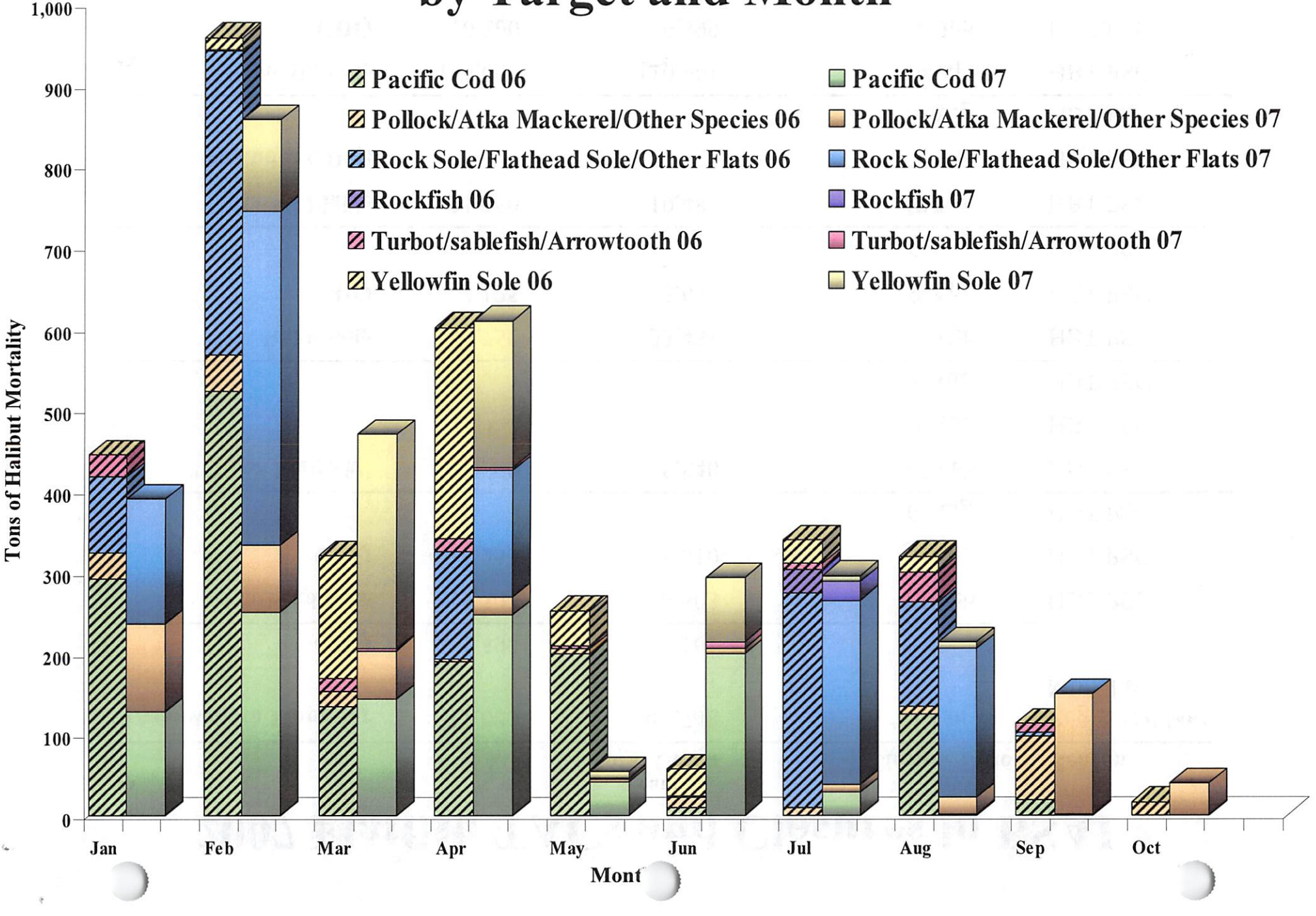
2007 BSAI Flatfish Catch By Week



2007 Flatfish TACs and Closures in BSAI

	TAC	Total Catch	Closure Date	Reason
Arrowtooth Flounder	17,000	10,748	1-Jan	Reg & Halibut Mortality
CDQ	1,500	1,161		
Flathead Sole	25,500	18,503	17-Feb	HBT PSC
CDQ	2,250	1,010	9-Apr	HBT PSC
			6-Aug	HBT PSC
"Other Flatfish"	8,500	5,840	17-Feb	HBT PSC
			9-Apr	HBT PSC
			6-Aug	HBT PSC
Rock Sole	46,750	33,438	17-Feb	HBT PSC
CDQ	4,125	3,637	9-Apr	HBT PSC
			6-Aug	HBT PSC
Alaska Plaice	21,250	19,483	17-Feb	HBT PSC
(includes CDQ)			9-Apr	HBT PSC
			6-Aug	HBT PSC
Yellowfin Sole	115,600	110,901	19-Apr	HBT PSC
CDQ	10,200	9,399	10-Jun	HBT PSC
			6-Aug	HBT PSC

2006/2007 BSAI Trawl Halibut Mortality by Target and Month



2007 Trawl Halibut Mortality in the BSAI

	Limit	Total Mortality
Pacific Cod	1,334	1,042
Rockfish	69	23
Pollock/Atka Mackerel/Other Species	232	503
Turbot/Sablefish/Arrowtooth flounder	0	17
Total Halibut Mortality (yellowfin sole and rock sole/flathead/other flatfish categories)	1,765	1,794
Total Halibut Mortality	3,400	3,380

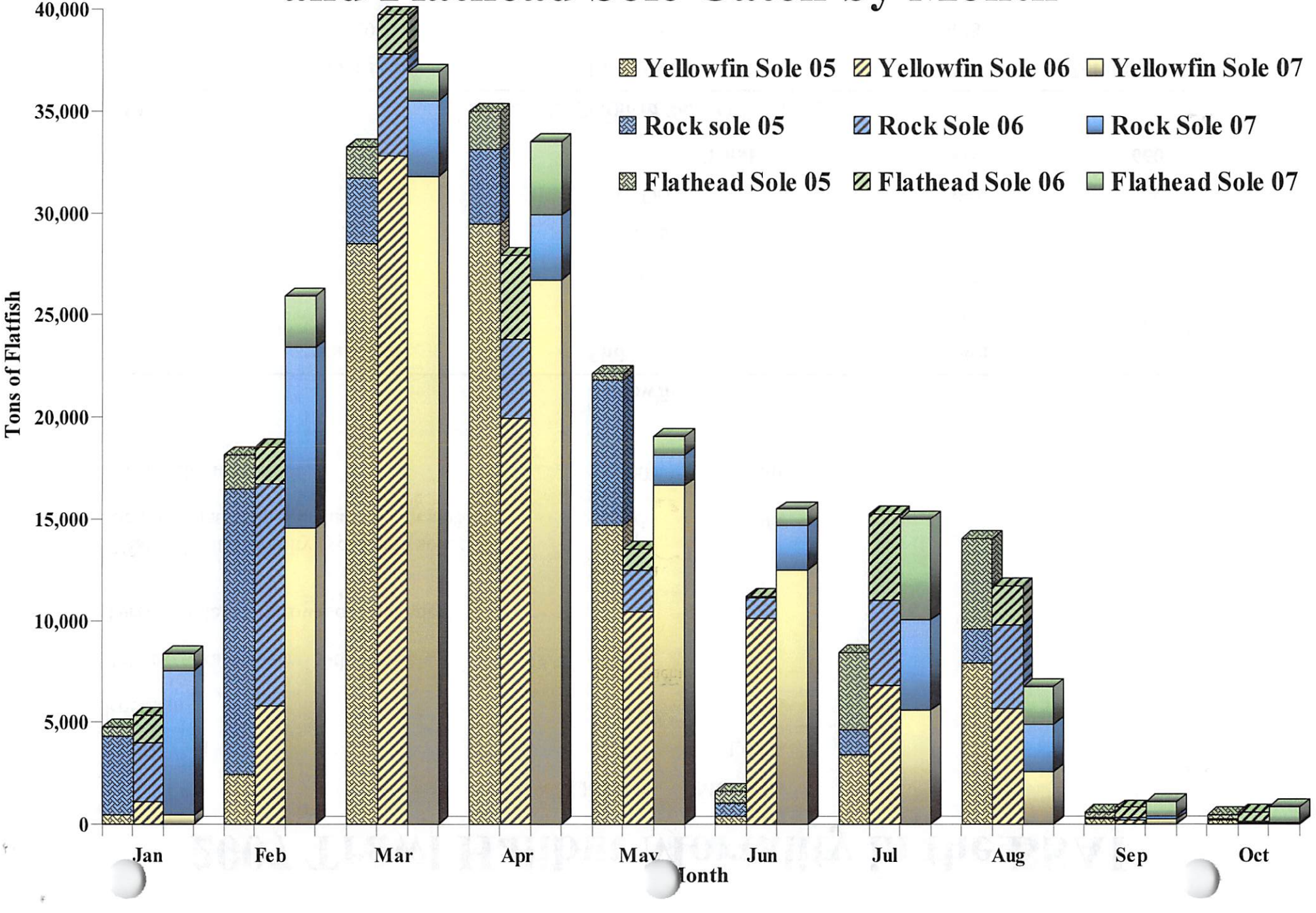
Yellowfin Sole

Season	Start Date	End Date	Limit	Total Catch
1	20-Jan	1-Apr	312	377
2	1-Apr	21-May	195	181
3	21-May	1-Jul	49	88
4	1-Jul	31-Dec	380	14
		Total	**936**	**660**

Rock Sole, Flathead Sole, Other Flatfish

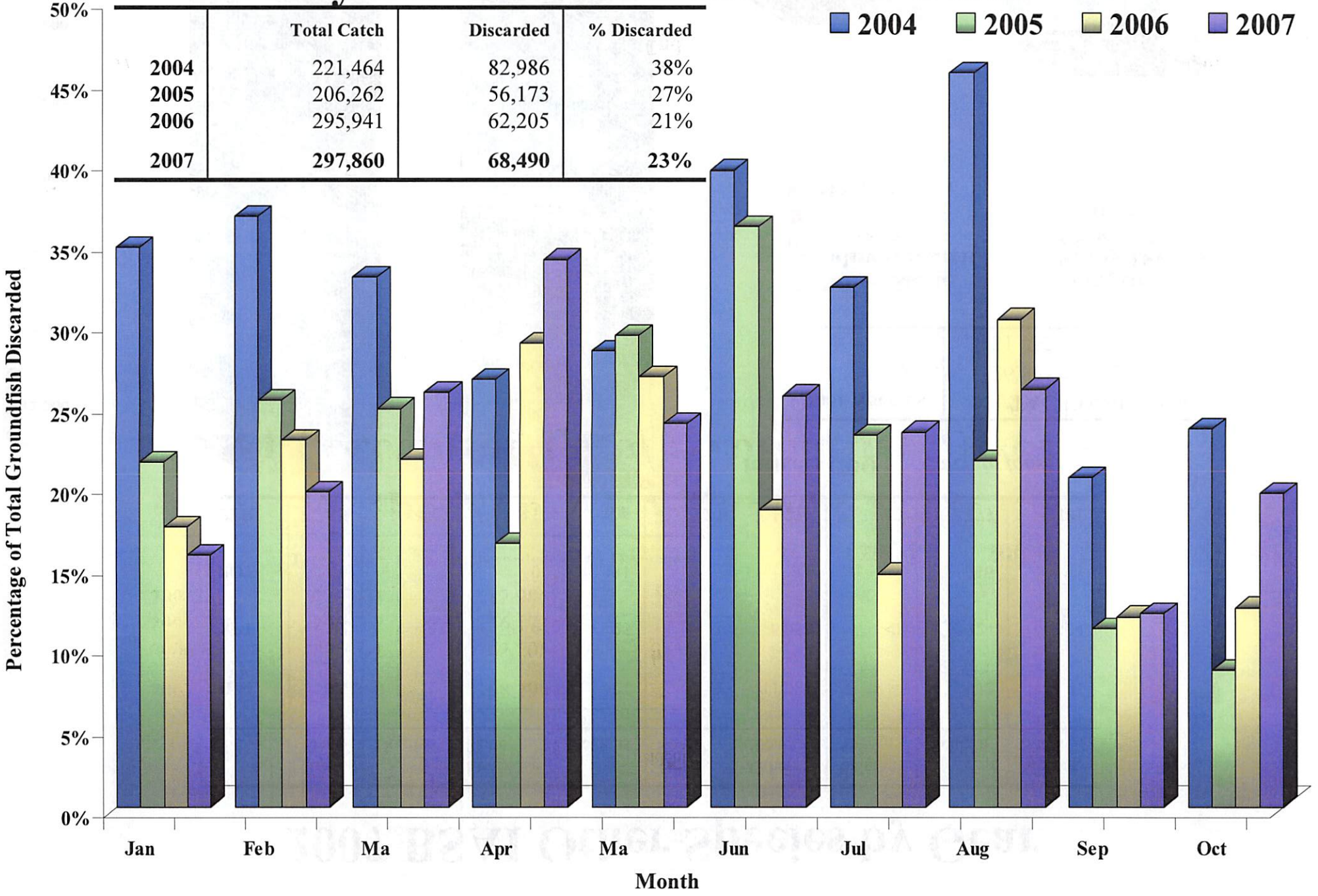
Season	Start Date	End Date	Limit	Total Catch
1	20-Jan	1-Apr	498	377
2	1-Apr	1-Jul	164	156
3	1-Jul	31-Dec	167	411
		Total	**829**	**1,134**

2005-2007 BSAI Yellowfin Sole, Rock Sole, and Flathead Sole Catch by Month



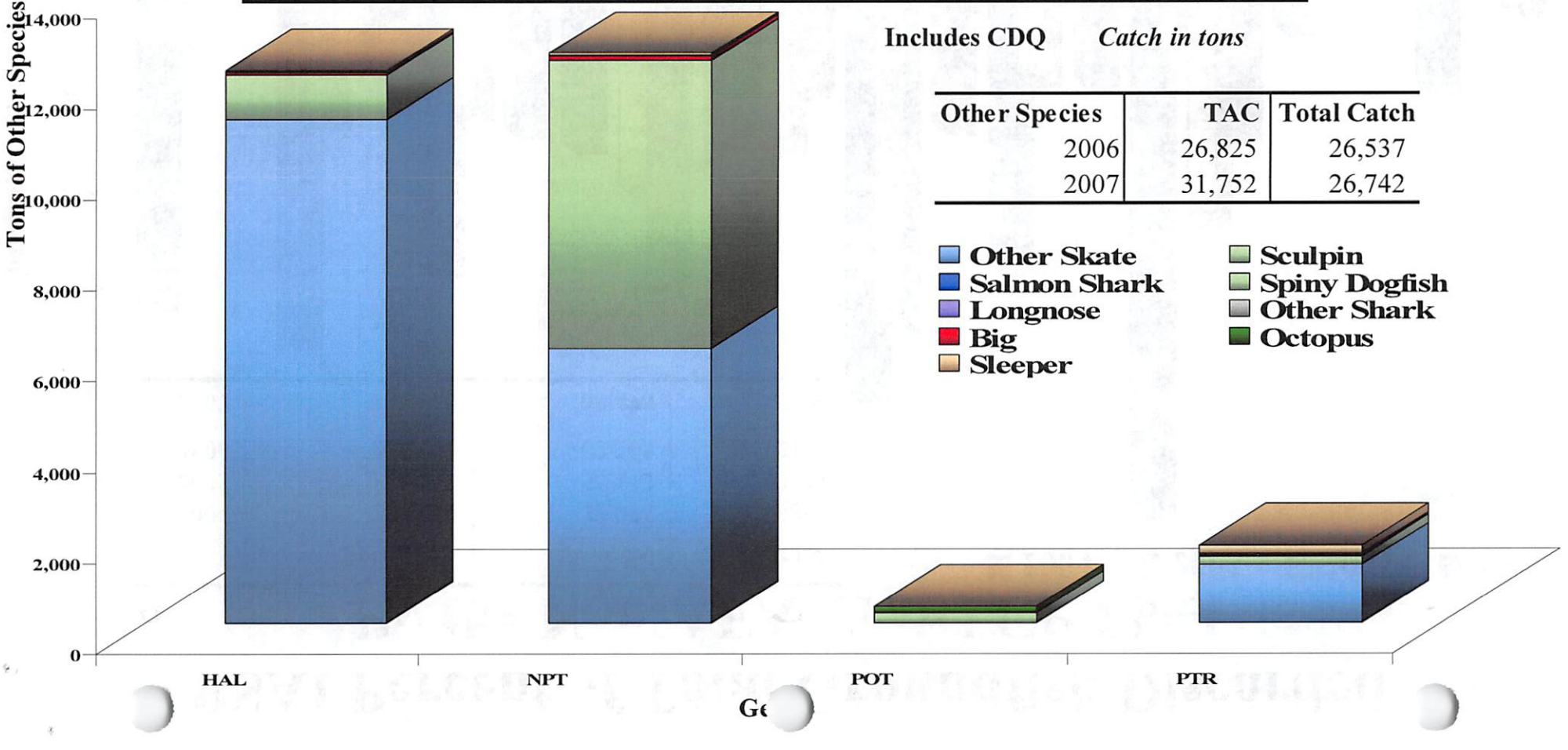
BSAI Percent of Total Groundfish Discarded By the Non-AFA Trawl CP Fleet

	Total Catch	Discarded	% Discarded
2004	221,464	82,986	38%
2005	206,262	56,173	27%
2006	295,941	62,205	21%
2007	**297,860**	**68,490**	**23%**



2007 BSAI Other Species by Gear

	Big Skate	Dogfish	Longnose Skate	Octopus	Other Shark	Other Skates	Salmon Shark	Sculpin	Sleeper Shark
HAL	43	2	<1	21	2	11,081		972	41
NPT	92	< 1	4	25	3	6,053	<1	6,324	34
POT	0		0	131		<1		216	<1
PTR	5	< 1	<1	4	20	1,271	42	173	181

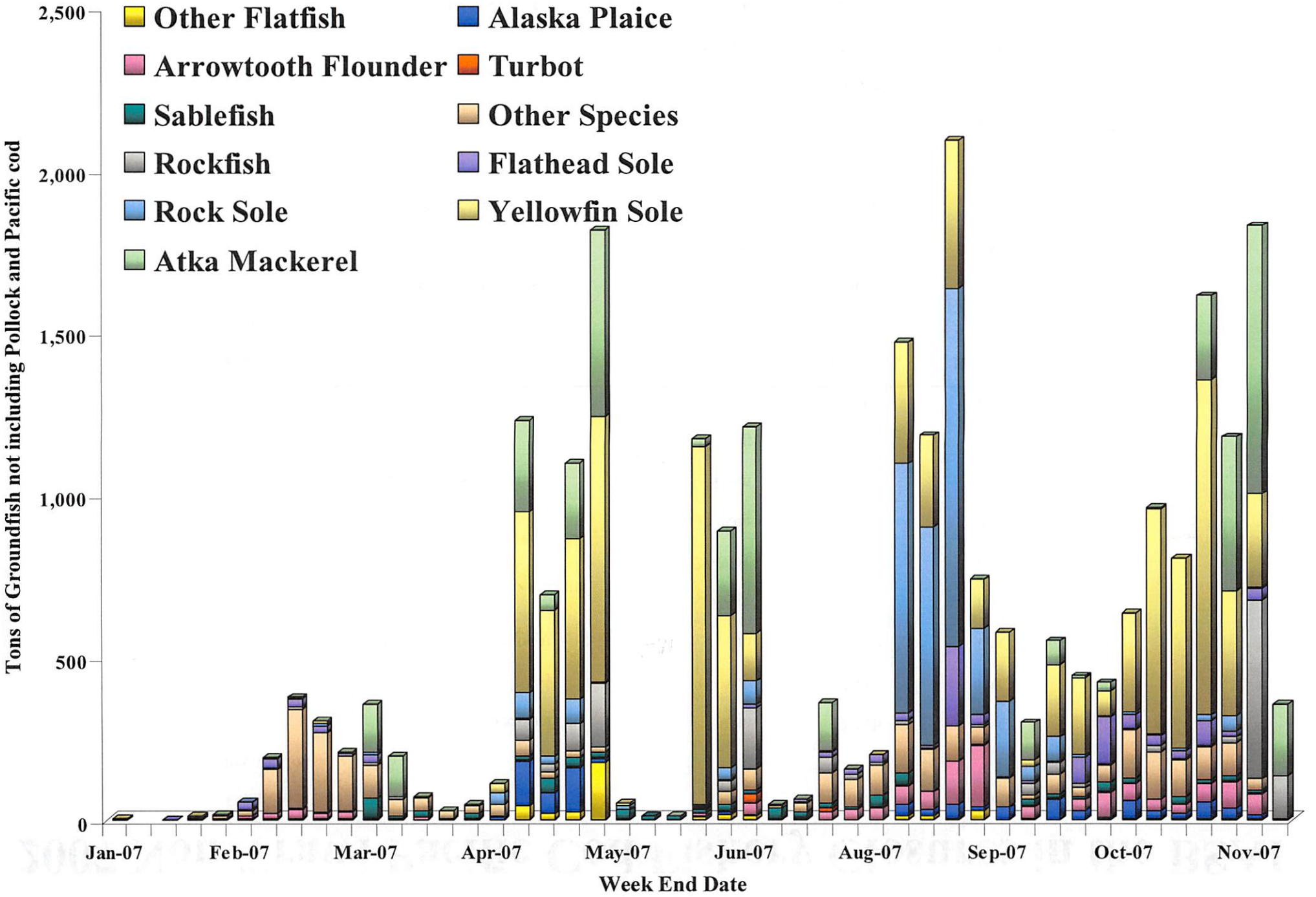


Includes CDQ ***Catch in tons***

Other Species	TAC	Total Catch
2006	26,825	26,537
2007	31,752	26,742

- Other Skate
- Salmon Shark
- Longnose
- Big
- Sleeper
- Sculpin
- Spiny Dogfish
- Other Shark
- Octopus

2007 CDQ Non Pollock / Pacific Cod Catch By Species

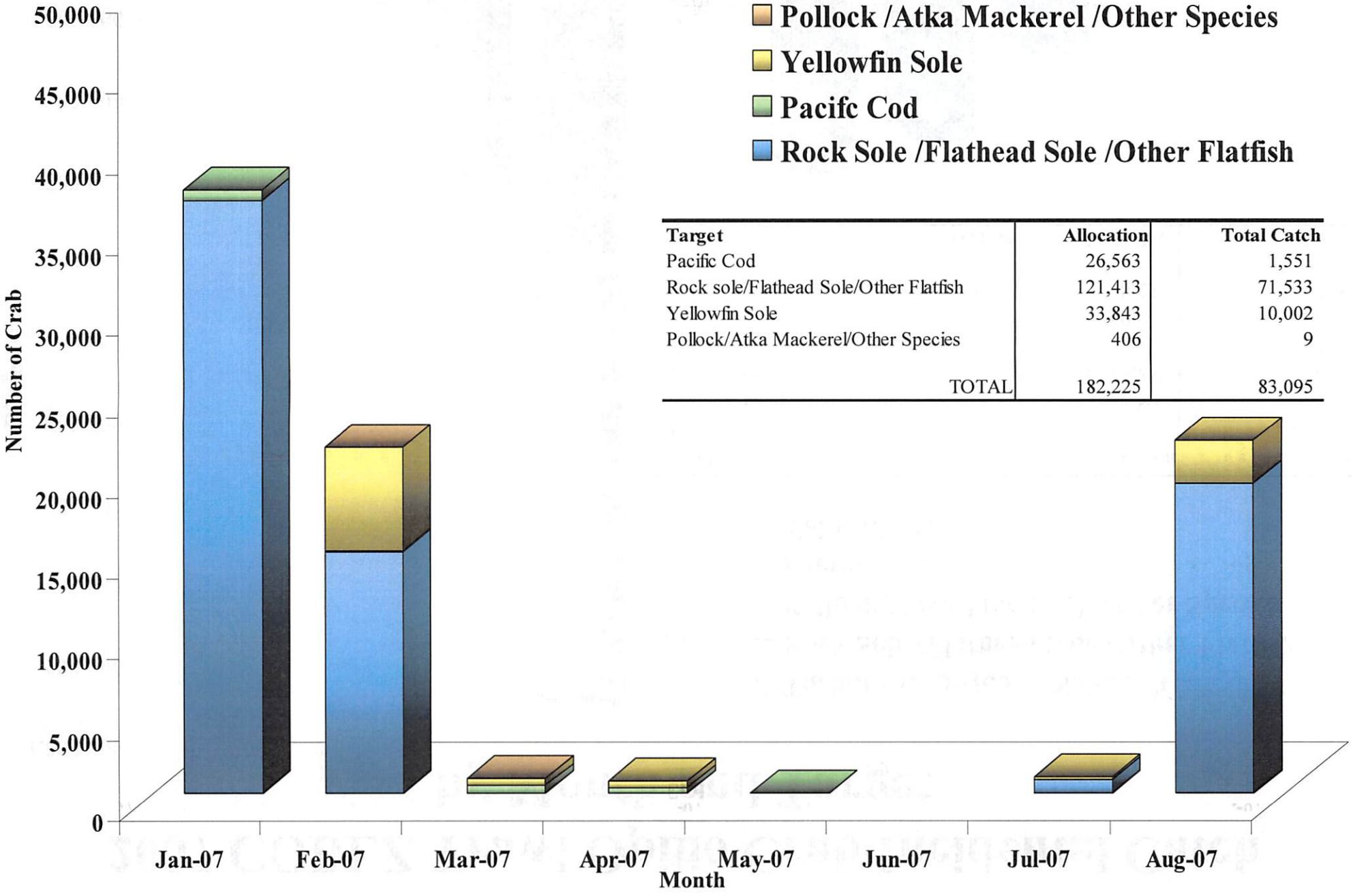


2007 Non-Trawl Pacific Cod Fishery Closures in the BSAI

Hook-and-Line		**Open**	**Closed**	**Reason**
Pacific Cod				
	Catcher processors	1-Jan	12-Feb	TAC
		15-Aug	2-Oct	TAC
	Catcher vessels < 60 ft	1-Jan	30-Mar	TAC
		30-Apr	15-May	TAC
		27-May	6-Jun	TAC
		15-Aug		Reg
	Catcher vessels >= 60 ft	1-Jan	21-Feb	TAC
		15-Aug		Reg
Greenland Turbot		1-May	14-Jul	TAC

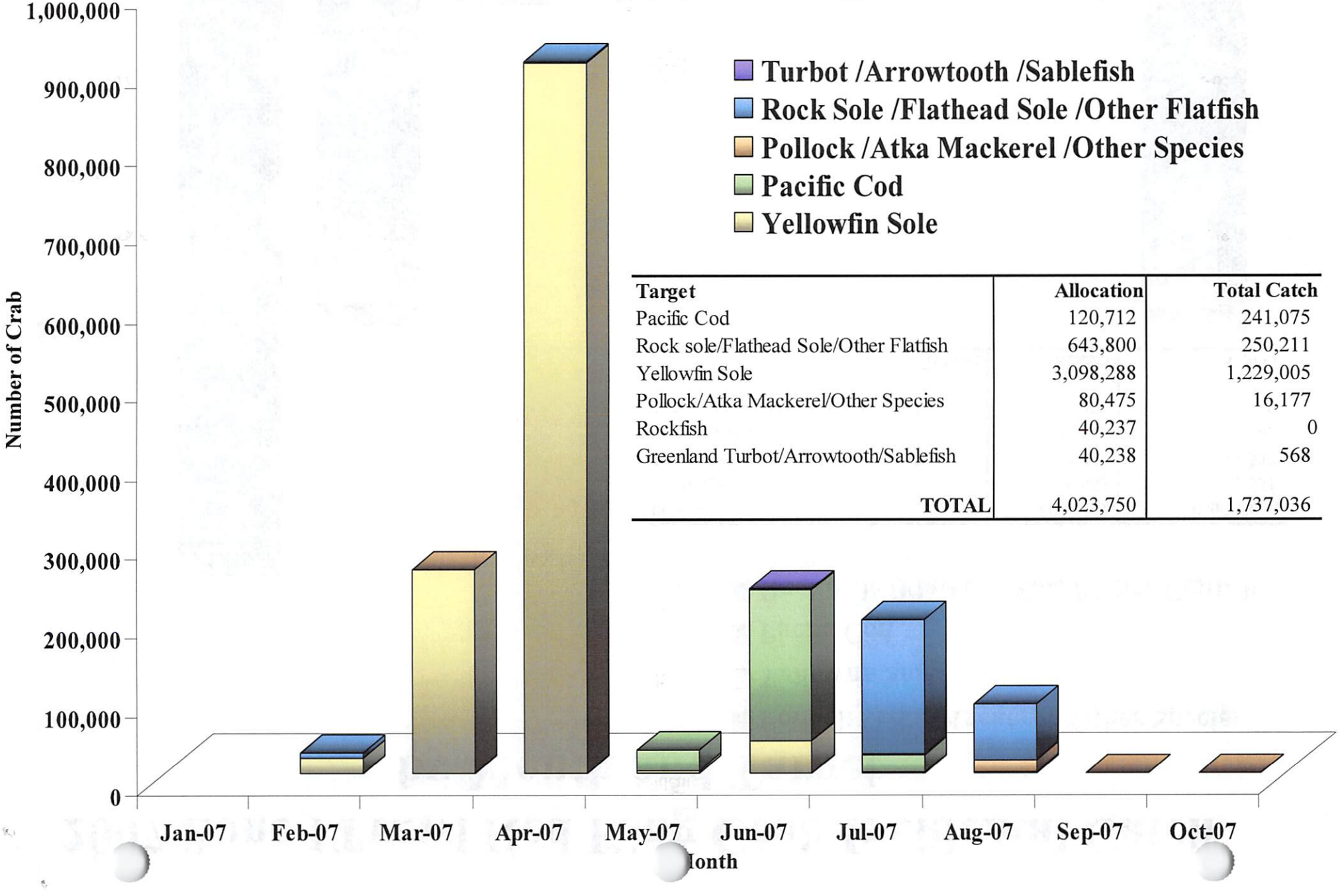
Pot		**Open**	**Closed**	**Reason**
Pacific Cod				
	Catcher processor	1-Jan	20-Feb	TAC
		1-Sep	28-Sep	TAC
	Catcher vessel < 60	1-Jan	30-Mar	TAC
		30-Apr	15-May	TAC
		27-May	6-Jun	TAC
		1-Sep	28-Sep	TAC
		2-Oct	18-Oct	TAC
	Catcher vessel >= 60	1-Jan	26-Jan	TAC
		1-Sep	28-Sep	TAC
		2-Oct	18-Oct	TAC

2007 Zone 1Trawl Red King Crab Incidental Catch by Month and Target



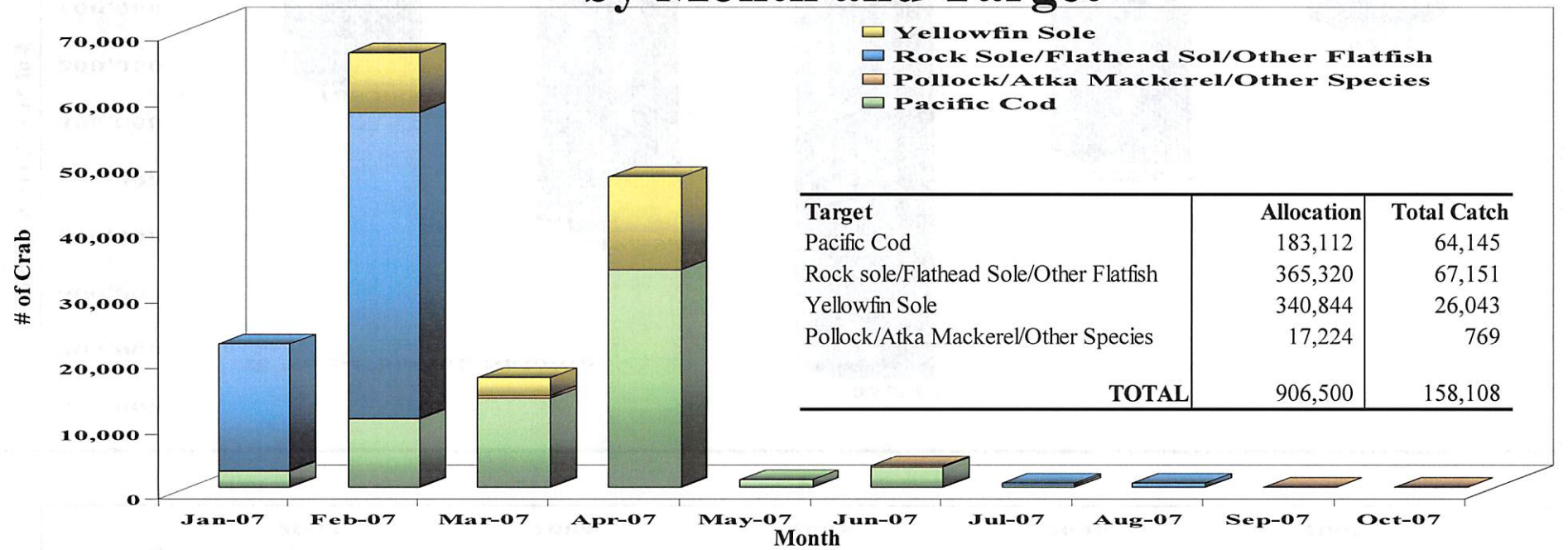
Target	Allocation	Total Catch
Pacific Cod	26,563	1,551
Rock sole/Flathead Sole/Other Flatfish	121,413	71,533
Yellowfin Sole	33,843	10,002
Pollock/Atka Mackerel/Other Species	406	9
TOTAL	182,225	83,095

2007 COBLZ Trawl Opilio Crab Incidental Catch by Month and Target



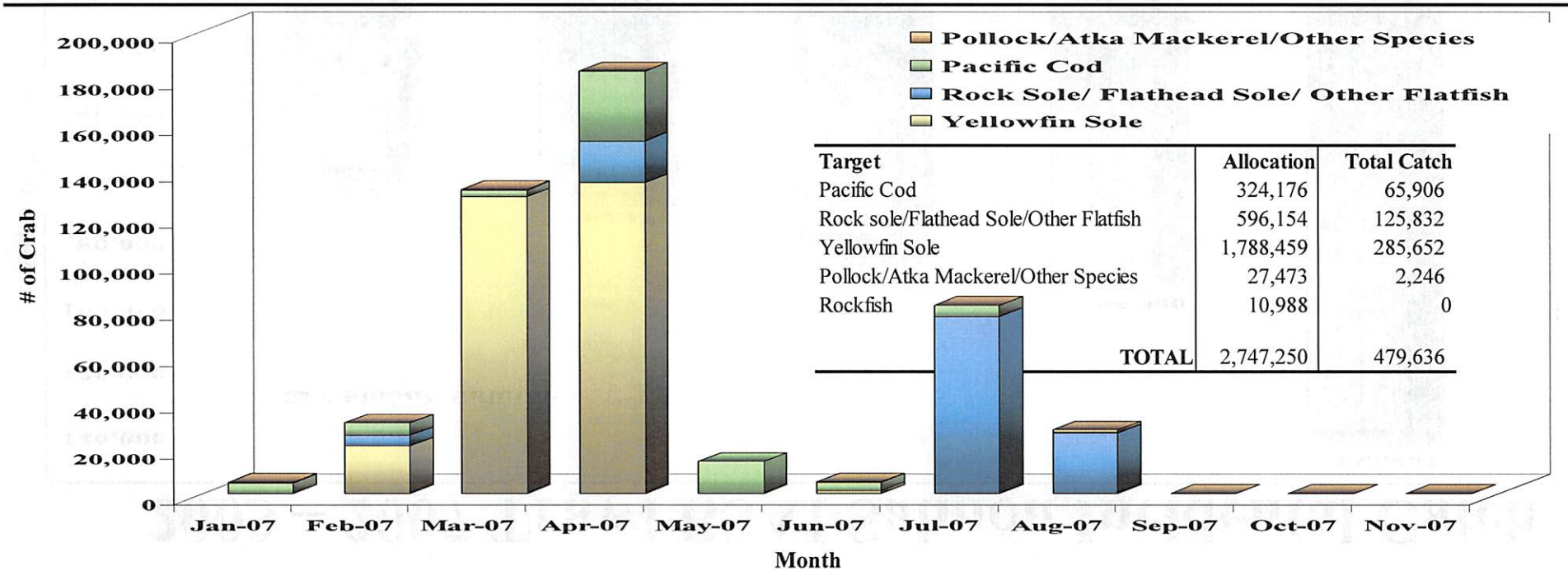
Target	Allocation	Total Catch
Pacific Cod	120,712	241,075
Rock sole/Flathead Sole/Other Flatfish	643,800	250,211
Yellowfin Sole	3,098,288	1,229,005
Pollock/Atka Mackerel/Other Species	80,475	16,177
Rockfish	40,237	0
Greenland Turbot/Arrowtooth/Sablefish	40,238	568
TOTAL	4,023,750	1,737,036

Zone 1 & 2 Trawl *C. bairdi* Crab Incidental Catch by Month and Target



ZONE 1

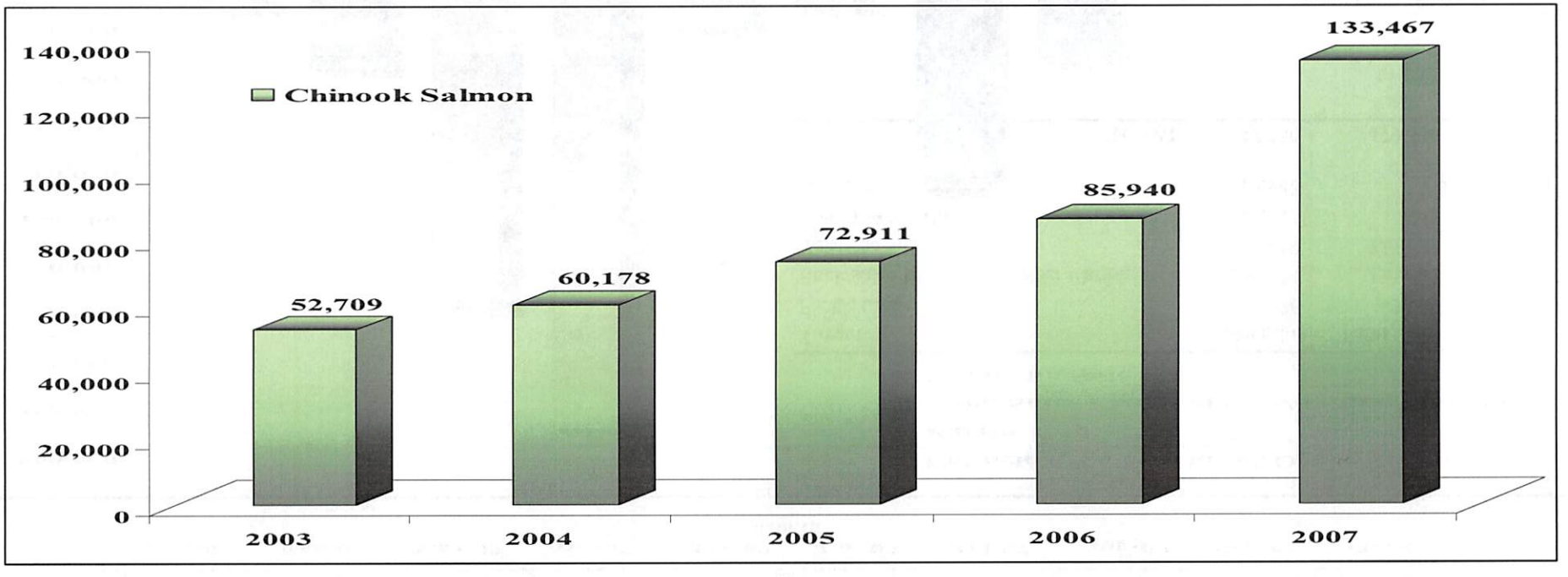
Target	Allocation	Total Catch
Pacific Cod	183,112	64,145
Rock sole/Flathead Sole/Other Flatfish	365,320	67,151
Yellowfin Sole	340,844	26,043
Pollock/Atka Mackerel/Other Species	17,224	769
TOTAL	906,500	158,108



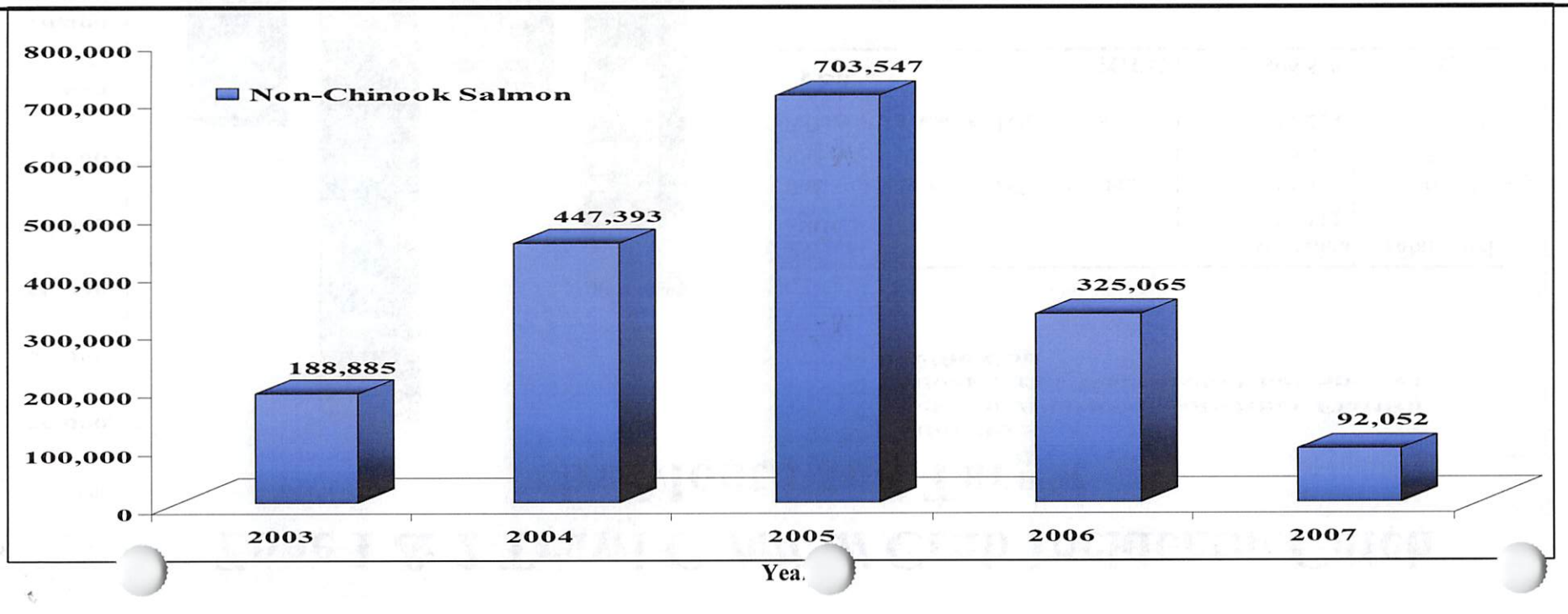
ZONE 2

Target	Allocation	Total Catch
Pacific Cod	324,176	65,906
Rock sole/Flathead Sole/Other Flatfish	596,154	125,832
Yellowfin Sole	1,788,459	285,652
Pollock/Atka Mackerel/Other Species	27,473	2,246
Rockfish	10,988	0
TOTAL	2,747,250	479,636

2003 – 2007 Trawl BSAI Salmon Incidental Catch

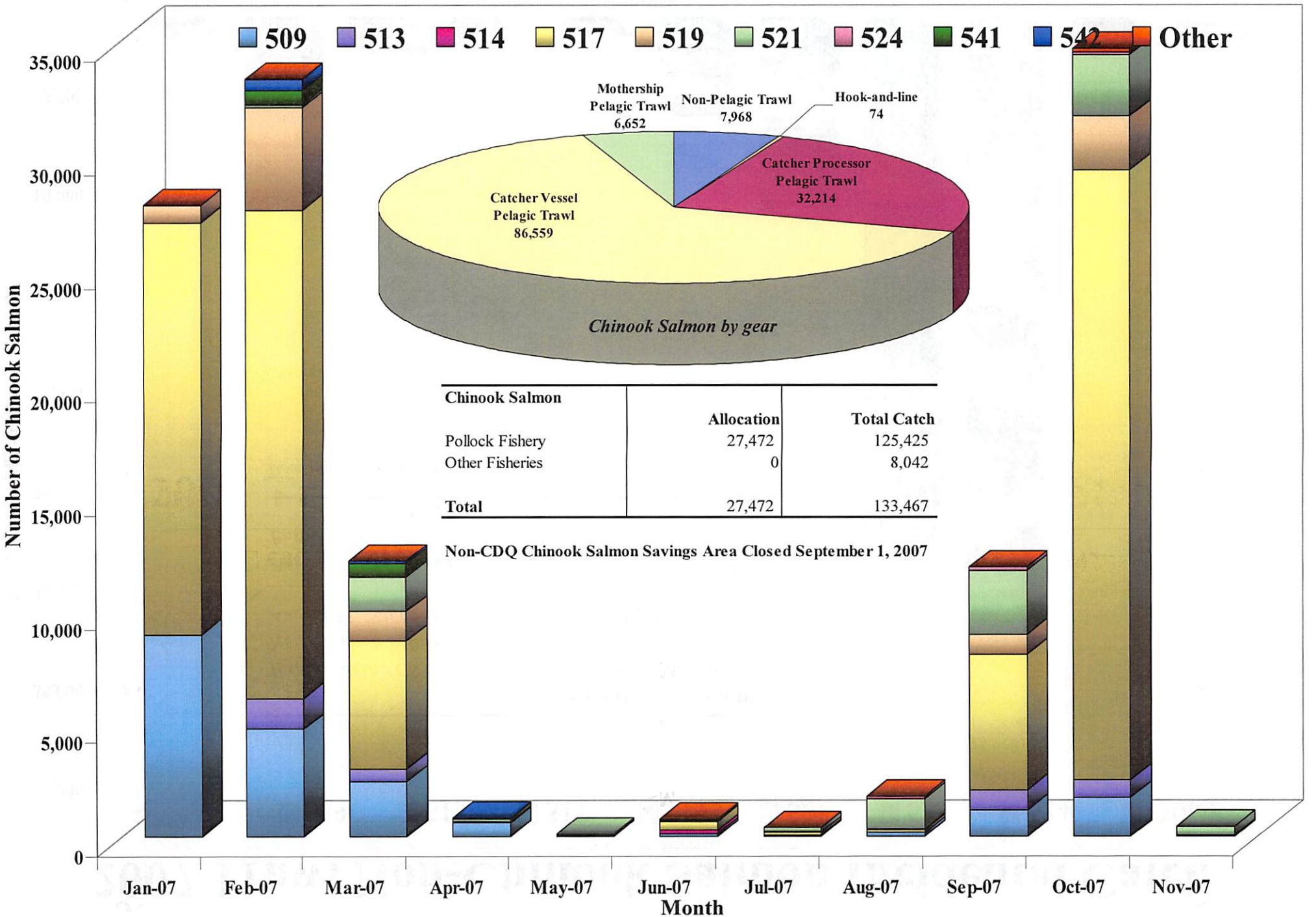


Chinook



Non-Chinook

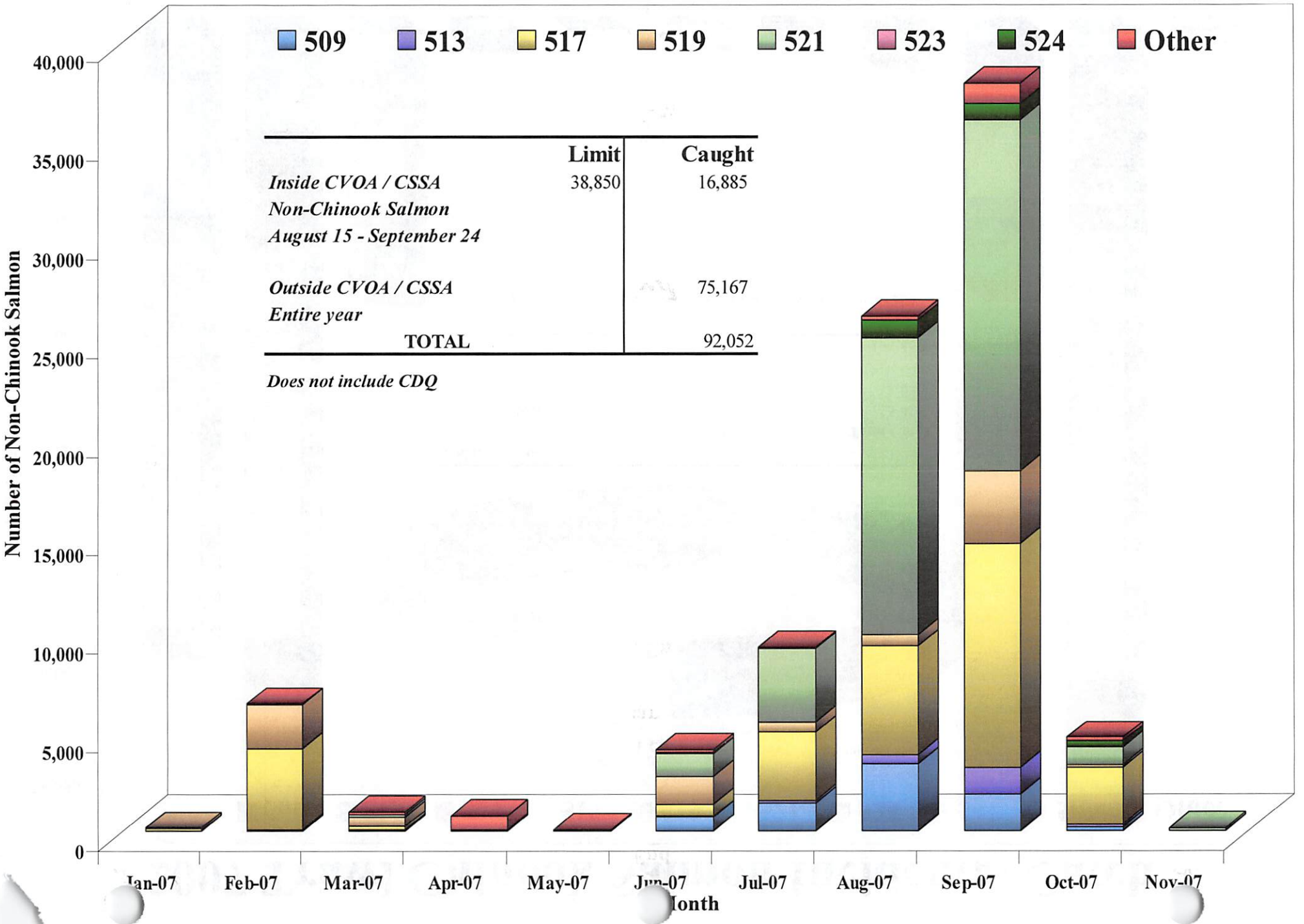
2007 Trawl Chinook Salmon Incidental Catch



Chinook Salmon	Allocation	Total Catch
Pollock Fishery	27,472	125,425
Other Fisheries	0	8,042
Total	27,472	133,467

Non-CDQ Chinook Salmon Savings Area Closed September 1, 2007

2007 Trawl Non-Chinook Salmon Incidental Catch



	Limit	Caught
Inside CVOA / CSSA Non-Chinook Salmon August 15 - September 24	38,850	16,885
Outside CVOA / CSSA Entire year		75,167
TOTAL		92,052

Does not include CDQ

AGENDA B-2
DECEMBER 2007
Supplemental

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
P.O. Box 21668
Juneau, Alaska 99802-1668

November 5, 2007

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue
Anchorage, AK 99501-2252

Dear Mr. Olson:

At its October 2007 meeting, the North Pacific Fishery Management Council (Council) and the National Marine Fisheries Service (NMFS) learned from the Alaska Department of Fish and Game (ADF&G) that the 2006 charter halibut guideline harvest level was exceeded in International Pacific Halibut Commission (IPHC) Areas 2C and 3A by 26 percent and 0.37 percent, respectively. Based on this information, the Council declined to pursue additional management measures to restrict the 2008 charter halibut fishery in IPHC Area 3A. The Council also acknowledged that its proposed management measures for the 2008 IPHC Area 2C charter fishery as adopted in June 2007 would continue to be developed by NMFS as a proposed rule. These proposed measures include a four-fish annual catch limit by guided anglers in addition to the harvest restrictions already in place during the 2007 season.

Council staff recently provided a draft supplement to the Environmental Assessment/Regulatory Impact Review/Initial Regulatory Flexibility Analysis (EA/RIR/IRFA) supporting the Council's June 2007 action. The updated analysis suggests the following: (1) the 2007 charter fishery in Area 2C may not have exceeded the GHL, and (2) if the Council's proposed measures are implemented in 2008, harvest likely would fall below GHL. Unless directed otherwise by the Council, we intend to continue to develop the proposed rule to implement the proposed management measures for the IPHC Area 2C charter halibut fishery as adopted by the Council. However, given the new supplemental information provided by ADF&G and Council staff, we likely will focus public review and comment on whether less restrictive measures for the Area 2C halibut charter fishery might be more appropriate to maintain harvest at the GHL level. If the proposed rule is published as scheduled, the Council will have opportunity to comment on the proposed action and the updated EA/RIR/IRFA during its February 2008 meeting.

Sincerely,

James W. Balsiger
Administrator, Alaska Region

Don Bremner
PO Box 20161
Juneau, Alaska 99802

Dec 5, 207

RE: Comment & recommendations regarding agenda item B-2, NMFS, and In-season Management Report

Comment:

As a resident of Alaska and a Tribal member of Central Council Tlingit and Haida Indian Tribes of Alaska the by-catch volumes of halibut and salmon is alarming.

- Halibut by-catch- 11,420,000 lbs.
- Chinook salmon- 133,467 fish
- Non-Chinook- 92,052 fish

Statement:

While our rural villages are living with high poverty levels, high unemployment, and low per capita incomes, it is practically insane and absurd that this volume of resource is being allowed to be taken from the over-all harvest amounts with no consideration given to volume, value, and/or restriction limitations.

Recommendations:

- That the NPFMC cap the by-catch amounts of halibut and salmon to current levels.
- That the NPFMC address opportunities of converting the halibut and salmon by-catch volumes to monetary value.
- That the monetary value be placed into an account or program for sustaining and development of coastal villages in areas (2C), (3A), and (3B).
- That the NPFMC form a Native subsistence and economic development panel to advise and make recommendations to the NPFMC regarding the management and implementation of these recommendations.

Don Bremner
Southeast Alaska Inter-Tribal Fish & Wildlife Commission
P.O. Box 20161
Juneau, Alaska 99802

December 5, 2007

RE: Supportive Comment for ADF& G report, Subsistence Harvest of Pacific Halibut in Alaska"; and Recommendations regarding By-catch issues of halibut and salmon

Comment:

- As an individual Tribal member that benefits from the subsistence halibut program I support the purpose & findings of the State's techniical report No. 333.

- As a member of the Subsistence Halibut Working Group we reviewed the purpose and findings of the techincal report and recognize the value of the findings.

Statement:

Aside from the program preserving our C&T subsistence way of life in regard to halibut, rockfish, and cod, this small program allows rural villages an opportunity to participate in the research & findings.

- By allowing for active participation in the study helps develop a system of communication & collaboration with the primary reserachers.

- Through the study process collaboration has developed into a Native community/user group partnership with the ADF&G division of subsistence.

- When you look at the small volume (1,147,725 lbs.) of subsistence harvest in comparison to the total halibut harvest in Alaska it might seem like a minuscule amount not warranting extensive research to affect your decision-making process.

- However, when you weigh-in the C&T, and cultural value of halibut as a Native food, and

- When you weigh-in the estimated cash replacement value of this protein source the value ranges from (5-12) million dollars. Money that is not easiliy generated in our native villages.

- As a Tribal member many of us view this subsistence report and findings as our only voice at the NPFMC table, and in the State of Alaska.

- Without the report findings we believe that you would not see us, nor hear our voices.

So, as Tribal members of rural Alaska we realize the small amount of subsistence harvest as critical to our rural subsistence economy and way of life. Without subsistence halibut many of our individual Tribal members way of life would decline to critical levels of poverty, as there is no current cash economy or protectin source to replace this subsistence species.

Recommendations:

To keep our voices and seat at the NPFMC table we request the NPFMC advocate and support (5) more years of funding for the subsistence halibut harvest studies in Alaska, and that coordination begin with Jim Fall and his staff take place immediately.

Justification:

There are a lot of reasons to support this recommendation, some are as follows;

- The first (5) years of study now nearing its conclusion established a good track record of valuable information.
- The study has not only benefited the Native community, but, the NMFS, State of alaska, and law enforcement.
- The halibut industry, State of Alaska, and federal agencies management programs are undergoing huge ownership and structural schemes and there is no evidence that the subsistence halibut will continue as a viable program.
- There are huge climate change effects taking place in the Pacific Ocean and there is no reference by scientists or resource managers that subsistence halibut will be given priority in situations compelled by the industry or resource managers.

Conclusion:

As Native people we view the subsistence halibut research and findings as;

- A reflection of our Tribal member voices.
- The study and findings our our Native eyes and ears, seeing and hearing what's taking place at the State and federal level regarding this resource.
- The technical report is our only seat at the NPFMC table.

Therefore, we request your full support in funding this project for (5) more years.

Thank-you,