ESTIMATED TIME

8 HOURS

MEMORANDUM

TO:

Council, SSC and AP Members

FROM:

Clarence G. Pautzke

Executive Director

DATE:

November 29, 1994

SUBJECT:

Comprehensive Rationalization Plan (CRP)

ACTION REQUIRED

(a) Review analyses and identify alternatives of most interest.

(b) Approve document for formal public review period in early 1995.

BACKGROUND

At our September meeting in Seattle the Council reviewed the analysis prepared by staff for the license limitation alternatives for groundfish and crab fisheries (document dated September 18). Based on Council direction, that analysis was supplemented with two additional Appendices which were mailed to the Council family and public in early November. These Appendices are: (1) Appendix VII which examines two specific system configurations identified by the Council as 'high interest' configurations, and (2) Appendix VIII which examines a proposal from Midwater Trawlers Cooperative for A and B license designations. The purpose of preparing these supplemental analyses was to allow for review by the industry and public prior to the December meeting where the AP and the Council hope to further refine the license limitation alternatives for public review.

If the Council wishes to stay on track for an April 1995 decision on license limitation, we would need to release the analytical package for formal public review at this meeting. Depending on action taken at this meeting, staff could prepare additional, more detailed analysis of specific system configurations as part of this public review package. Such additional analysis could include, for example, more detail on distributional impacts by specific communities involved in the subject fisheries. Staff would also supplement the analysis with additional social impact analysis which ties the results of our distributional, economic analyses to the industry sector profiles developed under contract to Impact Assessment, Inc (IAI). This may be accomplished through a supplemental contract to IAI after the December meeting. When complete, the entire package would be made available for public review and comment, likely in February 1995, prior to a Council decision in April. The Community Profiles prepared by the Council will also be available as additional background information.

Item C-4 (a) in your notebook contains a revised list of elements and options for both the groundfish and crab license programs, which incorporates the alternatives identified in the supplementary Appendices. The specific configuration(s) examined in Appendix VII are basically patterned after the original Groundfish License System (GLS) offered by the State of Alaska in previous meetings, with two primary changes: one is the inclusion of rockfish and flathead sole in the species list for licenses in the GOA, and the other is the identification of two specific qualification periods - Option A which is June 28, 1989 - June 27, 1992 or Option B which is January 1, 1990 - December 31, 1993. Because there is an option for the qualification period, Appendix VII actually

results in two specific system configurations. Council staff will summarize the results of Appendix VII. <u>Item C-4(b)</u> contains comments received on this issue.

The other item which the Council wished to solicit industry input on is the A and B license proposal offered by MTC. This is described in Appendix VIII, and basically proposes granting limited, non-transferable licenses (permits) to those vessels which have fished since 1980, but do not meet the qualification window adopted for A licenses. Several issues arise from this proposal with regard to the nature of the proposed B permits, how such permits would be integrated into the overall license limitation program, and how they would impact the overall effectiveness of the program. Council staff will summarize these issues and the results of the preliminary analysis.

A note on Catcher/Processor numbers in the distributional Tables: The Catcher/Processor numbers in the license limitation distributional tables include vessels listed as processors in the State of Alaska fish ticket data. These vessels have applied for, and received, a processor designation from the State but were not listed as Catcher/Processors in the Federal data sources. This State processor designation allows vessel operators to be issued fish tickets by the State and process or export fish. The result is that many small vessels (58' limit seiner types for example) are designated as Catcher/Processors. The Council may wish to determine whether these vessels should be classified as Catcher/Processors or as Catcher Vessels in the license limitation analysis. If the Council classifies them as Catcher Vessels, then only vessels listed as Catcher/Processors in the Federal data would be classified as Catcher/Processors.

A total of 71 vessels were listed as Catcher/Processors in the license limitation data set from 1990-93, <u>based</u> solely on landings reported in fish tickets and holding a State processing number. Of these 71 vessels 54 were less than 60' in length, 14 were between 60 and 125', and three vessels were greater than 125'. These vessels show up as qualified for groundfish licenses primarily due to small landings of Pacific cod and rockfish. An FMP-sub area breakdown of where these vessels operated is listed in the Table below:

Table 1. Vessels listed as Catcher/Processors only in the State data, by FMP-Subarea.

FMP-Sub Area	< 60'	60-125'	>125'
BS	7	7	2
AI	2	1	1
WG	8	4	0
CG	33	12	0
EG	30	5	0

GROUNDFISH LICENSES

Components and Alternative Elements Affecting Initial Assignment

License Classes A single class of licenses	1/1/80 - 12/31/93			
Nature of Licenses Single license for all species and areas 100000 Licenses for FMP areas (i.e., GOA and BSAI) 200000 Licenses for FMP sub-areas (i.e., EG, CG, WG, BS, AI) 300000 Licenses for Pollock, P.cod, Flatfish, Rockfish, and Other fisheries 400000 Licenses for Pollock, P.cod, Flatfish, Rockfish, and Other fisheries by FMP areas 500000 Licenses for Pollock, P.cod, Flatfish, Rockfish, and Other fisheries by FMP sub-areas 600000 Licenses for fisheries (see Box 1) by FMP sub-areas 700000 Licenses for fisheries (see Box 1) by the following areas: EG, CG, WG, BSAI 800000 Licenses for fisheries (see Box 2) by FMP sub-areas 900000				
Box 1 Fisheries Specified Under Options 700,00 BSAI Fishery Licenses: Pollock, Pacific Cod, Atka Mackerel, Yellowfin Sole, Other Flatfish, Water Rockfish, Squid (Fixed Gear), Rocksole, Turbots	00 and 800,000 GOA Fishery Licenses: Pollock, Pacific Cod, Deep Water Flats, Shallow Flatfish, Atka Mackerel			
Box 2 Fisheries Specified Under Options BSAI Fishery Licenses: Pollock, Pacific Cod, Atka Mackerel, Yellowfin Sole, Other Flatfish, Water Rockfish, Squid (Fixed Gear), Rocksole, Turbots Additionally, BSAI trawl sablefish will be bycatch only for any BSAI licensed vess	GOA Fishery Licenses: Pollock, Pacific Cod, Deep Water Flats, Shallow Flatfish, Atka Mackerel, Flathead Sole, Rockfish			
License Recipients Current owners				
License Designations No restrictions Catcher vessels & Catcher/processors Vessel length Inshore & Offshore Catcher vessels & Catcher/processors and vessel length Catcher vessels & Catcher/processors and Inshore & Offshore Inshore & Offshore and vessel length Catcher vessels & Catcher/processors, Inshore & Offshore, and vessels & Catcher/processors, Inshore & Offshore, Ins				

Qualifying Periods	
Jan. 1, 1978 - Dec. 31, 1993	100
Jun. 28, 1989 - Jun. 27, 1992	200
Jun. 28, 1989 - date of final action	
Jan. 1, 1990 - Dec. 31, 1993	400
The three years prior to the date of final action	
Jun. 28, 1989 - Jun. 27, 1992 & the three years prior to the date of final action	600
Each of the three calendar years from 1/1/90 - 6/27/92 & the 365 days prior to final action,	
except for fixed gear P. cod use 6/23/91 - 6/27/92 rather than 1/1/90 - 6/27/92	700
Landings Requirements For General License Qualification	
One Landing	10
Two landings	
5,000 pounds	
10,000 pounds	
20,000 pounds	
Landings Requirements for Endorsement Qualification	
One landing in qualifying period	1
Two landings in qualifying period	
Three landings in qualifying period	
Four landings in qualifying period	
One landing in year prior to council action	
Two landings in year prior to council action	
Three landings in year prior to council action	
Four landings in year prior to council action	

Components and Alternative Elements Affecting the Ownership, Use, and Transfer of Licenses

Who May Purchase Licenses

- 1. Licenses could be transferred only to "persons" defined under Title 46 U.S.C.
- 2. Licenses could be transferred to "persons" with 76% or more U.S. ownership, with "grandfather" rights for license recipients with 75% or less U.S. ownership (Title 46 U.S.C.).

Vessel/License Linkages

- 1. Vessel must be transferred with license.
- 2. Licenses may be transferred without a vessel, i.e., licenses may be applied to vessels other than the one to which the license initially was issued.

Options Regarding the Separability of Species and/or Area Designations

- 1. Species and/or Area designations are not separable, and shall remain as a single license with those initial designations.
- 2. Species and/or Area designations shall be treated as separable licenses and may be transferred as such.
- 3. Species and/or Area designations shall be regarded as separable endorsements which require the owner to also own a general license before use or purchase.

Vessel Replacement and Upgrades

- 1. No restrictions on vessel replacement or upgrades, except that the vessel must meet the "Use Restrictions" (License Designations) defined by the initial allocation.
- 2. Vessel may not be replaced or upgraded.
- 3. Vessel may be replaced or upgraded within the bounds of the 20% Rule defined in the moratorium proposed rule.

License Ownership Caps

- 1. No limit on the number of licenses or endorsements which may be owned by a "person."
- 2. No more than 5 area licenses per person with grandfather provisions.
- 3. No more than 10 area licenses per person with grandfather provisions.
- 4. No more than 15 area licenses per person with grandfather provisions.
- 5. No more than 5 fishery/area endorsements per person with grandfather provisions.
- 6. No more than 10 fishery/area endorsements per person with grandfather provisions.
- 7. No more than 15 fishery/area endorsements per person with grandfather provisions.

Vessel License Use Caps

- 1. No limit on the number of licenses (or endorsements) which may be used on a vessel.
- 2. No more than 1 area license (endorsement) may be used on a vessel in a given year.
- 3. No more than 2 area licenses (endorsements) may be used on a vessel in a given year.
- 4. No more than 3 area licenses (endorsements) may be used on a vessel in a given year.
- 5. No more than 4 area licenses (endorsements) may be used on a vessel in a given year.
- 6. No more than 5 area licenses (endorsements) may be used on a vessel in a given year.

Vessel Designation Limits

- A vessel which qualifies for multiple designations (i.e., both as a CV and as a CP or as both inshore and offshore) under the use restriction component will be able to participate under any designation for which it qualifies.
- 2. A vessel which qualifies for multiple designations under the use restriction component must choose a single designation.

Buy-back/Retirement Program

- 1. No buy-back/retirement program.
- 2. Fractional license system. (Fractional licenses may be issued to vessel owners at the time of landing and/or permit holders.)
- 3. Industry Funded Buy-back Program with right of first refusal on all transfers of licenses.

Two-Tiered Skipper License Program

- 1. Do not implement a Two-Tiered Skipper License Program.
- 2. Implement a Two-Tiered Skipper License Program.

Community Development Quotas.

- 1. No CDQ allocations
- 2. 3% of any or all groundfish TACs for CDQs patterned after current program w/o sunset provision.
- 3. 7.5% of any or all groundfish TACs for CDQs patterned after current program w/o sunset provision.
- 4. 10% of any or all groundfish TACs for CDQs patterned after current program w/o sunset provision.
- 5. 15% of any or all groundfish TACs for CDQs patterned after current program w/o sunset provision.

Community Development Licenses.

- 1. No Community Development Licenses.
- 2. Grant an additional 3% non-transferable licenses to CDQs communities.
- 3. Grant an additional 7.5% non-transferable licenses to CDQs communities.
- 4. Grant an additional 10% non-transferable licenses to CDQs communities.
- 5. Grant an additional 15% non-transferable licenses to CDQs communities.

Other Provisions (Choose any or none of the following)

- 1. Licenses represent a use privilege. The Council may convert the license program to an IFQ program or otherwise alter or rescind the program without compensation to license holders.
- 2. Severe penalties may be invoked for failure to comply with conditions of the license.
- 3. Licenses may be suspended or revoked for multiple violations.
- 4. Implement a Skipper Reporting System which requires groundfish license holders to report skipper names, address, and service records to NMFS.
- 5. Develop and implement mechanisms to collect management, enforcement costs and/or rents from the industry, including taxes and fees on the industry.

CRAB LICENSES

Components and Alternative Elements Affecting Initial Assignment

	Numbering
License Classes	Scheme
A single class of licenses	100000
Two license classes with Class B Permits for participants from 1/1/80 - 12/31/93	200000
Two license classes with Class B Permits for participants from 1/1/88 - 12/31/93	
Nature of Licenses	104
Nature of Licenses Single license for all species and areas	10000
Licenses for species (e.g., C. opilio, C. bairdi, Red, Blue and Brown King Crab) .	20000 Pre
Licenses for each species/area combination	30000
•	*
License Recipients	
Current owners	1000
Current owners and permit holders	
Current owners and permit noiders	
T' D' '	
License Designations	100
No restrictions	
Catcher vessels & Catcher/processors	
Vessel length	300
Catcher vessels & Catcher/processors and vessel length	400
Qualifying Period	
Jan. 1, 1978 - Dec. 31, 1993	10
6/28/89 - 6/27/92 (6/29/80 - 6/25/83 for D.H. Red & 6/29/85 - 6/25/1988 for Prib	
0/20/07 = 0/27/00 = 0/25/05 101 D.11. 100 & 0/25/05 = 0/25/15 0 101 1110	
Minimum landings	
Minimum landings	7 T
No minimum	
1 landing for Red & Blue King, 3 landings for Brown King, C. opilio, & C. bairdi	

Components and Alternative Elements Affecting the Ownership, Use, and Transfer of Licenses

Who May Purchase Licenses

- 1. Licenses could be transferred only to "persons" defined under Title 46 CFR 67.03.
- Licenses could be transferred to "persons" with 76% or more U.S. ownership, with "grandfather" rights for license recipients with 75% or less U.S. ownership (Title 46 CFR 802).
- Licenses are non-transferable.

Vessel/License Linkages

- Vessel must be transferred with license
- Licenses may be transferred without a vessel, i.e., licenses may be applied to vessels other than that
 to which the license was initially was issued.

Options Regarding the Separability of Species and/or Area Designations

- 1. Species and/or Area designations are not separable, and shall remain grouped as in the initial allocation.
- 2. Species or Area designations shall be treated as separable licenses and may be transferred as such.
- 3. Species or Area designations shall be regarded as separable endorsements which require the owner to also own a more general license before use or purchase.

Vessel Replacement and Upgrades

- 1. No restrictions on vessel replacement or upgrades, except that the vessel must meet the "License Designations" defined by the initial allocation.
- 2. Vessel may not be replaced or upgraded.
- 3. Vessel may be replaced or upgraded within the bounds of the 20% Rule as defined under the moratorium proposed rule.

Buy-back/Retirement Program

- 1. No buy-back/retirement program.
- 2. Fractional license system. (Fractional licenses may be issued to permit holders.)
- 3. Industry Funded Buy-back Program with right of first refusal on all transfers of licenses.

Two-Tiered Skipper License Program

- 1. Do not implement a Two-Tiered Skipper License Program.
- 2. Implement a Two-Tiered Skipper License Program.

Community Development Quotas.

- 1. No CDQ allocations.
- 2. Set aside 3% of crab fisheries with GHLs for CDQs patterned after current program w/o sunset provision.
- 3. Set aside 7.5% of crab fisheries w/GHLs for CDQs patterned after current program w/o sunset provision.
- 4. Set aside 10% of crab fisheries w/GHLs for CDQs patterned after current program w/o sunset provision.
- 5. Set aside 15% of crab fisheries w/GHLs for CDQs patterned after current program w/o sunset provision.

Community Development Licenses.

- 1. No Community Development Licenses.
- 2. Grant an additional 3% non-transferable licenses to CDQs communities.
- 3. Grant an additional 7.5% non-transferable licenses to CDQs communities.
- 4. Grant an additional 10% non-transferable licenses to CDQs communities.
- 5. Grant an additional 15% non-transferable licenses to CDQs communities.

Other Provisions (Choose any or none of the following)

- 1. Licenses represent a use privilege. The Council may convert the license program to an IFQ program or otherwise alter or rescind the program without compensation to license holders.
- 2. Severe penalties may be invoked for failure to comply with conditions of the license.
- 3. Licenses may be suspended or revoked for multiple violations.
- 4. Implement a Skipper Reporting System which requires groundfish license holders to report skipper names, address, and service records to NMFS.
- 5. Develop and implement mechanisms to collect management, enforcement costs and/or rents from the industry, including taxes and fees on the industry.
- 6. No Future Super-exclusive Area will be proposed.

Individual Transferable Pot Quota System

In addition to the components above, an Individual Transferable Pot Quota (ITPQ) System Alternative has been proposed in concept only. Under this option, the components affecting the initial assignment of crab licenses will remain unchanged. However, once it is decided which persons qualify for which vessel size and processing designations, licenses would be linked to a limited number of pots. Pots could be transferred to meet individual vessel requirements. Many of the component sets regarding the use and transferability of licenses may not apply under a ITPQ system. The Council will have to specify in more detail if additional analysis of the ITPQ system is desired.

NOV-30-94 WED 12:01 HOMER SECRETARIA

AGENDA C-4 DECEMBER 1994 SUPPLEMENTAL

DAVID HILLSTRAND BOX 1500 HOMER, ALASKA 99603 (907) 235-8706



Chairman of the Council: RICHARD LAUBER
NORTH PACIFIC COUNCIL FAV # 271-2817

I appreciate the helpfulness of the staff, they have sent 100's of pages of reading material to me, which you have also read. The Council has a large responsibility before it! The discussions that you will make will affect many people! I know that some of you have ties within the industry, and you will be able to see how the council's actions will affect you and others. This is a reason why I and many others are writing and giving public testimony to you!

The problems that the council has determined from the problem statement I agree with. The first three along with the next fourteen that enhance the first can be accomplished. What I see when I continue to read are issues of allocation; who gets what. Then I have watched people being eliminated from the fisheries, economic hardships being created, and a certain group rewarded, at the expense of others! Resentment and anger has been created form the Council; when they should be the ones to bring a clear direction to the industry. Do not let the council get sidetracked! Bring your thoughts back around to the resource and protect it! If you do that you will create order out of the fear that you have placed in many people!

Here are my thoughts about what you and I have read.

1. Harvesting capacity in excess of that required to harvest the available resource.

a. Those who have their vessels paid off will be the ones to weather out the times ahead in overcapitalization.

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b. Many have entered as you have stated under fear of being out of a fisheries, or the desire to qualify for as many fisheries as

possible. c. Five hundred boats can harvest the quota just as easily as a thousand. If you can justify excluding that amount of vessels, I would like for you to be able to get up out of your set and leave the council and any other job or occupation you have and never return! You can respond it two fashions, resentful; He is just not getting what he wants, or well you can buy one, well how would you like to pay 200,000.00 to have the job you just were forced out off. Why create that economic hardship on the industry. It should not matter how many boats participate but how they fish, that is a prudent non destructive manner. If it can be said " we justify the elimination of vessels because of the economic benefit to a certain group. Than the Council should be able to say I am sorry that you have overcapitalized and are going broke. d. The real thought to this sentence is the last part of it "available resource"; which ties into the first three statements. (1) assure the long term health and productivity of fish stocks and other living marine resources. The Sea ecosystem, the stability and economic well-being and diversity of the seafood industry, and the economic and social needs of the communities dependent upon that industry, not just the CDQ's but all American citizens! Efficiently manage the resource. All of this is answered in one word; that is the Quota, what the NPC allows to be taken out of the ocean. Over harvesting will create an imbalance in the ecosystem, and cause the closure of the fisheries. This can be seen in almost every foreign nation. The East coast, West Coast, the Gulf of Alaska, Kodiak, are a few examples mostly the Crab resource, The Council, the International Pacific Halibut Comm. and the State of Alaska have seen this happen and have rebuilt the stocks in Halibut several times. In the Stock Assessments the biomass of Fish and Crab are estimated. The exploitation rate is applied and the result is the quota. I know that your research is being fined tuned, and that we have fluctuations in a biomass because of

biological affects. But the levels of fish and crab in the ocean are

Davies Hillstone

not at their historic levels. We have closed areas, and species that are being rebuilt such as the Rock fish in the GOA. Which the foreign fleet over fished. Over fishing can occur but only from to large of quotas. The harvest is known and the exploitation rate is known but the biomass is assumed. Reduce the harvest from historical levels until you see an increase in the surveys. Please focus your effort on preserving the resource. Those of use who have to large of harvesting capacity will and can increase are quality, and economic returns by processing what we catch. Do not worry about us, having to large of vessels but how we are fishing with our gear, in a prudent manner or a destructive one!

2. The allocation issues affects use in the IFQ Halibut Sablefish fishery, down to 3,360 pounds and can not even fish it on our vessel which is to large. Would you like 100 skares of gear with hooks ever 4 feet. We will deliver it to your office or at the next council meeting. I hope the secretary can carry you each a tub of gear. So yes allocation of the resource is a hot topic to discuses. The Crah industry has a PSC which is another allocation of the resource at the expense of others in an established fishery! Not just dividing up the resource between different gears but destroying, harming and wasting a great benefit to the Nation! I am glad you closed the area down to trawling in the Bristol Bay area. There are still the fish there that need to be harvested in a prudent manner. We hope to do so this coming March in these closed areas to where Bottom trawling and its bycatch and waste will not have a chance to start again in these areas. We can get .07 cents a pound for chilled product and .39 cents for frozen product, that was at a broker that I talked to in Seattle. A processor will be in Togiak this spring to buy the chilled product if we chose not to process. I see this closed area to trawling as the opportunity to create new ways of fishing. We can eliminate all Crab, Herring, and Salmon bycatch for the bottom fish. The mid water fishery my brothers and I have thought about fish pots suspended from a buoy with a location indicator to recover them, to fish the mid water species. This would be harder, but we are sure we can harvest the

Duie Hilstone

bottom fish with only a halibut bycatch which can be returned to the ocean alive. We feel that the quality of the fish will go up since we are not harvesting large volumes causing bruising.

a. The inshere offshore allocation should be done away with because of its unfairness to the free market, What really should be addressed is bycatch! IF you clean up the fisheries PSC per boat, net sizes and mesh size, mostly the net size, Total weight of fish that are being processed, and bycatch retention and weight. You will slow the race down and allow for a CLEANER FISHERIES which is what is the real issue!

3., 4. Conflicts between gear. There are no conflicts with boats out on the ocean, its large with plenty of space! It is only when the vessels employ their gear on the limited grounds available. I see this issue being gone at backwards. Words such as overcrowding, conflict, excessive participation cause the Council to privatize a public resource, creating even more conflict. The real answer is

the gear.

a. In the Crab tishery I have seen gear restrictions work quite well and effective! The quota is one determining factor in setting these restrictions, along with the amount of. On the average with moving gear a vessel can pull about 150 pots per day. Usualiy a 24 hour soak is an adequate time. In Bristol Bay red crab fishery we will let our gear soak up to 48 hours or even 4 days and have an increase in the amount of crab per effort. We have pulled 200 pots in one day around the clock wasting a lot of effort. The first initial pick one can do a survey to find the general location, in a short soak; such as 12 hours. But once you find it is good to let the gear soak. In the St Paul Red Crab season we find that we are letting our gear soak at least 24 hours any thing less reduces our productivity. The St. Matthew Biue Crab fisher one can pull the gear every 12 hours but it is best to soak the gear longer. The amount of pots per boat in this area are greater which enables one to do this. Reducing the pot limit down to 50 pots in a fishery that has a 1-4 million pound quota slows the fleet down quite well. IN the 8-300 million pound quotas 150 pots is adequate. Since the gear limits have gone into affect we have loss less gear decreased

Davies Albertians

our gear conflicts. Increased our safety, decreased the gear work for crew members; who now make sure ever pot is in top shape! They appreciate that! I have not heard any one complain about it so far!

b. Gear reduction is important! The fewer pots the better one needs to place them for a maximum effort. Area closures are need in Bristol Bay and St. Paul Red crab fisheries to reduce the female handling by the commercial fleet. In Kodiak they found that once females where handled their egg clusters decreased. They imposed gear restrictions to help. But failed to close these areas down. Cook Inlet also went through these schools and now have a depressed stock. Its not trawling alone! Even the crab fleet needs to clean up its act! Proposals for this will be at the Alaska Dept. of Fish and Game for the 1996 proposal time.

5. Dead-loss such as with ghost fishing by lost or discarded gear.

a. The pot fisheries is required to have a biodegradable cotton lacing in it to allow for fish or crab to escape. It works great the area of its placement has been changed over the years and is now in a good location. We have found lost gear while fishing and have missed the old days when it would have a bonus in it of crab.

Now its empty!

b. Longline gear has a problem. Any fish that is on lost longline gear will die. I have thought about a the barb on the hook being removed or crimped; such as in Washington and Oregon. There is a lot of lost gear in rocky areas which are the biggest problem. Or others not tying gear back after they cut a cross over in a crowded area. Most fishers are avoiding bad areas now after learning them, and running away from crowds of boats or organizing which way to set the gear between themselves.

1.I would like to see a reduced amount of gear per vessel in the

longline fisheries.

2, the second would be trip limits; such as with the last Sablefish and Halibut opening in the fall of 1994. Every one I talked to did not complain but said words of encouragement. The weather was a limle rough. If it would have been on September 1st instead of the 15th the weather would have been nicer. The equinox and

David Hiltstand

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changes in the season are usually rough. If the Council would like to increase safety change the times of openings a little!

3. Or to see the first opening occur for Halibut in or on June 1st with the Blackcod season in the GOA 7 days following.

4. Or to have a Biodegradable cotton piece in the ganion. Or a

Barbless circle hook as mentioned above.

5. The trawl fleet has there share of discarded nets but a generally pretty good with making sure they do not lose there nets. Of course a few spares are always around because they do tear up occasionally. Most of the fish if alive would be spilled.

6. I wish you did not out law pots for Sablefish in the GOA. It

sure is a great way to fish with no bycatch problems!

6, and 7. Bycarch loss of ground fish, crab, herring, salmon, Economic loss and waste associated with discard mortality of target species harvested but not retained for economic reasons. a. This bycatch and waste occur mostly in the trawling industry. h. As long as this is allowed to continue we will see major problems. These are relatives, uncles, brothers and sisters that have these jobs in these fisheries with this problem. So we have a large public but cry from them when they face changes. If the council could take the emotion out of thinking process and be reminded of the resource, and the preservation of it. They would be able to present the change that is needed. c. At one tinje the foreign fleet fished in this destructive manner! It took years to remove them to 200 miles thanks to the Council. the ban on High Seas Gillness has helped the Salmon returns! In Gordon Blue's letter on October 19 th he showed the closure to the Japanese and Soviets in 1964 and 1975 which could have lead to the increase of Red King crais in the Bristol Bay area. After that we had our domestic fleet cut lose. I was not around for the first PSC for King and Tanners but I am hear for the Opilio crab PSC. d. If you allow a PSC instead of an area closure in the Priblofs you are making a mistake. An area closure, with a timed season will reduce crab mortality. It is not just trawling; of course when bycatch is added it is "the straw that broke the camels back". Also the Exploitation rate of 60% on Opilies should not exceed that of

David Littstrano

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tanner crab 40%. The King crab rate is 20% look at what happened at this rate; of course the biomass is estimated and assumed. Work the formula as I said earlier by reducing the quota until the surveys increase from historic levels. The matting of these crab is another problem which leads to the conclusion of making sure that enough males remain on the grounds in a given year. Also only certain males will mate. It is my belief that the large red crab in these female schools are the ones that will mate in the coming year or spring. Closing areas off to fishing will increase there protection.

8. Concerns regarding vessel and crew safety which are often

a. There will always be some race if its not with the next boat it will be with the weather, boat maintenance, expenses; which if to great take away from the profits. I guess we race are selves because of expenses! When you talk about safety I wish you would not through in the race for fish with it. People have died over the race for IFQ's! Think about that! Some of us have brains to know when we are limited. Most people who have fished with experienced stay safe. Its not the Council but the individual that made that choice to fish and compromised the safety of his crew and vessel!

b. Safety has been added to the fleet by the UNITED STATES COAST GUARD! Which I personal thank and solute. My Step Dad served 10 years as an E-5 in electronics, and communication! It was not until the USCO required by law for the fleet to have life rafts, epirbs, and survival suites, and now drills, have we seen our safety increase.

c. Most of the rescues occur by other vessels. Timed openings ensure this. Even with IFQ's the quota will be caught in a short time; it is just over a longer time frame that it will occur. The 4% 1% and 2% observer fee should pay for that though. I hope a boat doe not want to fish over Christmas! It's sure nice to be home on

the holicays.

David Wittetrand

d. The USCG cutters and planes with timed openings sure can keep track of us, makes us stay honest! They are able to be available in a general area if some does have a problem with the timed openings.

e. Gear restrictions have created safety and the reduction of fatigue in crews. With the quota still being harvested in a prudent

and economic manner!

f. Slow the race down; here you have me talking about it, so I guess it's okay for you to mention it. The weight of all species brought aboard a vessel that process at sea should be required! The NPC needs an accurate count of species and bycatch.

9.10. Economic instability within various sectors of the fishing industry, "Fishing Communities" are all of us that fish and live in homes, with families to feed. We are from Alaska to NewYork, we are all American citizens.

a. Short and unpredictable season do not deny access to fishing resources. IF() s. Limited Entry, Boat's breaking down, decisions

to not fish unpredictable seasons deny us access!

b. Over fishing and waste of fish and crab deny us of access more so than IFQ's and Limited Entry. Again Reduce the quotas, and clean up bycarch! We will take care of ourselves and our families as long as we can have access to the resource. We may live off of less on a bad year, but when we have a good year, its great. Which leads to the thought of IFQ's Those bad years can sure hang with a boat if they are the ones that you chose. We have bad years, sometime we highline other times we are average, and still other times we go broke. Its different when you tried your best! It is another to be told you can do no better; penalized, and forced to occur indebtedness! Puts your operation right on the line! Talk about economic instability! IFQ's and Limited Entry sure create that! Look at the people who bought salmon permits and boats a few years ago!

c. Disadvantaged coastal communities. I am glad you are concerned with the coastal communities. The CDQ program this year for pollock had the advantage of fishing early no pressure.

David Kilkhano

The bycatch of salmon was so great though that when the B pollock season opened the rest of fleet was shut down in a 5-8 day period. I hope this is not a president for IFQ's!

d. The CDQ should not be an IFQ it should be a training period of time 2-3 years to allow new entrants into the fishery. Once they have learned to fish on a leased vessel. They can enter at the end of that period. This vessel can not be leased but must be purchased. It must start the season with the rest of the fleet on the timed opening.

e. If you change the way fish are harvested as I mentioned earlier with pois. We will see a need for more entrants into the ground

fisheries!

f. Do not even think about privatizing any fisheries that has a bycatch problem! Clean it up first!

11. Reduction in ability to provide a quality product to consumers

at a competitive price.

a. Fewer vessels, with large volumes of gear reduce quality, and create monopolies! All species will be harvested by 400 factory trawlers including salmon like the foreign fleet use too.

- b. Maximum number of vessels, with reduced gear, produces a quality product, competitiveness, demand for product, jobs in repairs, gear sales, economic growth and a more controllable management because of the cleanliness of the gear fishing. The oversight does not need to be so great when vessels are fishing gear that is clean in its catching methods. The crab fleet only has observer in the catcher processor vessels. The Longline fleet needs 100% observer coverage.
- 12. Possible impacts on marine mammais and seabirds, and marine habitat.
- a. These will be a indicator that something is wrong. The Stellar sea lion declines not only in the adults but in the juveniles!

 b. I do not know about the bird populations enough to say anything, other than there decline if any would be contributed to a decrease in there food supply.

David Litterano

c. Marine habitat can be disturbed by trawling, one pass may not cause that much damage but repeated trawling with the type of roller gear that is used and horse power and speeds of the vessels and gear will disrupt critical habitat needed for a species recovery and existence!

13. Inability to achieve a long term sustainable economic benefit

to the Nation.

a. The NPC is doing this, you are doing good! What we need is to go the next step; it will be hard but it is needed. We need to change the way we harvest fish in the oceans. Bycatch by the trawl fleet is a double edge sword! Not only is there bycatch and waste of other fish and crab, but the waste of the targeted species. A larger mesh size on trawls will just allow the species to be there for next year. Caught because it could not escape the mesh size only to still be to small to process?

b. Over harvesting the ocean is the most important. As long as we have a resource and a rebuilding program with gear that reduces

all bycasch we will have a long term benefit to the Nation.

14. A complex enforcement regimen for fishers and management alike. Inhibiting the achievement of the Council's comprehensive goals.

a. As I mentioned earlier: only with a gear that reduces bycatch will the council be able to let down its guard against waste and destructive fishing practices!

The National Standard 1: conservation and management measures shall prevent over fishing while achieving, on a continuing basis, the optimum yield from each fishery for the U.S. Fishing Industry.

a. This is done with a quota or O'l as long as a conservative quota

is set we will have this.

b. The problem as you state with the rockfish in the GOA is the rebuilding program the Council has for this resource that the Japanese and Russians over fished. I would like to see a Jig and Por fisheries for rockfish in the future. The quality would be excellent.

David Litelians

National Standard 2 and 3 The Council is doing well and I would like to thank you. You have us on our toes sometimes though! Please use the best scientific information available; for the facts of how we fish are evident before you.

National Standard 4 Shall not discriminate, he fair and equitable promote conservation, or any corporation or individual or community acquires an excessive share of such privileges. a. Privileges! I had a conversation with Phil Smith from the NMFS in Impean. He told me this to but he used it in a wrong manner. That the government or the agency of it NPC is the one to tell who does and who does not have the privilege to fish. I know you have larys that say you can limit the entrants into the fishery. The State of Alaska had to change its State Constitution to do so in limited outry. I appreciate the freedom that I have in our Nation to free enterprise. But I also remember the Men and Women who tought and died for that privilege. Not for just me but for the neighbor down the street! It is said that it is a privilege to drive a vehicle. Well I say it is our right as American citizens to do so! No one can take that away from us! Unless we do something designative and violate that right. It is a privilege because it was earned by another, yet the minute that I change the handing off of that to others! It is like a slap in the face of every person who fought and died for our freedom. It is like a person taking the American flag and ripping every RED STRIP off of it! It creates a monopoly which violates the Anti Trust Law! Why do we have laws! To keep us in check! We are greedy, selfish, THAT IS WHY

- b. Food for thought Trip limits, gear limits, Port Charam Sabietish fishery in the State of Alaska.
- c. In your own words the primary test of inclusion rests with participation history: current and historical!
- d. CDQ's and eliginility: Restricted to, a small pementage to receive the benefits of such allocations. Yet the benefits of the program occur to vessels from states other than Alaska.

David Wilstrams

I have no problem with more entrants, but I see a contradiction in terms. Unfairness and an exploitation of a people who may be excluded one day. This violates the National Standard 4 as one person told all of us this spring it did!

e. If your concerned for the coastal communities, do not privatize the resource, and give the new entrants the ability to get in! Unless you are worried about overcapitalization. Which is were the

contradiction in terms and words comes in.

f. "not all residents of any state are eligible to receive such allocations". Who ever wrote these words should have thought before they did! The implication behind these words are hias! What does one need to do to be eligible to receive this allocation! Who are they that can give special rights to people over others! The law states in the Magnuson Act and the National Standard fair and equitable to all fishers, of course you can get out your pen and write some more words in as may happen this next year!

National Standard & Conservation and management measures, where practical, PROMOTE EFFICIENT utilization of fishery resources, except that no such measure shall have economic allocation as its sole purpose.

a. The Council needs to promote change it will not occur from the industry unless the opportunity arises as with the closed areas to

trawling.

b. The use of economic allocation is to keep the resource from being locked up by limited entry. Not like some may think efficient utilization = economic allocation= privatize! No it is there to promote efficient use of the resource. The resource is there to use and to manage by all. If it comes down to every American with a tishing pole and one hook so be it! Not every one can go and harvest the oceans resources. Your report even gives the average amount made by each boat and the operation costs, for a break even basis. We are going to see a lot of boats go out of business real soon. With out any Limited Entry system. Only so many vessels can operate with a limited product. Some do real well while some do real poor. Those who do will be slowly

David Hillstrand

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dropping out of the fishery. If you create a limited Entry system to soon you will lock up and lock in a lot of vessels that might have other wise dropped out.

National Standard 6

a. to respond to changes encountered in the fisheries in the future. The only way to do this will be through DEBT!

National Standard 7 Minimize costs a 2% observer+ 3% Borough + 4% -1% IFQ Limited Entry = 10% off the top without expenses. Can I stand in line for your job. Or hope I am the one to receive this allocation.

This all leads us to the problem that the Council has thought of!
4. All those boats and not enough fish for them all. Do not wony

about us. Go back to the resource!

b. I do not envy your position at all. What a time to be out as Council! You sure will be remembered by the direction you take us. It real easy if you follow the law, if you do not you will see us all tell you about it!

c. The determination of eligibility: CURRENT PARTICIPATION. That means the date of the final action of the council, with a period prior to it, the limited entry in Alaska is a 3 or 4 year period prior. The ruling by the Judge in DEC, will determine if the Council can use a retroactive date, it you can throw current participation out the window.

1. Page E-2 Landings and requirements for undersement qualification number #5 one landing in year prior to council action.

e. Start timing the openings make use chose what we want to fish. I. Place the moratorium back into effect. Without the crossover from Sailfish-Halibur.

Pg # E-1

David Hilstonia

License recipients

a. Current owners; I can tell you a story about the IFQ and historic

holders with no consideration of current participant!

b. Permit holder most vessels are not owner operated, I have heard 90% are not. Limited Entry in Alaska requires the permit holder to be on board. If you give a two ply system it is going to be a mess. The moratorium keeps it simple with no value on permits or vessels being created!

License Designations

a. No restrictions if you look up the ability of our vessels to improve the quality of the product, a disservice will be placed on the consumer. We should have the ability to catch and process in the future.

b. Inshore, offshore clean up bycatch and gear, slow down the volume of fish caught by net size. Fine bycatch, give each hoat a PSC. I would rather you clean it up though.

PG.# E-2

Qualifying period

a. The three years prior to the date of final action. 500

b. Timed openings to spread the fleet out. Wait tell the right time then Limit the Entry. There will be a weeding out in the future if you can wait that long. Say 5 years.

Landings Requirements for General License Qualification

a. One landing 10 the fisheries are so short now that we fish the entire quota before delivering in some fisheries. The pounds would have to be the lowest delivery of the fleet to be fair.

Landings Requirements for Endorsement Qualification

a. Each fishery is different but it should be at least one landing in year prior to council action 5-8.

Transferability, ownership, and use of licenses

a. Unless the permit holder is required to be on the vessel; such as in the case of the Limited Entry of Alaska, you will see the owner ship of the resource go to large corporate companies with lease, or

David Litterians

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PC# 15 of 1

hired employees operation at a reduced wage, with the burden of the expenses on the leaser.

b. This is why you need to really think about this. If you made it this far in my letter you are doing good! This is the most critical issue to contemplate.

c. You can put ever stipulation you could think of and there will be a way around it. My Grandpa told me and my brother about

laws.

Who may purchase a licenses

a. 100% UNITED STATES OWNERSHIP. Sorry charley, anything less is a sell out. These are U.S. water, if they are 100% if not than 50% 50% split. Better think again!

Vessel/License Linkages

a. #1 vessel must be transferred with license. Leaving each operation in tack gives those who are providing services on land there jobs as well. The rest of this will be covered later in replacement and upgrade.

Options Regarding the separate of species and or Area

designations

a. #1 most operations need all the fisheries they are using currently to maintain there expenses. Or would not be large enough to fish that fisheries. or to large to fish the smaller fisheries. Breaking even and getting a decent wage is important, especially with boat maintenance.

b. If sold off they would jeprodize an operation. Trading one for

one may be another.

PG. E-3

Vessel Replacement and Upgrade

1. No restriction

a. Johs are created in ports through upgrades.

b. Safety is improved. Such as stability.

c. Quality of the product is improved. Cleaner work areas, processing of product to promote freshness. As my Dad say "Fresh is Frozen."

License Ownership Caps

David Hiltstrano

P6#160F19

1. No Limit

a. If its privatized in the first place and it creates a monopoly and benefits certain individuals, and where not concerned. Why should it matter how permits they receive?

b. I do not see one license per owner, so apparently there are those

who own 5-15 boats.

- c. If a grandfather clause is good for one individual than it should be good for all of us. Initial receiver in the IFQ program received over 1% if you were so concerned about it violating the law in the first place you would take away anything over 1% and give it to those displaced.
- d. EVERY ONE IS TREATED FAIRLY how many times do we have to read it before ones brain gets sidetracked!

 Vessel license Use Caps

1. No Limit

- a. Some years are bud and one may need to diversify locking our that possibility will create hardship.
- b. On the other hand when the dice are rolling in your favor you sure can have a good year! Why not let that vessel have that good year?

Vessel Designation Limits

- 1. Will be able to participate under any designation.
- a. Costs and expenses
- b. Is there an enforcement problem, maybe a declared operation, once a vessel becomes a CP with offshore allocation it has developed its markets and is avoiding the cannery and broker. Buy-back/Retirement Program

1. No BBRP

- a. The supplies and maintenance that came form on shore suppliers will be missed. Bankraptcy should not happen in the first place you should pay back what you promised. But hard times come.
- b. The ability for that vessel to fish again is there but it went broke in the first place from it not being able to catch enough product for its debt load. Which leads to it coming back in at a reduced rate, with others that have a debt load already.

David Lilletians

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c. How about if you do not fish for a two year period you are not issue a license; such as the State of Alaska!
Two-Tiered Skipper License Program

1. Do not implement

- a. Same thought and argument as prior with permit holder on vessel.
- h. These permits will be sold or leased too.

c. This will make ITC's look friendly!

Community Development Program

a. You either have a problem or you do not with overcapitalization. CDQ's is how you will tell us. If you allow CDQ's then you are saying there is no problem with more entrants! 7.5% would allow in a fleet of 2100 vessels 15% more entrants, in a fleet of 500 it would be 3% more entrants. In a fleet of 500 it would be 3% more entrants. Start adding 10-15% into that!

b. We should not have a CDQ

e. But if you do it should have a sunser period of 2.3 years.

d. Not be able to lease other that time period.

e. And require the permit holder to be the vessel owner. If you are going to benefit my nucles you might as well make that they got rich.

Community Development Licenses

1. No CDL unless its for driving a vehicle.

- a. an additional percentage 7.5%-3% 15%-8.5% 22.5% has a only a quarter of the resource!
- b. hey I have a local would you like to lease it for 100 years!

Other provisions: Choose any or none of the following:

1. The first part Licenses represent a use privilege tie into #2.3.1.

Severe penalities: such as in the Halibut and Crab tishedes condition of license only includes the use of the public resource. Suspended or revoked, will keep the fluct from vicinting the law. The Salmon fishedes has seen violations reduced because of penalities. Of course you still have the Busiol Bay line fishedes! Now that a something to watch!

David Helbhand

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a. The skipper reporting system is a good idea it should also include all logs, which it does to some degree now.

b. Before this leads to anything else clean up the bycatch!

c. The industry should pay its own way. But should also be able to have imput on where they see waste! Be careful about to large of a burden on the smaller vessels.

Exclusive registration:

- a. Be careful many vessels rely on several fisheries to make it financially.
- b. Will eliminate pressure on stocks and slow down the fisheries and long as there is a moratorium.

License Limitation:

- a. Only on fisheries with limited bycasch.
- h. With no way of harvesting that species in another economic manner. Such as with Pots.

Trip Limits:

- a. Charam Straits
- b. Halibur/Sablefish but its IFO may be not? We will see! IFO's for PSC
- a. Good this will make each vessel accountable.
- b. Non transferable if a vessel is under its PSC its a benefit to the established fisheries and the resource. The only reward is knowing that you fished in a prudent manner. Most of the time it will be maxed out. To allow another vessel the ability to exceed its PSC and than borrow someone else's who has some left over, misses the original point. IFQ for PSC. Period! That's it!
- a. Non transferable shore bay operations depend on each vessel.
- b. Crews can be eliminated.
- c. The umbreila options lead me to believe that the Moratorium with exclusive area, timed openings, and cleaning up bycatch, is where the Council should spent its time.

Above all else read 1.1 Action Contemplated a. a-f the six criteria laid out in the Magnuson Act.

David Lillstrand

b. It is my firm belief that Mr. Magnuson, intention was to protect all those dependent on the resource when one day it was thought to be privatized. It was not his intent to eliminate those dependent on the resource but to make sure they were taken care of. I heard from a Judge that Mr. Magnuson had many bills and laws passed to protect people rights.

As it stands now we are out of the Halibut fishery, and will be excluded from the St. Matthew Blue crab season, if you move the date to September 31, 1992 we would qualify. The St. Paul Red crab fisheries we have fished since 1993 and 1994 since it opened again. The historic dates do not include current participants, which are to be included in any limited entry system. They are of greater matthest, but as long as the season is managed in a product fashion with a fair quota, there is no need to fear. We need these fisheres to offset the closure of Red crab in the Eristol Bay are. They aroyide the extra income needed to keep out operation going. This is a summon where one has to decree where to fish ST. Matthew or St. Pani. These timed openings give up a chose where to fish if one is sluttlown we need the time for income.

Thankyon for your time. David Littetians



ALASKA OCEAN SEAFOOD

LIMITED PARTNERSHIP

November 29, 1994

Mr. Richard B. Lauber, Chairman North Pacific Fishery Management Council P.O. Box 103136 Anchorage, AK 99510

Re: Agenda Item C-4 Comprehensive Rationalization (License Limitation)

Dear Mr. Lauber:

I am writing on behalf of Alaska Ocean Seafood Limited Partnership. I am General Manager of Alaska Ocean Seafood and an owner and principal captain of the surimi factory trawler ALASKA OCEAN. I have been involved in the Alaska crab and groundfish fisheries for some 25 years, and have owned and operated vessels engaged in the pollock fisheries since 1982.

The ALASKA OCEAN is the largest and one of the most modern surimi factory trawlers in the U.S. fleet. My partners and I committed to the ALASKA OCEAN project in 1987. After two years of negotiation and effort to develop a design and find a cost-effective shipyard, and another year of intensive shipyard work, the ALASKA OCEAN was completed and entered the BSAI pollock fishery in 1990.

My partners and I support the <u>concept</u> of a license limitation program, but are opposed to the Council's consideration of the complex proposal now under discussion. We believe that the license limitation should be no more - and no less - than a formalization and fine-tuning of the moratorium.

Therefore, the license limitation program should do no more than -

- Issue licenses to current owners of vessels that would qualify under the moratorium (as revised in September 1994) and that made landings during any of the three years prior to the control date of June 24, 1992.
- Delineate licenses by vessel size.
- Prohibit transfers of licenses from larger to smaller vessels, except where licenses of smaller vessels are combined to license a larger vessel and there is no resulting increase in the capacity of the fleet.
- Delineate licenses by fishery groundfish or crab on the basis of the vessel's primary

fishery in the three (3) years preceding June 24, 1992.

Prohibit transfer of licenses from one fishery to another.

My partners and I believe that any effort by the Council to develop a license limitation program more extensive than that described above would be an unwarranted expenditure made at the expense of true comprehensive rationalization, i.e., development and implementation of an ITQ program. In addition, we believe that implementation of the license program now under consideration could actually run counter to the purposes of the moratorium and add further complication to the issues which must be resolved with respect to ITQ's.

1. There is no justification for Council consideration of a complex license limitation program.

My partners and I have reviewed with interest the September 18, 1994 EA/RIR and the supplements thereto. Conspicuously absent from those documents is any rationale for pursuing a license limitation program rather than proceeding directly to an ITQ program.

Rather, the documents reiterate the conclusory statement that consideration of this license limitation program "is viewed as a necessary first step by the Council towards further development of longer-term CRP management regimes, including further development of IFQ alternatives." EA/RIR at E-1, see also id. at E-17, E-20, 1, 7, 41, 83. The documents set forth no reason for this perceived necessity.\(^1\)

Indeed, the only advantage identified with respect to the program is its ability to "define the field of players." See, e.g., id. at E-12, E-20, 7, 168, 196. But there is no readily apparent reason why the complexities embodied in the present proposal are necessary to this result. The very same result can be readily and easily achieved by the simple license program described above. Unlike the current proposal, our program has the combined advantages of continuing and enhancing the goals of the moratorium while enabling the Council to proceed directly to implementation of ITQ's.

2. The program under consideration will either be an unnecessary duplication of the moratorium or will have the potential to undermine the moratorium.

The EA/RIR notes that the license program's potential to cap growth gains importance only if the proposed moratorium is not implemented. <u>Id.</u> at 196. In this sense, it is a mere duplication of that which the moratorium itself can accomplish. As that same document

¹ It is interesting to note that the Council perceived no such necessity in implementing the halibut/sablefish ITQ program. Before that implementation, the Council specifically considered, and <u>rejected</u>, a license limitation program. EA/RIR at 6.

notes, costs associated with the current proposal "may be seen as unnecessarily high and duplicative to the moratorium passed by the Council. This is particularly true if the License Limitation program is viewed as only an interim measure in a step-wise CRP process, one of the stated intents of the moratorium." Id. at E-21, 202 (emphasis added). Besides being unacceptable from a common sense viewpoint, this result is also a clear violation of National Standard 7.

On the other hand, many of the options available to the Council under the current proposal would actually have the effect of undermining the goals of the moratorium by allowing and/or encouraging further capitalization, the very phenomenon that the moratorium, and license limitation, are supposed to prevent.

As one example, the Council has before it seven (7) options with respect to the qualifying period. Of these, only three (3) (options 200, 600, 700) would exclude vessels that entered the fisheries after the Council's June 24, 1992 cut-off date. Selection of any of the remaining four options would let in more vessels than intended by the moratorium, and indeed, vessels that were specifically intended to be excluded by the moratorium. My partners and I firmly believe that problems of this nature can and should be avoided by adoption of a simple license program which merely tracks the moratorium.

The potential results of the current proposal do not justify the expenditure of the time and effort necessary for its consideration.

As noted above, the only benefit posited for the current proposal is its ability to identify "who's in and who's out", a benefit that can more easily and readily achieved by a far simpler program. In fact, the EA/RIR makes it very clear that the program will achieve virtually nothing else:

- "None of the conditions necessary for a license limitation program to generate economic benefits appears to exist in the fisheries for which license limitation is being considered." <u>Id</u>. at E-7.
- "In the end, the result is the same under either open access or license limitation:

 Overall catch and revenues will not improve but fleet expenditures will increase to the point where all profits are dissipated." Id. at 84.
- "License limitation ... cannot be expected to significantly reduce economic discords."

 Id. at 100.
- License limitation leads to and encourages capital-stuffing, especially where (as is true under the current proposal), ITO shares are expected to be tied to the license

limitation program. Id. at 79, 80, 84, 167, 168, 189.

Of particular significance is the potential effect - or lack thereof - of the current proposal on the Council's 14 Problems. The EA/RIR, at pages E-16 - E-18 and 197-199 discusses this potential effect and concludes that, of the 14 problems, 12 will not be addressed at all Problem 1, overcapacity, may or may not be addressed, depending on the options chosen. Problem 10, concerning coastal communities, may be addressed, but with mixed results: Some coastal communities will benefit and others will be negatively affected.

The EA/RIR summarizes the potential effect - or lack thereof - of the current proposal on the Council's 14 Problems as follows:

"Most license limitation programs have failed, however, even those that constrained entry, because they did not eliminate the principle cause of over-capitalization: common property which leads to a race for the resource, This last statement is the centerpiece of the Council's problem statement ... Id at 84 (emphasis added).

In other words, the current proposal ignores the central problem and thus does nothing to solve it. There is no point in the Council's pursuing such a fruitless course.

In addition to the 14 problems, the Council has posited the assumption that the current proposal is a necessary interim step toward ITQ implementation. We have already shown that there is no basis for that assumption. Moreover, Implementation of the current proposal could well make ITQ implementation more complex than it would be if the Council were to proceed directly to ITQ's now.

As noted, the current proposal has the potential to allow in more participants than were contemplated by the moratorium. Thus, the proposal has the potential to create an entirely new constituency of license holders who will undoubtedly claim entitlement to ITQ's. Decisions - and dissention - regarding such entitlement need never arise if the Council never takes the interim step that gives rise to the issue.²

E.O. 12866 requires "careful identification of the problem to be addressed," EA/RIR at 40, and requires selection of the most cost-effective solution. Consideration of the current proposal flatly ignores this Order. The proposal would do virtually nothing to solve the 14 identified problems, would at best duplicate the benefits of the moratorium, and would overly complicate the already complicated issues surrounding ITQ's. In short, consideration of the current proposal is simply a waste of time.

² The Class B permit program proposed to the Council by the Midwater Trawlers Cooperative would lead to similar thorny issues.

4. The Council's efforts would be better spent in implementing a simple license program and proceeding directly to consideration of ITO's.

Those comments and the EA/RIR amply demonstrate that the current proposal will accomplish nothing that a simpler program could not accomplish and will introduce unnecessary pitfalls on the road to ITQ implementation. Indeed, the EA/RIR notes that many individual quota systems have been implemented in response to unacceptable conditions created by license limitation programs. Id. at 68

In contrast, the EA/RIR provides persuasive support for pursuing an ITQ program and doing so now. "The conclusion of most of the literature is that license limitation is not as effective as allocation of individual quotas in bringing about efficiency and maximizing the net benefits to society." Id. at 79. The document also reiterates the view of the Council's staff that, unlike license limitation ITQ's address "all the identifiable problems with the possible exception of marine mammals and enforcement concerns." Id. at 6.

Finally, the document illustrates that the benefits of quota systems are not merely theoretical by pointing to the effects of the community development quota system: Slower paced fisheries, higher value fisheries, lower by-catch rates of PSC species, lower discard rates, and more stable planning environment for the participants. Id. at 183.

Conclusion

If the Council is truly serious about addressing the 14 Problems it must get on with it. Consideration of the current license limitation program is an unnecessary and potentially very costly detour that should not be undertaken. My partners and I urge the council to proceed expeditiously in adopting the simple license program we have proposed and to immediate consideration of ITQ's.

Sincerely.

Alaska Ogean Seafood Limited Partnership

Jeff Hendricks, General Manager

North Pacific Fishery Management Council

Richard B. Lauber, Chairman Clarence G. Pautzke, Executive Director

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November 14, 1994

Dear Reviewer:

Enclosed are two supplemental analyses relative to the License Limitation program now under consideration by the Council. These are provided in the form of Appendices to the main analytical document (EA/RIR dated September 18, 1994) which was reviewed by the Council in September. The main document remains unchanged. Additional analyses may be incorporated into the document, depending on Council action at the upcoming December meeting. Also enclosed is an 'errata sheet' containing corrections to the main document. Unless specifically requested, the main document is not included in this mailing.

As noted in our September newsletter, the Council will be reviewing the License Limitation alternatives in December, and possibly narrowing those alternatives prior to a formal public review period and final action in April 1995. As part of this process of refining the alternatives, the Council requested that public input be solicited on two specific aspects of the program:

- (1) A specific License Limitation program with elements and options defined by the Council in September this is discussed in Appendix VII, with some limited quantitative analysis. This will likely form a starting point for Council discussion in December and has been identified as a configuration of high interest by the Council.
- (2) A proposal for A and B licenses submitted by Midwater Trawler's Cooperative (MTC) this is discussed in Appendix VIII and also contains some preliminary analysis. The Council will likely determine in December whether to proceed with further development of this proposal in the overall License Limitation program.

Please contact our office if you have any questions or if you need a copy of the main analytical document. If you have written comments on either of these proposals, or on any other aspect of the proposed program, please submit them to our office by November 30.

Sincerely,

Clarence G. Pautzke Executive Director

Enclosures



ERRATA

DRAFT for COUNCIL and PUBLIC REVIEW

ENVIRONMENTAL ASSESSMENT/REGULATORY IMPACT REVIEW (EA/RIR)

FOR

LICENSE LIMITATION ALTERNATIVES

FOR THE

GROUNDFISH & CRAB FISHERIES

IN THE

GULF OF ALASKA AND BERING SEA/ALEUTIAN ISLANDS

November 14, 1994

ERRATA SHEET FOR LICENSE LIMITATION ANALYSIS

Location	Correction	
p. E-1, ¶ 1, 4th line.	CAP should read CRP.	
p. E-7, 3rd line.	should read (1) a homogenous fleet	
p. 60, 1st line.	footnote 20 should follow the word "rent" on the next line.	
p. 101	NORTH PACIFIC UMBRELLA LICENSE THE CHARLES AND ADDRESS AND	
p. 108, Table 3.21	The note indicate that BOLD numbers are taken from tables in the back of the section. These are in fact taken from the Groundfish Tables Appendix.	
p. 121, Table 3.22	The 3rd set of results should be titled: 20000 (option B) and 30000 (option B), rather than "(option C)".	
p. 129, Figure 3.11, bottom right corner.	The number of vessels under Option 700 is 1,501 rather than 1,477.	
p. 134. Title of Table 3.24	Should read as A Comparison of the Number of Vessels Issued Licenses	
p. 149. Figure 3.7a is incorrect.	This should be the same as the corrected figure above.	
p. 172, last ¶, 3rd line.	The current configuration is #314X1, where X=6/28/92-6/27/93, i.e. the 92-93 crab year.	
p 173, Table 3.34	The Table header should read: "Licenses for each species/area combination issued to current owners which made landings between 6/28/92-6/27/93"	
List Of Appendices, following p. 211.	A corrected List of Appendices is attached.	
Groundfish Tables Appendix p.45, 115711	These numbers are incorrect, the total should be 1,536. Distributions by class and state are off by a similar amount.	
Groundfish Tables Appendix p.45, 215711	Total vessel count is incorrect: the total should be 1,527. Bottom line distributions by class and state are also off.	

Groundfish Tables Appendix p.46, 415711	Total vessel count is incorrect: the total should be 1,536. Bottom line distributions by class and state are also off.
Groundfish Tables Appendix p.46, 515711	Total vessel count is incorrect: the total should be 1,527. Bottom line distributions by class and state are also off.
Groundfish Tables Appendix p.49, 815711	Total vessel count is incorrect: the total should be 1,502. Bottom line distributions by class and state are also off.
Crab Tables Appendix pp. 7-13	The "Current" crab configuration uses 6/28/92-6/27/93 rather than 1/1/93-12/31/93.

LIST OF APPENDICES

APPENDIX I:

License System for Groundfish

APPENDIX II:

Data Summaries for 1990-92 to the License Limitation Alternatives for the Groundfish

& Crab Fisheries in the Gulf of Alaska and in the Bering Sea/Aleutian Islands

APPENDIX III:

Net National Benefits as Assessed for the Moratorium

APPENDIX IV:

Methods of Construction and assumptions in the Groundfish and Crab License

Limitation Data Bases

APPENDIX V:

Individual Transferable Pot Quotas in the BSAI Crab Fisheries

APPENDIX VI:

Analysis of Proposed Exclusions of Area Species Licenses for Gulf of Alaska Rockfish

APPENDIX VII:

Additional Alternatives Receiving Significant Consideration

APPENDIX VIII:

Assessment of Midwater Trawl Cooperative's Proposal for Class A Permits and Non-

Transferable Class B Permits

GROUNDFISH TABLE APPENDIX This appendix is bound separately.

CRAB TABLE APPENDIX

This appendix is bound separately.

APPENDIX VII

Additional Alternatives Receiving Significant Consideration

Additional Alternatives for Council Consideration

Discussions held during the September Council meeting in Seattle, regarding license limitation alternatives, generated two additional, specific alternatives to be analyzed and presented at the December meeting. These two specific configurations, which vary only by qualifying period, are analyzed in this appendix and are intended to elicit public comment which will aid the Council in developing the license limitation program's final structure. First we outline the major provisions as they relate to the initial allocation. Second, we describe the highlighted use, ownership and transfer provisions. Then we examine the distribution of licenses and endorsements under the specified configurations. Finally, we examine some of the issues regarding separability and transfer as they relate to the 'Nature of Licenses'.

The structure of the two specific alternatives identified by the Council is outlined below.

Nature of Licenses

Licenses for fisheries (see Table 1) by FMP sub-areas

In addition to the target species listed by FMP sub-area in Table 1, BSAI trawl sablefish (as well as any other species which does not fall into a specific category listed below) would be classified as a bycatch only fishery and arrowtooth could be targeted by anyone licensed to fish a particular FMP sub-area.

Table 1. List of target species by FMP sub-area

Bering S	ea and Aleutian Islands	Eastern, C	Central, and Western Gulf
Pollock	Other Flatfish	Pollock	Shallow Water Flatfish
Pacific Cod	Rock sole	Pacific Cod	Deep Water Flatfish
Rockfish	Squid (fixed gear)	Rockfish	Flathead Sole
Atka Mackerel	Turbots	Atka Mackerel	
Yellowfin Sole			

<u>License Recipient</u>

Current owners of vessels at the time of final Council action

Option A:

Current owner must be a U.S. citizen pursuant to Title 46

(i.e., 50% U.S. ownership).

Option B:

Current owner must be a U.S. citizen defined by Title 46,

Sec. 802 (the Shipping Act of 1916), i.e., 75% U.S.

ownership/control.

<u>License Designation</u>

Catcher vessels & Catcher/processors and vessel length.

Oualifying Period

Option A:

June 28, 1989 - June 27, 1992.

Option B:

January 1, 1990 - December 31, 1993.

Landings Requirement For General License Qualification

One landing in qualifying period.

Landings Requirement for Endorsement Qualification

One landing in qualifying period.

List of Components and Alternative Elements Affecting Initial License Assignment

The main body of the EA/RIR presented an analysis structure and numbering scheme for the license limitation alternatives. The numbering scheme is shown on page E-1 of the Executive Summary and repeated on page 87 of the EA/RIR. That structure divided the license limitation allocation alternatives into six components with various elements within each component. To form a complete license allocation alternative the Council will need to choose one element from each of the six components. The specific alternatives identified by the Council at the September meeting are for the most part contained within the original numbering scheme. Only the species definitions are changed. In order to keep the original numbering scheme and the main document intact, we have chosen to identify these additional alternatives by adding a new element (Option 900000) in the Nature of Licenses component. The amended numbering scheme is shown below. The specific elements of the configuration identified by the Council are shown in shaded text. Specifically the two highlighted configurations are #915211 and #915411.

	Numbering
Nature of Licenses	Scheme
Single license for all species and areas	100000
Licenses for FMP areas (i.e., GOA and BSAI)	200000
Licenses for FMP sub-areas (i.e., EG, CG, WG, BS, AI)	300000
Licenses for Pollock, P.cod, Flatfish, Rockfish, and Other fisheries	400000
Licenses for Pollock, P.cod, Flatfish, Rockfish, and Other fisheries by FMP areas	500000
Licenses for Pollock, P.cod, Flatfish, Rockfish, and Other fisheries by FMP sub-areas	600000
Licenses for fisheries (see Box 1) by FMP sub-areas	700000
Licenses for fisheries (see Box 1) by the following areas: EG, CG, WG, BSAI	800000
Licenses for fisheries (see Box 2) by FMP sub-areas	900000

Box 1	Fisheries Specified Under Op	tions 700,000 and 800,000
BSAI Fishery Licenses:		GOA Fishery Licenses:
Pollock, Pacific Cod, Atka Mackerel, Yellowfu	n Sole, Other Flatfish,	Pollock, Pacific Cod, Deep Water Flatfish, Shallow Water
Rockfish, Squid (Fixed Gear), Rock sole, Turbo	ots	Flatfish, Atka Mackerel

	Box 2	Fisheries Specified Under	Options 900,000	
	BSALFishery Licenses:		GOA Fishery Licenses:	
- 1	~aaaaaaaaaaaaaaaaaaaaaaaaaaaaaaaaaaaaa	ka Mackerel, Yellowim Sole, Other Flatfish,	Polinck, Pacific Cod, Deep 3	2/04/04/04/05/05/05/05/05/05/05/05/05/05/05/05/05/
	Rockfish, Squid (Fixed C	Gear), Rock sole, Turbots	Water Flatfish, Atka Macke	rel, Flathead Sole, Rockfish
	Additionally, BNAI trawt	sablefish will be bycatch only for any BSAI licensed	essel and Arrowtooth in any	sub-area is open to any vessei boloing

License Recipients Current owners
Current owners
Current owner, then owner at the time of landing, then permit holders (no duplicate)
Current owners, then permit holders (no duplicates)
Current owners, owners at the time of landing, and permit holders (duplicates allowed)
License Designations
No restrictions
Catcher vessels & Catcher/processors
Vessel length
Inshore & Offshore
Catcher vessels & Catcher/processors and vessel length
Catcher vessels & Catcher/processors and Inshore & Offshore
Inshore & Offshore and vessel length
Catcher vessels & Catcher/processors, Inshore & Offshore, and vessel length
Qualifying Periods
Jan. 1, 1978 - Dec. 31, 1993
Jun. 28, 1989 - Jun. 27, 1992

a sub-area license.

Niumboning

Jun. 28, 1989 - date of final action	
Jan. 1, 1990 - Dec. 31, 1993	0
The three years prior to the date of final action	0
Jun. 28, 1989 - Jun. 27, 1992 & the three years prior to the date of final action	0
Each of the three calendar years from 1/1/90 - 6/27/92 & the 365 days prior to final action,	
except for fixed gear P. cod use 6/23/91 - 6/27/92 rather than 1/1/90 - 6/27/92	0
Landings Requirements For General License Oualification	883
One Landing	Ð
Two landings	0
5,000 pounds	0
10,000 pounds 4	0
20,000 pounds 5	0
Landings Requirements for Endorsement Qualification	×:
One landing in qualifying period	
Two landings in qualifying period	
Three landings in qualifying period	3
Four landings in qualifying period	
One landing in year prior to council action	
Two landings in year prior to council action	6
Three landings in year prior to council action	7
Four landings in year prior to council action	8

Use and Transferability Provisions of the Highlighted Configurations

The two configurations highlighted by the Council incorporate some specific elements from the original list of options for the ownership, use and transfer of licenses, as well as Community Development Quota allocations. The original list is found on pages 146-147 of the EA/RIR. This list of element and options is reproduced on the next two pages. Options specifically highlighted by the Council are shown in shaded text (this is shaded). Struck-out elements indicate that the highlighted configuration would not include these options (this is stricken text). Components without shaded or stricken elements indicate that the Council did not specify a particular option. None of these options alters the number or distribution of licenses issued initially. These provisions may, however, impact a fisher's behavior under the license limitation program by restricting the number of licenses that may be purchased (reducing the number of fishing opportunities available to an individual/firm), limiting changes in vessel size, or by reducing the TAC available to all license recipients.

COMPONENTS AND ALTERNATIVE ELEMENTS AFFECTING THE OWNERSHIP, USE AND TRANSFER OF LICENSES

Who May Purchase Licenses

- Licenses could be transferred only to "persons" defined under Title 46 U.S.C.
- 2. Licenses could be transferred to "persons" with 76% or more U.S. ownership, with "grandfather" rights for license recipients with 75% or less U.S. ownership (Title 46 U.S.C.).

Vessel/License Linkages

- 1. Vessel must be transferred with license.
- Licenses may be transferred without a vessel, i.e., licenses may be applied to vessels other than the one to which the license initially was issued.

Options Regarding the Separability of Species and/or Area Designations

- 1. Species and/or Area designations are not separable, and shall remain as a single license with those initial designations.
- 2. Species and/or Area designations shall be treated as separable licenses and may be transferred as such.
- Species and/or Area designations shall be regarded as separable endorsements which require the owner to
 also own a general license before use or purchase.

Vessel Replacement and Upgrades

- 1. No restrictions on vessel replacement or upgrades, except that the vessel must meet the "Use Restrictions" (License Designations) defined by the initial allocation.
- 2. Vessel may not be replaced or upgraded.
- 3. Vessel may be replaced or upgraded within the bounds of the 20% Rule defined in the moratorium proposed rule.

License Ownership Caps

- 1. No limit on the number of licenses or endorsements which may be owned by a "person."
- 2. No more than 5 area licenses per person with grandfather provisions.
- 3. No more than 10 area licenses per person with grandfather provisions.
- 4. No more than 15 area licenses per person with grandfather provisions.
- 5. No more than 5 fishery/area endorsements per person with grandfather provisions.
- 6. No more than 10 fishery/area endorsements per person with grandfather provisions.
- 7. No more than 15 fishery/area endorsements per person with grandfather provisions.

Vessel License Use Caps

- 1. No limit on the number of licenses (or endorsements) which may be used on a vessel.
- 2. No more than 1 area license (endorsement) may be used on a vessel in a given year.
- 3. No more than 2 area licenses (endorsements) may be used on a vessel in a given year.
- 4. No more than 3 area licenses (endorsements) may be used on a vessel in a given year.
- 5. No more than 4 area licenses (endorsements) may be used on a vessel in a given year.
- 6. No more than 5 area licenses (endorsements) may be used on a vessel in a given year.

Vessel Designation Limits

- A vessel which qualifies for multiple designations (i.e., both as a CV and as a CP or as both inshore and
 offshore) under the use restriction component will be able to participate under any designation for which it
 qualifies.
- 2. A vessel which qualifies for multiple designations under the use restriction component must choose a single designation.

Buy-back/Retirement Program

- No buy-back/retirement program.
- 2. Fractional license system. (Fractional licenses may be issued to vessel owners at the time of landing and/or permit holders.)
- 3. Industry Funded Buy-back Program with right of first refusal on all transfers of licenses.

Two-Tiered Skipper License Program

- 1. Do not implement a Two-Tiered Skipper License Program.
- 2. Implement a Two-Tiered Skipper License Program.

Community Development Quotas.

- 1. No CDQ allocations
- 2. 3% of any or all groundfish TACs for CDQs patterned after current program w/o sunset provision.
- 3. 7.5% of any or all groundfish TACs for CDQs patterned after current program w/o sunset provision.
- 4. 10% of any or all groundfish TACs for CDQs patterned after current program w/o sunset provision.
- 5. 15% of any or all groundfish TACs for CDQs patterned after current program w/o sunset provision.

Community Development Licenses.

- 1. No Community Development Licenses.
- Grant air additional 3% non-transferable licenses to CDQs communities.
- 3. Grant air additional 7.5% non-transferable licenses to CDQs communities.
- 4. Grant air additional 10% non-transferable licenses to CDQs communities.
- Grant air additional 15% non-transferable licenses to CDQs communities.

Other Provisions (Choose any or none of the following)

- Licenses represent a use privilege. The Council may convert the license program to an IFQ program or otherwise alter
 or rescind the program without compensation to license holders.
- 2. Severe penalties may be invoked for failure to comply with conditions of the license.
- 3. Licenses may be suspended or revoked for multiple violations.

- Implement a Skipper Reporting System which requires ground/fish license holders to report skipper names, address, and service records to NMFS.
- 5. Develop and implement mechanisms to collect management, enforcement costs and/or rents from the industry, including taxes and fees on the industry.

Distributions of Licenses and Endorsements

Configuration #915211: This alternative closely resembles alternatives #715211 and #615211 presented in the September 18, 1994 draft of the license limitation EA/RIR. The only change is the addition of a rockfish species group and flathead sole to the Gulf of Alaska (GOA) target species list of configuration #715211. The new options differ from #615211 in that they break out the flatfish category into deep water flatfish, shallow water flatfish, and flathead sole in the GOA, yellowfin sole, other flatfish, rock sole, and turbots in the BSAI, and issue a target license for Atka mackerel (and squid for fixed gear in the BSAI). Configuration #615211 would grant a single endorsement for all flatfish and "other species." Grouping similar species into general categories, (i.e., rockfish, flatfish, and other species) by FMP sub-area may affect enforcement and fleet mobility under the license limitation system.

Table 2 on page 6 shows that 2,954 vessels were issued a total of 10,131 endorsements by target species and FMP sub-area. This is the same number of vessels receiving endorsements under configuration #715211 (Sept. 18, 1994, EA/RIR, Groundfish Table Appendix, page 30). This is because all vessels that made legal landings of Council managed groundfish species are granted licenses under both configurations. However, the number of endorsements issued to these 2,954 vessels increased from 7,638 in configuration #715211 to 10,131 in configuration #915211. Each of the 2,493 additional endorsements were granted for targeting rockfish or flathead sole in the GOA.

Closer examination of the distribution of endorsements between rockfish and flathead sole indicates that 236 of the endorsements were issued to target flathead sole while the remaining 2,257 endorsements were for rockfish in the GOA. The small boat fleet would receive most of these endorsements. Catcher vessels less than 60' accounted for over 72% (1,634) of the rockfish endorsements that would be issued in the GOA.

Configuration #915411: This option only differs from configuration #915211 in the qualification period selected for the eligibility requirement. Under this configuration, fishers were required to have made a legal groundfish landing between Jan. 1, 1990 and Dec. 31, 1993 as opposed to the June 28, 1989 - June 27, 1992 in configuration #915211.

Configuration #915411 would grant a total of 11,837 species/FMP sub-area endorsements to 3,382 vessels (Table 3, page 7). Configuration #715411 indicated that 8,837 endorsements would be issued to these same vessels. The 3,000 additional endorsements are issued to GOA vessels that have historically landed rockfish and/or flathead sole. Fishers that landed rockfish would receive 2,679 of the additional endorsements while 321 endorsements would go to the flathead sole fishers. Catcher vessels less than 60' accounted for 73% of the total GOA rockfish and 18% of the flathead sole endorsements. Catcher processors, on the other hand, accounted for 10% of the rockfish and 31% of the flathead sole endorsements in the GOA.

Configuration #915X11: Table 4 (page 8) represents those vessels that made a groundfish landing in 1993. Comparing the total number of vessels licensed under configuration #915211 and #915411 to #915X11 indicates a 76% and 101% increase respectively. The alternatives studied in this appendix would also approximately double the number of species endorsements available to fishers. Small vessel class licenses and endorsements, those under 60', had the greatest increase in numbers. This is expected because smaller vessels have historically entered and exited fisheries more frequently than larger vessels. This is probably due to the capital expenditure required to bring a large vessel into a fishery versus a small vessel.

Table 2																												
Configuratio	on 915211	Licenses issued to Current Owners Based on the Vessels, June 28, 1989 - June 27, 1992, Catch History																										
		on the Vessels, June 28, 1989 - June 27, 1992, Catch History Current Owner's State of Residence																										
	ļ					Alaska							Curre	eni Own	other	OI MOSIC	RUC8						Tot	al				
	}		CV			Alaska	CP			Alaska		CV			Callel	CP	,		Other		CV		1	ш	CP			
Area	Species	< 60 6		25	Total	< 60 60		>125	Total	Total	< 60 6	30-125	>125	Total	< 60 6	30-125	>125	Total	Total	< 60 6	30-125	>125	Total	< 60 60	-125	>125	Total	Licenses
Al	AMCK	0	2	1	3	1	0	9	10	13	1	20	6	27	3	6	39	48	75	1	22	7	30	4	6	48	58	88
· -	GTRB	8	9	1	18	1	3	9	13	31	16	24	3	43	6	14	42	62	105	24	33	4	61	7	17	51	75	138
	OFLT	0	2	이	2	0	0	9	9	11	3	15	5	23	6	9	35	50	73	3	17	5	25	6	9	44	59	84 210
	PCOD	19	13	2	34	2	4	10	16	50	23	46	13	82	6	16	56	78	160	42	59	15 14	116	8	20 7	68 56	94 70	120
	PLCK	0	0	1	_1	0	0	10	10	11	3	33 47	13	49 70	7 7	7 15	46 53	60 75	109 145	3 25	33 61	19	50 95	á	19	62	90	185
	ROCK RSOL	9	14	2	25	2	0	8	15	40	16 3	4 <i>1</i> 5	الم	12	4	4	37	45	57	3	6	4	13	4	4	45	53	66
	SQID	0	Ö	ď	اه	n	ů	ŏ	اة	ő	Ŏ	2	اه	2	Ö	Ö	Ö	o	2	0	2	o	2	0	0	0	0	2
	YSOL	ŏ	Ö	ŏ	اه	Ö	ŏ	3	3	3	ō	ō	o	0	2	0	10	12	12	0	0	0	0	2	0	13	15	15
Al Species Er		36	41	7	84	6	11	67	84	168	65	192	51	308	41	71	318	430	738	101	233	58	392	47	82	385	514	906
Al Vessels		23	18	2	43	2	4	10	16	59	31	60	18	109		16	61	84	193	54	78	20	152	9	20_	71	100	252
BS	AMCK	1	12	1	14	0	1	8	9	23	2	74	18	94	5	7	46	58	152 227	3 45	86 123	19 26	108 194	5 8	8 24	54 67	67 99	175 293
	GTRB	25	24	1	50	1	4	11	16	66 79	20 22	99 105	25 28	144 155	7 7	20 20	56 59	83 86	227	45 46	123 143	30	219	7	24	70	101	320
	OFLT	24 204	38 82	2	64 289	0 7	4 8	11	15 27	316	80	172	39	291	7	23	68	98	389	284	254	42	580	14	31	80	125	705
	PCOD PLCK	204 42	82 43	3	87	2	4	11	17	104	31	109	31	171	7	20	61	88	259	73	152	33	258	9	24	72	105	363
	ROCK	54	41	2	97	4	5	11	20	117	32	110	26	168	7	18	56	81	249	86	151	28	265	11	23	67	101	366
	RSOL	14	37	1	52	0	5	11	16	68	17	100	28	145	7	17	53	77	222	31	137	29	197	7	22	64	93	290
	SQID	0	1	0	1	0	0	1	1	2	0	4	2	6	0	2	2	4	10	0	5	2	7	0	2	83 83	· 5	12 249
	YSOL	8	27	1	36	0	1	10	11	47	15	90	25	130	- 7 54	12 139	53 454	72 647	202 1,951	23 591	1,168	26 235	1,994	68	13 171	540	779	2,773
	Endorsements	372	305	13	690	14	<u>32</u>	86 12	132 29	822 343	219 94	863 179	222 40	313	7	24	454 68	99	412	317	267	43	627	15	33	80	128	755
BS Vessels	ANCH	<u>223</u>	<u>88</u> 0	ᇷ	314	- 8	0	12	28	343	0	1/3	-	313	,	0	10	10	11		1	- 0	3	- 6	0	12	12	15
CG	AMCK DFLT	44	33	1	78	1	3	5	9	87	14	42	2	58	1	11	30	42	100		75	3	136	2	14	35	51	187
	FSOL	22	27	Ö	49	2	2	3	7	56	4	40	2	46	0	3	21	24	70	26	67	2	95	2	5	24	31	126
1	PCOD	675	117	3	795	26	11	6	43	838	102	103	13	218	1	20	35	56	274	777	220	16	1,013	27	31	41	99	1,112
	PLCK	187	46	ᅦ	234	7	3	6	16	250	19	67	10	96	2	11	33	46	142	206	113	11 10	330 920	9 29	14 28	39 43	62 100	392 1,020
	ROCK	573	93	1	667	27	8	6	41	708 121	140 14	104 55	9	253 76	2	20 9	37 29	59 38	312 114	713 88	197 94	10	189	29	11	33	46	235
OC Cassina	SFLT	74 1,577	39 355	旹	1.938	<u>2</u> 65	2 29	32	126	2,064	293	412	43	748	6	74	195	275		1.870	767	49	2,688	71	103	227	401	3,087
CG Vessels	Endorsements	861	128	ᆲ	992	33	13	6	52	1,044	175	142	15		3	23	41	67	399	1,038	270	18		38	38	47	119	1,443
EG	AMCK	0	0	ō	0	0	0	- 0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	DFLT	3	1	0	4	0	1	4	5	9	4	1	0	5	0	4	11	15	20		2	인	9	0	5	15	20	29
	FSOL	1	1	0	2	0	0	4	4	- 6	1	0	1	2	0	1	4	5	7	2	1	1 2	9 050	0 19	1		9 37	13 893
	PCOD	741	10	1	752	16	0	4	20	772	94	9	1	104	3	4	10 9	17 12	121 17	835 17	19 2	2	856 19	19	3	13	16	35
	PLCK	12	2		14 683	0 26	0 5	1	35	18 718	5 159	35	1	195	4	12	11	27	222		56	1	878	30	17	15	62	
	ROCK SFLT	662 10	21 2	ď	12	20	0	3	3	15	2	3	ö	5	ō	2	7	9	14	12	5	o	17	0	2	10	12	29
FG Species I	Endorsements	1,429	37	ᆌ	1,467	42	6	23	71	1,538	265	48	3	316	7	26	52	85	401	1,694	85	4	1,783	49	32	75	156	1,939
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License and Endorsement Structure

Within the 900000 alternative there are two separate structures which have significant implications for flexibility, transferability, and capacity increase after the licenses are initially issued. The first structure consists of an FMP area license with endorsements for each FMP sub-area and species. This option is portrayed in Figure 1a (also in Figure 3.7E on page 102 of the EA/RIR). Figure 1b is an example allocation received by a fisher that is discussed in the example below. Also selected for consideration are licenses issued for FMP sub-areas with species endorsements. Figure 2a (Figure 3.7G on page 103 of the EA/RIR) provides graphical representation of this license structure. Figure 2b shows the same hypothetical allocation as in Figure 1b.

The salient differences between these figures and how they might affect the fishery can be pointed out using an example. We will look at some decisions facing a fisher and compare how his decisions could change depending on the license structure the Council selects.

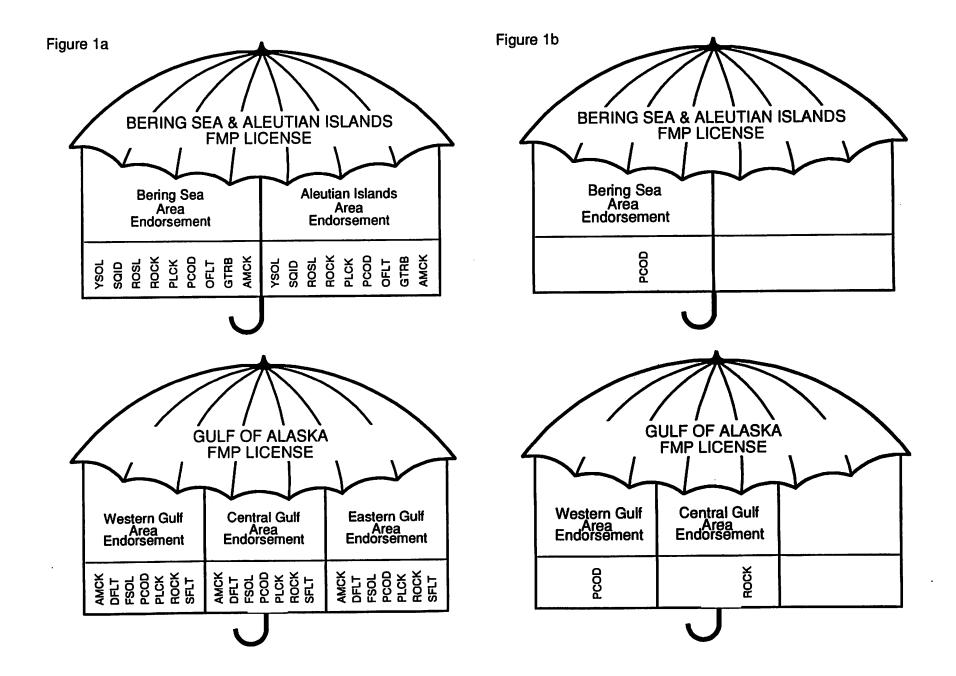
FMP Licenses

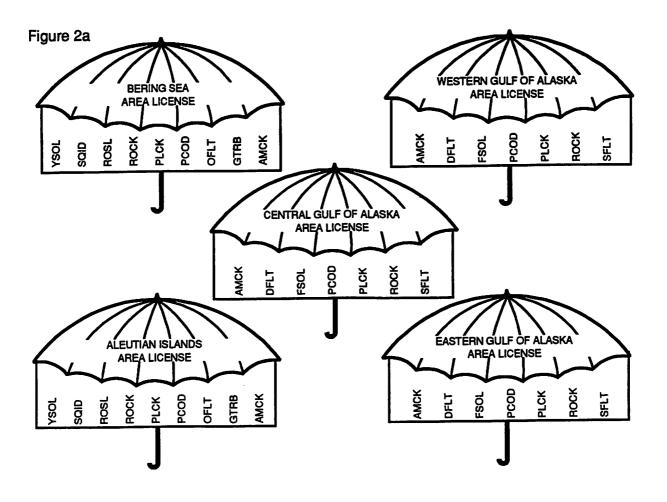
Assume that Fisher A landed rockfish in the Central Gulf during 1990, Pacific cod in the Western Gulf in 1991, and Pacific cod in the Bering Sea during early 1992. Based on the two specific license limitation configurations specified in this appendix and an FMP umbrella license structure (Figure 1b), this fisher will receive endorsements to fish Central Gulf rockfish and Western Gulf Pacific cod under a GOA license and Bering Sea Pacific cod under a BSAI license.

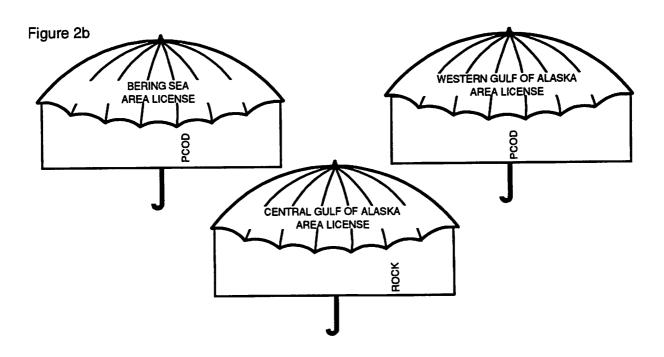
After receiving his license and endorsements from NMFS, Fisher A decides to sell his GOA license, Central Gulf endorsement, Western Gulf endorsement, rockfish (Central Gulf) endorsement, and Pacific cod (Western Gulf) endorsement and focus his energies on fishing Pacific cod in the Bering Sea. Two people are interested in purchasing his license and endorsements. The first person has not previously been involved in the groundfish fishery and currently holds no licenses. To enter the Central Gulf rockfish and Western Gulf Pacific cod fishery he must purchase Fisher A's GOA license and at least his attendant endorsements. Fisher A can continue to fish Pacific cod in the Bering Sea at the same time the individual who purchased his GOA license and endorsements fishes Pacific cod in the Western Gulf or rockfish in the Central Gulf.

This brings up an important point. Under an FMP umbrella license system, the number of vessels fishing groundfish in the North Pacific could increase, over the number of vessels initially licensed, by the number of people initially receiving both BSAI and GOA licenses. Given the license distribution in configuration #915211 and an FMP umbrella license, we can determine the maximum number of vessels that could fish in the North Pacific groundfish fishery at any one time. Given that 509 fishers hold licenses for both the GOA and BSAI the maximum number of vessels that could fish would be 3,463 versus the 2,954 vessels that were initially issued licenses.

The second interested buyer already holds a GOA license and a Central Gulf endorsement (he qualified through his landings history for a Central Gulf Pacific cod endorsement). This person would only need to purchase fisher A's rockfish endorsement (without the Central Gulf endorsement) to be eligible to fish rockfish in the Central Gulf. He would then need to purchase both the Western Gulf endorsement and the Pacific cod (Western Gulf) endorsement to be eligible to fish Pacific cod in the Western Gulf. Because Fisher A feels there is value in holding the Central Gulf endorsement, he offers to sell just the rockfish endorsement to the second buyer for 75% of the price he is offering the Central Gulf and rockfish (Central Gulf) endorsements to the first buyer. Holding the Central Gulf endorsement would allow Fisher A to purchase species endorsements for any target species licensed in the Central Gulf should he decide to re-enter that fishery.







FMP Sub-Area Licenses

Now consider the same situation under a system with FMP sub-area umbrella licenses as in Figure 2b. Fisher A would have received the licenses and endorsements shown in Figure 2b. Fisher A would now have the option of selling the Central Gulf license, Western Gulf license, rockfish (Central Gulf) endorsement, and Pacific cod (Western Gulf) endorsement to the first buyer. The first buyer purchases the Western Gulf sub-area license and the Pacific cod endorsement, as well as the Central Gulf sub-area license. (He hopes to purchase a CG Pacific cod endorsement elsewhere.) The second buyer purchases the Central Gulf rockfish endorsement. The net effect is that three vessels can now fish in the North Pacific when only one vessel was originally licensed.

Looking at the potential increase in vessels fishing groundfish in the North Pacific under configuration #915211 and an FMP sub-area umbrella license, compared to the number of vessels initially issued licenses, we see that the number could swell to 4,352 vessels from 2,954. This number is calculated by summing the number of FMP sub-area vessel licenses (i.e., BS Vessels, AI Vessels, etc.) that would be issued initially. The 4,352 vessels represents a theoretical maximum, and is not necessarily an expected eventuality.

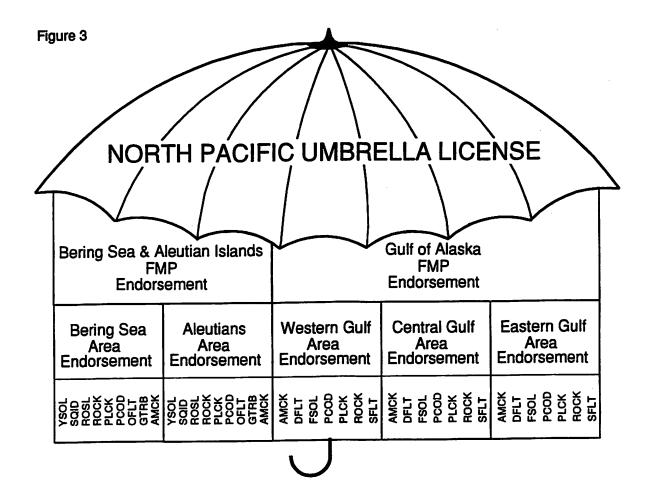
Neither the FMP umbrella license structure nor the FMP sub-area umbrella license structure allows more vessels to fish <u>in a licensed area</u> than were initially issued. However, an additional vessel could be used to fish each license at the same time if a fisher were granted more than one umbrella license. Adding vessels to fish specific umbrella license areas, instead of having only one vessel licensed to fish all the areas (i.e. the North Pacific) would potentially add capital and effort to a fishery the Council has indicated is already over-capitalized.

North Pacific Umbrella License

For comparison purposes a North Pacific umbrella license is discussed in this section. This umbrella license, Figure 3, was not explicitly selected as a license structure to be studied in this appendix. It is, however, the only option that caps the number of vessels that can fish for North Pacific groundfish at the number initially issued licenses, and is discussed here for comparison purposes.

If Fisher A were operating under this license structure, only the second buyer would be eligible to fish after purchasing Fisher A's GOA endorsements. The second buyer in our example, would have qualified for a North Pacific umbrella license through his Central Gulf Pacific cod landings. He would only need to purchase Fisher A's Central Gulf rockfish endorsement to fish rockfish in the Central Gulf. The other buyers didn't hold an umbrella license and while they could still purchase the endorsements from Fisher A they would still need to find someone willing to sell them a North Pacific license and leave the North Pacific groundfish fishery to be eligible to fish.

From the perspective of a fishery manager trying to limit the capacity of the fleet with an effective License Limitation Program, the separability structure shown in Figure 3 may be more desirable than either structure shown in the previous figures. Under this structure the number of vessels which may participate is strictly limited to the number of vessels receiving a license in the initial allocation. This structure is more onerous on new entrants wishing to enter the fisheries, and reduces flexibility somewhat for initial recipients.



Stacking Licenses and Endorsements

Stacking licenses or endorsements on a vessel would allow fishers on that vessel to target a wider variety of species, and depending on the completeness of the suite of species, may make enforcement of the program easier. Fishers may also be able to reduce their operating expenses by using fewer vessels. However, fishers may decide that stacking endorsements for several areas on a single vessel wouldn't be an optimal business decision. Under a limited access system that is driven by the race for fish, such as license limitation, the firm would more likely try to maximize its catch as opposed to minimizing cost. This would be especially true if the catch were expected to count toward allocation of individual harvest rights in the future.

Assume for example that a firm owns five vessels that qualify for Pacific cod licenses in both the Bering Sea and Aleutian Islands, and that FMP sub-area licenses were issued (as in Figure 2a). This firm would have three options for their general operational philosophy:

- 1. They could continue to operate as they did before the limited entry system was implemented. Each vessel would fish the same suite of species it did under open access.
- 2. The firm could stack its licenses on a single vessel and retire four of their vessels.
- 3. The firm could lease/purchase additional vessels and have five vessels fishing Pacific cod in the Aleutian Islands and five vessels fishing Pacific cod in the Bering Sea at the same time.

Given these conditions the firm may be very likely to maximize its catch by leasing/purchasing vessels and fishing more than one area at a time or by operating as they had in the past. It is unlikely they would reduce their catching capacity especially if they felt individual harvest rights based on catch history would be allocated in the future.

Summary and Conclusions

The addition of rockfish and flathead sole to the target species list in the GOA will not license any additional vessels. However, vessels that do receive licenses in the GOA and have reported rockfish (except DSR) or flathead sole landings, in the selected time period, will have the option to target these species. There will be approximately 3,000 more endorsements issued when rockfish and flathead sole are added to the GOA target species list.

Expanding the list of target species may increase the complexity of enforcement in the limited entry program. However, cohesiveness in species categories between the proposed license limitation alternatives and any future IFQ programs may be desired, and any increase in enforcement which is required may be outweighed by having more cohesive species groups.

Neither the FMP umbrella license system nor the FMP sub-area umbrella license system allows more vessels to fish in the licensed areas than were initially issued. However, because some fishers will be allocated more than one area license, additional vessels could be used up to the number of area licenses initially issued. Adding vessels to fish a specific area umbrella license may be an optimal solution for individuals, this would however add capital and effort to a fishery the Council has indicated is already over-capitalized. Limiting the total number of vessels licensed to fish in the North Pacific to those licenses which were initially issued could be accomplished by issuing North Pacific umbrella licenses as opposed to FMP or FMP sub-area umbrella licenses.

APPENDIX VIII

Assessment of the MTC Proposal to Create Non-transferable Class B Permits

The following appendix presents the MTC Proposal for Class B Permits with the Groundfish and Crab License Limitation Program. The appendix is divided into two parts:

- 1) A copy of the proposal as submitted to the Council on August 25, 1994.
- 2) An analysis of some of the central issues within the proposal, and tables showing the potential distributions of Class B permits.

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August 25, 1994

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CAPE FALCON

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EXCALIBUR

EXCALIBUR II

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LESLIE LEE

LISA MELINDA

MARATHON

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WESTERN DAWN

Mr. Rick Lauber, Chairman

North Pacific Fishery Management Council

RE:

CRP Analysis

Dear Chairman Lauber:

Enclosed is a proposal which we are now submitting so as to hopefully be included in the Council's Comprehensive Rationalization Plan (CRP) analysis. We would request that this proposal be included in the Council briefing books for the September/October meeting so that it can be appropriately considered by the SSC, the AP and the Council.

The enclosed proposal is intended only at this time as a framework to provide the opportunity for the Council to have more than one class of permits in its license limitation program. We feel based upon our experience in developing a license limitation program with the Pacific Council, that having a second class of permits will give the Council options that it does not now have including an ability to deal with extenuating circumstances and hardship cases, many of which may become contentious during the process.

Thank you for your consideration.

Sincerely,

MIDWATER TRAWLERS COOPERATIVE

R. Barry Fisher

President

Vice President

enclosure

PROPOSAL FOR AMENDMENT TO THE INTEGRATED FISHERIES RATIONALIZATION PROGRAM

The following would be added to the Groundfish and Crab License Limitation System:

- 1. Specify a Class A permit which would be fully transferable and a Class B permit which would be non-transferable.
- The Class A permits would be issued to those vessel owners who meet the "criteria for eligibility" ultimately adopted by the Council for permits that would be permanent and transferable.
- 3. Class B permits. A second category of permits would be created for issuance to those vessel owners in both the trawl and crab fishery who do not meet the criteria for eligibility for Class A permits but who do have a historical and/or current participation in the fishery that justifies a limited right of continuation. Eligibility criteria for Class B permits should be considered for:
- a. Historical participants that were involved in the fishery between 1980 and the cutoff date established for A permits.
- b. Recent participants in a fishery that do not qualify for an A permit because of entry after the cutoff date for A permits and/or because of insufficient participation in a fishery during the "window" period for qualifying for A permits.
 - c. Other hardship cases.
 - 4. The characteristics of the Class B permit would include the following:
- a. The permit would be non-transferable except to a replacement vessel owned by the same vessel owner of record that originally received the Class B permit. Restrict Page 1. Proposal for Amendment/Permpro.doc/SD

replacement vessel as to length (LOA) to prevent significant increases in capacity.

- b. The Class B permit would terminate upon the death of the owner of the permit. In the case of multiple owners or vessels owned by corporations the permit would expire with the death of the last owner or shareholder who are owners of the vessel or corporate owner at the time of the original issuance of the Class B permit.
- c. In addition, a performance requirement should be considered which would provide for the expiration of the permit in the event it was not utilized. For example, if the permit was not utilized in any two consecutive years the Class B permit would be terminated.
- d. In addition, after issuance of the permit, if there is a change of ownership by sale, foreclosure or otherwise, the Class B permit would terminate (however, transfers between original owners would not cause the permit to terminate).
- e. Class B permits would not be combinable into permits for larger vessels.

The merits of this particular proposal include the following:

1. First and foremost, it allows for equity. There are many vessel owners who would qualify under the moratorium to participate in the fisheries based upon historical landings between 1980 and whatever time is selected for the cutoff for eligibility for the currently proposed limited entry license. Most of these vessel owners have long since given up any concept of participating in the fishery but there are a few long term industry participants who have left the fishery for the sole reason they were pushed out by the overcapitalization occurring in 1988 and 1989, even though some of these participants have five or more years in the fishery prior to this time. For the reason that these vessel owners were the original pioneers in the Americanization

and for the further reason that they had the legal right to return to the fishery pursuant to the moratorium, they should be extended that right to at least earn a living personally under any license limitation program. Most of these vessels involved are small and would have little impact on overall capacity.

- 2. There will be vessel owners who will have significant participation in the fishery, both historic and current, that will be excluded from various fisheries when the final eligibility criteria is established. These vessel owners legally made their investments prior to the establishment of this criteria and should not be excluded from participating in the fisheries after the fact by the adoption of a retroactive license limitation program. The concept of the Class B permits can be used to address all of these issues as well as a number of hardship cases, many of which may be contentious.
- 3. Similarly, under the proposed crab license system, vessels that legally crossed over to the crab fishery after the 1992 moratorium cutoff date would not receive permits. Again, vessels that legally made investments in reliance upon the Council adopted moratorium should not be eliminated from fisheries with regulations adopted after the fact. A Class B permit issued to these vessels recognizing their legitimate investments would be an equitable approach.
- 4. The Class B permit system would continue to allow for a significant reduction of effort as compared to that permitted under the moratorium but without the draconian effects of only a single class of permits. The number of permits would be reduced by time and without cost to the industry or to the government as the result of time and the death of the vessel owners and/or as a result of non-use of their permit if that option should be selected.
 - 5. By being virtually non-transferable the permits would not acquire an

economic value nor provide the base for increases in capacity by the development of more modern vessels.

6. In many cases, by having the option of granting Class B permits to certain classes of fishermen, it will permit the Council to be more restrictive in its consideration of criteria for Class A permits.

Part Two

Assessment of Class B Permits in the Groundfish and Crab Fisheries

Discussion Issues Regarding Class B Permits

The Midwater Trawlers Cooperative has proposed that the Council create Class A and B permits within the Groundfish and Crab License Limitation Programs ultimately chosen by the Council. Several issues regarding this proposal need clarification in order to ensure a consistent interpretation by reviewers. The issues fall within the following components of the license limitation systems.

- 1. Nature of Class B permits.
- 2. Recipients of Class B permits.
- 3. License designations for Class B permits.
- 4. Qualification period for Class B permits.
- 5. Landings requirements for Class B permits.
- 6. Transferability of Class B permits.

1. The Nature of Class B Permits

It appears that the concept of Class B permits was modelled after the license limitation system adopted by the Pacific Fishery Management Council, wherein a single license for all areas and species was created. The proposal makes no mention of species or area licenses, which are currently proposed by the North Pacific Fishery Management Council. There are at least two possible interpretations of the intent of the MTC with regard to the nature of Class B permits: 1) Class B permits would be defined at the same level of precision as the licenses (Class A permits) ultimately adopted by the Council, i.e., if the Council adopted sub-area licenses with species endorsements, then B permits would be issued in terms of sub-areas and species. 2) Class B permits would be a single license good for all areas and species. The latter interpretation would clearly grant greater fishing privileges to Class B permits than to Class A permits, and therefore will be disregarded. This leaves only the interpretation that Class B permits will be defined at the same level of precision as Class A permits.

Recipients of Class B Permits

The proposal states that Class B permits would be awarded to "recent participants in a fishery that do not qualify for an A permit." The License Limitation Program under consideration by the Council could grant licenses to any combination of the following groups: a) current vessel owners, b) owners at the time of landing, or c) permit holders. The Council has not yet made a final decision on this point. Again, because the MTC proposal does not define participants in the same manner at least two interpretations are possible: 1) Define the Class B permit recipient pool the same as the eventual recipients of Class A permits, or 2) Define the Class B permit recipient pool as any current vessel owner, landings owner or permit holder. Assuming for the moment that the Council chose to allocate licenses only to current vessel owners, then the latter interpretation (2) would allocate Class B permits to non-qualifying current vessels owners, and to all landings owners and permit holders with a record of participation. The former interpretation (1) would only allocate Class B permits to non-qualifying current owners. For purpose of analysis and discussion, we will use the former interpretation (1) and assume that the Class B permits will be issued only to the same class of recipients as would Class A permits.

Another, perhaps more important issue arises from the words "do not qualify" in the MTC proposal. Assuming that the Council is intent on issuing sub-area licenses with species endorsements, then a given individual may qualify for one endorsement, two endorsements, or up to thirty-nine endorsements. If a person qualifies for a single Class A endorsement, that person could be ineligible to receive any other Class B endorsements. Assuming that it is not the intent of the proposers to make the Class A permit recipient worse off than Class B permit recipients, we will assume that qualification for a specific Class A endorsement does not eliminate the person from receiving Class B endorsements for other species and area. The following example will clarify this point.

Assume a vessel owner has the participation history described in the table below. Further, assume for the moment that participation is required in 1990 or later to qualify for Class A endorsement; Class B endorsements would be issued for participants who "do not qualify" for Class A endorsements. The first interpretation of "do not qualify" would mean that the receipt of any 'A' endorsement leaves the recipient ineligible for any 'B' endorsements. This is shown in the table in the row labeled 'Interpretation 1'. The vessel owner would receive an 'A' endorsement for the Bering Sea squid fishery and would not receive any 'B' permits. If on the other hand the words "do not qualify" are interpreted to be applied to specific species/area endorsements, then the receipt of an 'A' endorsement for one species area does not disqualify the fisher from receiving 'B' endorsements for other species/area combinations. This is shown in the row labeled 'Interpretation 2'. In this case the vessel owner would receive a mix of A and B licenses. The vessel owner would be clearly better off under the second assumption. Under the first interpretation, the recipient appears to fare better not to have fished at all in 1990, because the fisher would be allocated Class B permits for everything except Bering Sea squid.

Table 1 Example Showing results of Two Interpretations of "do not qualify"

AREA	Central	Gulf	Western	n Gulf	Bering	Sea
SPECIES	Pacific Cod	Pollock	Pacific Cod	Pollock	Squid	Pollock
Year of Participation	1987-89	1987-89	1988-89	1988-89	1990	1988-89
Interpretation 1:					Α	
Interpretation 2:	В	В	В	В	A	В

3. License Designations for Class B permits

The MTC proposal does not specifically mention license designations. Therefore for purposes of analysis we assume that Class B permits or endorsements would use the same license designations as issued for Class A permits or endorsements in terms of inshore/offshore of catcher vessel/catcher process. The proposal does discuss a length restriction in item 4a, which would allow the owner of a Class B permit to replace a vessel as long as it was no longer than the original qualifying vessel. Therefore the vessel length class designations of Class A permits, would be replaced with "Maximum LOA" designations for Class B permits. The "Maximum LOA" would be equal to the LOA in the most recent vessel documentation available.

4. Oualifying Period For Class B Permits

The proposal as drafted argues that some vessels and owners which qualified under the Council's moratorium may not receive licenses in the Groundfish and Crab License Limitation Program in the event one is adopted. At the time the proposal was written the qualifying period for the moratorium was 1/1/80-2/9/92. However the original moratorium was disapproved by the Secretary of Commerce, and the Council will be resubmitting a revised moratorium with a shorter qualifying period: 1/1/88-2/9/92. It is not clear whether the proposer's concern was for vessel owners which fished in the early years i.e., from 1980-1987, or whether their concern was for vessels

which were "moratorium" qualified. The revised moratorium results in a much smaller number of vessel owners. Because of this uncertainty the analysis will examine Class B permits using both the original moratorium qualifying period and the revised moratorium qualifying period.

Additionally, the proposal notes that vessels which have entered the fisheries after the license limitation qualifying period would not receive Class A permits, and therefore would be eligible for Class B permits. The analysis will use data through 12/31/93 which is the most recent complete year available.

In addition to the two Class B permit qualifying periods, the Council currently has seven alternative groundfish license qualifying periods, and two crab qualifying periods before them. At its September 1994 meeting the Council expressed an interest to focus further study on two alternative groundfish qualifying periods: June 28. 1989 - June 27, 1992 (Option 200) and January 1, 1990 - December 31, 1993 (Option 400). Therefore the analysis of Class B permits in the groundfish fishery will use these two alternatives as reference periods. The analysis of Class B permits in the crab fishery will be limited to the shorter of the two alternative qualifying periods. (Qualifying period Option 10 under the Crab License Limitation Program spans a longer period than either of the Class B permit qualifying periods.)

In summary, the analysis of Class B permits will look at four different combinations with respect to groundfish qualifying periods and two with respect to crab qualifying periods as shown in Table 2.

Table 2 Combinations of Class B Permit qualifying periods with groundfish and crab qualifying periods.

Combination	Class B Permits	Class A Permits
Groundfish 1	January 1, 1980 - December 31, 1993	June 28, 1989 - June 27, 1992
Groundfish 2	January 1, 1980 - December 31, 1993	January 1, 1990 - December 31, 1993
Groundfish 3	January 1, 1988 - December 31, 1993	June 28, 1989 - June 27, 1992
Groundfish 4	January 1, 1988 - December 31, 1993	January 1, 1990 - December 31, 1993
Crab 1	January 1, 1980 - December 31, 1993	6/28/89 - 6/27/92 for all but Dutch Harbor
Crab 2	January 1, 1988 - December 31, 1993	Red King Crab (6/29/80-6/25/83) and Pribilof Blue King Crab (6/29/85-6/25/88)

5. Landings Requirements For Oualification

The proposal for Class B permits arose because some "participants" would not qualify for regular licenses or "Class A permits". In the Groundfish and Crab License Limitation Program under evaluation by the Council, non-qualification may result from the qualifying period or from a failure of the vessel to meet the minimum landings requirements. Alternatives under consideration for "Class A permits" vary from a minimum of one landing up to a requirement that 20,000 lbs. be landed. (The Council has indicated continued interest in using a single landing for qualification for Class A permits.) In order for the Class B permit to act as a safety net for non-qualifiers it makes logical sense to set the Class B permit landings requirement at the minimum level of participation. Specifically this means that a single landing will qualify a vessel for a Class B permit.

Transferability of Class B Permits

The proposers indicate that the primary difference between Class B permits and Class A permits will be transferability. Class B permits will not be transferable and will be terminated upon the death of the recipient,

or recipients in the case of multiple owners. Class A permits on the other hand would be fully transferable within license designations and separability limits.

The Groundfish and Crab License Limitation Programs have been proposed by the Council as preliminary steps toward eventual IFQ programs. Once the hard job of defining the players is accomplished with license limitation, the Council believes it can get on with the task of allocating shares of the harvest to individuals. Regardless of the relative ease or difficulty of this final process, the Council has stated its intent to implement IFQs in the near future. With this in mind, it seems to be at least a possibility that persons holding licenses, if such a system is implemented, would be the initial recipients of IFQs. This possibility appears to greatly reduce the likelihood that licenses will be transferred during the interim period. If this is the case, (i.e., that owners of Class A permits will have little incentive to transfer their licenses) then there is little difference between Class A permits and Class B permits.

In conjunction with non-transferability, the proposed Class B permits would terminate upon the death of the recipient. This as stated would bring about an eventual reduction in capacity. In the interim however, it appears that the capacity to fish under a Class B permit is no less than under a Class A permit. Non-transferability does nothing to lessen a given vessel's harvest capacity in a 'race for fish' allocation system under license limitation.

The Council could if it chose, create a more significant difference between Class A permits and Class B permits. One way to accomplish this would be to indicate that Class B permits, or landings under a Class B permit, would not lead to IFQ allocations. A second approach would be to make it more likely that Class A permits would be transferred. This could be done by indicating that the possession of Class A permits, or landings under a Class A permit, would have little bearing on an eventual IFQ allocation, or that the transition to an IFQ system was more than a few years away.

The License Limitation Numbering Scheme and Class B Permits

Groundfish. Class B permits can be applied to any of the 76,000+ groundfish configurations described in the main document as well as those described in the previous appendix and therefore represent a new, seventh component. Because there are two qualifying periods under the Class B Permit alternative we have constructed two separate elements one for each period, and added a third element which allows the Council to choose not to allocate Class B permits. Adding the additional component with its three elements has the effect of tripling the number of possible configurations from which the Council may choose. The following table reflects the new components and elements. For simplicity we have added the Class B Permit Component to the top of the numbering scheme, thereby eliminating the need to re-number the original components and elements. With the additional Nature of License element described in the previous appendix the total number of alternative configurations has increased to 241,920. This number does not include the set of components regarding use and transferability, which do not directly affect the initial allocation of licenses.

	Humbung
License Classes	Scheme
A single class of licenses	1000000
Two license classes with Class B Permits For Participants From 1/1/80 - 12/31/93	2000000
Two license classes with Class B Permits For Participants From 1/1/88 - 12/31/93	
Nature of Licenses	
Single license for all species and areas	100000
Licenses for FMP areas (i.e., GOA and BSAI)	
Licenses for FMP sub-areas (i.e., EG, CG, WG, BS, AI)	
Licenses for Pollock, P.cod, Flatfish, Rockfish, and Other fisheries	
Licenses for Pollock, P.cod, Flatfish, Rockfish, and Other fisheries by FMP areas	500000

Licenses for fisheries (se	ee Box 1) by FMP sub-areas	reries by FMP sub-areas 600000 700000 6, CG, WG, BSAI 800000 900000
	The Control of the Control of	000 0004 000 000
Box 1	Fisheries Specified Under Options 7	00,000 and 600,000
Box 1 BSAI Fishery Licenses:	Fisheries Specified Under Options A	GOA Fishery Licenses: Pollock, Pacific Cod, Deep Water Flats, Shallow Water

Box 2 Fisheries Specified Under Opt	ions 900,000
BSAI Fishery Licenses:	GOA Fishery Licenses:
Pollock, Pacific Cod, Atka Mackerel, Yellowfin Sole, Other Flatfish,	Pollock, Pacific Cod, Deep Water Flats, Shallow Water
Rockfish, Squid (Fixed Gear), Rocksole, Turbots	Flatfish, Atka Mackerel, Flathead Sole, Rockfish

Additionally, BSAI trawl sablefish will be bycatch only for any BSAI licensed vessel and Arrowtooth in any sub-area is open to any vessel holding a sub-area license.

License Recipients Current owners	20000 30000
License Designations	
No restrictions	1000
Catcher vessels & Catcher/processors	2000
Vessel length	3000
Inshore & Offshore	4000
Catcher vessels & Catcher/processors and vessel length	5000
Catcher vessels & Catcher/processors and Inshore & Offshore	6000
Inshore & Offshore and vessel length	7000
Catcher vessels & Catcher/processors, Inshore & Offshore, and vessel length	8000
Qualifying Periods Jan. 1, 1978 - Dec. 31, 1993	200
Jan. 1, 1990 - Dec. 31, 1993	. 400
The three years prior to the date of final action	500
Jun. 28, 1989 - Jun. 27, 1992 & the three years prior to the date of final action	600
Each of the three calendar years from 1/1/90 - 6/27/92 & the 365 days prior to final action,	700
except for fixed gear P. cod use 6/23/91 - 6/27/92 rather than 1/1/90 - 6/27/92	700
Landings Requirements For General License Qualification	
One Landing	10
Two landings	20
5,000 pounds	30
10,000 pounds	40
20,000 pounds	50

Landings Requirements for Endorsement Qualification	
One landing in qualifying period	
Two landings in qualifying period	
Three landings in qualifying period	
Four landings in qualifying period	
One landing in year prior to council action	5
Two landings in year prior to council action	6
Three landings in year prior to council action	
Four landings in year prior to council action	8

Using the numbering scheme above, a system with Class B Permits For Participants From 1/1/80-12/31/93 in conjunction with, for example, the Universal Configuration would be identified as 2115211. (This is combination 'Groundfish 1' in Table 2 above.) Class B Permits For Participants From 1/1/88 - 12/31/93 in conjunction with the Explicit Configuration would be identified as configuration # 3715711.

Crab. Class B permits can be applied to only 48 of the 96 original crab license configurations because the proposed Class B permit qualifying period is shorter than one of the original crab qualifying periods (Option 10, from 1/1/78-1/1/93). With the addition of Class B permits as an option, the total number of possible crab license configurations increases to 192. As with groundfish Class B permits can be incorporated by introducing a new component with three elements. The amended crab license numbering scheme is shown below.

· N	Numbering
License Classes	Scheme
A single class of licenses	. 100000
Two license classes with Class B Permits for participants from 1/1/80 - 12/31/93	. 200000
Two license classes with Class B Permits for participants from 1/1/88 - 12/31/93	. 300000
1 WO HOOLIST CHASSES With Chass D I childs for participants from 1/1/00 1-/0-/-	
Nature of Licenses	
Single license for all species and areas	10000
Licenses for species (e.g., C. opilio, C. bairdi, Red, Blue and Brown King Crab)	20000
Licenses for each species/area combination	30000
Licenses for each species/area combination	,
Y to make The distance	
License Recipients	1000
Current owners	
Current owners and permit holders	2000
License Designations	100
No restrictions	100
Catcher vessels & Catcher/processors	200
Vessel length	300
Catcher vessels & Catcher/processors and vessel length	400
	* *
Qualifying Period	
Jan. 1, 1978 - Dec. 31, 1993	10
6/28/89 - 6/27/92 (6/29/80 - 6/25/83 for D.H. Red & 6/29/85 - 6/25/1988 for Prib. Blue)	20
Minimum landings	
No minimum	1
1 landing for Red & Blue King, 3 landings for Brown King, C. opilio, & C. bairdi	

Distribution of Groundfish Class B Permits

The distributions of Class B permits are based on the discussion of the definitional issues above, and the two alternative groundfish configurations in which the Council has indicated a specific interest (discussed in Appendix VII). These alternatives would allocate sub-area licenses with species endorsements to current vessel owners with catcher vessel/catcher processor designations and length classes for catcher vessels. Licenses would be allocated to the owners of those vessels which made one landing of a species in an area from June 28, 1989-June 27, 1992 or alternatively from January 1, 1990-December 31, 1993. Using the amended numbering scheme, the configurations examined in Appendix VII would be identified as 1915211 and 1915411, i.e. only Class A permits would be issued. The tables below show the configurations wherein Class B permits would be issued, i.e. 2915211, 2915411, 3915211, and 3915411.

Table 3 shows the number of A and B permits under configuration 2915211. The table is broken into three parts: A) shows the numbers of Class A permits which would be issued, (i.e. landings between 6/28/89 and 6/27/92) and is identical to Table 2 in the previous appendix. B) shows the number of Class B permits (i.e. landings between 1/1/80 and 12/31/93 excluding Class A permits). C) shows the Total number of permits by adding A and B permits together. Table 4 depicts configuration 2915411 in the same manner. Tables 5 and 6 show the allocations under 3915211 and 3915411 respectively.

Under 2915211, 7341 total Class B permits will be issued to over 4010 vessels. Obviously the potential for increased effort under this configuration is substantial, and the resulting License Limitation Program would not effectively limit actual effort in the fisheries. Under 2915411, 5682 total Class B permits will be issued to over 3356 vessels. Because the only difference between the two is a 5 month slippage for the Class A permit qualifying period, i.e. from 6/28/89 to 1/1/90, the allocations in Tables 3 and 4 are remarkably similar. For the same reason configurations 3915211 and 3915411 are remarkably similar. The latter configurations would however dramatically reduce the number of B permits when compared to options using the longer Class B permit qualifying period.

Distribution of Crab Class B Permits

Table 7 and 8 show the distribution of crab Class B permits under configurations 231421 and 331421. (Recall that configuration 31421 was the reference configuration used in the main document.) Not surprisingly, many more Class B permits would be distributed under 231421 than under 331421.

Conclusions

Class B permits will reduce the effectiveness of any License Limitation Program because virtually any vessel with a fishing history during the Class B permit qualifying period will receive fishing privileges. For the same reason, Class B permits could eliminate the need for a lengthy and costly appeals process. Given the Council's indication that the License Limitation Program is a stepping stone to an IFQ program, the transferability restrictions on Class B permits would not seem to differentiate the two types of licenses substantially.

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258	102	99	58	El	424	16	671	311			95		9		28	501	19	352	35	8	0	9	330			501	WG Species Endorsements
1'450	707	242	76	39	895	133	974	394			288	14	91		SII	776	100	723	78	75	53	01	076			CI	SFLT
201	20	18	CI	6	cor	30	19	61	SCI		EP	6	C		SO	15	9	56	S1	,	,	0	53 95	۶		69	BOCK
	98	99	61	8	SIS	61	€6	601			09	91		OEI	41	72	17		SI SI	l.		X	33	1		22	PLCK
561	97	96	Pl	S	154	SO	SL	56			99	01	-		So	79	4	57	61		•	Č	761			ESI	9009
	EB	09	52	8	243	90	128	192			29	61	-		72	08	35	513 13	0.		ĭ	ň		lo lo		z	LEOF
40	86	>C	•	ŀ	88	Or	**	•			Se	£			lo i	90	15 15	**	Ē.	l.	;	ĭ	lie.	17		SI	DFLT
991	89	69	41	Ş	101	91	99	72			17	CI	!		e i	43	0	61		16	i	á	11.	1.	ō	0	AG PHICK
10	Ϋ́E	96	<u>z</u>	<u> </u>	S¢	1	<u> </u>	0			Se		-	247	6	17	503	760'I	9C	1	Ġ	50	950'1	li	SS	1,030	C Vessels
eze i	01	81	91	76	1,303	17	99	1,233			29	12	y	916	-	89	562	858,1	12	\$3	9	45	199'1	1	7C	1,429	Strementobril selbege D
1,939	981	87	SE	67	697,1	<u> </u>	\$8 \$	199,1	107	50	ea	96	-	316	0	<u> </u>	2	51	2	E	ō	0	13	0	ž	01	TJAS
86	Ę,	loi	٤.	0	K1.	l.	-	129	ZZZ	7S	liı	15		201	ľ	SE	651	817	96	•	ç	50	683	0	51	895	BOCK
076	Z9	31	<u> </u>	90	876	l;	20 S	<u> </u>		Z1		6,	<u>,</u>	200	6	٥	6	81	•	•	ō	0	71	0	3	15	PLCK
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C68	τe	71	7	91	958	ľ	91	Z	, · · ·	la"	1.	ï	ŏ	lž"	li 💮	ŏ	ĩ	9	 •)	0	٥	5	0	L	1	FSOL
20	So	81	Š	0	la la	là.	ż	ž	So	SI	li.	÷	ō	وا	o	ī	•	le	s	7	l .	0	 	0	ı	C	TJRO
5	6	2.	0	٥	lő.	امّا	٥	ō	6		6	ó	ó	o	o	Ó	0	0	0	0	0	0	lo	0	0	0	G PWCK
699'1	611	<u> </u>	38	90	1/354	81	370	1,038	333	Ž9	19	<u>23</u>	è	SCC.	GI	145	SZI	1044	25	9	CI	CC	885	C	158	199	slessey Q
780.E	100	755	103	14	2,686	69	191	078,1	1,023		581	PL	9	817	E#	412	583	2,064	156	35	56	9 9	866,1	9	SSC	LLS'I	strementobril seisege 93
SCS	99	23	11	ž	691	12	76	88	711	8C	58	6	0	94	Ž.	99	71	121	8	7	2	Z	CII	0	38	14	SFLT
1,020	001	le.	Se	50	850	01	181	CIT.	SIC	69	76	50	2	523	8	104	071	807	10	9	8	72	199	13	68	CTZ	HOCK
268	ze	88	PI	6	930	lii	113	508	201	97	EE	11	2	96	01	78	61	520	91	9	C	1	234	li .	97	761	brck bcop
S11,1	66	19	16	22	1,013	91	220	LLL	274	99	32	50	1	815	13	EOI	102	858	C7	9	11	Se	201	E	211	279	FSOL
150	lic	54	ç	2	96	S	19	Se	01	54	ız	E	0	91	S	07	•	99	4	ļc	Ş	2	67	l ^o .	75	35	1750
101	18	32	*1	2	136	2	92	99	001	Z)	30	11	l .	88	S	45	71	7.8	6	S	C	1	87	l'	33	77 2	SG AMCK
9t	Z1	S1	0	0	c	lo	l		11	01	01	0	0	1	0	<u> </u>	<u> </u>	1	2	- E	0	<u> </u>	16	10	88	523	S Vessels
5 92	150	08	ce	91	159	61	792	716	415	66	89	39	L	EIC	07	641	76	343	58	15	6	8	916	C1	50E	372	Species Endorsements
CTT.S	611	099	141	68	166'1	332	691,1	169	1861	789	757	139	79	100,1	222	C98	518	955	135	99	35	0	96	10.	75	8	TOSA
310	68	69	CI	7	991	92	211	S	202	51	23	SI	L	130	SS	06	Ç I	47	l;•	١,٠	ò	٥	١	l.	ĭ	ŏ	CIOS
SI	9	E	2	0	<u> </u>	2	S.	0	01	7.	2	5	•	ğ.,	٤.	001	21	89	91	li.	č	ă	zs.	lī.	ZC.	PL	1059
560	60	70	35	4	791	58	TEI	16	222	11	53	71	4	145	58 58	011	SC	211	So	li:	ć	•	46	ž	10	75	BOCK
996	101	78	53	ii.	Sez	28	191	99	548	10	19	18	-	121	16	601	16	101	121	lii	,	ż	7.8	ž	Cr	45	b rck
cec	201	51	54		258	EC	125	£7.	528	88 88	88	33 33	,	162	36	571	08	916	75	is	è	Ĺ	585	c	95	504	GOOG
201	150	08	ıc	*1	088	45	S24	594 48	389	98	85	30	,	551	28	501	SS	64	Şī	11	,	Ō	19	z	96	54	OFLT
250 202	tor	78 07	54	4	218	30 Se	143	S7	122	69	95	SO	;	201	SZ	66	50	99	91	lii	7	ı	09	lı .	54	52	9 415
271 202	49 68	75	24	¥	108	96	99	27	521	95	97	<u> </u>	ć	76	91	74	ž	53	6	9	ı	Ó	71	li .	15	1	2 VWCK
252	001	112	30	- 6	152	30	82	95	183	70	19	91	-	601	91	09	16	89	91	01	7	Z	64	2	91	CZ	s lessey i
908	716	385	20	-20	385	88	233	101	738	430	816	14	17	806	19	185	99	891	78	78	11	9	18	1	19	96	Species Endorsements
81 800	SI	C1	0	2	6	0	0	-6	21	21	01	ō	<u> </u>	0	0	0	0	C	E	C	0	0	0	0	0	0	TOSA
Σ΄	5	0	ō	ŏ	ĺž	lō	ž	ŏ	z	0	0	Õ	Ö	2	0	3	0	0	0	0	0	0	0	lo	0	0	CIOS
50	66	G#	,	Ď	le i	»	9	Č	Z S	GP .	ZE	7	•	SI	 	S	C	6	8	8	0	0	11.	0	1.	0	JOSH
201	06	85	61	6	56	6	19	52	971	61	29	SI	1	04	14	44	91	07	SI	6	•	2	SS	į.	*1	•	ROCK
150	01	99	ĭ	Ĺ	09	11	33	C	601	09	91	L	4	87	61	CC	C	111	O I	01	0	0	15.	Ľ	0	0.	PLCK PCOD
310	76	99	SO	è	911	SI	69	15	091	87	99	91	9	SS	e1	97	53	05	91	01	,	2	96	٥	Č I	61	OFLT 0029
bo	69	77	6	•	SZ	S	41	3	73	09	SE	6	9	S3	S	51	E	1.1	J ⁶ .	6	0	0	81	١.		٧	8910 1.30
acı	94	IS	41	L	10		93	54	201	85	23	* 1	9	63	3	54	91	16	E1	8	Ç		la i	l:	,	•	AMCK
88	99	97	9	*	30	4	SS	<u>l</u>	87	81	38	•	<u>c</u>	75	9	50	1000	E1	01	10	1031-00	Too >	Leto I	>152	60-125	Ing >	sepeds ser
acenceo()	leto1	>152	60-125	09 >	IstoT	>152	60-125	09 >	latoT	latoT	>1\$5		09 >	LetoT	>155	60-125	108 >	axtestA latoT	latoT	>155	90-152 Cb	09 >	٦,,		NO	1-7	1
ł			3 0		1		A)		_ ≫¢o	L		do	10175			<u> </u>		— ▼# >	ь		93	Alaska	,	<u>-</u>			1
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										Liesan		Seer , TE e				21 010 10											
I										v vote!	Doese Catch b	1 GNOTAGE	memor v.	December	DECISOR OF	-,, - -,											FISSER nobatugâno
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Configuration 2915211																		
								ses Issued										1
-							Vessels, Jar and did not											
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!			Alask	(A				Outlon, O	Other						Total			
		CV		<u> </u>				CV						CV			ام	
Area Species	< 60	60-125	>125	Total	CP	Total	< 60	60-125	>125	Total	CP	Total	< 60	60-125 45	>125 12	Total	CP 18	Licenses 87
AI AMCK	2	11	1	14	의	14	10	34 41	11	55 74	18 15	73 89	12 39	45 54	18	111	17	128
GTRB	22	13	2	37 13	2	39 15	17 6	26	12	44	12	56	8	38	13	57	14	71
OFLT PCOD	2 15	10 14		29	1	30	16	44	15	75	16	91	31	- 58	15	104	17	121
PLCK	2	14	1	17	il	18	8	32	15	55	10	65	10	46	16	72	11	83
ROCK	24	16	il	41	3	44	26	43	19	88	13	101	50	59	20	129	16	145
RSOL	1	12	1	14	1	15	7	43	13	63	12	75	8	55	14	77	13 21	90 21
SQID	0	Ō	0	0	2	2	0	ō	ol	11	19	19 17	0	0	3	13	6	19
YSOL.	0_	2	<u> </u>	167	12	179	91	270	104	465	121	588	159	362	111	632	133	765
Al Species Endorsements Al Vessels	68 34	92 25	- 4	62	12	70	30	89	27	148	58	204	64	114	30	208	66	274
AI Vessels BS AMCK	4	<u>25</u> 11	- 3	15	- 1	16	11	20	- 8	39	7	46	15	31	8	54	. 8	62
GTRB	29	27	2	58	ó	58	29	40	11	80	9	89	58	67	13	138	9	147
OFLT	21	11	0	32	1	33	23	26	.8	57	5	62	44	37	8	89 165	6	95 171
PCOD	69	14	o	83	2	85	28	39	15	82	4	86	97 49	53 41	15 9	99	9	102
PLCK	28	7	이	35 72	1	36 72	21 28	34 31	10	64 69	111	66 80	49 78	52	11	141	11	152
ROCK	50 10	21 8	1	18		18	13	26	i o	47	5	52	23	34	e	65	5	70
RSOL SQID	10	ő	ĭ	'1	1	2	1	ō	1	2	26	28	1	0	2	3	27	30
YSOL	8	9	ol.	17	il	18	13	28	9	50	5	55	21	37	9	67	- 6	73
BS Species Endorsements	219	108	4	331	7	338	167	244	79	490	74	564	386	352	83	821	81	907
BS Vessels	123	45	2	170	5	175	57	88	26	169	52	221	160	131 17	28	339 22	67 5	396
CG AMCK	3	10	0	13	0	13	0 13	7 44	2	9 66	5 15	14 81	3 32	58	9	99	23	122
DFLT	19	14	0	33 35	8	41	14	54	a	76	12	88	39	64	ăl	111	18	129
FSOL PCOD	25 491	10 47	2	540	14	554	87	72	12	171	15	186	578	119	14	711	29	740
PLCK	118	25	ōl	143	9	152	24	60	111	95	13	108	142	85	11	238	22	260
ROCK	267	39	il	307	10	317	67	53	10	130	12	142	334	92	11	437	22 17	459
SFLT	_55_	18	0	73	8	81	25	53	8	88	9	95	80	71	8 63	1,777	138	176 1,913
CG Species Endorsements	978	163	3	1,144	55	1,199	230 147	343 130	60 23	633 300	81 40	714 340	1,208	506 239	26	1,207	72	1,27
CG Vessels	795	109	3	907	32	939	14/	130	0	300	1	1	0	0	0	0		7,1
EG AMCK DFLT	0 13	0 3		16	2	18	5	4	ŏ	9	13	22	18	7	ō	25	15	140
FSOL	4	1	ŏ	5	il	6	ž	Ò	ō	2	6	8	6	1	o	7	7	14
PCOD	801	30	2	833	16	849	155	22	1	178	19	197	956	52	3	1,011	35	1,04
PLCK	40	5	1	46	3	49	3	4	2	9	8	17	43	9	3	55 1,606	11 38	6 1,64
ROCK	1,252	50	1	1,303	20	1,323	263	36 6	4	303 24	18 12	321 38	1,515 79	86 10	2	90	17	10
SFLT	62	4	- O 4	2,269	5 47	2.316	17 445	72	8	525	77	602	2.617	165	12	2.794	124	2,91
EG Species Endorsements	2,172 1,906	93 77	- 2	1,985	35	2,020	383	57	5	445	32		2,289	134	7	2,430	67	2,49
EG Vessels WG AMCK	1,906	- 11	- 2	13	0	13	2	32	4	38	7	45	9	38	4	-51	7	5
DFLT	35	16	ŏ	51	5	56	15	46	6	67	8		50	62	6	118	13	
FSOL	13	12	1	26	1	27	9	31	6	46	8	54	22	43	7	72 212	9 20	23
PCOD	101	28	0	129	7	136	28	48	7]	83	13		129 32	76 39	<u>[</u>]	76	20 7	8
PLCK	20	12	1	33	1 7	34 84	12 25	27 47	6	43 78	6 12		78		7	155	19	
ROCK	53 21	23 12	1	77 34	4	36	25 10	29	الا	43	5	48	31	41	5	77	7	
SFLT WG Species Endorsements	250	109	4	363	23	386	101	260	37	398	59	457	351	369	41	761	82	
WG Vessels	174	53	- 2	229	13	242	54	111_	19	184	30	214	228	164	21	413	43	
Total Endorsements	3,687	565	22	4,274	144	4,418	1,034	1,189	288	2,511	412	2,923	4,721	1,754	310	6,785	556	T
BSAI Vessels	139	56	3	198	11	209	66	144	39	249	73	322	205	200	42	447	84	53
	2.693	178	6	2,877	61	2,938	497	197	32	726	70	798	3,190	375	38	3,603	131	3,78
GOA Vessels	2.093	170		4,011	- 71	- A,430	77.			823	102		3,358		55	3,843	167	4.01

Table 3C Configuration	n 2915211								B Licenses										
,oiiiiBa: evior								Vessels, J	anuary 1, 19	980 - Decei	mber 31, 19 Juration 91	993, Cetch 5211	History						
										Owner's Sta	ate of Resid								
	-			Alas	ka					Othe	10		L L		5 14	Total	T		
			CV						CV	4551	7.4.1	CP	Total	< 60	CV 60-125	>125	Total	CP	License
Area	Species	< 60	60-125	>125	Total	CP	Total	< 60	60-125	>125	Total 82	66	148	13	67	19	99	76	17
Al	AMCK	2	13	2	17	10	27	11 33	54 65	17 19	117	77	194	63	87	22	172	92	26
	GTRB	30	22	3	55	15	70 26	<i>33</i>	41	17	67	62	129	11	53	18	82	73	15
	OFLT	2	12	11	15 63	11 17	80	39	90	28	157	94	251	73	117	30	220	111	33
	PCOD	34	27 14	2 2	18	- 11	29	11	65	28	104	94 70	174	13	79	30	122	81	20
	PLCK	2 33	14 30	3	66	18	84	42	90	26	158	88	246	75	120	29	224	106	33
	ROCK RSOL	33	13	1	15	9	24	10	48	17	75	57	132	11	61	18	90	68	15
	SOID	Ö	.0	ol.	o	2	2	0	2	0	2	19	21	0	2	0	2	21	2
	YSOL	ň	· ,	ŏ	2	3	5	1_	7	3	11	18	29	1	9	3	13	21	3
Al Species E	ndorsements	104	133	14	251	96	347	156	462	155	773	551	1,324	260	595	169	1,024	647	1,67
Al Vessels	11441001101110	57	43	_5	105	24	129	61	149	45	255	142	397	118_	192	60	350 162	166 75	52 23
BS	AMCK	5	23	1	29	10	39	13	94	26	133	65	198	18	117	27 39	162 332	108	23 44
	GTRB	54	51	3	108	16	124	49	139	38	224	92 91	316 303	103 90	190 180	39	308	107	41
	OFLT	45	49	2	96	16	112	45	131	36 54	212 373	102	475	381	307	57	745	131	87
	PCOD	273	96	3	372	29	401	108	211 143	40	235	90	325	122	193	42	357	108	46
	PLCK	70	50	2	122	18	140	52 60	143	36	235	92	329	164	203	39	406	112	51
	ROCK	104	62	3	169	20	189	30	126	36	192	82	274	54	171	37	262	98	36
	RSOL	24	45	!]	70	16	86	30 1	120	3	اءً"	30	38	1	5	4	10	32	4
	SQID	0	1		2 53	12	65	28	118	34	180	77	257	44	154	35	233	89	32
	YSOL	16	36	17	1.021	139	1,160	386	1,107	301	1.794	721	2,515	977	1,520	318	2,815	860	3,67
	Endorsements	591 348	413 133	- '5	484	34	518	151	265	. 66	482	151	633	497	398	71	966	185	1,15
BS Vessels	ANOV	<u>345</u>	10	- 8	15	2	17	0	8	2	10	15	25	5	18	2	25	17	4
CG	AMCK DFLT	63	47	1	111	17	128	27	86	11	124	57	181	90	133	12	235	74	30
	FSOL	47	37	اه	84	13	97	18	94	10	122	38	158	65	131	10	206	49	25
	PCOD	1,166	164	5	1,335	57	1,392	189	175	25	389	71	460	1,355	339	30	1,724	128	1,85
	PLCK	305	71	- 1	377	25	402	43	127	21	191	59	250	348	198	22 21	568 1,357	84 122	65 1,47
	ROCK	840	132	2	974	51	1,025	207	157	19	383	71	454	1,047	289 165	15	1,357 348	63	41
	SFLT	129	57	0	186	16	202	39	108	15	1,381	47 356	209 1,737	168 3.078	1,273	112	4,483	537	5,00
CG Species	Endorsements	2,555	518	9	3,082	181	3,263	523	755 272	103 38	632	107	739	1,978	509	44	2,531	191	2,72
CG Vessels		1,658	237	- 6	1,899	84	1,983	322	0	30	032	107	1	0	0	70	0	1	
EG	AMCK	O	0	0	0	익	0 27	9	5	ŏ	14	28	42	25	9	ŏ	34	35	6
l	DFLT	16	4	9	20	- 4	12	3	ŏ	1	الم	11	15	8	2	1	11	16] 2
1	FSOL	5	2	0	1,585	36	1,621	249	31	ż	282	38	318	1,791	71	5	1,887	72	1,93
Į.	PCOD	1,542	40 7	3	1,565	7	67	8	4	2	14	20	34	60	11	3	74	27	
ł	PLCK	52 1,914	71	- 1	1,986	55	2.041	422	71	5	498	45	543	2,338	142	6	2,484	100	
	ROCK SFLT	72	6	'n	78	8	88	19	9	1	29	21	50	91_	15	1	107	29	13
FO Sanalan	Endorsements	3,601	130	5	3,738	118	3,854	710	120	11	841	162	1,003	4,311	250	16	4,577	280	4,85
EG Vessels		2,938	102	3	3,041	73	3,114	588	98	8	692	64	768	3,522	200	11	3,733	137	3,87
MG	AMCK	7	6	1	14	9	23	2	49	10	61	35	96	9	55	11	75	44	11 30
l''' 3	DFLT	50	31	1	82	18	100	27	89	21	137	63	200	77	120 87	22 17	219 130	81 48	
l .	FSOL	15	16	1	32	8	40	11	71	16	98	40 87	138 319	26 314	204	37	555	113	
l '	PCOD	254	66	3		26	349	60	138	34 24	232 134	69 69	203	61	114	25	200	82	28
l	PLCK	42	23	1	66	13	79	19	91	23	208	82	203 290	178	163	26	387	104	47
[ROCK	112	44	3	159	22	181	66 16	119 80	23	120	60	180	50	102	25	177	74	25
	SFLT	34	22	1	57	14	71 843	201	637	152	990	436	1,426	715	845	163	1,723	548	2,26
	s Endorsements	514	208	11		110 35		116	216	47	378	113	491	472	313	52	837	148	98
WG Vessels		357	97	5				1,976	3,081	722	5,779	2,226	8,005	9.341	4,483	778	14,602	2,870	
Total Endon		7,365	1,402	56		644 40		168	3,001	80	574	174	748	538	470	66	1,094	214	1,30
BSAI Vesso		370 4,529	144 326	11		137		818	372	62	1,252	165	1,417	5,347	698	73	6,118	302	6,42
GOA Vesas	T-									94	1,485	209	1,694	5,699	605	108	6,610	354	6,90

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Table 4A											License	d beared at	o Current V	Own Own											Γ
Configuration 915411				,					B	Based on the	Vessel's.	January 1,	the Vessel's, January 1, 1990 - December 31, 1993,	ember 31,	1993, Catch	h History							١	l	Т
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						ĕ ĕ	seels, Jam d did not f	teceive a	30 - Dece: License L	Vessels, January 1, 1880 - December 31, 1993, Catch History and did not Receive a License Under Configuration 915411	33, Catch P guration 9	istory 5411						
								Current O	wner's Sta	Current Owner's State of Residence	nce				Total			
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G Species Endorsements	1 720	3 8		7.8	3 8	1.806	326	88	6	388	92	394	2,046	65	3	2,146	64	
WG AMOK	-	7		S	-	9	-	92	2	82	7	38	~	8	2	34	8	
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Table 4	ration 2915411						· · · · ·	otal A and	B Licenses	lesued to	Current Ov	vners Base	d on the						
Johngoration 28 (54 ()							•		enuary 1, 19	80 - Dece	mber 31, 1	993, Catch							
											uration 91								
	ļ-	Alaska						Current Owner's State of Residence Other							Total				
	-	CV					h	CV						CV					1 1
Area	Species	< 60	60-125	>125	Total	CP	Total	< 60	60-125	>125	Total	CP	Total	< 60	60-125	>125	Total	CP	License
Al	AMCK	2	13	2	17	10	27	10	54	16	60	66	146	12	67	18	97 171	76	173 26 3
	GTRB	30	22	3	55	15	70	32	65	19 17	116	77 62	193 128	62 10	87 53	22 18	81	92 73	154
	OFLT	2	12	1	15 63	11 17	26 80	8 39	41 91	29	66 159	94	253	73	118	31	222	111	333
	PCOD PLCK	34 2	27 14	2	18	- 11	29	10	65	27	102	70	172	12	79	29	120	81	201
	ROCK	32	30	3	65	18	83	42	91	26	159	88	247	74	121	29	224	106	330
	RSOL	1	13	1	15	9	24	9	48	16	73	57	130	10	61	17	88	66	154
	SQID	0	0	이	0	2	2	0	2	0	2	19	21	0	2 9	0	13	21 21	23 34
	YSOL	0_	2	0	2	3	5	151	7 484	153	11 768	18 551	1,319	254	597	167	1.018	647	1,685
	ies Endorsements	103	133	14	250 104	96 21	346 125	151 58	145	41	244	111	355	117	186	45	348	132	480
Al Vessels BS AMCK		<u>59</u>	23	1	29	10	39	13	94	25	132	65	197	18	117	26	161	75	236
93	GTRB	54	51	3	108	16	124	51	141	37	229	92	321	105	192	40	337	108	445
	OFLT	45	49	2	96	16	112	44	133	37	214	91	305	89	182	39	310	107	417
	PCOD	273	96	3	372	29	401	108	214	55	377	102	479	381	310 195	58 42	749 357	131 108	680 465
	PLCK	70	50	2	122	18	140	50 63	145 142	40 36	235 241	90 92	325 333	120 167	204	39	410	112	522
	ROCK	104	62 45	3	169 70	20 16	189 86	30	128	35	193	82	275	54	173	36	263	98	361
	RSOL SQID	24 0	45	- 1	70	2	4	1	4	3	8	30	38	1	5	4	10	32	42
	YSOL	16	36	1	53	12	65	26	119	33	178	77	255	42	155_	34	231	89	320
BS Spe	cies Endorsements	591	413	17	1,021	139	1,160	386	1,120	301	1,807	721	2,528	977	1,533	318	2,828	860	3,688 1,079
BS Ves		331	134	4	469	32	501	144_	261	59	484	114	678 25	475 5	395	63	933 25	148 17	3,079
CG	AMCK	5	10	9	15	2 17	17 128	0 29	8 88	2 11	10 128	15 57	185	92	135	12	239	74	313
	DFLT FSOL	63 .47	47 37	,,	111 84	13	97	19	98	10	125	36	161	66	133	10	209	49	258
	PCOD	1.166	164	5	1,335	57	1,392	191	179	25	395	36 71	466	1,357	343	30	1,730	128	1,858
	PLCK	305	71	1	377	25	402	46	129	21	196	59	255	351	200	22	573	84	657
	ROCK	840	132	2	974	51	1,025	213	159	19	391	71	462	1,053	291	21	1,365 351	122 63	1,487 414
	SFLT	129	57	0	188	16	202	40 538	110 769	15 103	165 1,410	47 356	212 1,766	169 3,093	167 1,287	112	4,492	537	5,029
	cies Endorsements	2,555 1,567	518 228	9	3,082 1,801	181 72	3,263 1,873	314	253	38	603	92	695	1,881	481	42	2,404	184	
CG Ves	AMCK	1,567	0	- 8	1,801	- '6	1,073	0	0	0	0	1	1	0	0	0	0	1	1
	DFLT	16	4	ŏ	20	7	27	9	5	이	14	28	42	25	9	0	34	35	
	FSOL	5	2	0	7	5	12	3	0	1	4	11	15	8	2	1	11	16	
	PCOD	1,542	40	3	1,585	36	1,621	255	31	2	288	38 20	324 34	1,797 60	71 11	5	1,873 74	72 27	
	PLCK	52	7	!!	60 1,986	7 55	67 2.041	8 431	4 71	2	14 507	45	552	2.345	142	6	2.493	100	
	ROCK SFLT	1,914 72	71 6	긺	78	B B	2,041	19	9	1	29	21	50	91	15	1	107	29	136
	ocies Endorsements	3.601	130	5	3,736	118	3,854	725	120	11	856	162	1,018	4,326	250	16	4,592	280	4,872
EG Ves		2,902	101	3	3,006	68	3,074	587	95	8	690	66	756	3,489	198	11	3,698	134	
WG Spe	AMCK	7	6	1	14	9	23	2	49	10	61	35	96	9	55	11 22	75 218	44 81	119 299
	DFLT	50	31		82	18	100 40	26 11	89 71	21 16	136 98	63 40	199 138	76 26	120 87	17	130	48	
	FSOL	15 254	16 66	וַ	32 323	8 26	349	60	138	33	231	87	318	314	204	38	654	113	
	PCOD PLCK	42	23	1	66	13	79	19	91	24	134	69	203	61	114	25	200	82	282
	ROCK	111	44	al	158	22	180	66	119	22	207	82	289	177	163	25	365	104	
	SFLT	34	22	1	57	14	71	16	. 80	24	120	60	180	50	102	25	177	74	
	ecies Endorsements	513	208	11		110	842	200	637	150	987	436	1,423	713	845 295	161	1,719 774	546 143	
WG Vessels		333	92	4		36	465	102	203 3.110	40 718	345 5,828	107 2,226	452 8,054	435 9.363	4,512	774	14,649	2.870	
Total Endorsements BSAI Vessels		7,363	1,402	56		644 36	9,465 576	2,000	3,110 311	66	5,628	127	663	9,383 518	488	71	1,076	163	
BSAI V GOA V		359 4,467	175 308	5	4,782	121	4,903	830	345	65	1,230		1,377	5,297	651	64	6,012	268	
	esseis /esseis	4,623	338	11		126	5,098	960	428	84	1,472		1,642	5,583	764	95	6,442	296	

Configuration 915211						<u> </u> 			eg co	License: the Vessets, J	Licenses issued t essets, June 28, 11	to Current C 980 - June 1	Owners Based 27, 1992, Catch Histor	ed stch Histor	,									٦
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Al Species Endorsements	36	4	2	9	=	6	- 1	- 1	1	١		l	= :	1	1	1	ı	l	ı	l	5 2	ı	ı	2
Al Vessels	23	=	7	2	-	=	1		ı	1	1	1	-	1		1	ı	ŀ	1	ı	-	L	l	176
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600	204	2	38		•	-2							ន								5 5			2
PLCK	42	‡ 3	8	2	-	Ξ							2:								5 6) e
ROCK	54	= !	9 1	4	.	Ξ:							2 2								2 22			8
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EG AMCK	0	•	•		0	0						•	۰ ،								> 40			2
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CO Contract Endergements	1 420	15	12		•	23	١.	1	П		H	-	88	ı	H	1	Н	7	22.		32	1	١	
EG Vessets	1,030	25	1,056		8	٦	ı		١	ł	1	٠	2	1		1	П	1	1		-	ı	ı	3
WG AMCK	٥	٠:		- :	_ •	Φ 6							- 5								-			5
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WG Species Endorsements	183		2			L	П	Į I	П	Ц	ш		20			1		ı	_	1	2	I	ł	2
Total Endocements	3.678	l	•	49 137	101		U		П	H	1		8	- [- 1	- 1			1	1	482	Ί		
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GOA Vessela	1,636	148	1,989		=		-1.	- 1	1	ı	1	⅃	2 2	L		1	ı		L	L	9	ı	-	12
Total Vessels	1,940	150	2,100	63	=	12	_	-1	I	١	1		2				ı	۱	J		;	١		
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Table 5A

Table 5	В																		
Configur	ation 3915211								enses Issue										
								Vessels, J	anuary 1, 19 ot Receive	alicanee	Imper 31, 11 Under Con	993, Catch figuration	115101Y						
									Current C	Owner's St	ate of Resid	ance	<u> </u>						
	-			Alas	ka				CONTONIC	Oth						Total			
			CV				Į		CV						CV	4461		0.0	1:
Area	Species	< 60	60-125	>125	Total	CP	Total	< 60	60-125	>125	Total 30	<u>CP</u>	Total 46	< 60 8	60-125 20	>125 10	Total 36	CP 16	Licenses 52
Al	AMCK	2	3	!!	6 12	9	6 13	4 12	17 26	16	54	13	67	21	20 28	17	66	14	80
	GTRB OFLT	9 0	2	- 4	12	<u>ا</u> وٰ	5	2	9	9	20	9	29	2	11	10	23	11	34
	PCOD	3	1	اہ	الم	1	5	9	29	16	54	14	68	12	30	16	58	15	73
	PLCK	1	5	1	7	il	B	2	21	14	37	8	45	3	26	15	44	9	53
	ROCK	11	3	il	15	2	17	16	29	18	63	11	74	27	32	19	78	13	91
	RSOL	1	4	ol	5	1	6	1	18	10	29	9	38	2	22	10	34	10	44
	SQID	0	0	o	0	2	2	0	0	이	0	19	19	0	0	0	이	21	21
	YSOL .	0	0_	0	0	. 0	0	0	2_	2	4	5	9	0	2	- 2		- 5	463
	es Endorsements	27	20	5	52	10	62	46	151	94	291	104	395	73	171	99	343 132	114 63	457 198
Al Vesse		14		3	24	7	31	21	59 12	28	108	56 6	164 24	35	68 17	31 6	26	7	33
BS	AMCK	3	5	0	8	1	9 30	0 21	12 22	6 11	54	7	61	41	30	13	84	7	91
1	GTRB	20 14	8 2	2	30 16	, i	17	17	14	i i	39	الم	43	31	16	8	55	5	60
	OFLT PCOD	14 45	4		49	- 1	50	23	27	14	64	2	66	68	31	14	113	3	116
l	PLCK	45 22	2	ö	24	- 1	25	17	23	'al	48	īl	49	39	25	8	72	2	74
Ī	ROCK	33	6	1	40	öl	40	17	19	8	44	9	53	50	25	9	84	9	93
l	RSOL	7	3	òl	10	ő	10	8	15	6	29	4	33	15	18	6	39	4	43
l	SQID	ó	ŏ	ĭl	- il	il	2	1	0	1	2	26	28	1	0	2	3	27	30
l	YSOL	6_	2	0	8	1	9	6	15		30	4	34	12	17	9	38	5	43
	ies Endorsements	150	32	4	186	6	192	110	147	71	328	63	391	260	179_	75	514	69 63	583 280
BS Vess	els	77	19	2	98	4	102	45	61	23	129	49	178	122	60	25	227	5	12
CG	AMCK	2	3	0	5	9	5	0	2	의	2	5 13	7 44	2	5	0	7 55	21	76
	DFLT	16	8	0	24	B	32	9	18 25	41	31 35	13		25 24	26 31	1	59	16	
1	FSOL	18	6	0	24	6	30 244	6 51	25 37	4	94	13		24 260	59	7	326	25	
l	PCOD	209	22 9		232 80	12	87	16	34	2	55	11	66	200 87	43	5	135	18	153
l	PLCK ROCK	71 145	25	Ÿ	171	á l	180	48	24	7	79	11	90	193	49	. B	250	20	270
1	HOCK SFLT	145 25	7	ó	32	6	38	12	20	4	36	7	43	37	27	4	68	13	81
CG Spec	ios Endorsements	486	80	2	568	4B	616	142	160	30	332	70	402	628	240	32	900	118	
CG Vess		367	56	2	425	27	452	98	76		184	38	220	465	131	13	609	63	672
EG	AMCK	0	0	0	0	0	0	0	0	0	0	1	1	0	0	0	.0	1	
l	DFLT	7	2	0	9	2	11	3	3	이	6	13	19	10	5	9	15	15	
1	FSOL	2	1	0	3	1	4	2	0	9	2	5		4	1	0	_5	6	11
l	PCOD	409	14	2	425	11	436	87	9		97	15			23 6	3	522 26	26 9	540 31
1	PLCK	14	3	1	18	. 2	20	3	3	2	8 130	7 12	15 142	17 519	45	5	569	23	
Ī	ROCK	408	30	1	439	11	450	111 5	15 0	:1	130	12	17	14	40	7	16	14	3
	SFLT	9	<u>-</u>! -	0	904	30 30	13 934	211	30	- 1 B	249	64		1.060	81	12	1,153	94	1,24
	cies Endorsements	849	51 49	4	1,013	23	1.038	204	29	5		24		1,166	78	7	1,251	47	
EG Vesa	AMCK	962	2			0	1,030	1	8	3	12	3		7	10	3	20	3	2
1774	DFLT	18	3	0	21	Δ	25	ż	11	4	22	4	26		14	4	43	8	5
i .	FSOL	11	3	1	15	1	16	5	10	2	17	6	23	16	13	3	32	7	3:
	PCOD	62	9	ò	71	6	77	14	13	5	32	9		76	22	5	103	15	
	PLCK	16	7	1	24	1	25	7	9	2	18	5		23	16	3	42	6	4
	ROCK	29	9	0	38	7	45	17	14	4	35	8	43		23	4	73	15	
	SFLT	18	4	1	23	2	25	6	9	2	17	4	21	24	13	3	40	6	4
	cies Endorsements	160	37	3		21		57	74	22		39			111	25 16	353 241	60 35	
WG Ves		116	22	1		12		37	50	15		23			72	243		455	
Total En	dorsements	1,672	220	18	1,910	115		566	562	225		340	1	1	782		3,263		
BSAI Ve	esels	85	21	3	109	9	118	55	105	36	198	70	266	140	126	39	305	79	38
GOA Ve		1,345	106	5	1,456	46	1,502	285	109	21	415	57	472	1,630	215	26	1,871	103	1,97
				<u> </u>		51		374	173	42	589	94	693	1,836	288	47	2,171	145	2,31
Total Ve	188018	1,462	115	5	1,582	51	1,033	3/4	1/3	72			300	1,000			.,,,,,		-1-

Table 5C												<u>~</u>							
Configuration	n 3915211								B Licenses										
								Vessels, J	anuary 1, 19		mber 31, 1 juration 91		History						
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				Alas			— т		Current	Othe		30/100				Total			
			CV	Alas	- Ka				CV	Ouio	"		i i		CV	19.00			
A	Species	< 60	60-125	>125	Total	CP	Total	< 60	60-125	>125	Total	CP	Total	< 60	60-125	>125	Total	CP	License
Area Al	AMCK	2	5	2	10,0	10	19	5	37	15	57	64	121	7	42	17	66	74	140
^'	GTRB	17	11	2	30	14	44	28	50	19	97	75	172	45	61	21	127	89	216
	OFLT	Ö	4	1	5	11	16	5	24	14	43	59	102	5	28	15	48	70	118
	PCOD	22	14	2	38	17	55	32	75	29	136	92	228	54	89	31	174	109 79	283 173
	PLCK	1	5	2	8	11	19	5	54	27	86 133	68 86	154 219	6 52	59 93	29 28	94 173	103	173 276
	ROCK	20	17	3	40	17	57 15	32 4	76 23	25 14	41	54	95	92 5	28	14	47	63	110
	RSOL	1	5	0	6	9	10	ñ	23	'ä	اد "	19	21	ő	2	[6]	72	21	23
	SQID YSOL	0	0	, i	ង្គ	3	5	ŏ	2	2	4	17	21	ŏ	2	2	4	20	24
Al Species Er		63	61	12	136	94	230	111	343	145	599	534	1,133	174	404	157	735	628	1,383
Al Vessels	HUUTSUHUTHS	37	25	5	67	23	80	52	119	46	217	140	357	89	144	51	284	163	447
BS	AMCK	4	17	1	22	10	32	2	86	24	112	64	176	6	103	25	134	74	208
- -	GTRB	45	32	3	80	16	96	41	121	36	198	90	288	88	153	39	278	106	384 380
	OFLT	38	40	2	80	16	96	39	119	36	194	90	284	77	159	38 56	274	106	380 821
	PCOD	249	86	3	338	28	366	103	199	53 39	355 219	100 89	455 308	352 112	285 177	41	693 330	128 107	437
	PLCK	64	45	2	111	18	129 157	48 49	132 129	34	219	90	302	136	176	37	349	110	459
	ROCK	87	47 40	3	137 62	20 16	78	49 25	115	34	174	81	255	46	155	35	236	97	333
	RSOL SQID	21 0	40	- 1	2	10	'a	1	4	3	B	30	38	1	5	4	10	32	42
	YSOL	14	29	il	المه	12	56	21	105	34	160	76	236	35_	134	35	204	88	292
BS Species F	Indorsements_	522	337	17	876	138	1,014	329	1,010	293	1,632	710	2,342	851	1,347	310	2,508	848	3,356
BS Vessela		300	107	5	412	33	445	139	240	63	442	148	590	439	347	68	854	181	1,035
CG	AMCK	4	3	0		2	9	0	3	0	3	15	18	4	6	0	10 191	17 72	27 263
	DFLT	60	41	1	102	17	119	23	60	6	89 81	55 34	144 115	83 50	101 98	6	154	47	203
	FSOL	40	33	0	73	13	86 1.082	10 153	65 140	19	312	69	381	1.037	279	အိ	1,339	124	1,463
	PCOD	884 258	139 55	4	1,027 314	55 23	337	35	101	15	151	57	208	293	158	16	465	80	545
	PLCK ROCK	718	118	2	838	50	888	188	128	16	332	70	402	906	246	18	1,170	120	1,290
	SFLT	99	46	ō	145	14	159	26	75	11	112	45	157	125	121	11	257	59	316
CG Species I	Endorsements	2,063	435	В	2,506	174	2,680	435	572	73	1,080	345	1,425	2,498	1,007	81	3,586	519	4,105
CG Vessels	Citabilation	1,228	184	5	1,417	79	1,498	273	217	26	516	103	619	1,501	401	31	1,933	182	2,115
EG	AMCK	0	0	0		0	0	0	0	악	0	.11	_1	0	0	9	0	. 1	1
	DFLT	10	3	0	13	?	20	7	4	의	11	28 10	39 14	17	7 2	위	24	35 15	59 24
	FSOL	3	2	0	5	5	10	9 181	18	2	201		233	1.331	42	5	1,378	63	1,441
	PCOD	1,150 26	24 5	3	1,177	31 6	1,208 38	8	3	5	13	32 19	32	34	8	3	45	25	70
	PLCK ROCK	1.070	51	- 1	1,122	46	1,168	270	50	5	325	39	384	1,340	101	6	1,447	85	1,532
	SFLT	1,070	3	ò	22	6	28	7	3	1	11	20	31	26_	6	1	33	26	59
FG Species I	Endorsements	2,278	88	5	2,371	101	2,472	476	78	11	565	149	714	2,754	168	16	2,938	250	3,188
EG Vessels	Lilegiouthonie	1,992	74	3		61	2,130	407	70	8	485	56	541	2,399	144	11	2,654	117	2,671
WG	AMCK	6	2	1	9	9	18	. 1	25	.9	35	31	66	7	27	10 20	44 144	40 76	84 220
	DFLT	33	18	1	52	17	69	19	54	19	92 69	59 38	151 107	52 20	72 57	13	90	76 48	136
	FSOL	13	7	1	21	8	29 290	7 48	50 103	12 32	181	83	264	261	150	35	446	108	654
1	PCOD	215	47 18	3	265 57	25 13	70	14	73	22	109	68	177	52	91	23	166	81	247
l	PLCK	38 68	30	2		22	142	58	88	21	165	78	243	146	116	23	285	100	385
1	ROCK SFLT	31	14	1	46	14	60	12	60	22	94	69	153	43	74	23	140	73	213
WG Species	Endorsements	424	136	10		108	678	157	451	137	745	416	1,161	581	597	147	1,315	624	1,839
WG Vessels		299	66	4		34	403	98	155	43	298	106	402	397	221	47	685	140	805
Total Endors		5,350	1,057	52		615	7,074	1,508	2,454	659	4,621	2,154	6,775		3,511	711	11,080	2,769	13,849
BSAI Vesse		316	109	6		38	469	157	287	77	521	171	692	473	398	83	952	209	1,161
GOA Vessel		3,181	254	10		122	3,567	606	284	51	941 1,251	152	1,093	3,767	538 563	61 98	4,386 4,938	274 332	4,660 5,270
Total Vessel	<u> </u>	3,402	274	11	3,697	131	3,818	775	389	87	1,251	201	1,452	4,177	003	86	4,838	332	0,2/0

MIT/DOC/APPENDIX.8

November 14, 1994 *

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Table 6A											and and a	Part Carpe	O process Veneral Co.											Γ
Configuration 915411									Based on		I'e, Januar	v 1, 1990 · 1	the Vessel's, January 1, 1990 · December 31, 1993, Catch History	1, 1993, C	ntch Histo	1								
				Alacka							CurrentO	wher's State	Current Owner's State of Residence			\mid				Cotal				-
		į		-		9		Alacka		5		L	පි		ŗ	ğ					8			_
	9 09 >	80-125	125	Total	< 60 60-125	5 >125	Ţ	Total	09 09 >		- 1	9	60-125	125	Total	夏	< 60 60-1		- 1	20.00	60-125	1	7 S	90000
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Al Species Endorsements	34	30	2	63	-	2	88	1	ŀ		1		5	2/8	8 2	200				l		1	107	202
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CG Species Endorsements	980	148	1	100		١			1	П	П	20	23	45	72	475				١	ı	- 1	200	
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Al Species Endorsements	٥	0	9	0	6	5		ı	1	1	1	١			ı		1,
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Table 7A Configuration 31421									ses issued t				10						
omigaration 31421		1						,	Vessels, Ju	ne 28,198	19 - June 27	, 1992							
						(June 29,	1980 - June	e 25, 1983 fc	or Dutch Ha	rbor Red	& June 29,	1986 - Jur	ie 25, 1988	for Pribilot	Blue)				
									Current O		ate of Reside	Price							
				Alask	a		<u> </u>			Othe	97		- 1			Total			1
			CV		1				CV	- :		ا۔۔			CV	404	Total	CP	Hanna
Area	Species	< 60	60-125	>125	Total_	CP	Total	< 60	60-125	>125	Total	CP	Total	< 60	60-125	>125	10131	UP	License
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King Creb												-		1	0	0		- 0	
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	Blue	0	0	- 0		0	- 0	0	<u> </u>	- 0		- 6	- 	- i		- 6	- 1 1	<u> </u>	
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St.Lawrence/St. Mathew Species Endorsements			20	10	31		33	- 6	55	19	74	14	88	1	75	29	105	18	
St. Lawrence/St.Mathew Vessels	Red	- 1	<u>ZU</u>	- 101	3)	- 1	- 3	0	5 -	0	- 6	ō	0	0	0	ō	0	0	
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Pribliot Vessels Adak	Red	- 0	12	- 2	14	11	15	0	30	10	40	5	45	0	42	12	54	6	
TUAN	Brown	ŏ	10	3	13	0	13	0	38	18	54	- 6	60	0	46	21	67	6	:
Akak Species Endorsements	0.0	0	22	5	27	11	28	0	66	28	94	11	105	0	88	33	121	12	
Adak Vessels		0	16	4	20	1	21	0	47	22	69	7	76	0	63	26	89		
Dutch Harbor	Red	30	39	3	72	1	73	21	96	7	124	7	131	51	135	10	196	8	2
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	Brown	0	1	1	2	0	2			11	18	3	21	0	- 8	12	20	3	
Dutch Harbor Species Endorsements		30	40	4	74	1	75	21	103	18	142	10	152	51	143	22	216	11	
Dutch Harbor Vessels		30	39	4	73	1	74	21	103	18	140	10	150	51	142	20	338	11 23	
Bristol Bay	Red	6	110	16	132	3	135	3	156	47	206	20	226	0	266 0	63	338	23	l ,
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Bristol Bay Species Endorsements		6	110	16	132	3	135	3_3	156 156	47	206	20	226	9	266	63	338	21	1 3
Bristol Bay Vessels			110	16	132	3	135		100		200		220		200				1
Total King Crab Species Endorsements		37	192	35	264	7	271	27	419	121	567	62	629	64	611	156	631	69	9
				19	194		198	26	221	53	300	24	324	62	380	72	494	28	
Total King Crab Vessels		38	139	10	194		150									- 17			
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Tenner Creb			73	15	68		91	2	123	49	174	19	193	2	198	64	262	22	2
Eastern Bering Sea	C. opilio	0	94	16	111	3	114	2	146	49	197	19	216	· 3	240	65	308	22	: a
	C. bairdi		167	31	199	- 6	205	4	269	98	371	38	409	5	438	120	570	44	
Eastern Bering Sea Species Endorsements			94	16	111	3	114	4	148	50	202	19		6	242	68	313	22	1
Eastern Bering Sea Vessels	C. opišo	.	50	11	61	3	64	1	98	41	140	18	158	1	148	52	201	21	
Western Bering Sea	C. bairdi	ŏ	7	او:	اه	ō	9	0	7	12	19	5	24	0	14	14	28		·
W D. J D Consider Endamenta	U. Daru	- 0	57	13	70	3	73	11	105	53	159	23		1	162	88	229	26	
Western Bering Sea Species Endorsements		- 0	50	11	61	3	64	. 1	98	41	140	18	160		146	62	201	21	2
Western Bering Sea Vessels	C. opilio	0	0	0	O	0	0	0	3	0	3	0	3	0	3	0	3	0	9
Eastern Aleutians	C. bairdi	8	2	ŏ	10	0	10	2	5	. 0	7	1		10		0	17	1	
Eastern Aleutians Species Endorsements	J	8	2	- 6	10	0		2	8	0		1	11		10	0	20	1	
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CABITILI AIGULIANS TOTATIA	C. opišo	0	 -	Ö	1	0	1	0	1	0	_1	0	1	0	2	이	2	0	?1
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			5	ō	5	0		5	6	2		3					18		-
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Western Aleutians Western Aleutians Species Endorsements		0	6	0	5		- 01												
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Western Aleutians Western Aleutians Species Endorsements				44	284		293	12	388	153	553	65		21	610	197	837		
Western Aleufans Species Endorsements Western Aleufans Species Endorsements Western Aleufans Vessels Total Tanner Crab Endorsements		0	6			9	_		388 150	153 60		65 19		21 21	610 246	197 68	837 223	74 22	1
Western Aleufans Western Aleufans Species Endorsements Western Aleuflans Vessels		0	5 231	44	284	9	293	12						21	246				

H:V MITYDOCAPPENDIX.8

Total Vessels for King and Tanner Crab

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Table 7B																			
Configuration 231421								B Lice	nses Issued	to Curre	nt Owners	Based on 1	lhe .	<u>-</u>					
								Vess	els, January	1, 1980 t	o Decembe	r 31, 1993 (and						
						D1		on bib	t Receive a l bservations v	License u	Inder Conii	e leutskiegi a leutskiegi	1421 ren theu we	m not inched	lod				
						Piez	30 NO(8, DG	ause some c	Current (Deporte S	tate of Resid	lance	140, 0.07 110	10 101 111000					
	ŀ			Alas	ka				<u> </u>	Other					Total				
	ŀ		CV				· '		CV						CV				1
Area	Species	< 60	60-125	>125	Total	CP	Total	< 60	60-125	>125	Total	CP	Total	< 60	60-125	125	Total	CP	Licenses
71704							-				1	· · · · · · · · · ·					1		
King Creb																			18
Norton Sound	Red	0	4	1	5	0	_	0	8	- 1	9		13	0	12	2	14	3	10
	Blue		<u> </u>	- 0	. 0	0	- 0	0	<u> </u>		0	- 0	13	0	12	2	14		16
Norton Sound Species Endorsements		0		!	5	8			8				13		12		14	4	10
Norton Sound Vessels St.Lawrence/St Mathew	Red		0	- :	- 6	ŏ			- 0	i	- 6	o	Ö	0	Ö	0	0	0	
St.Lawrence/St.Matnew	Bhe	ĭ	37	4	42		44		58	14	72	15	87	1	95	18	114	17	131
	Brown	ò	5	6	11	ō			6	5	11	2	13	0	11		22	2	
St.Lawrence/St. Mathew Species Endorsements		1	42	10	53		55		64	19	83	17	100	1	106	29	136	19	
St. Lawrence/St.Mathew Vessels		11	40	7	48		50		60	18	78	16	93		100	25	126	17	
Pribile!	Red	0	1	0	1	0			0	0		0	0	0	1 6	0	3	0	1:
	Bhe	1	6	2	9	0	9		0	0	0		4	1	5	2	7	1	i '
	Brown	<u> </u>		- 0	11	- 0	11			2	6	5	11	1	12	4	17	5	2
Pribilof Species Endorsements				2	11		- ;;			2	8	- 5	11		12	4	17	- 6	2
Pribilof Vessels Adak	Red	1	40	11	52				78	25		17	121	2	118	36	156	20	
NUGE .	Brown	i	39	8	48	3	51		78_	28	108	20	128	3		36	156	23	17
Akak Species Endorsements		2	79	19	100				156	53		37	249	5		72	312	43	35
Adak Vessels		22	62	14	58		71		109	37		21		4		61	216	24	
Dutch Harbor	Red	1	5	2	8	1	9		9	0			17	2		2	18	ő	
	Bhe	0	0	0	0 17	! ?	18		0 61	0	0 71	0 13	0 84	3	73	12	88	.14	
	Brown	2 3	12	3 5	25				70	- 5				5		14	106	22	
Dutch Harbor Species Endorsements		3	17		25				69	9				6		14	103	18	12
Dutch Harbor Vessels Bristol Bay	Red	7	61	12	80				64	21				9		33	167	33	20
DIISIOI Day	Blue	ò	2	ō	2	ا			6	2		0	8	0		2	10	G	
	Brown	0	ō	0	0	0			0	0	0	0	0	0		- 0		0	L
Bristol Bay Species Endorsements		7	63	12	82				70	23				- 0		35	177	33	
Bristol Bay Vessels		7	61	12	60				70 372	23 107		29 112	124 598	21		156	762	126	
Total King Crab Species Endorsements		14	213 113	49	276 147				188	107				19		77	395	36	
Total King Crab Vessels		14	113_	20	147		101		100		2.70								
Tenner Crab							1	ì				l	·				1		l
Eastern Bering Sea	Č. coilo	1	31	7	39	3	42	2	25	6				3		15	74	21	
Casteri Delling Gea	C. bairdi	10	25	3	38	1 3	41		19	7	29	19		13		10	67	22	
Eastern Bering Sea Species Endorsements		11	56	10					44	15		37		16		25	141	43	
Eastern Bering Sea Vessels		11	41		60				38	11				16		19 25	112	21	11
Western Bering Sea	C. opišo	0	38	10			51		33 64	15 17						28	141	12	
	C. bairdi_	0	49 87	21	108		113			32						53	237	33	
Western Bering Sea Species Endorsements		0	70	17			90			26						42	197	21	
Western Bering Sea Vessets Eastern Alextians	C. opilio	6	- 70	- 1/	- 6			3 1	0	0	1	0	1	7	0	0	7		
COMMINICACIONIS	C. bairdi	28	6	·	34		34		19	2	28		31			2	62		3
Eastern Aleutians Species Endorsements		34	6	0					19	2							69		3
Eastern Aleutians Vessels		27	6	0					18	2	28					2	61		
Western Aleutians	C. opišo	0	0	0		1			0 20	9	0 26		31			6	36		
	C. bairdi		<u>8</u> 8		10		1 1			5						6	38		6
Western Aleutians Species Endorsements Western Aleutians Vessels			8				1									6	36		6 4
Atestery Vientisus Aesseis							1									88	483	8	5 5
Total Tanner Crab Endorsements		46	157	32	235	1	2 24	7 14	180	54	248	73	321						
Total Tenner Crab Vessels		37	94	17	140) 4	15	12	126	34	172	23	198	49	220	61	320		7 3
Total Endorsements for King and Tanner Crab		60	370	81			53	7 21	552	161	734	185	916	81	922	242	1,245	21	1 1,4
Total Vessels for King and Tanner Crab		48	145	23	210		22	0 17	215	63	298	32	327	6:	5 360	86	511	3	s 6

Configuration 331421									Licenses iss									
								Vess	els, January				nd					
											iguration 31							
						Please	note, beca	use some ol	servations w	ere not br	oken out by	individual a	rea, they w	ere not included.				
									Current C		ate of Resid	ence						
				Alasi	а					Oth	er		1		Total			
			CV				L		CV					CV				
Area	Species	< 60	60-125	>125	Total	CP	Total	< 60	60-125	>125	Total	CP	Total	< 60 60-125	>125	Total	CP	Licens
										- 1	ı	1			- 1	1		
King Crab																		
Norton Sound	Red	0	4	1	5	0	5	1	8	1	10	4	14	1 12	2	15	- 4	
	Blue	00	0_	0	0	0	0	0	0	0	- 0	0	- 0	0 0	- 0	- 0		
Norton Sound Species Endorsements		0	4		5	0	5		8		10		14	1 12		15	4	
Norton Sound Vessels		0	4		6	0	- 5				10		14	1 12	2	16	4	
St.Lawrence/St.Mathew	Red	0	0	0	0	이	0	0	0	0	٧,	~	175	2 170	47	219	33	2
	Blue	2	57	14]	73		77	0	113 6	33 5	146 11	29	13	0 11	71	22	23	
	Brown	0	5	B]	11	- 0	11				157	31	188	2 181	58	241	35	2
St.Lawrence/St. Mathew Species Endorsements		<u> 2</u>	62	20	84		88 83	0	119	38	152	29	181	2 175	64	231	33	2
St. Lawrence/St.Mathew Vessels	5.4	2	60	17	79	- 4	- 83	- 0	110	- "	6		- 0	0 1	- 3		0	
Pribliof	Red	0	!	្នា		ű		2	39	ä	50	10	60	3 45	11	59	10	١,
	Blue	1	6	2	,	XI	1	6	4	او	6		امّ	0 5	2	7	او .	i '
	Brown	<u> </u>	- I	2	- il l	- 0		2	43	11	56	12	68	3 51	13	67	12	
Pribliof Species Endorsements			B	2	- 	- 0	11	2	43	11	56	12	68	3 61	13	67	12	
Pribliof Vessels	Red	- : -	52	13	66	-	70		108	35	144	22	166	2 160	48	210	26	2
Adak	Brown	:	49	11	61	3	64	2	114	46	162	26	168	3 , 163	57	223	29	2
Akak Species Endorsements	GIOWII	2	101	24	127	 #	134	3	222	81	306	48	354	5 323	105	433	55	
			68	10	88	Ā	92	2	158	69	217	28	245	4 224	77	305	32	3:
Adak Vessels Dutch Harbor	Red	31	44	5	80	2	82	22	105	7	134	14	148	53 149	12	214	16	2
Dutan Harbor	Blue	ö	0	ŏ	o.	0	0	0	0	o	ol	o	o	0 0	0	0	0	i
	Brown	ž	13	4	19	1	20	1	68	20	89	16	105	3 81	24	108	17	
Dutch Harbor Species Endorsements	0.0	33	57	9	99	3	102	23	173	27	223	30	253	56 230	36	322	33	3
Dutch Harbor Vessels		33	68	8	98	2	100	23	172	25	220	25	245	66 228	34	318	27	
Bristol Bay	Red	13	171	28	212	7	219	5	220	68	293	48	342	18 391	96	505	56	50
Children Guy	Blue	0	2	ol	2	0	2	0	6	2	6]	0	8	8 0	2	10	0	ł
	Brown	.0	0	_ 0	0	0	0	0	0	C	c	0	- 0	0 0	0	0	0	
Bristol Bay Species Endorsements		13	173	28	214	7	221		226	70	301	49	350	18 399	98	515	56	
Bristol Bay Vessels		13	171	28	212	7	219	6	226	70	301	49	350	18 397	93	613	58	- 5
		51	405	84	540	21	561	34	791	228	1,053	174	1,227	85 1,196	312	1,593	195	1,7
Total King Crab Species Endorsements										110	548	66	604	81 659	149	889	84	91
Total King Creb Vessels		80	252	39	341		349	31	407	110	048	00	604	91 600	140/	- 683		
											ŀ				ľ	1		i
Tenner Crab									- 440					F 050		- 200		
Eastern Bering Sea	C. opilio	1	104	22	127	6	133	4	148	57	209	37 38	246	5 252 16 284	79 75	336 375	43 44	
•	C. bairdi	11	119	19	149	6	155	5	165	56 113	226 435		264 510	16 284 21 538	154	711	87	
Eastern Bering Sea Species Endorsements		12	223	41	276	12	288		313	61	254	75 38	292	21 536	85	425	44	
Eastern Bering Sea Vessels		12	135	24	171		177 115		131	56	188	36	224	1 210	77	297	42	
Western Bering Sea	C. opillo	0	88	21	109	5	115 71		131 71	29	100	15	115	0 127	42	169	17	
	C. baird	•	56 144	13	69 178		186		202	85	288	51	339	1 346	119	466	59	R.
Western Bering Sea Species Endorsements		0		34 28	148	- 8	164		183	66	250	38	288	1 303	94	298	42	
Western Bering Sea Vessels	O ======	- 0	120	30	148	- 6	6	-	3	- 0		- 0		7 3	0	10	C	
Eastern Aleutians	C. opilio	6	0	9	44	ĭ	44	ه ا	24	او	35	ĭ	39	45 32	او	79	Ă	
	C, bairdi	38	B B		50	·	50		27	- 5	39	- 7	43	52 35	- 2	89	4	
Eastern Aleutiana Species Endorsements		42 35		- 0	43		43		23	2	35	Ā	39	45 31	- 1	78	4	
Esstern Aleutiana Vessela	C. opillo	<u>35</u>	-				1	1 0	1	čl	11	ő	1	0 2	0	2	Ö	
Western Aleutians	C. opino C. bairdi	·	12	រុ	14	ĭ	15			7	38	8	46	7 37		52		
Western Alandone Paneles Endersements	U. DaiU		13		15	1	16		26	7	39	8	47	7 39	8	54	9	
Western Aleutians Species Endorsements Western Aleutians Vessels		- i	13	 i l	15		16		26	. 7	39	8	47	7 39	8	84	0	
THE STATE OF THE S		`							***				444	01 020	200	1,320	150	1,4
Total Tanner Crab Endorsements		55	388	76	519	21	540	26	568	207	801	138	939	81 956	283	1,320	159	
		48	190	33	269	7	276	24	276	84	384	42	426	70 466	117	653	49	,
Total Tenner Crab Vessels			130															
		106	793	160	1,059	42	1,101	60	1,359	435	1,854	312	2,166	188 2,152	595	2,913	354	3,2
Total Endorsements for King and Tarmer Crab			193		1,038	76		 	*15-5									
										122	616			145 726	166		64	1.1

H:N MITOOCAPPENDIX.8

November 14, 1994 P

Table 8A																		
Configuration 31421									es lasued to (•					
	l					/ hina 2	1080 - him	V 01 1092 40	essels, June	28,1989 ·	- JURO 2/	, 1992 1988 - Jan	95 1088	for Pribliof Blue)				
						(some 2	e, 1900 - 901	10 20, 1803 10	Current Own				,	101111222				
	1			Alaski	9				CONGRECATION OF THE PROPERTY O	Other			1		Total			
	ŀ		CV		-		1 [CV				[C				l '
Area	Species	< 60	60-125	>125	Total	CP	Total	< 60	60-125	125	Total	CP	Total	< 60 60-125	>125	Total	CP	Licenses
							i 1			- 1	ľ	İ			ı			
King Crab							 		0					1 0	-		0	-
Norton Sound	Red	0	0		0	0		1	0	ä	,,	្ហ	اہ	0 0	- 1	اہ	ő	
	Byve			- 	0				- 0	 	1	ŏ	<u> </u>	1 0		1	0	1
Norton Sound Species Endorsements Norton Sound Vessels		0	- i					1	Ö	Ö	1	0	1	1 0	0	1	0	
St.Lawrence/St.Mathew	Red	0	ō	0	ō	ō	0	0	0	0	0	0	0	0 0		0	0	
D. 2011 1010 0 1.111 2010 11	Blue	1	20	10	31	2	33	0	55	19	74	14	88	1 75		105	16	
	Brown	0	0	0	0		0	0	<u> </u>			0	0	0_0		0	0 16	
St.Lawrence/St. Mathew Species Endorsements		1	20	10	31			0	55	19	74	14	88 88	1 75 1 76		105	16	
St. Lawrence/St.Mathew Vessels			20	10	31		33	0	65	19	74	14		0 0		100	- 10	
Pribitof	Red	0	0	9	0			0 2	0 39		50	ě	56	2 39		50	6	56
,	Biown Brown	0	0		0	"		ő	0	6	3	ĭl	1	0 0			i	تـــــــــــــــــــــــــــــــــــــ
Pribitof Species Endorsements	Diomi		0	- 6	0	0			39	9	50	7	57	2 39		50	7	
Pribliof Vessels		0	0	0	Ō		0	2	39	9	60	7	57	2 39		60	7	
Adak	Red	0	12	2	14	1	15		30	10	40	5	45	0 42		54	6	
	Brown	0	10	3	13		13	0	36	18	54	- 6	60	0 48 0 88		67 121	<u>6</u>	
Akak Species Endorsements		0	22	5	27		28	0	66	28	94 69	11	105 76	0 88 0 63		69	12 0	
Adak Vessels		0	16		20		21 73	21	96	- ~; -	124		131	51 135			8	
Dutch Harbor	Red	30	39 0	3	72	;	(3)	21	0	61	'6	6	131	0 0		اه	ŏ	
	Blue Brown	0	1	ា	9	1 7	اءُ ا	ŏ	7	11	18	3	21	o a	12	20	3	23
Data Habas Consider Fordersonate	Blown	30	40		74	 	75	21	103	18	142	10	152	51 143	22	216	11	227
Dutch Harbor Species Endorsements Dutch Harbor Vessels		30	39	4	73		74		103	16	140	10	160	51 142			11	
Bristol Bay	Red	6	110	16	132	3	135		156	47	206	20	226	9 266			23	
J	Blue	0	0	0	0	(, -	0	0	인	9	0	0	0 0		0	0	
	Brown	0	0_		0	1	0	0	0		- 0	- 0	- 0	9 266		338	23	
Bristol Bay Species Endorsements		6	110	16	132		135		156 156	47	206 206	20	226 226	9 268			22	
Bristol Bay Vessels			110	16	132													
Total King Crab Species Endorsements		. 37	192	35	264	1	271	27	419	121	567	62	629	64 611		831	_69	
Total King Crab Vessels		38	139	19	194		198	26	221	53	300	24	324	62 360	72	494	20	622
Total King Clab Vessels							T**										1	
Tenner Creb						·												
Eastern Bering Sea	C. opišo	0	73	15	88				123	49	174	19	193	2 198			22	
	C. bairdi	1	94	16	111		114		146 269	98	197 371	19 38	216 409	3 240 5 438				
Eastern Bering Sea Species Endorsements			167	31	199		205 114		148	50	202	19	221					
Eastern Bering Sea Vessels	0:	1 0	94 50	16 11	111 61				98	41	140		158				21	22
Western Bering Sea	C. opišo C. bairdi	0	30 7	' '	91	1			7	12	19	5	24	0 14	1 14	28		5 3:
Western Bering Sea Species Endorsements	J. 0414	<u>ö</u>	57	13	70		3 73		105	53	159		182	1 163				8 25
Western Bering Sea Species Endosements		0	50	11	61		3 64	1	98	41	140	18	158					1 22
Eastern Aleutians	C. opilio	0	0	0			0		3	0	3	0	3	0				
	C. bairdi_	8	2	0	10		0 10		5	<u> </u>	7	1		10	7 0			1 1
Eastern Aleutans Species Endorsements		8	2	0			0 10		<u>8</u>	- 9	10	1	11		7 0			1 2
Eastern Aleutians Vessels			2	- 0	10		0 10	2	<u> </u>	- 0	 !	1			2 0		 	
Western Aleutians	C. opišo	0	1	의	1	1	0 1		5	ä	12		15		9 2	16		3 1
	C. bairdi	0	- 4	0			0 5	5	6	2	13		16		1 2	18		3 2
Western Aleutians Species Endomements Western Aleutians Vessels		- 0	- 5	- 6			0 6		6	2	13	3						
						1	293	12	388	153	553	65	618	21 61	9 197	837	74	4 91
Total Tanner Crab Endorsements			231	44	28	4											·	
Total Tenner Crab Vessels		9	98	16	12	<u> </u>	3 124	12	150	60	212	19	231	21 24	6 66	333	2:	2 35
Total Endorsements for King and Tanner Crab		46	423	79	54	3 1	6 564	39	807	274	1,120	127	1,247	85 1,23	0 353	1,668	14	3 1.81
Total Vessels for King and Tenner Crab		42	142	21	20	5	4 209	38	224	69	321	24	341	80 36	8 60	626	2	8 68

-	10	

Table 8B										44- 0		Deced on	75.						
Configuration 331421									enses issue sels, January										
								did na	ot Receive a	License (Under Conf	leuration 3	1421						
		1				Plea	se note, bed	BUSO SOME	observations v	were not b	roken out by	individual s	rea, they w	ere not inclu	ded.				
									Current Owner										
				Alas	ka					Ott	107				ĊV	Total			
			CV				7-4-1		60-125	>125	Total	CP	Total	< 60		>125	Total	CP	Licenses
Area	Species	< 60	60-125	>125	Total	СР	Total	< 60	60-125]	>120	10:8:1		1044		00-125				
King Crab					1														
Norton Sound	Red	0	4	1	5	0	5	0	8	1	9	3	12			2	14	3	17
	Blue	0	0		0	. 0	0	0		0	0	0	0				- 0	0	
Norton Sound Species Endorsements		0	4	1	5	0	5	0			9	3	12			2	14	3	
Norton Sound Vessels		0			6	0	6	0	8	- 1	0	0	12	- 0			170	Ö	
St.Lawrence/St.Mathew	Red	0	0 36	9	0 40	9	0 42	•	55	14	69	14	83			16	109	16	
	Blue Brown	0	4	21	A	ć	8	ŏ	6	4	10	2	12	_		. 8	18	2	20
St.Lawrence/St. Mathew Species Endorsements	Diowii	0		8	48	2	50	Ö	61	18	79	16				26		18	14
St. Lawrence/St. Mathew Vessels		- i	39	7	47	2	49	0		18		14	89		96	28	122	18	131
Pribilof	Red	Ö	1	0	1	0	1	0		0		0	0	0		0	1	0	1:
	Bue	1	5	2	8	0	8	0	0	0				1	5 5	2	8	4	"
	Brown	0			1	0		- 8	- +	5	6	5	11			- 4	16	5	3
Pribitof Species Endorsements			7 7	- 2	10 10	- 0	10			- 2 2		<u> </u>	11		11	4	18	8	
Pribitof Vessels	Red		34	ام ح	43		45			20		13				28	130	15	149
Adak	Brown	;	29	á	36	2	38			17	75	15	90	1	87	23	111	17	12
Akak Species Endorsements	Olowii.	2	63	14	79	4	83		125	37		28	190			51		32	
Adak Vessels		2	42	11	55	2	67	0	88	26		16				27		18	
Dutch Harbor	Red	0	1	2	3	0	3	0		0		4	5			2		4	
	Bive	0	0	0	0	0	0			0	0	0] 64	1 -	0 54	10		10	
	Brown	1	8_	2		0			46	8	54 55	10			56	12			-
Dutch Harbor Species Endorsements				4	14		14								56	12	69	11	
Dutch Harbor Vessels	Red	- 7	33		49		52			14						23		23	11
Bristol Bay	Bio Bio	ó	33	ő	0		70			2	a e	0	"	i a		2		0	
•	Brown	ŏ	ŏ	6	ō		0	0		0		0				0			
Bristol Bay Species Endorsements		7	33	9	49		52			16						25 25	99	23	12
Bristol Bay Vessels			33	9	49	3	52			16								21	
Total King Crab Species Endorsements		11	156	38	205	9	214	2	277	62		88				120		95	_
Total King Crab Vessels		11	80	17	108	3	111	2	134	48	182	20	202		214	63	290	21	31
								I											
Tenner Creb						<u> </u>	40	1	18	8	27	18	45	2	47	15	64	21	
Eastern Bering Sea	C. opilio	1	29 24	71	37 37	3	40 40			7	26	18				10			i a
Faster Bades Con Preside Endomements	C. bairdi	10	53	10	74					15				14	88	25 19		42	16
Eastern Bering Sea Species Endorsements Eastern Bering Sea Vessels		11		- 10	68		61	3		11	43	18	61	14	68	19	101		12
Western Bering Sea Vessers	C opišo	- ;		10	47	3	50	0		15						25	95		
	C. bairdi	Ó		11	60		62			17		10				28		12	15
Western Bering Sea Species Endorsements		0		21	107					32						53 42			
Western Bering Sea Vessels		0		17	85				83	25	110	18				- 42			 *'
Eastern Aleutians	C. opišo	2		0	2 16		16		. 4	2	1 1] ;	1			2	25	}	l
	C. bairdi	13 15			18				4	2	10	1 1				2			2
Eastern Aleutians Species Endorsements Eastern Aleutians Vessels		15			18											2	26		
Western Aleutians Vessers	C. opišo	0		Ö	0		- 0			O	0	0				0			1
THOUSE TRANSPORT	C. bairdi	1	5	1	7	1		1		1	10		1				17		
Western Aleutians Species Endorsements		1	5	1	7	1					10				2 13	2			
Western Aleutiana Vessels		1		1	7		7	1 1	8	1	1								
Total Tanner Crab Endorsements		27	147	32	206	12	216	ه ا	144	50	202	68	27	3	3 291	82	400		48
		25		17	128	3	131		100	.30	138	18	16	3	188_	47	264	2	23
Total Tenner Crab Vessels		25																	
Total Endorsements for King and Tanner Crab		38	303	70	411	21				132	1		i –	1		202	1	1	
Total Vessels for King and Tanner Crab		35	111	20	168	3	169		155	52	215	20	23	5 <u>4</u> 5	3 266	72	381	2	40
									-										

H:V MIT\DOC\APPENDIX.8

Table 8C								A and B I	Licenses iss	ued to Cu	rrent Owne	ra Based o	n the						
configuration 231421	- 1																		
		Vessels, January 1, 1989 to December 31, 1993 and and License Configuration 31421																	
		Please note, because some observations were not broken out by individual area, they were not included.																	
							,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		Current 6	Owner's St	ate of Resid	ence							
				Alask						Oth	N'		L			Total			1
			CV				[CV						CV				
Area	Species_	< 60	60-125	>125	Total	CP	Total	< 60	60-125	>125	Total	CP	Total	< 60	60-125	>125	Total	СР	Licenses
vea	<u> </u>									1						1	į.		l l
King Creb															12		15		
Norton Sound	Red	0	4	-1	5	0	5	1	8		10	3	13	1	12	3	12	3	: ا
	Blue	0	0	0	- 0	0	0	0	0	- 0	10		13	- 	12		15	3	18
Norton Sound Species Endorsements		0	4	1	5	0	5		8		10	3	13		12	- 2	15	3	
Norton Sound Vessels			4	1	6	0	- 5	1 0		- :	- 10	- 3	0	0	- 70	ő	Ö	ō	
St.Lewrence/St.Mathew	Red	0	0	0	0 71		75		110	33	143	28	171	ĭ	168	47	214	32	248
	Blue	1	56	14	(1)	7	1,5	ă	6	4	10	2	12	Ó	10	8	18	2	20
	Brown	- 0	60	18	79		83	0	116	37	153	30	183	1	176	55	232	34	
St Lawrence/St. Mathew Species Endorsements		- 1	69	17	78	 }	82	- 0	112	37	149	28	177	2	171	54	227	32	
St. Lawrence/St.Mathew Vessels	Red	0	1	- 6			1	ō	Ö	0	C	0	0	0	1	O	_1	0	
Pribilof	Blue	ĭ	Ś	2	ė	ŏ	ė	2	39	8	50	10	60	3	44	11	58	10	
	Brown	ċ	ĭ	ō	īl		1	0	4	2	. 6	2	8		5			2	
Pribliof Species Endorsements	(FI OWIT	i	7	2	10	0			43	11	56	12	68	3_	50	13	66	12	
Pribliof Vessels		1	7	2	10	0			43	11	66	12	68	3	50	13	184	12 21	
Adak	Red	i	46	10	57	3	60		97	30	127	18	145 150	1	143 133	40 44	176	21	
Annual Control of the	Brown	1	39	- 9	49	2	51		94	35	129	21		1 2	276	84	362	44	
Akak Species Endorsements		5	85	19	106	5	111			65	256 183	39 23	295	- 2	193	63	258	20	28
Adak Vessels		2	68	16	76	3	78		135 97	- 44	125	11	136	51	137	12	200	12	
Dutch Harbor	Red	30	40	5	75	1	76	21	0/	, (1	123	'6		0			0	ï	d -
	Blue	0	0	익	0		13		53	19	72	13	85	1	62	22	85	13	3 0
	Brown	!_	. 0	- 3	13		69			26	197	24	221	52	199	34	285	2!	5 31
Dutch Harbor Species Endorsements		31	49	8	88 87		88		150	24	195	21	218	62	198	32	282	2	2 30
Dutch Harbor Vessels		31	143	25	181		187			61	248	40	288	18	325	86	429	41	8 47
Bristol Bay	Red	13 0	143	23	0	7	1	ه ا	6	2	8	0	8	. 0	6	2	8		0
	Brown	0	ő	ŏ	ő		1 6	ة ا	Ō	G	0	0	0	0		0	0		0
	Brown	13	143	25	181		187	5	168	63		40		18	331	88		4	
Bristol Bay Species Endorsements		13	143	26	101		197	6	188	63	256	49	296	10	331	88	437	4	6 41
Bristol Bay Vessels						16	485	29	696	203	928	148	1,076	77	1.044	276	1,397	16-	4 1,56
Total King Crab Species Endorsements		48	348	73	469			- 11										6	
Total King Crab Vessels		47	219	38	302	1 1	309	28	355	99	442	44	524	76	674	135	/84		4
TOTAL KING CIND VOSSEIS							1										1		
Tenner Crab													238	4	243	79	326	4	3 30
Eastern Bering Sea	C. opillo		102	22	125					57 56		37 37	238 260	15		75		4	
	C. bairdi	11	118	19	148		154		163	113		74	498	19		154		8	
Eastern Bering Sea Species Endorsements		12	220	41	273					61		37		19		85			3 4
Eastern Bering Sea Vessels		12	133_	24	169		114			56		38	224	1	218	77	296	4	2 3:
Western Bering Sea	C. opilio	0	87	21 13	108		7			28		15	115			42	169	1	7 1
	C. bairdi	0	56 143	34	177		18		202	85		51	339		345	119			9 5
Western Bering Sea Species Endorsements		- 0	119	28			16:		103	66		30			302	94			2 4
Western Bering Sea Vessels	C. oplio	- 2	119	- 40	17		5		3	Ô	4	Ó	4	3		0	6	l	9
Eastern Aleutians	C. bairdi	21	5	n	26		2		9	2	16	2	16	26			42	⊢—	2
Tanton Alautona Charles Endorgements	J. 04.4	23	5		28		2	8 6		2		2	22	29			48		2
Eastern Aleutians Species Endorsements Eastern Aleutians Vessels		23	5	0			2				17						45		0
Western Aleutans	C. opilio	0	1	Ō			0	1		9		9		9	2 22	2	33	l	7
LI DOG LI CADEGI D	C. baird	1	9	1	11		1 1				22	<u> </u>	28						/
Western Aleutians Species Endorsements		1	10	1	12		1 1			3	23		29	<u> </u>	24		35		6
Western Aleutians Vessels		1	10	1	1	1	0 1	2	14		23	- '					1		_
		36	378	76	496	2	1 51	1 20	532	203	755	133	888	56	910	279	1,245	15	54 1,3
Total Tenner Crab Endorsements						-				80	1	37			432	113	697	1 4	63 6
Total Tanner Crab Vessels		34	182	33	24	4	6 25	11	200		+	 	700	 			1		
							7 99	6 46	1,228	406	1,683	281	1,964	133	1.954	555	2,642	31	18 2,0
Total Endorsements for King and Tanner Crab		84	726	149	95	" 3	7 99	" "	1,220		1 ,,303		1				1		
													680	123	632	163	907		61 S

AP Recommendations (December 7, 1994)

The following list of elements and options was used as a working document during AP discussions. Options strated are those selected by the AP. The AP felt these options deserved more consideration than those options that were not highlighted. Likewise, the AP felt that those elements they chose to strike-out should receive less consideration than those that had no action taken. No alternatives are considered to be permanently deleted from future considerations.

GROUNDFISH LICENSES

Components and Alternative Elements Affecting Initial Assignment

	Numbering
License Classes	Scheme
A single class of licenses	
Two license classes with Class B Permits For Participants From	
Two license classes with Class B Permits For Participants From	
Two license classes with Class B relinits For randopants From	m 1/1/88 - 12/31/93
NT-A CT !	
	*00000
Single license for all species and areas	
Licenses for FMP areas (i.e., GOA and BSAI)	
Licenses for FMP sub-areas (i.e., EG, CG, WG, BS, AI)	300000
Licenses for Pollock, P.cod, Flatfish, Rockfish, and Other fishe	eries 400000
Licenses for Pollock, P.cod, Flatfish, Rockfish, and Other fishe	
Licenses for Pollock, P.cod, Flatfish, Rockfish, and Other fisher	
Licenses for fisheries (see Box 1) by FMP sub-areas	
· · · · · ·	
Licenses for fisheries (see Box 1) by the following areas: EG,	
Licenses for fisheries (see Box 2) by FMP sub-areas	
Licenses for fisheries (see Box 3) by FMP sub-areas	A00000
Licenses for fisheries (see Box 4) by newly configured areas	B00000
Box 1 Fisheries Specified Under Options 700	0,000 and 800,000
BSAI Fishery Licenses:	GOA Fishery Licenses:
Pollock, Pacific Cod, Atka Mackerel, Yellowfin Sole, Other Flatfish,	Pollock, Pacific Cod, Deep Water Flats, Shallow
Water Rockfish, Squid (Fixed Gear), Rocksole, Turbots	Flatfish, Atka Mackerel

Box 2 Fisheries Specified Under Options 900,000

BSAI Fishery Licenses:

Pollock, Pacific Cod, Atka Mackerel, Yellowfin Sole, Other Flatfish,

Rockfish, Squid (Fixed Gear), Rocksole, Turbots

GOA Fishery Licenses:

Pollock, Pacific Cod, Deep Water Flats, Shallow Water Flatfish, Atka Mackerel, Flathead Sole,

Numbering

Rockfish

Additionally, BSAI trawl sablefish will be bycatch only for any BSAI licensed vessel and Arrowtooth in any sub-area is open to any vessel holding a sub-area license.

Box 3 Fisheries Specified Under Options A00,000

Fishery Endorsements for BS and AI:

Pollock, Pacific Cod, Atka Mackerel, Yellowfin Sole, Other Flatfish, Rockfish, Squid (Fixed Gear), Rocksole, Turbots, Trawl Sablefish

Fishery Endorsements for EG. CG and WG:
Pollock, Pacific Cod, Deep Water Flats, Shallow
Water Flatfish, Atka Mackerel, Flathead Sole,
Rockfish

Additionally, Arrowtooth in any sub-area is open to any vessel holding a sub-area license.

Note: General licenses would be issued for GOA, BSAI, and GOA/BSAI. In case of the latter, GOA and BSAI are not separable. There would be no intermediate license at the sub-area level

Box 4 Fisheries Specified Under Options B00,000

Target species are defined the same as in Box 3. Areas would be defined as 610, 620, 630+640, 650+680, AI, and BS.

Wote: General licenses would be issued for GOA, BSAI, and GOA/BSAI. In case of the latter, GOA and BSAI are not separable. There would be no intermediate license at the sub-area level

License Recipients
Current owners 10000
Current owner, then owner at the time of landing, then permit holders (no duplicate)
Current owners, then permit holders (no duplicates)
Current owners, owners at the time of landing, and permit holders (duplicates allowed)
License Designations
No restrictions
Catcher vessels & Catcher/processors
Vessel length
Inshore & Offshore 4000
Catcher vessels & Catcher/processors and vessel length 5000
Catcher vessels & Catcher/processors and Inshore & Offshore
Inshore & Offshore and vessel length
Catcher vessels & Catcher/processors, Inshore & Offshore, and vessel length 8000
Qualifying Periods
Jan. 1, 1978 - Dec. 31, 1993
Jun. 28, 1989 - Jun. 27, 1992
Jun. 28, 1989 - date of final action
Jan. 1, 1990 - Dec. 31, 1993 400
The three years prior to the date of final action 500
Jun. 28, 1989 - Jun. 27, 1992 & the three years prior to the date of final action
Each of the three calendar years from 1/1/90 - 6/27/92 & the 365 days prior to final action,
except for fixed gear P. cod use $6/23/91 - 6/27/92$ rather than $1/1/90 - 6/27/92 \dots 700$
$1 \cdot 1 \cdot 1 \cdot 1 \cdot 1 \cdot 1 \cdot 1 \cdot 1 \cdot 1 \cdot 1 \cdot$
ADD: 1/1/88 - 6/27/92

Landings Requirements For General License Qualification	333
One Landing	0
Two landings 2	0
5,000 pounds	0
10,000 pounds	
Landings Requirements for Endorsement Qualification One landing in qualifying period	*
Two landings in qualifying period	2
Three landings in qualifying period	3
Four landings in qualifying period	4
One landing in year prior to council action	5
Two landings in year prior to council action	6
Three landings in year prior to council action	7
Four landings in year prior to council action	

Components and Alternative Elements Affecting the Ownership, Use, and Transfer of Licenses

Who May Purchase Licenses

Licenses could be transferred only to "persons" defined under Title 46 U.S.C.

Licenses could be transferred to "persons" with 76% or more U.S. ownership, with "grandfather" rights for license recipients with 75% or less U.S. ownership (Title 46 U.S.C.).

Vessel/License Linkages

Vessel must be transferred with license.

Licenses may be transferred without a vessel, i.e., licenses may be applied to vessels other than the one to which the license initially was issued.

Options Regarding the Separability of Species and/or Area Designations

- Species and/or Area designations are not separable, and shall remain as a single license with those initial designations.
- Species and/or Area designations shall be treated as separable licenses and may be transferred as 2. such.
- 3 Species and/or Area designations shall be regarded as separable endorsements which require the owner to also own a general license before use or purchase.

Vessel Replacement and Upgrades

- No restrictions on vessel replacement or upgrades, except that the vessel must meet the "Use Restrictions" (License Designations) defined by the initial allocation.
- Vessel may not be replaced or upgraded.
- 2. Vessel may be replaced or upgraded within the bounds of the 20% Rule defined in the moratorium proposed rule.

License Ownership Caps

- No limit on the number of licenses or endorsements which may be owned by a "person."
- No more than 5 area licenses per person with grandfather provisions.
- No more than 10 area licenses per person with grandfather provisions.
- 2 3. 4. No more than 15 area licenses per person with grandfather provisions.
- No more than 5 fishery/area endorsements per person with grandfather provisions. 5.
- No more than 10 fishery/area endorsements per person with grandfather provisions. 6.
- No more than 15 fishery/area endorsements per person with grandfather provisions. 7.

Vessel License Use Caps

- No limit on the number of licenses (or endorsements) which may be used on a vessel.
- No more than 1 area license (endorsement) may be used on a vessel in a given year. 2.
- No more than 2 area licenses (endorsements) may be used on a vessel in a given year. 3.
- No more than 3 area licenses (endorsements) may be used on a vessel in a given year. 4.
- No more than 4 area licenses (endorsements) may be used on a vessel in a given year. 5.
- No more than 5 area licenses (endorsements) may be used on a vessel in a given year. 6.

Vessel Designation Limits

- A vessel which qualifies for multiple designations (i.e., both as a CV and as a CP or as both inshore and offshore) under the use restriction component will be able to participate under any designation for which it qualifies.
- A vessel which qualifies for multiple designations under the use restriction component must choose a 2. single designation.

Buy-back/Retirement Program

- No buy-back/retirement program.
- Fractional license system. (Fractional licenses may be issued to vessel owners at the time of landing 2. and/or permit holders.)
- 3. Industry Funded Buy-back Program with right of first refusal on all transfers of licenses.

License Ownership Caps

- No limit on the number of licenses or endorsements which may be owned by a "person."
- No more than 5 area licenses per person with grandfather provisions.
- No more than 10 area licenses per person with grandfather provisions.
- 4. No more than 15 area licenses per person with grandfather provisions.
- 5. No more than 5 fishery/area endorsements per person with grandfather provisions.
- 6. No more than 10 fishery/area endorsements per person with grandfather provisions.
- 7. No more than 15 fishery/area endorsements per person with grandfather provisions.

Two-Tiered Skipper License Program

- Do not implement a Two-Tiered Skipper License Program. 1.
- 2. Implement a Two-Tiered Skipper License Program.

Community Development Quotas.

- 1. No CDO allocations
- 2. 3% of any or all groundfish TACs for CDOs natterned after current program w/o sunset provision.
- 7.5% of any or all groundfish TACs for CDQs patterned after current program w/o sunset provision.
- 4 10% of any or all groundfish TACs for CDQs patterned after current program w/o sunset provision.
- 5. 15% of any or all groundfish TACs for CDQs patterned after current program w/o sunset provision.

Community Development Licenses:

- No Community Development Licenses.
- 2. Grant an additional 3% non-transferable licenses to CDQs communities.
- 3. Grant an additional 7.5% non-transferable licenses to CDQs communities.
- Grant an additional 10% non-transferable licenses to CDQs communities:
- Grant an additional 15% non-transferable licenses to CDQs communities.

Other Provisions (Choose any or none of the following)

1. Licenses represent a use privilege. The Council may convert the license program to an IFQ program or otherwise alter or rescind the program without compensation to license holders.

- 2. Severe penalties may be invoked for failure to comply with conditions of the license.
- 3. Licenses may be suspended or revoked for multiple violations.
- Implement a Skipper Reporting System which requires groundfish license holders to report skipper names, address, and service records to NMFS.
- 5. Develop and implement mechanisms to collect management, enforcement costs and/or rents from the industry, including taxes and fees on the industry.

High to me can a company to the comp

CRAB LICENSES

Components and Alternative Elements Affecting Initial Assignment

Numi	ering
	theme 10000 10000
Nature of Licenses Single license for all species and areas Licenses for species (e.g., C. opilio, C. bairdi, Red, Blue and Brown King Crab) Licenses for each species/area combination	20000
License Recipients Current owners Current owners and permit holders	1000 2000
License Designations No restrictions Catcher vessels & Catcher/processors Vessel length Catcher vessels & Catcher/processors and vessel length	. 200 . 300
Qualifying Period Jan. 1, 1978 - Dec. 31, 1993	10
6/28/89 - 6/27/92 (6/29/80 - 6/25/83 for D.H. Red & 6/29/85 - 6/25/1988 for Prib. Blue)	20
6/28/89 - 6/27/92 (6/29/80 - 6/25/83 for D.H. Red & 6/29/85 - 6/25/1988 for Prib. Blue. These two groups must also have made a landing in any Federally managed crab fishery between 1/1/92-12/31/94. For Norton Sound Red and Blue King Crab fisheries use 6/28/93-7/30/94)	30000 2000
1/1/92 - 12/31/94 (6/29/80 - 6/25/83 for D.H. Red & 6/29/85 - 6/25/1988 for Prib. Blue. These two groups must also have made a landing in any Federally managed crab fishery between 1/1/92-12/31/94. For Norton Sound Red and Blue King Crab fisheries use 6/28/93-7/30/94)	
Minimum landings No minimum 1 landing for Red & Blue King. 3 landings for Brown King. C. apillo, & C. bairdi 3 landings of King or Tanner crab from federally managed fisheries during the qualifying period	1 2
Definition of C/P	

Components and Alternative Elements Affecting the Ownership, Use, and Transfer of Licenses

Who May Purchase Licenses

Licenses could be transferred only to "persons" defined under Title 46 CFR 67.03.

- 1. 2 Licenses could be transferred to "persons" with 76% or more U.S. ownership, with "grandfather" rights for license recipients with 75% or less U.S. ownership (Title 46 CFR 802).
- Licenses are non-transferable. 3.

Vessel/License Linkages

Vessel must be transferred with license

2 Licenses may be transferred without a vessel, i.e., licenses may be applied to vessels other than that to which the license was initially was issued.

Options Regarding the Separability of Species and/or Area Designations

- 1. Species and/or Area designations are not separable, and shall remain grouped as in the initial allocation.
- Species or Area designations shall be treated as separable licenses and may be transferred as such.
- Species or Area designations shall be regarded as separable endorsements which require the owner to also own a more general license before use or purchase.

Vessel Replacement and Upgrades

- No restrictions on vessel replacement or upgrades, except that the vessel must meet the "License Designations" defined by the initial allocation.
- Vessel may not be replaced or upgraded.
- Vessel may be replaced or upgraded within the bounds of the 20% Rule as defined under the moratorium proposed rule.

License Ownership Caps

- No limit on the number of licenses or endorsements which may be owned by a "person."
- No more than 5 area licenses per person with grandfather provisions.
- No more than 10 area licenses per person with grandfather provisions.
- No more than 15 area licenses per person with grandfather provisions.
- 5. No more than 5 fishery/area endorsements per person with grandfather provisions.
- 6. No more than 10 fishery/area endorsements per person with grandfather provisions.
- 7. No more than 15 fishery/area endorsements per person with grandfather provisions.

Buy-back/Retirement Program

- No buy-back/retirement program. 1.
- 2. Fractional license system. (Fractional licenses may be issued to permit holders.)
- 3. Industry Funded Buy-back Program with right of first refusal on all transfers of licenses.

Two-Tiered Skipper License Program

- 1. Do not implement a Two-Tiered Skipper License Program.
- 2. Implement a Two-Tiered Skipper License Program.

Community Development Quotas.

- No CDO allocations.
- Set aside 3% of crab fisheries with GHLs for CDQs patterned after current program w/o sunset 2.
- Set aside 7.5% of crab fisheries w/GHLs for CDQs patterned after current program w/o sunset 3.
- Set aside 10% of crab fisheries w/GHLs for CDQs patterned after current program w/o sunset 4.
- Set aside 15% of crab fisheries w/GHLs for CDQs patterned after current program w/o sunset 5. provision.

Community Development Licenses.

- No Community Development Licenses:
- Grant an additional 3% non-transferable licenses to CDQs communities.
- Grant an additional 7.5% non-transferable licenses to CDQs communities. 3.
- Grant air additional 10% non-transferable licenses to CDQs communities:
- Grant an additional 15% non-transferable licenses to CDOs communities:

Other Provisions (Choose any or none of the following)

- Licenses represent a use privilege. The Council may convert the license program to an IFQ program 1. or otherwise alter or rescind the program without compensation to license holders.
- Severe penalties may be invoked for failure to comply with conditions of the license. 2.
- Licenses may be suspended or revoked for multiple violations.
- 3. Implement a Skipper Reporting System which requires groundfish license holders to report skipper names, address, and service records to NMFS.
- Develop and implement mechanisms to collect management, enforcement costs and/or rents from the 5. industry, including taxes and fees on the industry.
- No Future Super-exclusive Area will be proposed. 6.

Individual Transferable Pot Quota System

In addition to the components above, an Individual Transferable Pot Ouota (ITPO) System Alternative has been proposed in concept only. Under this option, the components affecting the initial assignment of crab ticenses will remain unchanged. However, once it is decided which persons qualify for which vessel size and processing designations, licenses would be linked to a limited number of pots. Pots could be transferred to meet individual vessel requirements. Many of the component sets regarding the use and transferability of licenses may not apply under a ITPQ system. The Council will have to specify in more detail if additional analysis of the ITPQ system is desired.

ADD IN NON-transferability + SUNSET ISSUES

NU Shading - Box - Separate wine, NoT

UNN Other Provision

TESTIMONY OF THE PENINSULA MARKETING ASSOCIATION BEFORE THE NORTH PACIFIC FISHERY MANAGEMENT COUNCIL ON THE COMPREHENSIVE RATIONALIZATION PROGRAM

December 7, 1994

For the record, my name is <u>Barbara Wilson</u>; I am president of the Peninsula Marketing Association (PMA). We represent fishermen of the Alaska Peninsula and Shumagin Islands. Today I would like to give the Council our preferred options on the Comprehensive Rationalization Program.

Our main concern is that we need to keep fishing opportunities flexible so that fishermen in our small, coastal communities can respond to changing market demands as well as fluctuating stock abundance.

We would like to state for the record that our fishermen would prefer open access to Gulf of Alaska groundfish fisheries. However, if open access is not a viable option, then it is in our best interest to develop an alternative, which is a license limitation program. As our own discussions have proceeded down this path to license limitation, we have come up with three very important issues that we support and desire the Council to give consideration and discussion.

- 1.) Federal groundfish license limitation should apply only outside territorial seas.
- 2.) The Gulf of Alaska should be split from the Bering Sea in such a way that the Bering Sea interests would be free to move toward an IFQ/CDQ program if they want. Gulf interests would be free to move toward a simple license limitation program.
- 3.) License limitations in the Gulf should <u>not</u> roll over into IFQ's.

We have specific problems in our fishery which we do want you to be aware of. The groundfish fishery in our area is a relatively new fishery. It's not new to our cultural history, but new from a

marketability standpoint. We represent participation in only P. cod and pollock. Processors in our areas only began buying P. cod in 1988 and pollock in 1993. These years show how current and new our participation is. We feel this also signifies how we have had to maintain flexibility in the fisheries to maintain our livelihoods.

We don't have participation in other target fisheries; again, the problem being market accessibility. Only in 1993 were our bycatch species even added to our fish tickets. And that is the only way we would have landings on species other than P.cod and pollock, which furthers our opposition to species endorsements. Again, we cannot tell you enough about the need for flexibility to change in the fisheries as markets change.

Our preferred options for license limitation in the Gulf are:

<u>Components</u> <u>Numbering Scheme</u>

License Class: A single class of licenses 1,000,000

Nature of License: Licenses for FMP subareas 300,000

Licenses for FMP areas Gulf

and Bering Sea 200,000

Short version is 1 license to participate, 2nd needed license for subareas. If you participated in both the Bering Sea and the Gulf, you would receive a non-separable license also with subarea licenses. We are not tying this into any species endorsements.

License Recipients: Current owners 10,000

License Designations: Catcher vessels & catcher/processors

and vessel length 5,000

(including vessel length to

catcher/processor)

Qualifying Periods: January 1, 1990 - Dec. 31, 1994

3 yrs. prior to implementation, at very least.

(We specify current participation as current through and including 1994)

Landing Requirements: one landing 10

Landing Requirements for Endorsements:

We do not support species endorsements for reasons previously given, which were lack of marketability. Marketability takes more than any particular vessel participating, it also takes the processors in our areas having processing capabilities and established markets.

We previously said we wanted a single class of license and FMP licenses and we feel those options leave us with flexibility and, at the same time, you are limiting entrance into the North Pacific fisheries.

Who may purchase licenses: we support the AP's recommendation with further analysis.

Vessel/license linkages: Option #2

Options regarding the separability of species: Option #3 (that the license is separable)

Vessel replacement and upgrades: Option #3

License ownership caps: Option #2/no more than 5 licenses Vessel license use caps: Option #3/no more than 2 licenses

Buy back/retirement program: Option #1/no buy back or retirement program.

Two tiered skipper license program: Option #1/do not implement a two tiered skipper license program.

In conclusion and summary: the Gulf is very different from the Bering Sea and we would strongly like to see these areas separated. We support the need to protect the fish stocks and feel this can be done in the Gulf through a license limitation program if the Council must continue down with this comprehensive rationalization process.

Pastime Became Profitable

fre ACIFIC FISHERMAN, June 3, 1904

catch last year is estimated at 2,042-000 fish, a slight decrease from that of the year before that. The catch this coming year ought to reach the 3,000,000 mark as several new companies are in the field. Previous to 1863 all of the salt cured cod and smoked fish used on the Pacific coast were the products of the Atlantic fisheries, and were brought across the Isthmus or shipped around Cape Horn. The transportation charges were high, and the product was often injured or entirely spoiled in passing through the heat of the tropics. Dried cod was, consequently, difficult to obtain on the Pacific coast, and always expensive to the consumer, while dealers frequently suffered severe loss by being compelled to throw consignments of fish into the bay.

"In 1857, Capt. Mathew Turner, master of the brig Timandra, 120 tons, sailed from San Francisco with an assorted cargo for Nicolaevsk, on the Amoor river. He was detained, however, for three weeks at Castor Bay, at the head of the Gulf of Tartary, because the Amoor river was full of ice when he reached iatic coast. While the vessel lay waiting, anchored in three fathoms of water, the crew began fishing over the rail with hand lines, simply as a pastime. They were surprised to find plenty of cod, averaging about two feet in length. Capt. Turner had not previously seen codfish, but some of his crew were familiar with the species, and he knowing their market value at S a n Francisco, appreciated the importance of the discovery, and became interested in the fishing. . .

"In 1863 Capt. Turner once more sailed in the Timandra to the Amoor river. But this time he went prepared to catch and cure some cod on his return voyage. Besides fishing gear, he carried 25 tons of salt. Returning he stopped to fish at the Gulf of Tartary. Cod were plentiful at first, and ten tons were e taken in a few days, and salted in kench. But suddenly the fish disappeared and none could be caught. Then the brig ran down the coast to southern Kamchatka, where fish were found in abundance, and excellent suc-

sel lay near the rocky coast, and on the second day during the prevailance of a dense for g, both anchors were lost. This mishap compelled Capt. Turner to abandon fishing and leave the coast; he reluctantly sailed for home. His fish sold at San Francisco for 15 cents per pound, and his voyage would have been notably profitable if the loss of anchors had not interfered with obtaining a full fare. This was the first occasion that salt cod were landed on the west coast from Pacific fishing grounds.

"In 1864 Capt. Turner sailed on his brig on a cod fishing voyage. Thus the Timandra was the first vessel to engage in this industry from the Pacific ports. On the same grounds visited the previous year a fare of 100 tons of codfish was obtained, and the voyage was remunerative. The same year the schooner Alert made a trip to Bristol Bay, Alaska, in pursuit of cod. Her voyage proved a failure, for she took only 9 tons of fish.

". . . in 1865 six vessels sailed to the Okhotsk sea in pursuit of cod. These were the first American vessels to visit that region on cod fishing trips; and their sailing evidenced a resolution to begin the business upon a broad commercial basis. . . /Capt. Turner/ sailed for Alaska on the schooner Porpoise, of 45 tons, March 27, 1865, and arrived at the Shumagin Islands May 1. He began fishing the same day. Cod were abundant and close in shore. As a result he returned to San Francisco on July 7 with a fare of 30 tons of fish --- something less than a full cargo, only for the desire to market the catch in advance of the arrival home of the vessels that had sailed to the fishing grounds on the Asiatic side of the Pacific. This was the first fare of cod from the Shumagin Islands, a locality since famous in the annals of the Pacific cod fishery.

"The cod-fishing fleet of 1864 was composed wholly of rather small sized schooners, most of which were originally built in New England for the Atlantic fisheries. . . It is remarkable that one of those that crossed the Pacific, sailing about 5,000 miles from home, was only 20 tons, a mere boat in which to make such a voyage, and to return loaded 'nearly decks to the water.' . . .

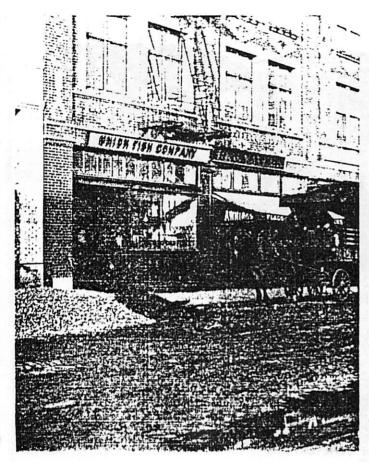
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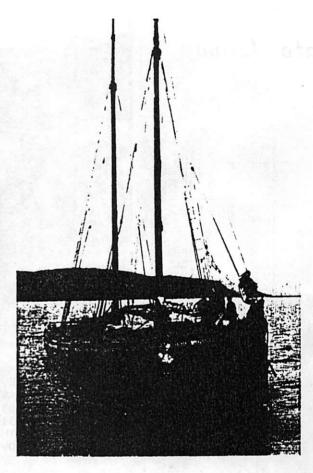
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Sujona at Redwood 1169
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UNION FISH COMPANY'S STORE FRONT IN SAN FRANCISCO BEFORE 1306 EARTHQUAKE

McCollam Fishing & Trading Company of San Francisco operated the first shore station for codfishing. "'Early in the Seventies, a party of hunters had established a station at Pirate Cove, a very pretty and well-sheltered cove with ample depth of water, at the North end of Popof Island, one of the Shumagin group. A wharf and several buildings had been constructed by the party; Mr. McCollam purchased this station and established the first regular shore fishing station for cod in Alaska.' It might be mentioned that in its first year of operation, 1876, the Pirate Cove Station produced only 30,000 codfish; none-the-less, by 1915, Pirate Cove had become not only the first but also the largest shore station in Alaska.

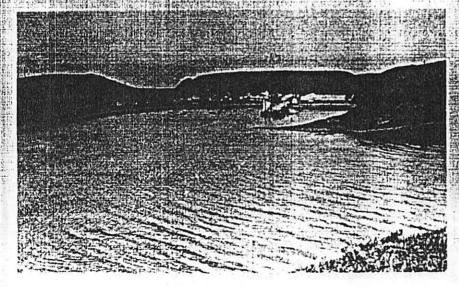
"By 1915, there were 17 shore stations in Alaska, 13 of them in the Shumagin Island group: 7 operated by Union Fish Company, 6 by the Alaska Codfish Company, and 4 by private entrepreneurs. Such 'private new-comers' into the business of codfishing were not received with open arms by the established codfishing companies. Still — they kept coming, and by the early 1920's, there were between 15 and 20 codfishing stations on Unga Island alone — nearly all of which were operated by independent fishermen/business men; small business men, to be sure — but independent ones! Of the hardy and hard working men who sought economic freedom and independence by going into the codfishing business on a small scale but little is known. Few records of their work, their aims, their successes, and their failures have survived; even their names are forgotten. . "

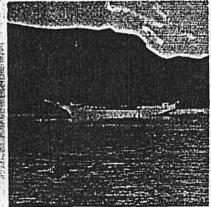
FROM THE SAGA OF THE PACIFIC COD FISHERY A K Larssen

Pirate Cove



RUDOLPH HOELKE, SUPERINTENDENT OF THE COD-FISH STATION, WAS APPOINTED POSTMASTER I N NOVEMBER 18, 1909: THE POST OFFICE WAS DIS-CONTINUED MAY 31, 1918 AND MOVED TO SAND POINT: MANY OF THE HOELKE FAMILY WERE BURIED IN THE PIRATE COVE CEMETERY.





SCHOONER -- "GOLDEN STATE"



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Codfishing is almost a thing of the past. Yet once it was the main industry of the Shumagin Islands. Perhaps it might interest people to know a little of this "lost industry."

At first the fishing was done in dories, which, after a haul would return to a schooner near by. This schooner was used as a saltery and carrier for both the fish and the dories. When their season's catch had been made, they would return to their home port. In the early seventies, a shore station with nine men was established at Pirate Cove, which is about 18 miles from Unga. This station was the pioneer codfish station of Alaska. Many of these stations were established as time went on, due to the fact that it was found advantageous for both the fishermen and the companies. In 1915 there were about 20 of these shore stations in the vicinity of Unga, about 8 were situated on Unga Island. Most of these stations were owned by large concerns in San Francisco. At times, as many as forty men were employed at the larger stations. A few independent stations were established by local people. At the present time, there are about 8 of these small stations operating on Unga Island — the large companies have gone a long time ago.

Some of you may not know a lot about codfish and how they are caught, so I'll try and give you some idea about this fish of the past, (but which is coming into its own again.)

The fishermen set out for the grounds or banks early in the morning in s m a l l power dories and upon reaching their favorite spot or fishing hole, drop their anchor. Each dory has two sets of cod lines, each line with two hooks. One set of lines is dropped from each side of the dory for about 60 fathoms. Each one of the hooks is baited, and lucky is the fisherman who can haul up the fish, "pair by pair." As soon as the fish reach the gunwales of the boat, they are cut at the throat. This throating causes the fish to bleed in order that the meat remain white after curing.

As soon as the fisherman gets his day's catch, which averages around 200, he sets out for his shore station, where after a quick meal, he must "dress" his fish. The dressing operation consists of heading and splitting the fish, the removal of the backbone. The fish are then placed meat side up in large tanks and partly covered with rock salt. After a period of 24 to 48 hours the fish produce a brine pickle and after five to seven days are completely cured and ready for shipment to the market. Codfish vary in size, running from 40 to 11 or fewer pounds and are from 43 to 26 inches in length. Anything smaller is called a "snapper" and generally not used for market purpose, but is excellent for home use.

Often before the codfish are headed, the tongues are taken out. The tongues are cured in the same manner as the fish itself. They are put up in small kits. Codfish tongues are delicious, having a taste similar to oysters, when fried.

Codfish is salted, frozen or dried, the dried fish being known as "stock-fish." Codfish in the salted or dried form required considerable time in preparing, inasmuch as it had to be soaked in water for some time. Now that the process of canning codfish has been perfected, the average housewife will find it easier to prepare. Codfish is rich in food value and makes a delicious dish whether creamed, boiled, fried or made into fish balls.

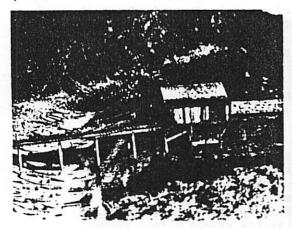
Why, if this fish is so good and was so plentiful at one time, has it lost its popularity? Salmon was taking its place, inasmuch as salmon is easily canned a n d easily prepared for a meal. Salmon, in a way, is also to blame for the diminishing for codfishing, due in part to the large number of codfish caught each year in the many salmon traps and destroyed and the fact that oftimes the gurry or offal from the salmon canneries finds its way out to the feeding grounds of the codfish, which either destroys them or makes them inedible.

The people here at Unga, where codfishing is one of their means of livelihood, hope that someday codfish will make a "come back" and we all hope it won't be in the too far future.

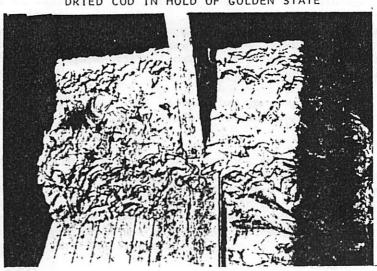
The article above on codfishing was written about ten years ago by Mrs.Edward F. Casey and is now published for the informational value that it may hold for those unacquainted with the industry and may it bring back memory to those that witnessed the Golden Age of Unga.

ALASKA PEN, 1947

CODFISH STATION



DRIED COD IN HOLD OF GOLDEN STATE



Komedal Knutsen Nelson Einmo Johnson

Alfred Komedal got into codfishing and the Shumagin Islands by suggesting to at mending fishermen in Kodiak some helpful advice about their task. He had been a mate on a sealer but was persuaded to beach seine for the rest of the season. After salmon season, he went to work in the Unga gold mine. A skillful business man, he bought the general store and several other buildings in Unga as well as a codfish station across the Bay. "His was one of the two stations that produced dried fish..." Although he and his family moved to Bainbridge Island in 1920, his codfish station continued until the late 1920's.

Knut Knutsen, skipper/owner of the schooner HIGHLAND QUEEN, lost his boat to a fierce November (1915) storm in the Outer Harbor. His resolve to build a codfishing station met with great frustration; lumber was hard to locate and when it was in stock, the companies refused to sell to a new-comer. However, along with a good partner, Danish Pete, the station was completed.

John H. Nelson and John Einmo formed a partnership to open a codfishing station at Hardscratch in 1902. Nothing more is heard about the station until 1911, when R.H. Johnson operated it. The next owner, Captain Nicolai Johnson ('Old Nick') had the station 1915-1930.

Crews on codfishing schooners were from many nationalities ("from Italy to Iceland") but the shore station crews were mostly Scandinavians with some Aleuts assisting. Nicknames sometimes meant more than the man's original name: Whiskey Bill was perhaps too fond of the drink but Whiskey Jack hated all forms of liquor passionately. Gentleman Gus, Gloomy Gus, German Bill, Russian Bill, Halibut Pete, Pete the Snailer, Dirty Dick, Valhalla Nels, The Stril, Lofoten were all good men and true.

In 1920, the Alaska shore stations produced close to two million cod, a total more than 38 million cod for the 44 years since the first station at Pirate ve.

A.K. Larssen

from Pacific Fisherman

Alaska Dry Salt Codfish

In 1926, the shipment of wind dried codfish from s.w. Alaska amounted to 184,000 pounds, all except 6000 pounds of which came from Sand Point, Squaw Harbor, Unga Village. Among the seventeen shippers were P. Gundersen, Unga, 1500 pounds; Nick Johnson, Hardscratch Point, 38,400; John Vasstrand, Squaw Harbor, 33,800; Pete(the Snailer) Torgersen, Unga, 17,500; Sam Larsen, Squaw Harbor, 19-400; Martin Gilbert, Squaw Harbor, 14,500; A. Grosvold, Sand Point, 8,600 pounds.

AKL

Name and Location		Pounds
Berntsen, John	Unga	30,000
Gilbert, Martin	Squaw Harbor	4,000
Gilbert, William	Unga	82,000
Grifberg, Edwin	"	6,000
Galovin, Mike	ti .	10,000
Hammer, John	O	10,000
Hermes, John	a	20,000
Iverson, John	ti '	14,000
Lauritzen, Conrad		
& Co.	H	74,000
Pagano, Michael	41	5.000
Petus, William	44	26,000
Pomian, Fred	'n	30,000
Rogers, Frank	n	24,000
Smith, A.& Co.	Sand Point	20,000
		24,000
Thompson, Tengwal		28,000
Vastrand, John	Unga	80,000
Wilson, Edward	T-4-1	
	Total	487,000

"At an early date in the fishery oil was being extracted from the livers of cod. In 1866, 10,000 gallons were reported as being rendered, which statement seems somewhat of an exaggeration when the then extent of the fishery is taken into account. In 1879 Lynde & Hough are reported as bringing to San Francisco 3,000 gallons of oil. In later years a small quantity was prepared each season, the quantity depending upon the demand and price.

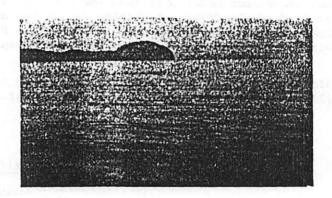
"In 1899 the Alaska Codfish Co.installed a refining plant at its Kelleys Rock station, in Alaska, and operated it successfully until 100 barrels (iron-lined receptacles holding 20 gallons) had accumulated, when they were brought to San Francisco and the oil offered for sale to makers of emulsion of cod-liver oil. At that time the market was overloaded with this grade of oil and the best price offered was about what the container cost, so the oil was stored and the plant shut down. A few years later the market picked up and the oil was disposed of at \$22 per barrel. In the meantime the company's oil maker had disappeared and the plant was so badly dilapidated through the action of the elements that the industry was not resumed.

"Later the Union Fish Co. installed a plant at Pirate Cove, but after refining a small quantity at no profit to the company, this plant was also shut down and has remained so ever since."

Cobb, pp. 59, 70, 71

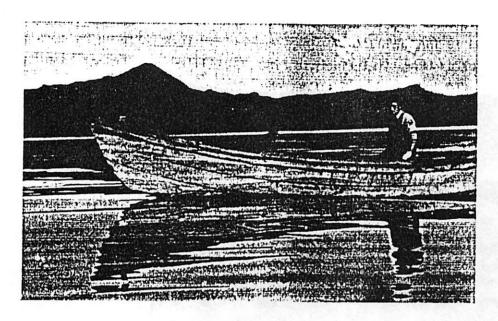
Pacific Coast Codfish Catch Since 1870

Year	Fish	Year	Fish	
1870	1,467,000	1904	2,551,000	
1871	926,000	1905	3,642,000	
1872	305,500	1906	4,527,000	
1873	563,000	1907	3,012,000	
1875	362,000	1908	3,245,000	
1876	844,000	1909	2,460,000	
1877	857,000	1910	1,969,000	
1878	857,000	1911	2,793,000	
1879	1,499,000	1912	2,326,000	
1880	1,203,000	1913	2,425,357	
1881	1,061,000	1914	3,920,802	
1882	1,241,000	1915	3,798,071	
1883	1,720,000	1916	3,891,986	
1884	1,620,000	1917	3,880,633	
1885	1,374,000	1918	3,357,384	
1886	1,231,000	1919	3,341,000	
1887	1,129,000	1920	3,027,500	
1888	1,051,000	1921	1,969,000	
1889	816,000	1922	1,957,000	
1890	1,138,000	1923	2,629,507	
1891	1,220,000	1924	2,407,989	
1892	1,312,000	1925	3,112,489	
1893	1,216,000	1926	2,351,060	
1894	969,000	1927	1,632,928	
1895	1,014,000	1928	1,580,752	
1896	802,000	1929	1,882,200	
1897	1,740,000	1930	1,774,075	
1898	817,000	1931	1,214,460	
1899	1,377,000	1932	1,203,231	
1900	1,417,000	1933	1,676,081	
1901	1,504,000	1934	1,633,425	
1902	2,248,000	1935	1,563,898	
1903	2,177,000	1936	1,585,741	



Alaska Salt Codfish- 1932 Packed at Shore stations

Packer	Location	Pounds
Gilbert, William-	Unga	7,000
Iverson, John-	" b.	8,400
Lauritzen, Harold-		4,200
Lauritzen, Hjalmar-	и	5,700
Pedersen, Lauritz-		4,500
Pomain, Fred-		1,500
Sjoberg, Gus-	11	71,800
	total	103,130



"The late Thomas W. McClollam is said to have been the first on the Pacific Coast to establish on a permanent basis a business devoted exclusively to the fish trade. In 1867 he bought his first cargo of cod, and the next year he determined to engage permanently in the trade and to conduct the business on the most approved methods. At the beginning he bought and cured several cargoes of cod at Old Sausalito /California/ /later moved to Redwood City and then to nw of San Francisco/. He visited New England and purchased the fishing schooners, Rippling Wave, Wild Gazelle and Flying Mist. The first was lost in the passage in Magellan Straight; the others arrived safely and were immediately sent to the Shumagin Islands for cod.

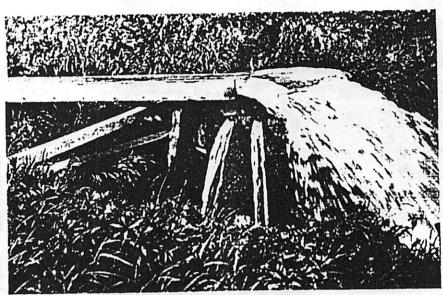
"The business appears to have been prudently managed, and prospered. In addition to the fish taken by his own vessels he bought many other cargoes. In 1873 a partner was taken into the business, and the firm was then known as Thomas W. McClollam & Co. In 1874 the schooner Alfred Adams was added to the cod-fishing fleet. But the same year the Flying Mist went to hunt sea otters. . .with marked success.

/That same year/ "it was determined to introduce a new feature in the cod fishery by establishing a station at one of the Shumagin Islands, where fishermen could live in summer and from which they could pursue cod fishing in boats, salting their catch in store houses on shore where the fish could remain in kench until it was suitable to send them to market. Pirate Cove, Popoff Island, was selected. The place had already been occupied by a party of hunters, who had resorted here for several years, and had erected a wharf and two buildings. Cod were

abundant near the shore, and the fact that the station still is occupied proves the wisdom of its selection. Three schooners were sent to the station the first year, and their crews worked in conjunction with the men on shore.

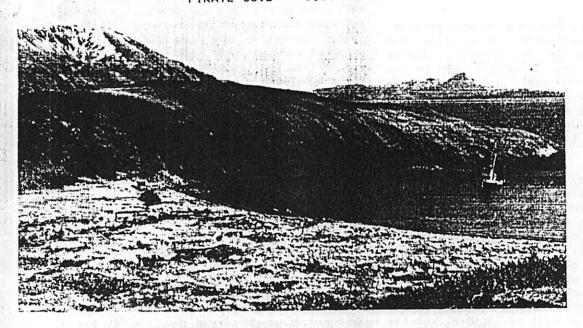
"In 1883 several new members were admitted to the firm, and its name was changed to the McCollam /sic/ Fishing & Trading Company. The fishing fleet was increased. . . The business at Pirate Cove, which previously had been confined to supplying the employees of the firm was largely increased. A new building was erected at the Cove, and it was stocked with a large amount of goods suitable to the trade. . . Additional new buildings and a new wharf were constructed at Pirate Cove in 1884, and the stock of goods was enlarged and improved in variety. This resulted in making the Cove headquarters for supplies for residents within a radius of 100 miles, and it also induced many of the fishermen to make their homes there, and now, instead of returning to San Francisco at the close of the fishing season, when their term of engagement expires in the fall, they remain to fish or to hunt for fur-bearing animals during the winter."

"In 1864 there were seven boats in the trade and in 1870 the catch amounted to 1,-467,000 fish. The catch since that date has varied from 305,000 fish in 1871 to 2,073,-000 the estimated catch for 1902. It will be observed from this that the industry has remained practically at a stand still for the past thirty years.



PIRATE COVE WATER SUPPLY

PIRATE COVE -- 1981



AGENDA C-4 DECEMBER 1994

QUALIFYING PERIOD FOR CRAB LICENSES NEED TO STRESS RECENT PARTICIPATION

The 6/28/89 - 6/27/92 qualifying period does not give adequate weight to recent participation in the crab fisheries.

1. THE EARLY DATES ARE INCONSISTENT WITH LATER GROUNDFISH

For groundfish licenses the AP recommended two alternatives to conform with weighing recent participation:

1: Jan 1, 1990 to Dec. 31, 1993

2: The three years prior to final council action. The 6/28/89-6/27/92 dates were <u>not</u> recommended for groundfish to avoid dislocation of recent participants.

2. FAVORING RECENT PARTICIPATION WILL NOT CREATE TOO MANY LICENSES

A: Only 354 vessels participated in the crab fisheries in 1993 (Executive Summary for License limitation Alternatives P. E-13. while the 89-92 dares would create 550 licenses)

B: Due to the large capital investment in pots, all vessels dedicated to Bering sea crab would have made deliveries in the last two years

3. EARLY DATES WILL CREATE WINDFALL FOR VESSELS WHICH HAVE BEEN RETIRED FROM THE FISHERY

A: Vessels which crabbed in 1989, 1990, and 1991 but have not particpated since are no longer financially dependent on the crab fisheries and should not be awarded licences.

B. All "crab boats" in operational order which participate in the Bering Sea fisheries would have fished either the 1993 or 1994 seasons..

4. LESS DISLOCATION WILL OCCUR THE MORE RECENT THE DATES

- What advantage is there to awarding a license to a vessel that crabbed about five years ago in 1989 and has made no crab deliveries since?
 - At a minimum the full 1992 and 1993 years should be included.
- IF a smaller number is needed why not take out the earlier years in favor of the later ones. @ 550 licenses would be award using the 89-92 dates while only @350 boats fished in 1993.

5. THE STATE OF ALASKA AND AK FISH AND GAME HAVE RECOMMENDED MORE RECENT DATES WHICH WERE ALSO RECOMMENDED BY THE AP

- A. Smaller Kodiak type crab boats which crabbed all through the late 70/s and early 80's missed crab seasons in 1989,1990, and 1991 because of Joint Venture participation which is no longer available.
- B. Unless sunk all active crab vessels would have made deliveries in 1993 and/or 1994, so the 1992-1994 dates should be more than adequate and 1992 could be cut out if numbers need to be reduced.