

Jon McCracken
Jim Richardson

MEMORANDUM

Bring to your attention but court will be accommodated

TO: Council, SSC and AP Members

FROM: Chris Oliver *Chris*
Executive Director

DATE: April 2, 2002

SUBJECT: Additional Sideboards for Winter Pacific Cod Fishery

ESTIMATED TIME
10 HOURS
(For all C-7 items)

ACTION REQUIRED

Initial review of measures for BSAI winter Pacific cod amendment, and formally identify a Problem Statement for this proposed action.

BACKGROUND

In October, 2001, the Council tasked staff to provide an analysis of alternatives for restricting AFA vessels from targeting BSAI Pacific cod during January and February. The Council requested the analysis be completed in time for initial review during the April 2002 Council meeting. The purpose of this action is to provide greater protection to non-AFA trawl catcher vessels targeting BSAI Pacific cod during the months of January and February. The concern is over impacts to the non-AFA vessels that have traditionally fished Pacific cod and may have been subject to increased competition as a result of implementation of the AFA. The potential impacts of this increased level of competition include factors such as decreased catch per unit of effort resulting in longer fishing times per trip, reductions in catch and a need to venture further out into the Bering Sea with possible increased dangers to smaller vessels during January and February.

There are four alternatives in the proposed action that are under consideration. The first alternative is status quo. The remaining three alternatives are combination of limited access options and/or an allocation of Pacific cod. The second alternative would restrict access to the BSAI winter cod fishery to only cod-exempt AFA vessels and open access vessels who have delivered 500,000 pounds or more of Pacific cod during 4 out of 5 years from 1995 to 1999. In this alternative, it is not clear from the wording whether the Council intended the threshold criteria apply only to the non-AFA fleet, or whether it is intended to be applied to the AFA cod-exempt vessels as well. The third alternative would allocate a portion of trawl catcher vessel allocation of Pacific cod to non-AFA vessels who qualified under the second alternative. There are two options under consideration. The first is an allocation that provides a minimum of between 2.5 to 5 million pounds with no cap. The second option is an allocation based on the vessels historical catch. The fourth and final option would require cooperatives to limit the number of AFA vessels on the winter cod grounds so as not to preempt non-AFA vessels from the historic participant. Staff will summarize results of the analysis at this time.

PRITCHETT & JACOBSON

ATTORNEYS AT LAW

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March 19, 2002

By Facsimile to: (907)271-2817
and by Federal Express No. 8301 3245 9484

Mr. Mark Fina
Mr. Jon McCracken
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501

RECEIVED
MAR 20 2002
N.P.F.M.C

Re: F/V Miss Leona, F/V Lone Star, and F/V Windjammer

Dear Mr. Fina and Mr. McCracken:

As we discussed, I am sending copies of documents which my clients previously submitted to the Council.

As noted in their previous testimony before the Council, as well as in the enclosed documents, there are several types of adverse impacts which the AFA has had upon these three vessels.

I will not reiterate in detail the particular statistics and points set forth in the prior submissions and testimony to the Council on behalf of my clients, but rather will summarize those points in this letter.

During the five pre-AFA years (1995-1999) there was an average of 11 boats on the relevant cod grounds during the first five weeks of the Bering Sea cod fishery. In January and February, the vessels fishing in my clients' traditional fishing grounds rose from no more than 15 vessels (including these three vessels) to up to 35 vessels on the grounds at one time in 2000. Please see Exhibit 1.

In 2001, even more AFA vessels were on the grounds during the first week of the fishery in January than were on the grounds in the first week of the 2000 fishery. However, because of reasons of economics and biology (it was more profitable at that time in 2001 to fish for pollock) many of the AFA boats left the cod grounds soon afterward to fish pollock. The

experience in 2000, and in the first week of 2001, clearly shows the ability of the AFA boats to invade the cod grounds in large numbers at any time, depending upon where they deem it most advantageous to be fishing. That ability leaves these three small non-AFA boats permanently adversely affected.

My clients testified before the Council on a number occasions, starting in June of 2000. They testified that because of the race for fish caused by the incursion of such a large number of AFA boats, they were compelled to fish in hurricane force winds, at risk both to their vessels and to their lives. As has constantly been emphasized, these vessels are very small vessels, ranging from 75 feet in length overall to 88 feet. Additionally, they have relatively narrow beams.

As indicated in their testimony and in documents previously submitted to the Council, an additional adverse impact of the AFA is that they must often fish behind larger and more powerful vessels, and their catch per unit effort fell off as a result. They have had to fish longer to make a season, and believe that the catch was naturally reduced from what they could have caught if there was not the additional competition on the grounds (compared to pre-AFA years).

In addition to documents previously submitted to the Council, I have enclosed as Exhibit 2 a study done by the Alaska Ground Fish Data Bank. Please note that in 1998 there were no shore side processors purchasing Pacific cod in zone 517 during January or the first three weeks of February. Essentially, there was no market for cod at that time, because of the race for pollock inspired by the prospect of the AFA. Because of that, these three vessels either did not fish in their traditional fishery, or had significantly reduced catch of Pacific cod in 1998. Therefore, we believe the comparable years for them are 1995 to 1997, in order to indicate pre-AFA catch. Please see the document entitled "Three Cod Vessels Combined" (attached as Exhibit 3). This summary, which was previously presented to the Council, indicates that the catch during the January and February portion of the cod fishery was significantly reduced as a result of the AFA both in terms of percentage of catch caught during January and February, and pounds of cod caught.

These three fisherman have also testified to the Council that, as a result of the incursion of AFA vessels, they have been forced to fish further from town, with the increased risk that entails in the winter in the Bering Sea.

Finally, with respect to the types of protections which are to be required under the AFA, please note the statements in the Conference Report of Senators Stevens and Murray, which indicates that the Council must "ensure that other fisheries are held harmless to the maximum extent possible" from adverse impacts of the AFA, and that the Council should "consider particularly any potential adverse impacts on fishermen and other fisheries resulting in increase competition in those fisheries from vessels eligible to fish in the BSAI directed pollock fishery" (Exhibit 1). National Standard 10, also sited in the enclosed materials, emphasizes concerns which are relevant here.

Please let me know if there is any further information from any of these three fishermen which would be useful to your analysis. Thank you very much for your consideration of these

materials.

Sincerely,

A handwritten signature in black ink, appearing to read "Russell W. Pritchett". The signature is fluid and cursive, with a large initial "R" and a long horizontal stroke at the end.

Russell W. Pritchett

Enclosures

cc: Mr. Omar Allinson
Mr. Steve Aarvik
Mr. Chuck Burrece

rwp/#133/all-npfc.lt

C-4(c)

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January 31, 2001

Mr. David Benton, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue
Anchorage, AK 99501-2252

Re: February Meeting
Item C-4(c) - American Fisheries Act

Dear Mr. Benton,

I am writing on behalf of Omar Allinson (F/V MISS LEONA), Steve Aarvik (F/V WINDJAMMER), and Charles Burrece (F/V LONE STAR).

There has been no agreement between my clients and the AFA industry members, as to ways to resolve the adverse impacts of the AFA. The inter-coop group has proposed to my clients that they will limit the daily on-grounds participation of AFA cooped non-exempt vessels fishing in area 655430 (my clients' traditional fishing ground) to a maximum of 21 boats prior to March 1. Together with the 10 cod-exempt AFA boats, and my clients 3 boats, this would be a total of at least 34 boats on the grounds at one time, as opposed to an average of only 11 boats on the grounds during the first 5 weeks of the cod fishery in the five pre-AFA years (1995-1999). Please see:

Exhibit A: Chart (prepared by Alaska Groundfish Databank);

Exhibit B: Graph depicting the figures in Exhibit A.

Because no agreement has been reached, we request that the Council take the management measures set forth below.

BACKGROUND

All three of these vessels are small vessels for the Bering Sea fishery, ranging in length overall from 75 to 88 feet. All have beams under 24 feet. They have fished for cod in the Bering Sea since the 1970's (Charles Burrece), 1980's (Steve Aarvik), and 1991 (Omar Allinson),



respectively.

In prior Council meetings my clients have testified as to the extremely adverse effects caused by an unprecedented increase in the number of vessels fishing in January and February in the year 2000 BSAI Pacific cod fishery. Because of the AFA, the number of vessels fishing in their traditional fishing grounds in Area 517 (and especially Statistical Area 655430) increased from no more than 15 vessels (including these 3 vessels and the 10 AFA cod-exempt vessels) to up to 40 vessels on those grounds in January and February of 2000. Please see:

Exhibit C: Data prepared by Alaska Groundfish Databank.

Because of the resulting race for fish, my clients had to fish in extremely dangerous weather conditions for their small vessels, including hurricane force winds. They were constantly passed by the much larger AFA vessels.

Section 211(a) of the AFA provides as follows:

Sec. 211. Protections for other Fisheries; conservation measures.

(a) General.-- The North Pacific Council shall recommend for approval by the Secretary such conservation and management measures as it determines necessary to protect other fisheries under its jurisdiction and the participants in those fisheries, including processors, from adverse impacts caused by this Act or fishery cooperatives in the directed pollock fishery.

By Section 211, Congress articulated certain duties borne by the Council for the purpose of determining, and remedying, such adverse impacts. In the presentation of the AFA to the Senate for its consideration, key sponsoring Senators including Senator Ted Stevens and Senator Patty Murray, explained what Section 211 requires of the Council. Their comments are set forth in the Conference Report (Senate - October 20, 1998).

Senator Murray explained the nearly absolute protections intended in the AFA for non-pollock fisheries as follows:

The bill attempts to ensure adequate protections for other fisheries in the North Pacific from any potential adverse impacts resulting from the formation of the fishery cooperatives in the pollock fishery. The formation of fishery cooperatives will undoubtedly free up harvesting and processing capacity that can be used in new or expanded ways in other fisheries. Although many of these vessels and processors have legitimate, historic participation in these other fisheries, they should not be empowered by this legislation to gain a competitive advantage in these other fisheries to the detriment of participants who have not benefitted from the resolution of the pollock fishery problems.

While we have attempted to include at least a minimum level of protections for these other fisheries, it is clear to many of us that unintended consequences are likely. It is therefore imperative that the fishery management councils not perceive the protections provided in this bill as the only protections needed. In fact, the opposite is true. Although the protections provided for the head and gut groundfish offshore sector are more highly developed and articulated in the bill, the protections for other fisheries are largely left for the Councils to recommend. Those of us involved in the development of this legislation strongly urge the Councils to monitor the formation of fishery cooperatives closely and ensure that other fisheries are held harmless to the maximum extent possible. [Conference Report, at page 12707].

The comments of Senator Stevens were wholly consistent:

Subsection (a) of Section 211 directs the North Pacific Council to submit measures for the consideration and approval of the Secretary of Commerce to protect other fisheries under its authority and the participants in those fisheries from adverse impacts caused by subtitle II of the American Fisheries Act or by fishery cooperatives in the BSAI directed pollock fishery. The Congress intends for the North Pacific Council to consider particularly any potential adverse effects on fishermen in other fisheries resulting from increased competition in those fisheries from vessels eligible to fish in the BSAI directed pollock fishery or in fisheries resulting from any decreased competition among processors. [At page 12781].

Paragraph (3) of subsection (c) directs the Pacific Council to submit any measures that may be necessary to protect fisheries under its authority by July 1, 2000 and allows the Secretary of Commerce to implement measures if the Council does not submit measures or if the measures submitted are determined by the Secretary to be inadequate. [At page 12781].

Thus, Congress' intent was that the Council would determine the adverse impacts and take measures under Section 211(a), which are in addition to sideboards. It was also Congress' intent that protections be put in place for any adverse impacts on non-AFA fishermen, and that the Council will ensure that other fisheries are held harmless to the maximum extent possible.

We believe that the protections sought today are mandated by the AFA, as well as by National Standard 10.

Under National Standard 10 (50 CFR §600.355), conservation and management measures must, to the extent practicable, promote safety of human life at sea. The regulations implementing National Standard 10 provide, in part, as follows:

"Typically, larger vessels can fish farther offshore and in more adverse weather

conditions than smaller vessels. An FMP should try to avoid creating situations that result in vessels going out farther, fishing longer, or fishing in weather worse than they generally would have in the absence of management measures. Where these conditions are unavoidable, management measures should mitigate these effects, consistent with the overall management goals of the fishery.”
§600.355(c)(1).

The safety concerns articulated under National Standard 10 precisely reflect the dangerous conditions which are faced by these 3 small vessels. All 3 vessels are non-AFA, so they do not have the ability of AFA vessels to shift their cod catch to a larger coop vessel. Nor do they enjoy the pollock allocations held by AFA vessels, which give those vessels alternate Bering Sea fisheries, or alternate sources of income through leasing pollock quota. All three fishermen have long-term dependency on the directed cod fisheries (and not the pollock fishery) in the Bering Sea. Because of their vessels’ small size, none of these three vessels can safely fish in winter outside of Critical Habitat.

Thus, without the protection mandated by the AFA and by National Standard 10, the MISS LEONA, the LONE STAR, and the WINDJAMMER will be forced once again to engage in an “A” season winter fishing derby. This is especially true in light of the extreme limitations on catch which will be imposed in Critical Habitat (Area 7) under the RPA’s. They will be unavoidably compelled to fish in a situation which will subject them to the dangers which National Standard 10 is intended to prevent.

The regulations under National Standard 10 note that “derby” fisheries can create serious safety consequences, including fishing in bad weather and overloading a vessel with catch. Section 600.355(c)(3) therefore requires as follows:

“Where these conditions exist, FMPs should attempt to mitigate these effects and avoid them in new management regimes, as discussed in paragraph (e) of this section.”

Among the measures set forth in paragraph (e) of the regulation are:

- Limiting the number of participants in the fishery. §600.355(e)(6).
- Implementing management measures that reduce the race for fish and the resulting incentives to take additional risks with respect to vessel safety. §600.355(e)(8).

REQUEST FOR ACTION:

We respectfully request that the Council, in order (1) to comply with the Section 211(a)

requirements to determine and submit measures to protect non-AFA fishermen from any adverse impacts of the AFA or of the pollock cooperative system, and (2) to fulfill the policies set forth in National Standard 10, take the following actions:

1. That the Council recommend to the Secretary of Commerce that regulations be implemented as soon as possible to hold these three long-time cod vessels harmless from the adverse effects of the AFA and the coop system by:

A. Limiting access to the directed trawl fishery for Pacific cod to the cod-exempt AFA vessels and to open access vessels which have a history of economic dependency upon the winter Bering Sea Pacific cod fisheries, as demonstrated by average January and February deliveries of at least 500,000 pounds for 4 out of the 5 pre-AFA years of 1995-1999 (or such other measure of dependency as the Council deems fit), and

B. Allocating a minimum of 5,000,000 pounds (with no cap) of Pacific cod to non-AFA vessels which meet the criteria set forth in paragraph A above.

2. That the Council task Council staff to determine the nature and extent of any adverse impacts on other fisheries or participants in those other fisheries caused by the AFA or the fishery cooperatives in the directed pollock fishery, including:

- A. Increased safety problems,
- B. Decreased catch per unit of effort,
- C. Increased fishing time required,
- D. Loss of earnings, and
- E. The measures which are necessary to ensure that participants in other fisheries

*Applies
to Jan &
Feb. only.
(make clear
in testimony)*

are held harmless to the maximum extent possible.

3. That the Council recommend to the Secretary of Commerce and/or the U.S. Congress
that the groundfish license limited entry program be amended to allow trawl vessels to use
longline or pot gear in order to harvest their Pacific cod.

3

Withdraw

Thank you for your consideration of these requests.

Respectfully submitted,



Russell W. Pritchett

Attachments

#111/AFA-FEB

Number of Trawl Catcher Vessels targeting Pacific cod by Stat Week in NMFS Reporting Area - 509 & 517

NMFS Reporting Area - 509

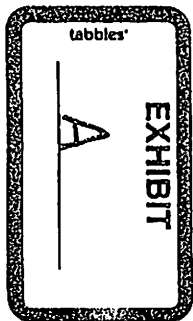
Catcher Vessel

Statistical Week:	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25
Number of Vessels																									
1995	NA	NA	NA	NA	NA	NA	NA	NA	Cnfdl	32	9	Cnfdl	5	NA	NA	Cnfdl	Cnfdl	NA	NA	NA	NA	NA	NA	NA	NA
1996	NA	NA	NA	NA	Cnfdl	Cnfdl	Cnfdl	NA	Cnfdl	12	27	43	56	41	51	47	47	28	20	10	NA	NA	NA	NA	NA
1997	NA	NA	NA	NA	NA	NA	Cnfdl	4	7	12	30	47	44	43	46	42	47	8	NA	NA	NA	NA	NA	NA	NA
1998	NA	NA	NA	Cnfdl	NA	NA	Cnfdl	NA	Cnfdl	20	33	55	57	13	41	32	21	10	Cnfdl	Cnfdl	NA	NA	NA	NA	NA
1999	NA	NA	NA	NA	5	Cnfdl	4	Cnfdl	10	5	27	29	9	42	29	10	NA	NA	NA	NA	NA	NA	NA	NA	NA
2000	NA	NA	NA	NA	NA	NA	NA	NA	Cnfdl	Cnfdl	Cnfdl	10	7	17	25	24	23	14	NA	NA	NA	NA	NA	NA	NA

NMFS Reporting Area - 517

Catcher Vessel

Statistical Week:	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25
Number of Vessels																									
1995	NA	NA	NA	7	9	9	9	11	22	30	31	41	40	44	43	45	31	Cnfdl	NA	NA	NA	NA	NA	NA	NA
1996	NA	NA	NA	8	11	9	10	9	12	29	40	34	24	37	44	42	38	10	3	Cnfdl	NA	NA	NA	NA	NA
1997	NA	NA	NA	6	7	9	8	12	30	36	35	34	24	24	39	44	44	21	NA	NA	NA	NA	NA	NA	NA
1998	NA	NA	NA	8	8	9	15	14	13	35	25	42	40	18	53	44	20	4	NA	NA	NA	NA	NA	NA	NA
1999	NA	NA	NA	11	15	15	15	23	17	39	50	47	19	41	37	24	NA	NA	NA	NA	NA	NA	NA	NA	NA
2000	NA	NA	NA	6	26	32	23	15	20	20	27	33	25	16	28	30	18	15	NA	NA	NA	NA	NA	NA	NA



NUMBER OF TRAWL VESSELS TARGETING COD
EFFECTS OF THE AFA - AREA 517

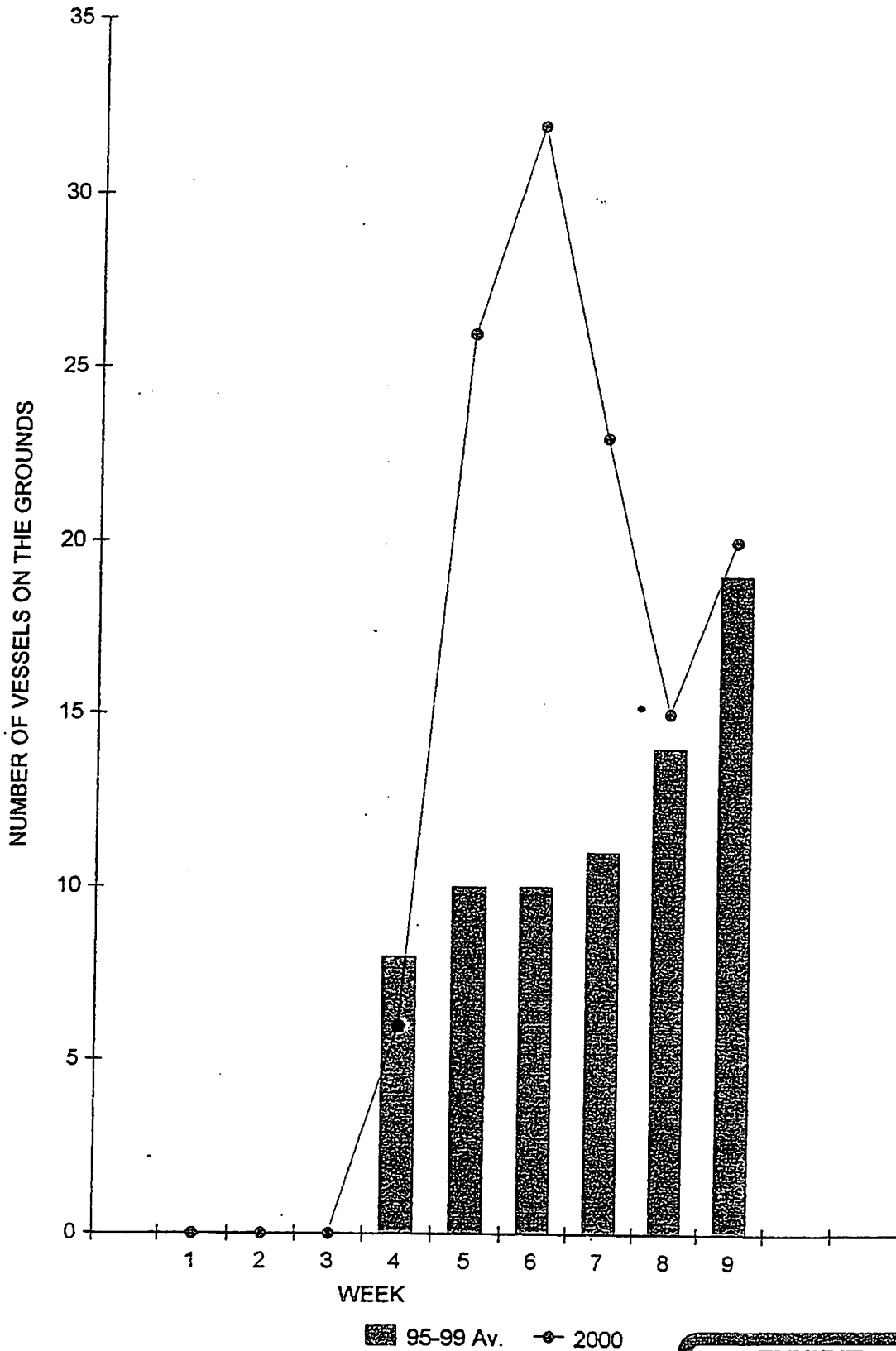


EXHIBIT
B

Number of Trawl Vessels targeting Pacific cod by Stat Week in State Stat Reporting Area - 655430

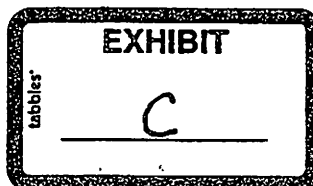
STATISTICAL AREA 655430

Number of Vessels¹ by Year and Month

Year	Month	# of Vessels
1995	January	8
	February	16
	March	62
	April ²	52
1996	January	9
	February	18
	March	72
	April ²	73
1997	January	7
	February	33
	March	64
	April ²	66
1998	January	8
	February	19
	March	60
	April ²	61
1999	January	15
	February	30
	March	61
	April ²	45
2000	January	36
	February	40
	March	43
	April ²	39

¹ All vessel types, catcher and catcher/processor have been combined to comply with confidentiality SOP

² April and May data combined to comply with confidentiality SOP



NUMBER OF SHORESIDE PROCESSORS PURCHASING PACIFIC COD BY WEEK IN NMFS ZONE 517
 TOTAL PACIFIC COD TARGET CATCH BY WEEK FOR ZONE 517 FOR THESE PROCESSORS

1995			1996			1997			1998			1999			2000		
WED	TONS	Count	WED	TONS	Count	WED	TONS	Count	WED	TONS	Count	WED	TONS	Count	WED	TONS	Count
01/28/95	166	3	01/27/96	946	4	01/25/97	564	3				01/23/99	296	3			
02/04/95	1,061	5	02/03/96	1,088	4	02/01/97	910	3				01/30/99	935	5	01/29/00	2,072	8
02/11/95	627	3	02/10/96	461	4	02/08/97	1,982	4				02/06/99	1,318	3	02/05/00	2,814	7
02/18/95	2,091	4	02/17/96	987	4	02/15/97	1,866	3				02/13/99	1,652	4	02/12/00	1,549	6
			02/24/96	1,019	4	02/22/97	1,745	3	02/21/98	1,818	3	02/20/99	2,662	5	02/19/00	1,377	5
Total 1*	3,945	5	Total 1*	4,502	4	Total 1*	7,067	4	Total 1*	1,818	3	Total 1*	6,863	5	Total 1*	7,812	8
02/25/95	1,190	4	03/02/96	1,295	4	03/01/97	2,724	5				02/27/99	1,686	5	02/26/00	1,745	5
03/04/95	3,571	4	03/09/96	685	4	03/08/97	2,370	6	03/07/98	2,456	5	03/06/99	3,788	7	03/04/00	1,022	5
03/11/95	2,117	5	03/16/96	2,149	6	03/15/97	1,496	3	03/14/98	1,507	5	03/13/99	2,844	6	03/11/00	1,259	6
03/18/95	2,386	5	03/23/96	861	4	03/22/97	543	4	03/21/98	1,064	6	03/20/99	985	4	03/18/00	2,183	5
Total 2*	9,265	5	Total 2*	4,989	6	Total 2*	7,132	6	Total 2*	5,026	6	Total 2*	9,303	7	Total 2*	6,210	6
03/25/95	1,373	4	03/30/96	642	5	03/29/97	563	5	03/28/98	508	5	03/27/99	358	4	03/25/00	1,630	7
04/01/95	2,372	7	04/06/96	1,472	5	04/05/97	576	3	04/04/98	598	5	04/03/99	1,372	5	04/01/00	244	7
04/08/95	3,792	6	04/13/96	1,881	6	04/12/97	1,900	6	04/11/98	2,181	7	04/10/99	1,435	5	04/08/00	1,393	5
04/15/95	5,701	6	04/20/96	2,113	6	04/19/97	2,260	6	04/18/98	1,285	6	04/17/99	1,181	6	04/15/00	1,576	6
Total 3*	13,238	7	Total 3*	6,107	6	Total 3*	5,299	6	Total 3*	4,572	7	Total 3*	4,346	6	Total 3*	4,843	7
04/22/95	3,976	5	04/27/96	773	6	04/26/97	1,372	4	04/25/98	288	4				04/22/00	599	5
04/29/95	1,545	5	05/04/96	318	5	05/03/97	647	5							04/29/00	373	4
			05/11/96	97	5												
			05/18/96	99	3												
Total 4*	5,521	5	Total 4*	1,288	6	Total 4*	2,018	5	Total 4*	288	4	Total 4*	-	-	Total 4*	971	5
Time Tot	31,968		Time Tot	16,887		Time Tot	21,516		Time Tot	11,704		Time Tot	20,511		Time Tot	19,837	
nmfs Tot	31,968		nmfs Tot	16,887		nmfs Tot	21,516		nmfs Tot	18,182		nmfs Tot	20,511		nmfs Tot	20,058	

* Time period -- total target Pacific cod catch, highest number of processors shown for any one week within the time period

THREE COD VESSELS COMBINED

A. CATCH BY YEAR IN POUNDS DURING THE PRE-AFA YEARS*

1995 - 6,013,303

1996 - 5,155,624

1997 - 5,208,417

PRE-AFA AVERAGE: 5,459,115 pounds per year

2000 Catch: 3,890,714

* 1998 is excluded because the Alaska Groundfish Database study indicated that in 1998 there was greatly reduced purchasing of cod by shoreside processors, especially in the first period of 1998. That was apparently due to processors using capacity for pollock due to the pre-AFA race for pollock. As a result only one of the three vessels actively pursued Bering Sea cod in 1998, and one had to move entirely to another area for his operations in 1998.

B. CATCH BY TIME PERIOD IN POUNDS (PERIOD 1: About January 20 to February 20)

1995 2,400,130

1996 1,940,215

1997 2,454,906

PRE-AFA AVERAGE: 2,265,084 pounds in period 1

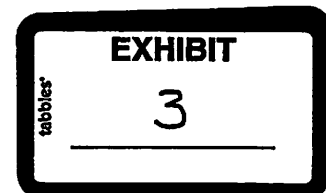
2000 Catch: 1,330,004

C. CATCH BY TIME PERIOD IN PERCENT (For PERIOD 1: About January 20 to February 20)

PRE-AFA AVERAGE: 41.49%

2000: 34.18*

* Even this significantly lower catch both in terms of pounds and percent in Period 1 of Year 2000 was reached only by fishing in extremely severe weather in which the 3 boats normally would not fish, as the fishermen testified previously.



State of Alaska
Commercial Fisheries Entry Commission

Limited Power of Attorney to Receive and Use
Confidential Fish Ticket Data

Request for Release of Fish Ticket Data to Third Party

The undersigned permittee holds (or has held) limited entry or interim-use permits issued by the Alaska Commercial Fisheries Entry Commission (CFEC). By signing and submitted this form to CFEC, the permittee grants to the person designated below as a third party a limited power of attorney to receive and use confidential data that CFEC will release directly to that person.

This limited power of attorney begins on the day that this form is notarized, and will expire no less than thirty (30) days and no more than one year from the date specified by this form.

I, Charles Burrece, hereby request fish ticket records for the following commercial fisher permit numbers(s): CFEC M07B20864N, for the year(s) 1990-PRESENT.

Please indicate the ADF&G vessel number(s) if you want the report limited to a specific vessel(s): 30322.

To process this request, please remit the \$24.00 fee payable to the State of Alaska to the following address CFEC, 8800 Glacier Hwy, #109, Juneau, AK 99801.

I authorize the release of these records to the professional staff of the North Pacific Fishery Management Council ("NPFMC") and understand and agree that the information contained in these records may be released to the public as a part of the analysis of Amendment 74 of the Bering Sea Aleutian Islands

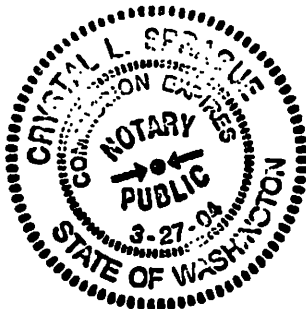
Groundfish Fishery Management Plan. The release authorizes public release of data on an individual vessel basis. The data might be aggregated to the extent that the analysis permits.

Date limited Power of Attorney Authority Expires: March 20, 2003.

Lois Burrece
Lois Burrece for
Charles Burrece

Subscribed and sworn before me Crystal Spigue.
This 26th day of March, 2002.
My Commission expires March 27, 2004.

rwp/#132/burrece-pa.rel



State of Alaska
Commercial Fisheries Entry Commission

Limited Power of Attorney to Receive and Use Confidential
Fish Ticket Data

Request for Release of Fish Ticket Data to Third Party

The undersigned permittee holds (or has held) limited entry or interim-use permits issued by the Alaska Commercial Fisheries Entry Commission (CFEC). By signing and submitted this form to CFEC, the permittee grants to the person designated below as a third party a limited power of attorney to receive and use confidential data that CFEC will release directly to that person.

This limited power of attorney begins on the day that this form is notarized, and will expire no less than thirty (30) days and no more than one year from the date specified by this form.

I, Omar Allinson, hereby request fish ticket records for the following commercial fisher permit numbers(s):
CFEC M07B21398H, for the year(s) 1990-PRESENT.

Please indicate the ADF&G vessel number(s) if you want the report limited to a specific vessel(s): 25227.

To process this request, please remit the \$24.00 fee payable to the State of Alaska to the following address CFEC, 8800 Glacier Hwy, #109, Juneau, AK 99801.

I authorize the release of these records to the professional staff of the North Pacific Fishery Management Council ("NPFMC") and understand and agree that the information contained in these records may be released to the public as a part of the analysis of Amendment 74 of the Bering Sea Aleutian Islands Groundfish Fishery Management Plan. The release authorizes public release of data on an individual vessel basis. The data might be aggregated to the extent that the analysis permits.

Date Limited Power of Attorney Authority Expires: March 20, 2003.

Omar Allinson
Omar Allinson

Subscribed and sworn before me Jessica Earnshaw
This 25 day of March, 2002.
My Commission expires 7/13/03

svp/8132/all-pa-rel



State of Alaska
Commercial Fisheries Entry Commission

Limited Power of Attorney to Receive and Use Confidential
Fish Ticket Data

Request for Release of Fish Ticket Data to Third Party

The undersigned permittee holds (or has held) limited entry or interim-use permits issued by the Alaska Commercial Fisheries Entry Commission (CFEC). By signing and submitting this form to CFEC, the permittee grants to the person designated below as a third party a limited power of attorney to receive and use confidential data that CFEC will release directly to that person.

This limited power of attorney begins on the day that this form is notarized, and will expire no less than thirty (30) days and no more than one year from the date specified by this form.

I, Omar Allinson, hereby request fish ticket records for the following commercial fisher permit numbers(s):
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Date Limited Power of Attorney Authority Expires: March 20, 2003.

Steve Arivk
Steve Arivk

Subscribed and sworn before me: Rowena S. Lason
This 20th day of March, 2003.
My Commission expires 10/31/05

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