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July 14, 2005

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NATIONAL MARINE FISHERIES
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Mr. James W. Balsiger
Administrator, Alaska Region
U.S. Department of Commerce
National Marine Fisheries Service
P.O. Box 21668
Juneau, AK 99802-1668

Dear Mr. Balsiger:

Pursuant to 50 C.F.R. 679.30(d) and 6 AAC 93.045, I am pleased to present the State of Alaska's (State) recommendation for approval of all six Community Development Plans (CDPs) submitted to the State for the new 2005 crab species added to the Western Alaska Community Development Quota (CDQ) Program. The State received six 2005 CDP applications pursuant to 50 CFR 679.30 and State of Alaska regulations 6 AAC 93. The applicants are as follows:

- Aleutian Pribilof Island Community Development Association (APICDA)
- Bristol Bay Economic Development Corporation (BBEDC)
- Central Bering Sea Fishermen's Association (CBSFA)
- Coastal Villages Region Fund (CVRF)
- Norton Sound Economic Development Corporation (NSEDC)
- Yukon Delta Fisheries Development Association (YDFDA)

These six 2005 CDPs have been fully reviewed by the State. Each of the six CDPs met the requirements of 50 C.F. R. 679 and 6 AAC 93. However, because these six CDPs requested more quota than was available, the State recommends apportioning the available quota among the six CDQ groups. The State recommends apportioning the available 2005 crab species allocations as follows:

Species	APICDA	BBEDC	CBSFA	CVRF	NSEDC	YDFDA	Total
EAI Golden King	8%	18%	21%	18%	21%	14%	100%
Adak Red King	8%	18%	21%	18%	21%	14%	100%

The state's findings and rationale in support of these recommendations are contained in the enclosed appendices. The State arrived at these recommended quota allocations following a thorough review of each application, prior-period financial and compliance reviews, public hearings with each applicant, consultation with the North Pacific Fishery Management Council, and a determination of consistency with applicable state and federal regulations.

Additionally, the State received a request for reconsideration from CVRF and APICDA on March 31, 2005, and April 1, 2005, respectively. The State reviewed and responded to the requests for reconsideration finding neither request justified an adjustment to the State's allocation recommendations. On June 22, 2005, the CDQ Team forwarded their Final 2005 Crab CDQ allocation recommendations to my office. On June 24, 2005, I concurred with the CDQ Team's 2005 Crab CDQ recommendations, findings, and rationale. All six CDQ groups were given ten days to file a second request for reconsideration of these findings and/or explain how their proposed CDP or specific CDQ project(s) might be affected by the proposed apportionment. The State did not receive any second request for reconsideration from the CDQ Groups. Therefore, I am forwarding the state's 2005 Crab CDQ allocation recommendations to the NMFS as required under 50 C.F.R. 679.30(d).

Your timely approval of the recommendations for the 2005 Crab CDQ allocations would be appreciated. Please do not hesitate to contact Greg Cashen, CDQ Program Manager, at (907) 465-5536, if you need any additional information or documentation to complete your review of these recommendations.

Sincerely yours,

Frank H. Murkowski
Governor

Enclosures

cc: Commissioner Edgar Blatchford, Alaska Department of Commerce, Community and Economic Development
Commissioner McKie Campbell, Alaska Department of Fish and Game
John Katz, Director of State/Federal Relations and Special Counsel
Chris Oliver, Executive Director, North Pacific Fisheries Management Council

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June 24, 2005

Mr. Phillip Lestenkof
President
Central Bering Sea
Fishermen's Association
P.O. Box 288
St. Paul, AK 99660-0288

RECEIVED
JUN 27 2005
SOA / DEPT OF COMMERCE
CDQ PROGRAMS

Dear Mr. Lestenkof:

The Community Development Quota Team (CDQ Team) and I are pleased with the success of the CDQ program and recognize the social and economic benefits it provides to western Alaska residents. Since the CDQ program began over 12 years ago, revenues of over $580 million have been generated and were available for investments on behalf of 65 eligible communities for the purpose of developing a sustainable fisheries related economy in western Alaska. Since 1992, the CDQ program has provided nearly $125 million in wages, education, and training benefits to over 25,000 western Alaska residents. CDQ groups have invested in fishing companies and harvest quota, onshore seafood processing companies, and fisheries-related infrastructure development in western Alaska. The asset value of all CDQ groups at the end of 2004 was over $350 million and growing.

Pursuant to 6 AAC 93.040(c) I have reviewed the CDQ Team's evaluation and allocation recommendations for the six proposed Community Development Plans (CDPs) for the 2005 crab allocation cycle, which include the two new crab CDQ species Eastern Aleutian Islands Golden (Brown) and Adak (Petrel Bank) Red king crab. I concur with the CDQ Team's finding that each of these six proposed 2005 crab CDPs meet the requirements set out in 6 AAC 93 and 50 C.F.R. 679. However, I also find the total amount of crab quota requested in these six CDPs exceeds the amount of fishery resource available to the CDQ program at this time. Therefore, pursuant to 6 AAC 93.040(e)(1) I find it necessary to apportion the available quota among the six groups who have submitted 2005 crab CDPs. The need to apportion quota also triggers the application of the regulatory guidance provided by 6 AAC 93.040(g) to this apportionment process.

To this end, I have consulted with the CDQ Team on their proposed apportionment of available crab quota among the six CDPs and concur with

their recommendations, findings, and rationale (see CDQ Team's Final Allocation Recommendations dated June 22, 2005). However, pursuant to 6 AAC 93.040(f) and in the interest of correcting potential legal or factual errors early on in this time sensitive allocation process, each of the six CDQ groups shall have ten days to submit to me a written request for reconsideration of the findings set forth above and/or explain how a CDQ group's proposed CDP or specific CDQ project(s) might be affected by this proposed quota apportionment. A request for reconsideration that raises factual or legal errors previously raised in the first reconsideration process will not be reconsidered in this second reconsideration process. All requests for reconsideration and the state's response will be incorporated into the state's final allocation recommendation to the National Marine Fisheries Service pursuant to 6 AAC 93.045.

Sincerely yours,

Frank H. Murkowski
Governor

cc: CDQ Team

STATE OF ALASKA
DEPARTMENT OF
COMMERCE
COMMUNITY AND
ECONOMIC DEVELOPMENT

OFFICE OF THE COMMISSIONER

Frank H. Murkowski, Governor

June 22, 2005

Governor Frank H. Murkowski
P.O. Box 110001
Juneau, AK 99811-0001

RE: 2005 Crab CDQ Team Final
Allocation Recommendations

Dear Governor Murkowski:

Introduction

The National Marine Fisheries Services (NMFS) has informed the State Community Development Quota (CDQ) Team they intend to issue two separate Initial Administrative Determinations (IADs): one for the 2005 allocations of Eastern Aleutian Island (EAI) Golden king crab and Adak Red king crab (2005 crab allocations) and a second for the 2006-2008 allocations of groundfish, prohibited species, halibut and crab (including EAI Golden king crab and Adak Red king crab). Separate IADs and separate appeals processes will provide the possibility of final agency action on the two new crab allocations for 2005 in time for the CDQ groups to harvest their EAI Golden king crab CDQ when the season starts, which may be as early as August 15, 2005. NMFS's preference is for the State to submit these recommendations and rationale in two separate documents to facilitate their preparation of two separate IADs and to simplify the administrative record that NMFS must submit to the Office of Administrative Appeals if a CDQ group appeals either one of the IADs.

The State, in hopes of supporting NMFS efforts to see the 2005 crab allocation fished this August, will issue separate allocation recommendations per NMFS request. This letter is the CDQ Team's Final Allocation Recommendation for the 2005 crab allocations pursuant to 6 AAC 93.040(c). Set forth below is the process the CDQ Team followed and the findings and rationale supporting these recommendations.

State Allocation Recommendation Process

The State's role in the CDQ allocation process is governed by State and federal regulations. 6 AAC 93.010-.900 and 50 C.F.R. 679.30(a)-(d). The state regulations require the CDQ Team to solicit the submittal of Community Development Plans (CDPs), review and evaluate these CDPs, and then make an allocation recommendation to you. 6 AAC 93.015(c)(1)-(3). You, in turn, with the CDQ Team's assistance, are responsible for meeting with the North Pacific Fishery Management Council (Council) and then making a final recommendation to the National Marine Fisheries Service (NMFS). 6 AAC 93.040-.045. The federal regulations require the State to: 1) evaluate each CDP to verify it includes the required information, 2) hold a public hearing to discuss the contents of the CDPs, 3) consult with the Council before forwarding the recommendation to NMFS, and 4) make an allocation recommendation to NMFS, supported with findings and rationale. 50 C.F.R. 679.30(a)-(d).

The CDQ Team followed both state and federal regulations during this allocation recommendation process. On August 16, 2004, pursuant to 6 AAC 93.020, the CDQ Team notified the public of the 2005 Crab CDP Application Period and application packets were mailed to all six CDQ groups. The application period began on October 1, 2004, and ended November 1, 2004. During this application period, the CDQ Team received six CDPs requesting allocations of the two new crab species for 2005 Crab CDP allocation cycle.

These six CDPs are from the six regional organizations or CDQ groups representing 65 eligible coastal communities bordering the Bering Sea. Each CDP is a detailed description of how a particular group proposes using allocations to achieve success in the Bering Sea fishing industry, in order to improve the social and economic conditions specific to their regions.

After soliciting and receiving these CDPs, pursuant to 6 AAC 93.030, the CDQ Team reviewed each CDP to ensure that it was complete and contained all of the information required under state and federal regulations. 50 C.F.R. 679.30(a) and 6 AAC 93.025. This initial evaluation process took place within fifteen days of the application period closing. On November 15, 2004, letters were sent out to the groups whose CDPs were found to be incomplete and they were given ten days to provide the missing information.

Following the initial evaluation of each CDP for completeness, pursuant to 50 C.F.R. 679.30(b) and 6 AAC 93.035, the CDQ Team announced and held a public hearing in Anchorage. Public notice scheduling a public hearing was provided on October 15, 2004 and held in Anchorage on November 30, 2004. Expanded public hearings with each CDQ group were also noticed and held during December 15 through 17, 2004 in Anchorage. At these public hearings, the substance and the content of the proposed CDPs were discussed and all interested persons were allowed an opportunity to make comments on these proposed CDPs. These hearings were recorded and transcribed, with the exception of the CDQ groups' presentation of information deemed confidential under State law. This information was heard in 'executive session' pursuant to AS 44.62.310.

Following the public hearings, pursuant to 6 AAC 93.040(a), the CDQ Team evaluated the six CDPs to determine whether they were consistent with the CDQ program standards in 6 AAC 93.017 and met all requirements of 6 AAC 93 and 50 C.F.R. 679.30. Additionally, the CDQ Team considered all 20 factors set forth in 6 AAC 93.040(b) for consideration when reviewing the proposed CDPs.

In considering CDQ program standards (1)-(4), the CDQ Team evaluated whether each CDP and the CDQ projects described in it: 1) were supported by their respective communities and board of directors, and 2) provided specific and measurable benefits to their respective communities and residents. 6 AAC 93.017. In considering CDQ program standards (5)-(7), the CDQ Team evaluated whether the CDQ projects described in each CDP demonstrated the application of sound business judgment principles. And, in considering CDQ program standard (8) which references 50 CFR 679.1(e), the CDQ Team evaluated whether each CDP demonstrated a plan to use CDQ allocations to initiate or support commercial fisheries business activities in their communities that will, in time, result in an ongoing, regionally based, fisheries related economy.

In considering whether the CDPs met the requirements of 50 C.F.R. 679.30, the CDQ Team verified that each CDP contained all of the required information. Additionally, the CDQ Team applied the 'directory' language in 50 C.F.R. 679.30(a) which provides: 1) CDQ allocations represent the means for CDQ groups to complete their CDQ projects, and 2) when a CDP expires, further CDQ allocations are not implied or guaranteed, and a qualified applicant must re-apply for further allocations on a competitive basis with other qualified applicants.

In considering the factors set forth in 6 AAC 93.040(b), the CDQ Team reviewed each CDP with all 20 factors in mind. However, the CDQ Team found all six CDQ groups CDPs demonstrated: 1) support for their CDP from their participating communities, 2) support for their CDQ projects from their board of directors, 3) sufficient experience of their industry partners, 4) that their outreach project met the requirements of 6 AAC 93.025(4)(c), and 5) sufficient degree of community input in their CDP. 6 AAC 93.017(3)-(4) and 6 AAC 93.040(b)(8), (18)-(19). As a result, these factors were given little weight in the allocation recommendation.[1]

The CDQ Team also found that cooperation was present between all of the CDQ groups, therefore, little weight was given by the CDQ Team to this factor. 6 AAC 93.017(7). Likewise, the CDQ Team found that the benefits to the State's economy as a whole is not presently the focus of this program and was given little weight in the allocation recommendation.[2] 6 AAC 93.017(10). Last, the CDQ Team found that, although public

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1 The CDQ Team did not find that these factors were not important. The CDQ Team found that evaluating the six CDQ groups on factors they had all met made it impossible to differentiate between the groups on these factors. Therefore, these factors did not assist the CDQ Team's in competitively evaluating the groups in relation to each other.

2 The CDQ Team found that, to date, the primary focus of this program is still the economies of the western Alaskan communities directly involved in this program, not the State as a whole. Therefore, the CDQ Team focused on the benefits to these western Alaskan communities.

comments are important to consider, little weight was given to this factor because almost no comments were submitted for consideration. 6 AAC 93.040(20).

Therefore, the CDQ Team's allocation recommendation focused on the remaining factors set forth in 6 AAC 93.040(b)(1)-(6), (9), (11)-(17) and the program standards in 6 AAC 93.017(1)-(2), and (5)-(9). The CDQ Team concluded that these remaining factors and program standards could be roughly distilled into three main areas allowing the CDQ Team to competitively evaluate to what extent each CDQ group: 1) sought to maximize the benefits of the CDQ Program to the greatest number of participating communities, 2) did well in terms of overall performance, and 3) proposed a CDP that was consistent with goals and purposes of the CDQ Program.

The total allocations requested by the six CDQ groups exceeded 100% of the reserve for most species. For example, the allocations requested for Eastern Aleutian Islands (EAI) Golden (Brown) king crab totaled 195% and for Adak (Petrel Bank) Red king crab totaled 227%. When there is insufficient quota to meet the combined allocations requested, 6 AAC 93.040 (g) guides the State to maximize the benefits of the CDQ program to greatest number of participating communities. The CDQ Team concluded factors (1) – (4), (9), (14), and (16) and program standards (1)-(2) were consistent with the guidance set out in 6 AAC 93.040(g). 6 AAC 93.040(b) and 6 AAC 93.017.

The CDQ Team also focused on factors (3)-(6), (11)-(12), and (14)-(15) and program standards (5)-(7). 6 AAC 93.040(b) and 6 AAC 93.017. The CDQ Team concluded that these factors allowed the CDQ Team to determine which groups did well in terms of overall performance. The CDQ Team measured overall performance by reviewing to what extent each CDQ group:

1) expanded investment in a) profitable Bering Sea fishing vessels and quota, and b) onshore processing projects that were sustainable;
2) provided measurable benefits to their residents through in-region projects (including employment, education, and training programs); and
3) achieved these results with reasonable administrative expenses (including compensation of senior level management as compared other non-profit corporations, for-profit corporations, and high level government officials in Alaska.)

Last, the CDQ Team focused on factors (12)-(13), (16), and (17), and program standards (8)-(9). 6 AAC 93.040(b) and 6 AAC 93.017. The CDQ Team concluded these factors allowed the CDQ Team to verify that: 1) each CDP is geared toward transition to a self-sufficient, regionally based, fisheries related economy, and 2) each group has promoted, to the greatest extent possible, conservation-based fishing of their CDQ allocations.

Initial Allocation Recommendation and Requests for Reconsideration

After reviewing the six 2005 Crab CDPs and having considered all factors for consideration under 6 AAC 93.040(b), CDQ Program Standards under 6 AAC 93.017, and federal CDQ regulations under 50 C.F.R. 679.30, the CDQ Team issued initial

allocation recommendations for all six CDQ groups on March 14, 2005.[3] The CDQ Team gave the CDQ Groups until April 1,2005, to request reconsideration of these initial allocation recommendations. Two of the CDQ groups filed a request for reconsideration with the State. *See* Exhibit A. The CDQ Team found that neither of these requests for reconsideration revealed any factual or legal errors in the initial allocation recommendations that would warrant an adjustment to the CDQ Team's initial allocation recommendations. *See* Exhibit B.

Council Consultation

On April 8, 2005, the CDQ Team attended a North Pacific Fishery Management Council (Council) meeting to consult with them regarding the proposed CDPs to be recommended for allocation. This consultation complied with the state and federal regulations. 6 AAC 93.040(h) and 50 C.F.R. 679.30(c). A transcript of that meeting is attached for your review. *See* Exhibit C.

During the April 8th consultation, the Council engaged the CDQ Team in extensive discussion primarily through two members. While the Council recognized that the CDQ program has provided significant benefits to western Alaska, it raised concerns with the program as it continues to mature. More specifically, concern was expressed relating to the way the CDQ program standards and evaluation criteria are applied by the CDQ Team in its evaluation of CDPs and development of the allocation recommendations. The Council also expressed concern regarding the ability of the CDQ groups to understand the most important factors for consideration and the relative weighting of the criteria in each new allocation cycle.

Many of the issues raised during this consultation were previously addressed in Amendment 71 passed by the Council in June of 2002. However, for reasons beyond the control of the State, much of Amendment 71 has not yet been codified into regulations.

Also during this April 8th consultation, the Council approved a motion to encourage the State to appoint a "blue ribbon" committee to review of the CDQ program in its entirety, with special attention given to the following issues:

- Thorough review of the CDQ regulations to ensure that all regulations continue to fit the program as it evolves
- Thorough and independent financial review of the CDQ investments and procedures and commitments
- Prioritize goals of the CDQ program in regard to the following:
    - Investment in local community infrastructure
    - Improvement in basic needs for community residents
    - Development of sustainable business ventures in the CDQ region

[3] Please note the CDQ Team's initial allocation recommendations were issued in two parts, one on February 9, 2005 and the other on March 14, 2005 and included proposed CDPs for both the 2005 crab and the 2006-2008 multi-species allocations.

- The need to expand the opportunities for CDQ investment and development outside fishery businesses
- Other items identified by the Governor

Final Allocation Recommendations and Second Requests for Reconsideration

Set forth below are the CDQ Team's Final Allocation Recommendations, findings and rationale for each of the six proposed 2005 Crab CDPs. 6 AAC 93.040(c). The CDQ Team found that each of the six proposed CDPs met the requirements of 6 AAC 93 and 50 C.F.R. 679. However, because there is insufficient crab quota available to meet their combined allocations requested, the CDQ Team recommends apportioning the quota among the six groups. 6 AAC 93.040(c)(2) & 6 AAC 93.040(e)(1). The CDQ Team's recommended apportionment of available crab quota is also set forth below.

Following your review of the proposed CDPs and the CDQ Team's final allocation recommendations, your findings under 6 AAC 93.040(c) should be provided to each of the six CDQ groups. Each CDQ group will then have 10 days to provide a written request for reconsideration of your findings and/or explain how their CDP might be affected by your recommendations regarding the 2005 crab allocations. 6AAC 93.040(f). The CDQ groups requests for reconsideration and the State's response to such requests should be included in your final allocation recommendations, findings, and rationale to NMFS pursuant to 6 AAC 93.045.

APICDA

Per the 2000 U.S. Census, APICDA has the lowest population (515 people), or 2% of the 26,445 residents in the CDQ region, and lowest unemployment rate (9%) among the CDQ groups. APICDA has the second highest median household income ($45,861/yr.) and a low poverty rate (8.7%) among the CDQ groups. Based on these factors, the APICDA region has a relatively high standard of living and low economic need in comparison with regions represented by the other five CDQ groups.

APICDA's past performance of existing offshore CDQ projects have, for the most part, been successful in generating capital for fisheries related business investment. APICDA has negotiated an agreement with their pollock CDQ partners that provide significant revenues to support their CDQ projects. However, APICDA, in contrast with the other five CDQ groups, has not been actively investing in additional for-profit investments in the Bering Sea fishery that have the proven ability to provide a steady income stream to support their CDQ projects.

For example, APICDA did not make a major vessel or non-CDQ quota investment in the Bering Sea from 2000 through April 2005. Meanwhile, other CDQ groups have been very active making a significant number of crab vessel and quota investments since 2000 which have resulted in a considerable increase in value as a result of crab rationalization. However, on April 21, 2005, APICDA submitted a proposed substantial amendment to the State requesting approval to purchase an equity interest in a longline/crab catcher

vessel with Pacific cod, Bristol Bay Red king, opilio, bairdi, and St. Matthew Blue king crab history. As outlined in this proposed amendment, this longline/crab catcher vessel will deliver to APICDA's partners processing plants in St. Paul and Akutan. Although this vessel will not harvest or deliver any of APICDA's 2005 new crab allocations, the State is hopeful this proposed investment is a sign that APICDA intends to pursue more for-profit investments in the Bering Sea fishery which will provide them with additional revenue to fund their CDQ projects.

APICDA has previously invested in in-region infrastructure and processing projects in their communities and other for-profit investments. These investments are consistent with other CDQ groups who have also invested in onshore processing of various fish species and in the infrastructure needed for such plants. Unfortunately, with the exception of one in-region CDQ project in Atka started in 1994, APICDA's in-region CDQ projects have experienced significant financial losses, provided benefits to a limited number of APICDA residents, and resulted in the ownership of non-performing assets.[4]

Based on past performance, many of APICDA's current in-region projects set forth in the CDP for this allocation cycle do not appear to have the likelihood of developing a self-sustaining local fisheries economy or have a strong business plan for transition from reliance on an allocation to self-sufficiency. According to APICDA, their transition plan places emphasis on the amount of CDQ allocation they receive, especially pollock. Per 50 C.F.R. 679.30(a)(6), "The plan for transition to self-sufficiency must be based on the qualified applicant's long-term revenue stream without CDQs."

The CDQ Team is concerned with the overall strategy expressed in APICDA's CDP for this allocation cycle based on the group's past performance and future plans. The CDQ Team submits that the CDP is outdated, and does not respond to changes in the area or industry, such as crab rationalization, and changes in the population in communities served by APICDA. For example, the CDP focuses on False Pass where the population has been static for several years. This lack of forward thinking reflects on the fact that the 2005 Crab CDP is very similar to prior CDP's for other allocation cycles. It is very similar to other plans, which were produced under different economic and business conditions.

The CDQ Team is also concerned that APICDA has not performed as well as the five other CDQ groups in terms of asset growth, expansion and diversification of investments in income producing Bering Sea fishing vessels and quota, and investments in in-region onshore seafood processing companies. Additionally, APICDA, along with two other CDQ Groups have incurred high administrative expenses which include particularly high compensation levels for senior level management. This causes significant concern to the CDQ Team.

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[4] In-region CDQ projects such as False Pass, Ocean Logic, and Nikolski fishing lodge were all funded by APICDA with capital contributions of several million dollars, which have been exhausted to date, and the future viability of these projects are questionable. *See* March 14, 2005 Initial Allocation Recommendations.

In the CDQ Team's view, APICDA's long-range business plan set forth in the CDP submitted for this allocation cycle will have difficulty in accomplishing the purpose of the CDQ program which is to invest in income producing commercial fisheries business investments that will result in a self-sustaining fisheries related economy in western Alaska. APICDA's CDP fails to establish how many of its projects could become self-sustaining, and glosses over the significant losses already incurred by this type of CDP approach. Essentially, the CDP submitted by APICDA in 2004 for the 2005 Crab allocation cycle differs little from the CDP APICDA submitted in 1998.

APICDA's future plans in their proposed CDP include securing funding for construction of a boat harbor planned in Atka, widening the face of the Atka City Dock, a fuel supply business in Atka, a crab processing facility in St. George, construction of a boat harbor in False Pass, Nikolski Mooring System, Nikolski Airport Improvements, Akutan Harbor, Expansion of a Small Boat Fleet, Central Bering Sea Research Facility in St. George, False Pass Airport Improvements, purchasing crab harvesting and processing shares, and a Nelson Lagoon Navigation Project.

APICDA's future plans also consist of building seafood processing plants in St. George, False Pass, and Atka for crab, cod, and salmon. All three communities are located in proximity to large established seafood processing plants owned by major seafood companies. The CDQ Team feels multi-million dollar processing plants in communities with small populations under 200 people or less that directly compete with major industrialized seafood processing plants present many challenges and will have difficulty being successful. Given APICDA's past performance noted above, the CDQ Team does not feel these projects have strong business plans or warrant the required capital expenditures, and is concerned significant losses and non-performing assets will result.

For example, APICDA's 2005 Crab CDP proposes to build an onshore processing project in False Pass. However, APICDA has not fully developed their exit strategy for the previous False Pass project. Additionally, this plan does not address the structural problems with the concept, such as whether fishermen will be willing to end long-term relationships with other processing facilities. Such problems contributed to the failure of the processing barge effort, and this issue is not adequately addressed in the 2005 Crab CDP. As a result, the CDQ Team feels further due diligence is needed for this proposed project.

On the flip side, some of APICDA's CDQ projects, such as Atka Pride Seafoods, in Atka have been successful in providing employment for local residents and fishing opportunities for local fishermen. The CDQ Team feels similar small-scale projects could benefit APICDA's relatively small communities and provide employment and fishing opportunities for local residents. Other CDQ groups have been successful building small halibut processing plants in their communities that minimize capital construction costs, and the CDQ Team feels APICDA could benefit from similar projects.

The CDQ Team is also concerned with the economic situation in the community of St. George and feels the community could benefit if APICDA and CBSFA formed a cooperative working relationship based on St. Paul Island for projects involving the halibut and crab fisheries per 6 AAC 93.040(7), which states the CDQ Team shall consider the coordination or cooperation with other CDQ groups on CDQ projects when reviewing a CDP.

CDQ Projects consisting of loan programs for the purchase of halibut and sablefish quota share and small fishing vessels appear to have merit and would provide employment and fishing opportunities for local APICDA residents and should be pursued. The new Gulf of Alaska Community IFQ Program, or CQE program, recently approved by the Council is similar in approach and the CDQ Team feels APICDA communities would benefit from additional halibut and sablefish quota in their communities for harvesting by local fishermen.

While the CDQ Team encourages onshore development, the CDQ Team feels APICDA should have a more balanced approach in terms of investments in income producing projects that will support in-region investment. APICDA is presented with many unique challenges in their region due to their low population, weather, transportation difficulties, and the fact that many of their proposed projects require high capital expenditures that are difficult to justify based on realistic financial pro forma. Additionally, the CDQ Team does note that APICDA has contributed to many in-region and infrastructure projects including docks and harbors, sport fishing lodges, small halibut processing projects, and employment, education, and training programs since 1992. And, the CDQ Team feels these projects are worthwhile in general and have resulted in infrastructure development in APICDA's communities. However, clearly an overall stronger long-term business plan that includes these activities as well as income producing partnerships are needed to fund projects that are sustainable.

APICDA has been successful in providing employment, education, and training programs to local residents. However, the CDQ Team encourages APICDA to work on improving their employment efforts with industry partners on behalf of APICDA residents.

The State's 2005 Crab CDQ allocation recommendations for APICDA are as follows:

Including APICDA's proposed new vessel investment, APICDA currently has an ownership interest in three crab harvesting vessels. However, APICDA's 2005 Crab CDP states that none of APICDA's crab catcher vessels have any catch history for the two new crab species and, therefore, will have their 2005 CDQ allocations for the two new crab species harvested and processed in collaboration with CBSFA.

Although APICDA has identified proposed CDQ projects in their 2005 Crab CDP Application for crab processing plants in False Pass, St. George, and Atka, the CDQ Team feels the future business plans for these proposed CDQ projects will have difficulty given their proximity to industrialized processing plants, barriers to entry that require significant capital expenditures, a low crab Guideline Harvest Level (GHL), lack of a

formal agreement with an experienced industry partner, and their past performance with in-region projects.

The State recommends an allocation of 8% for Eastern Aleutian Islands (EAI) Golden (Brown) king crab and Adak (Petrel Bank) Red king crab CDQ based on the factors and findings above. The State's 2005 allocation recommendations for the two new species of crab are consistent with APICDA's current opilio crab CDQ allocation percentage. Although the State supports APICDA's investment in the new longline/crab catcher vessel, the new investment has no practical impact on the State's 2005 Crab allocation recommendations as the new vessel has no catch history for the two new species and APICDA's 2005 CDP states their allocations for these species will be harvested by CBSFA's vessels and processed in collaboration with CBSFA in Dutch Harbor in 2005. The State took into consideration APICDA's business plan and investment in the crab sector in making this recommendation.

BBEDC

Per the 2000 U.S. Census, BBEDC has the third highest population (5,932), or over 22% of the CDQ region population, and fourth highest unemployment rate (15%) among the CDQ groups. BBEDC has the 4th highest median household income ($43,592/yr.) and a mid-range poverty rate of (17.5%). Based on these factors, BBEDC has a mid-range standard of living and economic need among the CDQ groups. However, many BBEDC communities have been adversely affected by overall low salmon prices which is the primary source of revenue in the region.

BBEDC's past performance of existing offshore CDQ projects have been very successful in generating capital for fisheries related business investment. BBEDC has been very active investing in for-profit offshore and onshore investments in the Bering Sea that provide a steady income stream to support their active and proposed CDQ projects. BBEDC has a well-prepared long-range transition plan to develop a self-sustaining fisheries economy in the Bristol Bay region.

BBEDC's CDQ projects for employment, education, and training that provide career track opportunities have been successful for several years. BBEDC successfully negotiated with their pollock CDQ partner to pay for a recruiter position in Dillingham to enhance the employment of Bristol Bay residents with their offshore pollock partner. However, the CDQ Team feels BBEDC could improve their employment efforts on behalf of BBEDC residents, especially with industry partners.

BBEDC's active in-region projects and proposed in-region projects appear to have the likelihood of developing a self-sustaining local fisheries economy and a viable schedule for transition from reliance on an allocation to self-sufficiency. Per 50 C.F.R. 679.30(a)(6), "The plan for transition to self-sufficiency must be based on the qualified applicant's long-term revenue stream without CDQs." BBEDC's in-region projects appear to be designed with realistic measurable milestones for determining progress for their projects.

BBEDC has contributed to many in-region CDQ projects including their Regional Fisheries Development Project, Community Seed Fund, Infrastructure Matching Fund, Employment and Education Programs, and Community Liaisons to promote fisheries related infrastructure development and support for their salmon and halibut fishermen, many of which are partially funded by grants. BBEDC formed the Bristol Bay Science and Research Institute for the purpose of obtaining grants for scientific research with the goal of improving management of area fisheries stocks. BBEDC has supported many youth and adult work readiness programs in cooperation with local Bristol Bay organizations and SAVEC.

BBEDC's future plans involve becoming a major owner of the Bering Sea fishery through acquisitions in a diversified portfolio of pollock, cod, halibut, and crab investments including the leveraging of CDQ for vertical integration benefits providing revenues to fund in-region CDQ projects and the means to support commercial fisheries business activities resulting in an ongoing, regionally based, sustainable fisheries related economy in western Alaska.

The State's 2005 Crab CDQ allocation recommendations for BBEDC are as follows:

BBEDC currently has an equity ownership in six crab catcher vessels and two crab L.L.P's and has been very active investing in crab vessels and quota over the last few years prior to crab rationalization. In making this recommendation, the CDQ Team considered BBEDC's business plan, investment in the crab sector, the success of their business agreements, their commitment to employment agreements for their residents with industry partners, and long-range business plan for self-sufficiency.

BBEDC's 2005 Crab Executive Summary states they will harvest their Adak Red king crab CDQ with vessels co-owned with their crab harvesting partner adding this crab species to their existing royalty agreements.

BBEDC's 2005 Crab Executive Summary states they have worked together with CVRF and YDFDA to pool their EAI Golden king crab quotas on one vessel, the F/V Erla-N. The vessel's crew is very experienced and an agreement has been made with these three groups to have one vessel intern/deck hand trainee position in 2005.

The State recommends an allocation of 18% for Eastern Aleutian Islands (EAI) Golden (Brown) king crab and Adak (Petrel Bank) Red king crab CDQ based on the factors and findings above. The State took into consideration BBEDC's business plan, investment in the crab sector, and employment benefits with industry partners in making this recommendation.

CBSFA

Per the 2000 U.S. Census, CBSFA has the fifth highest population (532 people), or 2% of the CDQ region, and highest median household income ($50,750/yr.) among the CDQ

groups. CBSFA has a low poverty rate (11.9%) and mid-range unemployment rate (15%) among the CDQ groups. Based on these factors, the CBSFA region has a relatively high standard of living and lower economic need among the CDQ groups. However, CBSFA has been adversely affected by a downturn in the opilio crab harvest level over the last few years which the City of St. Paul is heavily dependent upon for tax revenues.

CBSFA's past performance of existing offshore CDQ projects have been successful in generating capital for fisheries related business investment. CBSFA has been very active recently investing in for-profit onshore pollock and crab investments in the Bering Sea that provide a steady income stream to support their active and proposed in-region CDQ projects. CBSFA has contributed to in-region projects such as the St. Paul Small Boat Harbor, the formation of a successful halibut cooperative, multi-species processing in St. Paul Harbor, crab rationalization community protection initiatives, a vessel launch and retrieval project, and was successful in modifying regulations to allow for area 4C halibut to be harvested in 4D to increase harvest rates for local fishermen. CBSFA has a well-prepared long-range transition plan to develop a self-sustaining fisheries economy on St. Paul.

CBSFA's CDQ projects for employment, education, and training that provide career track opportunities have been successful. CBSFA's halibut fishery provides employment to a significant portion of St. Paul residents. However, the CDQ Team feels CBSFA could improve in their employment efforts on behalf of CBSFA residents, especially with industry partners.

Furthermore, the CDQ Team is concerned with the economic situation in the community of St. George and feels the community could benefit if APICDA and CBSFA formed a cooperative working relationship based on St. Paul Island for projects involving the halibut and crab fisheries per 6 AAC 93.040(7), which states the CDQ Team shall consider the coordination or cooperation with other CDQ groups on CDQ projects when reviewing a CDP.

CBSFA's active in-region projects and proposed in-region projects appear to have the likelihood of developing a self-sustaining local fisheries economy and a viable schedule for transition from reliance on an allocation to self-sufficiency. Per 50 C.F.R. 679.30(a)(6), "The plan for transition to self-sufficiency must be based on the qualified applicant's long-term revenue stream without CDQs." CBSFA's in-region projects appear to be designed with realistic measurable milestones for determining progress for their projects.

CBSFA's active CDQ projects include a Multi-Species Development project, Vessel and IFQ loan program, Halibut Cooperative, Local Fleet Support Project, Large Vessel Transition Project, Vessel Repair and Maintenance Project, Small Boat Harbor project, and CBSFA's future plans involve the St. Paul Harbor Maintenance, Repair and Improvements project and a Vessel Repair and Maintenance Storage Facility.

CBSFA's future plans involve becoming a major owner of the Bering Sea fishery through acquisitions in a diversified portfolio of pollock, cod, halibut, and crab investments including the leveraging of CDQ for vertical integration providing revenues to fund in-region CDQ projects and the means to support commercial fisheries business activities resulting in an ongoing, regionally based, sustainable fisheries related economy in western Alaska.

The State's 2005 Crab allocation recommendations for CBSFA are as follows:

CBSFA has been very active recently investing in three crab catcher vessels with EAI Golden King crab and Adak (Petrel Bank) Red king crab history. CBSFA recently acquired an equity ownership investment in an onshore crab processing company in Dutch Harbor with significant Golden king crab and Adak (Petrel Bank) Red king crab processing quota which will lead to vertical integration and further leverage CBSFA's crab CDQ allocations. Further, there are opportunities for two to three additional CDQ groups to participate in this venture. One additional CDQ group has recently submitted an amendment that was approved by the State to participate in this venture. Per APICDA's Executive Summary, APICDA has agreed to lease their EAI Golden king crab and Adak (Petrel Bank) Red king crab CDQ allocations to CBSFA for harvesting and processing.

CBSFA has been actively involved in crab rationalization deliberations at the Council and in Washington, D.C. and was successful in negotiating community protection measures to insure crab processing on St. Paul Island, which is heavily dependent on tax revenues from this fishery. With crab rationalization, significant benefits may be delivered to CBSFA in terms of employment opportunities for local residents, and harvesting and processing revenues. In making this recommendation, the CDQ Team considered CBSFA's business plan, investment in the crab sector, the success of their business agreements, their commitment to employment agreements for their residents with industry partners, and long-range business plan for self-sufficiency.

The State recommends an allocation of 21% for Eastern Aleutian Islands (EAI) Golden (Brown) king crab and Adak (Petrel Bank) Red king crab CDQ based on the factors and findings above. CBSFA's crab harvesting vessels hold significant EAI Golden king crab and Adak (Petrel Bank) Red king crab and CBSFA recently acquired an equity ownership interest in an onshore crab processing company which holds significant EAI Brown king crab and Adak (Petrel Bank) Red king crab processing quotas. These investments will lead to vertical integration and further leverage CBSFA's crab CDQ allocations providing benefits to CBSFA and their residents.

CVRF

Per the 2000 U.S. Census, CVRF has the 2nd highest population (7,855 people) and a high unemployment rate (20%) among the CDQ groups. CVRF has the lowest median household income ($28,170) and a highest poverty rate (26.5%) among the CDQ groups.

Based on these factors, the CVRF region has a low standard of living and high economic need among the CDQ groups.

CVRF's past performance of existing offshore CDQ projects have been very successful in generating capital for fisheries related business investment. CVRF has been very active investing in for-profit investments in the Bering Sea that provide a steady income stream to support their active and proposed CDQ projects in-region. CVRF has a well-prepared long-range transition plan to develop a self-sustaining fisheries economy in the CVRF region. However, CVRF has incurred very high administrative expenses for senior management personnel, which concerns the CDQ Team.

CVRF's CDQ projects for employment, education, and training that provide career track opportunities have been very successful in-region. CVRF's 4-SITE project has been successful for many years providing Scholarships, Internships, Training, and Employment to local residents.

CVRF owns a large salmon processing plant in Quinhagak and seven small halibut processing plants in Toksook Bay, Mekoryuk, Tununak, Chefornak, Kipnuk, Hooper Bay, and Quinhagak. These processing plants have been very successful and provide considerable employment benefits and markets for local resident fishermen where none exist. In 2004, CVRF employed over 700 western Alaska residents alone. However, CVRF's employment numbers with industry partners have decreased in recent years as residents have favored working in their local communities and the State acknowledges this. However, the CDQ Team feels CVRF could improve in their employment efforts on behalf of CVRF residents with industry partners.

CVRF's active in-region projects and proposed in-region projects appear to have the likelihood of developing a self-sustaining local fisheries economy and a viable schedule for transition from reliance on an allocation to self-sufficiency. Per 50 C.F.R. 679.30(a)(6), "The plan for transition to self-sufficiency must be based on the qualified applicant's long-term revenue stream without CDQs." CVRF's in-region projects appear to be designed with realistic measurable milestones for determining progress for their projects.

CVRF's active projects include salmon and halibut processing plants in seven communities, support for local salmon and herring fisheries, sportfishing operations, fishery support centers in two communities, and a marine transportation infrastructure plan. CVRF has done considerable long-range planning for innovative investments including contributing to wind power turbines and a high-speed catamaran designed to lower variable costs for salmon processing and marketing of their salmon products which impressed the CDQ Team.

CVRF's future plans consist of creating immediate opportunity and hope for local residents, long-term fisheries infrastructure development, and pursuing financial investments to further the goals of their CDP. Future plans include a regional port, additional fishery support centers, vessel construction and support programs, and in-

region fisheries buying and processing infrastructure. CVRF's future plans involve becoming a major owner of the Bering Sea fishery through acquisitions in a diversified portfolio of pollock, cod, halibut, and crab investments including the leveraging of CDQ for vertical integration providing revenues to fund in-region CDQ projects and the means to support commercial fisheries business activities resulting in an ongoing, regionally based, sustainable fisheries related economy in western Alaska.
However, the CDQ Team is concerned with the accumulating long-term debt of CVRF's offshore pollock partner and feels the viability of this strategy should be addressed by all equity partners.

The State's 2005 Crab CDQ allocation recommendations for CVRF are as follows:

In making this recommendation, the State took into consideration CVRF's business plan, investment in the sector, and employment and training benefits provided by vessels harvesting and processing crab. CVRF currently has a 50% equity ownership in nine crab vessels and has been very active investing in crab vessels and quota over the last few years prior to crab rationalization. In making this recommendation, the CDQ Team considered CVRF's business plan, investment in the crab sector, the success of their business agreements, their commitment to employment agreements for their residents with industry partners, and their long-range business plan for self-sufficiency. With the implementation of crab rationalization and if crab GHL's return to historic levels, significant benefits may be provided to CVRF and their residents.

CVRF owns an equity interest in a crab catcher vessel with Adak (Petrel Bank) Red king crab history. CVRF recently invested in a crab catcher vessel with significant EAI Golden king crab history and has been involved in negotiating a possible joint venture with another CDQ group in a crab processing company in Dutch Harbor with significant EAI Golden king crab and Adak (Petrel Bank) Red king crab processing quota. CVRF will be participating in a pool with two other CDQ groups for the harvesting, processing, and marketing of EAI Golden king crab in Dutch Harbor.

The State recommends an allocation of 18% for Eastern Aleutian Islands (EAI) Golden (Brown) king crab and Adak (Petrel Bank) Red king crab CDQ based on the factors and findings above. The State took into consideration CVRF's business plan, investment in the crab sector, and employment benefits provided by industry partners in making this recommendation.

NSEDC

Per the 2000 U.S. Census, NSEDC has the highest population (8,488 people) and a mid-range unemployment rate (16%) among the CDQ groups. NSEDC has the third highest median household income ($44,335) and a mid-range poverty rate (17.4%) among the CDQ groups. Based on these factors, the NSEDC region has a mid range standard of living and economic need among the CDQ groups.

NSEDC's past performance of existing offshore CDQ projects have been successful in generating capital for fisheries related business investment. However, NSEDC has incurred high administrative expenses which include particularly high compensation levels for contract personnel. This causes significant concern to the CDQ Team. NSEDC has been active investing in for-profit investments in the Bering Sea that provide a steady income stream to support their active and proposed CDQ projects in-region. NSEDC has a long-range business plan to develop a self-sustaining fisheries economy in their eligible communities.

NSEDC's CDQ projects for employment, education, and training that provide career track opportunities have been very successful. The CDQ Team feels NSEDC has done well in their employment efforts for their residents with industry partners. NSEDC has provided significant employment benefits and opportunities for local halibut and crab fishermen with their Nome Seafood Center and small crab fishery in Golovin. However, the CDQ Team feels NSEDC should continue their employment efforts on behalf of NSEDC residents, especially with industry partners.

NSEDC's active in-region projects and proposed in-region projects appear to have the likelihood of developing a self-sustaining local fisheries economy and a viable schedule for transition from reliance on an allocation to self-sufficiency. Per 50 C.F.R. 679.30(a)(6), "The plan for transition to self-sufficiency must be based on the qualified applicant's long-term revenue stream without CDQs." NSEDC's in-region projects appear to be designed with realistic measurable milestones for determining progress for their projects.

NSEDC's active projects include the Norton Sound Fisheries Research and Development Program, Salmon Research, Restoration and Enhancement Program, Fisheries Development, Education, Employment, and Training Programs, Revolving Loan Program, Fund for IFQ Purchases, Shoreside Infrastructure Improvements Program, Harvesting/Tendering Vessel Funding, Fund for Vessel Purchases, and Processing Vessel Funding. NSEDC has conducted experimental fisheries for shrimp and crab in Diomede and Wales and funds salmon enhancement programs in Norton Sound which impressed the CDQ Team and should be continued.

NSEDC's future plans are to build on the economic development programs started in 1992, in addition to making further investment in the Bering Sea fishery through acquisitions in a diversified portfolio of pollock, cod, halibut, and crab investments including the leveraging of CDQ for vertical integration providing revenues to fund in-region CDQ projects and the means to support commercial fisheries business activities resulting in an ongoing, regionally based, sustainable fisheries related economy in western Alaska.

The State's 2005 Crab allocation recommendations for NSEDC are as follows:

The State recommends an allocation of 21% for Eastern Aleutian Islands (EAI) Golden (Brown) king crab and Adak (Petrel Bank) Red king crab CDQ based on the factors and

findings above. In making this recommendation, the CDQ Team considered NSEDC's business plan, the success of their business agreements, investment in the crab sector, and employment benefits provided by industry partners harvesting and processing crab.

NSEDC has an equity ownership interest in three crab catcher vessels that hold significant EAI Brown king crab quota and the CDQ Team felt a larger allocation to NSEDC was warranted. NSEDC proposes to have their EAI Golden king crab and Adak (Petrel Bank) red king crab processed by Royal Aleutian Seafoods in Dutch Harbor or possibly with Adak Fisheries, L.L.C. in Adak.

YDFDA

Per the 2000 U.S. Census, YDFDA has the 4th highest population (3,123 people) and the highest unemployment rate (26%) among the CDQ groups. YDFDA has the 2nd lowest median household income ($31,022) and a high poverty rate (26.3%) among the CDQ groups. Based on these factors, the YDFDA region has one of the lowest standards of living and highest economic needs among the CDQ groups.

YDFDA's past performance of existing offshore CDQ projects have been successful in generating capital for fisheries related business investment. YDFDA has been active investing in for-profit offshore investments in the Bering Sea that provide a steady income stream to support their active and proposed CDQ projects in-region. YDFDA has a well-prepared long-range transition plan to develop a self-sustaining fisheries economy in their eligible communities.

YDFDA's CDQ projects for employment, education, and training that provide career track opportunities have been successful. A significant percentage of the YDFDA region population is under the age of 18 and will soon be entering the workforce. YDFDA recognizes this issue, and has made considerable efforts to provide employment opportunities for local residents both onshore and offshore. YDFDA's salmon processing plant in Emmonak has provided considerable employment and fishing opportunities for local residents in surrounding communities. Through YDFDA's efforts the ex-vessel salmon prices for local fishermen have increased considerably the last few years. YDFDA has provided funding for young residents to attend a vocational training center in St. Mary's that provides training to allow residents to pursue careers in the construction trade industry. Although YDFDA has done a good job, the CDQ Team feels YDFDA could improve in their employment efforts on behalf of their residents, especially with industry partners.

YDFDA's active in-region projects and proposed in-region projects appear to have the likelihood of developing a self-sustaining local fisheries economy and a viable schedule for transition from reliance on an allocation to self-sufficiency. Per 50 C.F.R. 679.30(a)(6), "The plan for transition to self-sufficiency must be based on the qualified applicant's long-term revenue stream without CDQs." YDFDA's in-region projects appear to be designed with realistic measurable milestones for determining progress for their projects.

YDFDA's active projects include investments in the Bering Sea fishing industry, Investment in Regional Fisheries, Education and Training Programs, the Lower Yukon Regional Salmon Quality Preservation Project, a Regional Fisheries Support Project, and Regional Economic Development. YDFDA's salmon processing project in Emmonak has been very successful providing employment and fishing opportunities for local residents, and has recently been expanded to include a value added processing operation that will increase the value of Yukon River King and Chum salmon providing additional benefits to residents.

YDFDA's future plans include additional investment in the Bering Sea industry and regional fisheries, fishery support centers, cultural fisheries tourism, and human resource development through YDFDA's employment, education, and vocational training programs. YDFDA's future plans involve becoming a major owner of the Bering Sea fishery through acquisitions in a diversified portfolio of pollock, cod, halibut, and crab investments including the leveraging of CDQ to provide revenues to fund in-region CDQ projects and the means to support commercial fisheries business activities resulting in an ongoing, regionally based, sustainable fisheries related economy in western Alaska.

The State's 2005 Crab allocation recommendations for YDFDA are as follows:

The State recommends an allocation of 14% for Eastern Aleutian Islands (EAI) Golden (Brown) king crab and Adak (Petrel Bank) Red king crab CDQ based on the factors and findings above. The State took into consideration YDFDA's business plan, investment in the crab sector, and employment benefits provided by industry partners in making this recommendation.

YDFDA's Adak (Petrel Bank) Red king crab will be harvested by two vessels in which they own an equity interest. YDFDA will be participating in a pool with two other CDQ groups for the harvesting, processing, and marketing of EAI Golden king crab in Dutch Harbor.

Conclusion

We look forward to meeting with you to answer any questions or concerns you might have regarding these recommendations.

Sincerely,

Edgar Blatchford

Edgar Blatchford
Commissioner

Attachments

cc: CDQ Team
CDQ Groups

Western Alaska Community Development Quota Program
2005 Crab Quota Allocations

	APICDA	BBEDC	CBSFA	CVRF	NSEDC	YDFDA	Total
EAI Golden (Brown) King Crab	8%	18%	21%	18%	21%	14%	100%
Adak (Petrel Bank) Red King Crab	8%	18%	21%	18%	21%	14%	100%