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PRODUCERS AND WHOLESALERS



E. C. PHILLIPS AND SON, INC.

Fresh-Frozen and Smoked Alaska Fish

PO BOX 8235 • KETCHIKAN, ALASKA 99901 • 907 225 1121 • FAX 907 225-7249

January 31, 1991

Members of the House Resources Committee
House of Representatives
Alaska State Legislature
Box V
Juneau, Alaska 99811

SUBJECT: EXCHANGE OF RAW SPORT, AND PERSONAL USE
CAUGHT FISH FOR PROCESSED PRODUCTS AS AN ALTERNATIVE TO
CUSTOM PROCESSING

Dear Members:

We have requested that House Bill No. 60, entitled "An Act relating to the exchange of certain fish for seafood products" be introduced for your consideration.

We believe that the bill will provide a valuable service to the ever increasing number of sport fishermen visiting Alaska. We believe it will also provide many benefits to the state of Alaska, including:

Retention of additional visitor dollars in Alaska.

Additional jobs for Alaskans.

Retention of existing jobs which will be lost if legislation is not passed which will allow this practice to continue in those portions of Alaska where it has been ongoing since the early 1970's.

Growth for the Alaskan added value seafood processing industry.

Exposure of large numbers of additional visitors to Alaskan added value fishery products, enhancing opportunities to develop expanded markets for these products.

Currently, many sport fishermen in southeast Alaska have a problem even getting their fish frozen, or properly packed for transport home. If they want their product preserved, or processed in any manner, custom processing is their only option.

Custom processing requires that each individuals fish be processed as a separate batch of product. The identity of the owner must be maintained throughout the process, resulting in literally hundreds of small, segregated batches of product. This results in excessive labor requirements, increased space requirements, and a significant administrative burden in comparison to an exchange as proposed in House Bill No. 60.

Custom processing is not practical for many visitors due (1) to the time required, (2) the minimum quantity required to make custom processing practical for the processor, (3) limits placed on production capacity by the complexity of custom processing, and (4) the excessively high cost of shipping finished goods to the fisherman after he/she has returned home.

House Bill No. 60 provides AN EFFICIENT ALTERNATIVE TO CUSTOM PROCESSING. That alternative is an EXCHANGE PROGRAM as defined in House Bill No. 60.

Existing Alaska statutes which prohibit the sale or barter of sport caught fish are construed as prohibiting this type of exchange process.

In spite of this statutory prohibition, some processors in southcentral have been conducting sport fish exchange programs since the early 1970's. These same practices have been prohibited in southeastern Alaska.

On October 23, 1989 a request for an Attorney General's opinion was submitted by the Dept. of Public Safety, Fish & Wildlife Protection, Statewide Investigations concerning the exchange of sport caught or personal caught fish for processed fish products. An opinion was drafted by the AG's office which we believe states that the practice violates current Alaska Statutes and regulations (AS 16.10.265, AS 16.05.940, & 5 AAC 75.015 SALE OF SPORT CAUGHT FISH). Formal announcement and action concerning the opinion were withheld under the Cowper administration to avoid the impact of the opinion during the 1990 summer season. This has not resolved the problem of inconsistency in enforcement. It also does not provide any benefit to the state of Alaska.

It is our opinion that the statutes and regulations which prohibit sale or barter were intended to prevent sport or personal use fisherman from selling or bartering their catch for personal gain, or in a manner which establishes a value in the market place for their catch. The exchange process does not result in a personal gain to the sport, or personal use fisherman, or establish a value for their catch. The fisherman is receiving the same product he would receive through much more complex and impractical (but legally acceptable) custom processing, and is paying only for the service. House Bill No. 60 will not compromise the purpose of existing statutes.

House Bill No. 60 would not require any significant increase in regulatory work load, or require additional administrative regulations for enforcement.

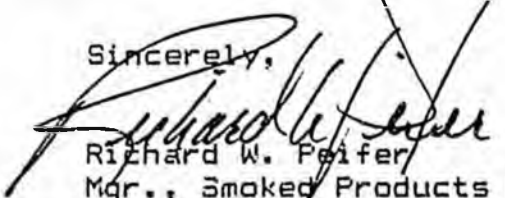
The Alaska Department of Environmental Conservation (ADEC), Division of Environmental Health, is the state agency responsible for public health regulation of the Alaska seafood industry. Current ADEC FISH INSPECTION REGULATIONS, 18 AAC 34.090 HANDLING OF FISHERIES PRODUCTS, FOOD INGREDIENTS, FOOD ADDITIVES, PACKAGING MATERIALS, AND CHEMICALS, paragraph (b) requires segregation of sport, or personal use fish from commercial fish, maintenance of records to maintain the identity of all non-commercial fish processed throughout all aspects of processing, and 18 AAC 34.170 LABELING REQUIREMENTS requiring labeling of all non-commercial fish and fishery products with the words "NOT FOR SALE".

The Director of the Division of Environmental Health, ADEC, has stated that ADEC would be willing to verify that the yields or recoveries used for the exchange process are an accurate representation of the processing recoveries or yields.

We believe that enforcement of these existing regulations and the requirements of House Bill No. 60 can be accomplished by ADEC in cooperation with the Department of Public Safety during the course of their normal inspection activities with no increase in staff or funding.

We respectfully request that you give this bill favorable consideration, and act to ensure that it is passed and in effect for the 1991 sport fishing season.

Sincerely,


Richard W. Peifer
Mgr., Smoked Products Div.

January 31, 1991

Resources Committee
House of Representatives
Alaska State Legislature
Box V
Juneau, Alaska 99811

Dear Members:

We are writing to express our support for House Bill No. 60, entitled "An Act relating to the exchange of certain fish for seafood products."

Sport fishing is the number one leisure activity in the United States today. Alaska provides an opportunity for one of the finest sport fishing experiences available. An ever increasing number of visitors are coming to Alaska specifically for the sport fishing, or including sport fishing as a major experience during their visit.

House Bill No. 60 will provide a much needed service. This service is part of the infrastructure necessary to support the growth of this important part of our visitor industry. We believe the bill will also:

Retain additional visitor dollars in Alaska.

Provide new jobs for Alaskans.

Retain existing jobs which will be lost if legislation is not passed which will allow this practice to continue in those portions of Alaska where it has been ongoing since the early 1970's.

Support the continued growth of the Alaskan added value seafood processing industry.

Expose large numbers of additional visitors to Alaskan added value fishery products, developing and enhancing opportunities for expanded markets for these products.

We urge you to vote for the passage of this bill in a timely fashion to allow this important service to be offered to sport fishermen beginning with the 1991 fishing season.

Thank you for your consideration.

Sincerely,

KECHIKAN SPORTFISHING

SEE ATTACHED FOR SKIPPER SIGNATURES

We the undersigned support HOUSE BILL NO.60

Regarding exchange of sport caught fish for processed seafood products.

Sport caught fish will be labeled "NOT FOR SALE", and used for exchange only.

NAME	OCCUPATION	CO.
<i>Carol Ann Hanger</i>	Coordinator	Ketchikan Sportfishing
<i>Margaret & Alie Hanger</i>	Owner - Operator	Ketchikan Sportfishing
<i>Mike Dooley</i>	Reservations Manager	Waterfall Resort
<i>[Signature]</i>	RESIDENT GRUNT	" "
<i>Pat Leary</i>	Controller	Waterfall Resort
<i>F. Wallace Hanger</i>	Gen. Manager	Waterfall Resort
<i>[Signature]</i>		
<i>M. C. Munkit</i>	Another Resident Grunt	Waterfall Resort
<i>[Signature]</i>	Accounting	Waterfall Resort
<i>Judy Wharton</i>	ASST Manager	Charley's Waterfall Ltd.
<i>Robert S. Young</i>	Manager	Ingersoll Hotel
<i>[Signature]</i>	GENERAL MANAGER	WESTMARK HOTEL
<i>[Signature]</i>	Sales Manager - KTN	Holland America Line

We the undersigned support "HOUSE BILL NO.60
Charter boat skippers-owners

DAVID R. MAYNARD - David R. Maynard 3772 ALASKA AVE., KTN. AK 995
MIKE WILLIAMS Mike Williams 7390 ST. Ketchikan AK 999
DICK CAVENTINE Dick Caventine 5640 S. TONGUES - KTN 99901
Dennis Collins Dennis Collins 1414 Tongues Ave Ktn 99901
Dewie Hamilton Dewie Hamilton P.O. Box 9551 KTN. AK 999
Lawrence H. Smith Lawrence H. Smith P.O. 5737 KTN-AK 99901
CARL H PORTER III Carl Porter III P.O. Box 7844 Ktn. AK 99901
MALCOLM DIXON Malcolm Dixon P.O. Box 725 WARD CO. AK 9992
KENNETH P. TEUNE Kenneth P. Teune P.O. Box 793 WARD CO. AK 999
ANTHONY R. AZURE Tony Azure P.O. BOX 7724 KETCHIKAN, AK 999
STEVE LEMIE Steve Lemie P.O. Box 9515 KTN, AK 999
WILLIAM HUNTINGTON William Huntington Box 9637 KTN. AK. 99901
EDWARD H. PEUS Edward H. Peus 11003 Victoria St N. KTN. AK. 99901
GARY PLUMB Gary Plumb 441 Hillcrest KTN. AK
Rob Miller Rob Miller P.O. Box 7982 KTN. AK
Vic Utterback Vic Utterback P.O. Box 9345 Ktn. AK
John Luhrs John Luhrs 898 Monroe KTN. AK 9990

1990 ADF&B REGISTERED CHARTER VESSELS

OWNERS NAME	OWNERS ADDRESS	VESSEL NAME	C. G. LIC	BUSLIC	ADF&B	VESSEL PORT
SMITH	LAWRENCE BOX 5737	KETCHIKAN AK 99901 SHANNON	231661	104085	54243	KETCHIKAN
CAMPBELL	BRUCE BOX 19236	THORNE BAY AK 99919 REBECCA MARIE	278087	107433	58906	THORNE BAY
GICKER	GEORGE 626 MAIN STREET	KETCHIKAN AK 99901 MYTIME	268170	048773	22533	KETCHIKAN
BURNETT	RALPH BOX 443	THORNE BAY AK 99919 FAIR-SEA	268116	016867	44877	JUNEAU
ERWIN	TROY BOX 7236	KETCHIKAN AK 99901 BRAY SEA	614180	046932	51519	KETCHIKAN
DOIRON	MALCOLM BOX 725	WARD COVE AK 99928 BEA MIST	278100	051177	51473	KETCHIKAN
MILLER, III	ROBERT BOX 7902	KETCHIKAN AK 99901 LADY D	231721	032267	49158	KETCHIKAN
HASSELL	JOE 2949 S. TONGASS HWY.	KETCHIKAN AK 99901 KING FISHER	167416	020584	10368	KETCHIKAN
CAMPBELL, III	CLYDE BOX 8889	KETCHIKAN AK 99901 BETTY D	0526L	110332	58862	KETCHIKAN
HAUGHTON	LONNIE BOX 3006	KETCHIKAN AK 99901 CHINA COVE	508440	024469	43450	KETCHIKAN
ANDERSON	CURTIS BOX 7118	KETCHIKAN AK 99901 LOVELY LADY	530062	059544	52896	KETCHIKAN
HAYIDA CHARTER	BOX 3034	KETCHIKAN AK 99901 BEA BREE	614364	067793	51054	KETCHIKAN
MCCOY	GARY 6A48 ZENOBIA BT. #9	WEBSTER CO 80030 WANDERIN' STAR	216374	107404	58022	KETCHIKAN
HILLEY	LAWRENCE BOX 7483	KETCHIKAN AK 99901 AK 0426 K	508500	065483	52010	KETCHIKAN
KOWALSKI	DARYL 520 JACKSON #3	KETCHIKAN AK 99901 LOIS ANN	4295H	113346	40636	KETCHIKAN
SANGER	WAYNE 1122 NELSON	SEDRO WOLLEY WA 98284 WAVE DANCER	248122	020818	55212	CRAIG
SANGER	WAYNE 1122 NELSON	SEDRO WOLLEY WA 98284 JUSTIN CASE	248122	020818	58599	CRAIG
THOMAS	KIRK Rt. 2 BOX 1312	KETCHIKAN AK 99901 FLYING HIGH	231890	026711	57257	KETCHIKAN
RAMISKEY	TOM 428 TOWER	KETCHIKAN AK 99901 PHAEDRA MAE	627327	066603	34736	KETCHIKAN
HOUVART	DUANE BOX 84	CRAIG AK 99921 DUCHESS	278030	104240	53727	CRAIG
NEVILLS	BILL BOX 6123	KETCHIKAN AK 99901 SLO BELL	231883	060930	59541	KETCHIKAN
COLLENTINE	RICHARD	KETCHIKAN AK 99901 SILVER QUEEN	268083	030105	59559	KETCHIKAN
HUNTINGTON	GEORGE BOX 9637	KETCHIKAN AK 99901 SHAKER	269091	110854	58881	KETCHIKAN
PERCE	WILLIAM 110 BAYVIEW DRIVE	COFFMAN COVE AK 99950 SQUARE DANCER	268190	043537	56793	COVE
TEUNE	KENNETH BOX 793	WARD COVE AK 99928 ALASKA	268157	081646	55517	KETCHIKAN
HANSEN	ERNEST 1027 MILLAR STREET	KETCHIKAN AK 99901 NIMBUS	231736	000871	33808	KETCHIKAN
BREER	JAMES 1033 MILLAR STREET	KETCHIKAN AK 99901 SEABREEZE	268160	072233	54264	KETCHIKAN
DENNIS	AL BOX 9009	KETCHIKAN AK 99901 SALTARY "C"	268179	070849	55758	KETCHIKAN
HALL	MURTHUR BOX 1479	MINDEN NV 89423 SUMDUM		107876	53740	KETCHIKAN
CHARTERS, LTD	BRINDALL BOX 1058	WARD COVE AK 99928 BARBARA K	195378	015757	55632	WARD COVE
FATTISON	WILLIAM 735 S. PT. HIGGINS NT	KETCHIKAN AK 99901 DEALER'S CHOICE	268180	083816	48692	KETCHIKAN
PIERCE	WILLIAM 110 BAYVIEW DRIVE	COFFMAN COVE AK 99950 MILLER TIME	268190	043537	59419	COFFMAN COVE
GRIFFIN	FRANK BOX 6081	KETCHIKAN AK 99901 GRAFIN	268057	016498	32322	KETCHIKAN
MCFARLAND	JAMES BOX 159	THORNE BAY AK 99919 JEANNIE M	231838	016692	52260	THORNE BAY
PLEIN	KENNETH BOX 19329	THORNE BAY AK 99919 BIGENUFF II	278023	039285	50457	THORNE BAY
HUNTINGTON	WILLIAM BOX 9637	KETCHIKAN AK 99901 SIAKER SEEKER	231737	002529	53758	KETCHIKAN
LUNDAMO	RONALD 657 N. PT. HIGGINS RD	KETCHIKAN AK 99901 SILVERTIP	231799	019183	56127	KETCHIKAN
TURNER	ALBERT BOX 304	WARD COVE AK 99928 SILVER LADY	278054	059779	51254	KETCHIKAN
MCCOY	DAN R.R. 2 #280J	KETCHIKAN AK 99901 SALMON BUSTER	231810	045578	58482	KETCHIKAN
MANNING	RICHARD GENERAL DELIVERY	CRAIG AK 99921 -----	268666	100091	58166	CRAIG
RIPP	FAUL GENERAL DELIVERY	CRAIG AK 99921 -----	165397	100091	58167	CRAIG
HUNTINGTON	GEORGE P.O. BOX 9637	KETCHIKAN AK 99901 GEORGE'S CHARTER	269091	110854	59832	KETCHIKAN
STANL	ED 651 DEARBERRY CT. NTB	KETCHIKAN AK 99901 NIKKI MARIE	231767	017286	57984	KNUDSON COVE
ENGELMAN	GERALD BOX 774	WARD COVE AK 99928 KINGFISHER II	195400	059777	49780	KETCHIKAN
LOITZ	DAN 2306 4TH AVE.	KETCHIKAN AK 99901 TRISHALYN	231849	041455	54925	KNUDSON COVE
OKSMITH III	STANLEY BOX 8944	KETCHIKAN AK 99901 SALTY DAME	195414	070285	35429	KETCHIKAN

1990 ADF&G REGISTERED CHARTER VESSELS

OWNERS NAME	OWNERS ADDRESS	VESSEL NAME	C. G. LIC	BUSLIC	ADF&G	VESSEL PORT
MILMEISTER DALE	82 SHOUP ST.	KETCHIKAN	AK 99901 SARAH H	278092	113045	50889 KETCHIKAN
MERMAN WILLIAM	P.O. BOX 265	THORNE BAY	AK 99919 VINDICATOR		054853	28393 JUNEAU
MARDNER CLIFFORD	BOX 6141	KETCHIKAN	AK 99901 AMANTE	223374	054975	50116 KETCHIKAN
MESLEY DAVID	P.O. BOX 9037	KETCHIKAN	AK 99901 HEMMING BAY	544965	062221	48426 KETCHIKAN
MESLEY DAVID	P.O. BOX 9037	KETCHIKAN	AK 99901 REEL FUN		062221	54265 KETCHIKAN
MENOR FORREST	2544 THIRD AVE.	KETCHIKAN	AK 99901 CHERI	231744	045990	41765 KETCHIKAN
MENOR FORREST	2544 THIRD AVE.	KETCHIKAN	AK 99901 EL SOL	231744	045990	20639 KETCHIKAN
MILLOTSON LARRY	P.O. BOX 585	WARD COVE	AK 99928 CATHERINE MARIE	231887	012351	43991 KETCHIKAN
MILLIM RUBY	P.O. BOX 1156	WARD COVE	AK 99928 Z	235701	034625	20545 KETCHIKAN
MIMM LEWIS	P.O. BOX 672	KETCHIKAN	AK 99901 LUCKY STRIKE	278046	002608	51303 KETCHIKAN
MICK ROLF	Box 7311 Ketchikan, AK	KETCHIKAN	AK 99901 MY FAIR LADY	627399	126194	20357 KETCHIKAN
MICK DAN	511 TOWER RD KETCHIKA	KETCHIKAN	AK 99901 NO NAME	231772	121955	59762 KETCHIKAN
MERR DAVID	8404 35TH ST. W-TACOMA	TACOMA	WA 98466 EXODUS	247901	121217	59615 TACOMA, WA
MULLOCK, JR. JAMES	BOX 1197 WARD COVE, AK	WARD COVE	AK 99928 TCHAIKA	231741	238857	58380 WARD COVE, AK
METTJE LARRY	BOX 5182 KETCHIKAN AK	KETCHIKAN	AK 99901 MISTY LADY	278082	111470	49138 KETCHIKAN AK
MOLPH NETTIE	148 THOMAS ST.	KETCHIKAN	AK 99901 DA'HOD	0786K	061820	50439 KETCHIKAN AK
MUMBY GARY	441 HILLCREST	KETCHIKAN	AK 99901 VERA CRUZ	278081		55389 KETCHIKAN
MAYNARD DAVID	3772 ALASKA AVENUE	KETCHIKAN	AK 99901 ISLANDER	268127	009498	51487 KETCHIKAN
MORTER, SR. CARL	BOX 7844	KETCHIKAN	AK 99901 AK-7992-L	235838	121038	60105 KETCHIKAN AK
MOFFINET DON	BOX 5874	KETCHIKAN	AK 99901 AMY JO	231775	054798	51374 KETCHIKAN AK
MORSE CLASSICALASKA CHARTERS	P. O. BOX 6117	KETCHIKAN	AK 99901 BATTERY "C"		078849	55758 KETCHIKAN, A K
MULLINS DENNIS	BOX 8712	KETCHIKAN	AK 99901 CHIANE II	231702	043216	26132 KETCHIKAN AK
MURPHY THOMAS	BOX 9051	KETCHIKAN	AK 99901 WHITE BEAR	627395	125432	60535 KETCHIKAN AK
MURPHY, JR. FRANK	2802 THIRD AVENUE	KETCHIKAN	AK 99901 AMBER GIRL	627409	125335	29048 KETCHIKAN AK
MURPHY ANTHONY	BOX 7724	KETCHIKAN	AK 99901 FISH N FUN	231824	066897	58402 KETCHIKAN AK
MURPHY MIKE	7390 TONGASS HIGHWAY	KETCHIKAN	AK 99901 MELODY JEAN	627403	125721	48320 KETCHIKAN AK
MURPHY DUANE	BOX 84	CRAIG	AK 99921 DUCHESS	278030	003070	53727 CRAIG AK
MURPHY RICHARD	BOX 133	KLAWOCK	AK 99925 SCOTTY II	278016	108480	54801 CRAIG AK
MURPHY GARRY	BOX 9290	KETCHIKAN	AK 99901 DOMINO	195349	009551	4589J KETCHIKAN AK
MURPHY EDWARD	BOX 166	KLAWOCK	AK 99925 MISS RIANNON	278107	100308	54324 KLAWOCK AK
MURPHY ASSOCIATES REBORT	BOX 6440	KETCHIKAN	AK 99901 WATERFALL #1		068373	52838 KETCHIKAN AK
MURPHY ASSOCIATES RESORT	BOX 6440	KETCHIKAN	AK 99901 WATERFALL #2		068373	48922 KETCHIKAN AK
MURPHY ASSOCIATES RESORT	BOX 6440	KETCHIKAN	AK 99901 WATERFALL #3		068373	48923 KETCHIKAN AK
MURPHY ASSOCIATES RESORT	BOX 6440	KETCHIKAN	AK 99901 WATERFALL #4		068373	48924 KETCHIKAN AK

1990 ADF&G REGISTERED CHARTER VESSELS

OWNERS NAME	OWNERS ADDRESS	VESSEL NAME	C. G. LIC	PUBLIC ADF&G	VESSEL NO.
ASSOCIATES RESORT	BOX 6440	KETCHIKAN AK 99901 WATERFALL #5	068373	48925	KETCHIKAN AK
ASSOCIATES RESORT	BOX 6440	KETCHIKAN AK 99901 WATERFALL #6	068373	48926	KETCHIKAN AK
ASSOCIATES RESORT	BOX 6440	KETCHIKAN AK 99901 WATERFALL #7	068373	48927	KETCHIKAN AK
ASSOCIATES RESORT	BOX 6440	KETCHIKAN AK 99901 WATERFALL #8	068373	48928	KETCHIKAN AK
ASSOCIATES RESORT	BOX 6440	KETCHIKAN AK 99901 WATERFALL #9	068373	48929	KETCHIKAN AK
ASSOCIATES RESORT	BOX 6440	KETCHIKAN AK 99901 WATERFALL #10	068373	48930	KETCHIKAN AK
ASSOCIATES RESORT	BOX 6440	KETCHIKAN AK 99901 WATERFALL #11	068373	48931	KETCHIKAN AK
ASSOCIATES RESORT	BOX 6440	KETCHIKAN AK 99901 WATERFALL #12	068373	48932	KETCHIKAN AK
ASSOCIATES RESORT	BOX 6440	KETCHIKAN AK 99901 WATERFALL #14	068373	48933	KETCHIKAN AK
ASSOCIATES RESORT	BOX 6440	KETCHIKAN AK 99901 WATERFALL #15	068373	50315	KETCHIKAN AK
ASSOCIATES RESORT	BOX 6440	KETCHIKAN AK 99901 WATERFALL #16	068373	59327	KETCHIKAN AK
ASSOCIATES RESORT	BOX 6440	KETCHIKAN AK 99901 WATERFALL #17	068373	50317	KETCHIKAN AK
ASSOCIATES RESORT	BOX 6440	KETCHIKAN AK 99901 WATERFALL #18	068373	52450	KETCHIKAN AK
ASSOCIATES RESORT	BOX 6440	KETCHIKAN AK 99901 WATERFALL #19	068373	59328	KETCHIKAN AK
ASSOCIATES RESORT	BOX 6440	KETCHIKAN AK 99901 WATERFALL #21	068373	53829	KETCHIKAN AK
ASSOCIATES RESORT	BOX 6440	KETCHIKAN AK 99901 WATERFALL #22	068373	55322	KETCHIKAN AK
ASSOCIATES RESORT	BOX 6440	KETCHIKAN AK 99901 WATERFALL #23	068373	55323	KETCHIKAN AK
ASSOCIATES RESORT	BOX 6440	KETCHIKAN AK 99901 WATERFALL #24	068373	54463	KETCHIKAN AK
ASSOCIATES RESORT	BOX 6440	KETCHIKAN AK 99901 WATERFALL #25	068373	56939	KETCHIKAN AK
LIHRA JOHN	3816 ALASKA AVENUE	KETCHIKAN AK 99901 KAYJAY	278177	125132	60752 KETCHIKAN AK
FRUIT WRIGHT TED DON	BOX 9419 BOX 5953	KETCHIKAN AK 99901 MIDNIGHT SUN KETCHIKAN AK 99901 MAR-DON	684887 627341	003411 016817	51577 JUNEAU AK 51488 KETCHIKAN AK
COOK HAMILTON SIDNEY DEWIE	BOX 121 BOX 9551	THORNE BAY KETCHIKAN AK 99919 BOARDWALK AK 99901	290738 278279	110904 111166	60170 THORNE BAY 60573 KETCHIKAN AK
MILLER, III ROBERT	P. J. BOX 7982	KETCHIKAN AK 99901 LADY D	231721	032267	49158 KETCHIKAN AK
STENFORD LELF	431 DOCK STREET	KETCHIKAN AK 99901 MAJESTIC DAWN	659393	125443	60559 KETCHIKAN AK

1990 ADF&G REGISTERED CHARTER VESSELS

OWNERS NAME	OWNERS ADDRESS	VESSEL NAME	C. G. LIC	PUBLIC	ADF&G	VESSEL NUMBER
PATTISON	WILLIAM P. O. BOX 878	KETCHIKAN AK 99901 KATRINA LYNN	195377	028479	51341	KETCHIKAN, AK
WESTLUND	DONALD P.O. BOX 7883	KETCHIKAN AK 99901 SILVER KING	231773	040495	51428	KETCHIKAN, AK
JOYNER	JOHN P.O. BOX 5451	KETCHIKAN AK 99901 STARFISH	268171	080981	56463	KETCHIKAN, AK
ASHCRAFT	JOE BOX 122	METLAKATLA AK 99926 TALOFA TEINE	278174	126336	60591	METLAKATLA
PATTISON	WILLIAM P.O. BOX 878	WARD COVE AK 99928 KATRINA LYNN	195377	028479	51341	KETCHIKAN
STENFORD	LEIF 431 DOCK STREET	KETCHIKAN AK 99901 MAJESTIC DAWN	659393	125443	60559	KETCHIKAN, AK
CLASSIC AK	CHARTERS P.O. BOX 6117	KETCHIKAN AK 99901 SALTERY "C"		126621	55758	KETCHIKAN, AK
MANNING	RICHARD GENERAL DELIVERY	CRAIG AK 99921 AK 8401 L	268666	108091	60433	CRAIG, AK
MANNING	RICHARD PO BOX 480	CRAIG AK 99921 AK 8401 L	268666	108091	60433	CRAIG, AK
McFARLAND	JAMES P.O. BOX 153	THORNE BAY AK 99919 FISH MAGNET	231838	016692	60794	THORNE BAY
RUSMAN	DAVID PO BOX 9629	KETCHIKAN AK 99901 BOLLASHDANCE	231764	063862	58882	KETCHIKAN, AK
RUSMAN	DAVID PO BOX 9629	KETCHIKAN AK 99901 WHIFFERSNAPPER	231764	063862	51721	KETCHIKAN, AK
KELLER	GLENN PO BOX 6812	KETCHIKAN AK 99901 SHAMROCK	231841	031013	50960	KETCHIKAN, AK
ORNI	B PO BOX 7552	KETCHIKAN AK 99901 AK 0931 H		031013	53552	KETCHIKAN, AK
KNOTNAS	WILLIAM 1010 POND REEF ROAD	KETCHIKAN AK 99901 MAGNUM II	231821	040861	55669	KNUDSON COVE
RESORT	ASSOCIATES PO BOX 6440	KETCHIKAN AK 99901 WATERFALL #20		060373	60661	KETCHIKAN, AK
PHILLIPS	LIFE WATERFALL RESORT	WATERFALL AK 99950 RED STORM	268785	060373	60754	KETCHIKAN, AK
QUERTINE, JR	THOMAS PO BOX 7414	KETCHIKAN AK 99901 HUNTER K	231796	121920	60258	KETCHIKAN, AK
HAMILTON	DON BOX 153	CRAIG AK 99921	268685	126737	04414	CRAIG, AK

A W BRINDLE
H. A. BRINDLE

JAN 22 1991

PROCESSORS OF
CHOICE ALASKA SEAFO
SINCE 1912

Wards Cove Packing Company

PHONE (206) 323-3200
TELEX 328759

88 E. HAMLIN STREET
P.O. BOX C-5030
SEATTLE, WA 98105-0030

Day Fax (206) 323-3200 Ext 25
Night Fax (206) 323-3204

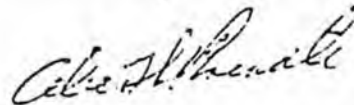
January 17, 1991

Mr. Joe Ambrose
House of Representatives
Alaska State Legislature
P.O. Box V
Juneau, Alaska 99811

Dear Mr. Ambrose:

I have reviewed the draft bill you sent me with regard to the exchange of sport or subsistence fish for processed seafood products and I have no problems with either the concept or with the bill as drafted. It seems to me it should accomplish the objective but I hope that people from the industry would have an opportunity to meet with the appropriate people in DEC to make sure that the implementing regulations, such as they may be, will be workable. We would of course be happy to participate in any meetings to further that objective. Please let me know if we can be of any help in pushing this legislation along.

Sincerely,



Alec W. Brindle

AWB:knh
cc: Cliff Phillips

Overall Economic Development Program

7th & Madison, Ketchikan, AK 99901

(907) 225-6171

Fax (907) 225-3895

February 1, 1991

Representative Cliff Davidson, Chair
Resources Committee, Alaska House of Representatives
PO Box V (MS 3100)
Juneau, Alaska 99811


RE: HB 60, RAW FISH EXCHANGE PROGRAM

Dear Representative Davidson:

We urge your support of House Bill 60. As you well know, the industries of tourism and of fishing make significant contributions to the local economies of Southeast Alaska. Your support of HB 60 will go a long way toward enriching the tourist experience of Southeast, while providing a valuable and perhaps lifelong link to the premier fish products of Southeast Alaska.

Thank you for your efforts on the behalf of all Alaskans.

Yours truly,



John Clifton, Chair
Overall Economic Development Program

cc: Members of the Resource Committee,
Alaska House of Representatives

Senator Lloyd Jones

Representative Robin Taylor
Representative Cheri Davis



ALASKA VISITORS ASSOCIATION

501 West Northern Lights, Suite 201 • Anchorage, Alaska 99503

Tel: (907) 276-6663 • Fax: (907) 258-4036

1990-91

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Princess Tours

Seattle, Washington

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John Litten

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Ralph Nestor

Travel Industry

Management, UAF

David Palmer

Alaska Airlines

Brad Phillips

Phillips Cruises & Tours

Terry Underwood

HAL-Westours Inc.

Richard West

Alaska Sightseeing Tours

Tim Worthen

Kennerly Cruises

Karen Cowart

Executive Director

#91-02

A RESOLUTION

RELATING TO THE EXCHANGE OF RAW SPORT AND PERSONAL USE CAUGHT FISH FOR PROCESSED PRODUCTS AS AN ALTERNATIVE TO CUSTOM PROCESSING.

WHEREAS, the number of tourists visiting Alaska to enjoy our sport fishery is growing rapidly; and

WHEREAS, the number of non-resident sport fishing licenses issued in 1990 increased by 34 percent to 176,433; and

WHEREAS, a growing percentage of these sport fishermen arrive via cruise ships with limited time in port; and

WHEREAS, fishermen visiting in this manner have a problem dealing with any fish they catch; and

WHEREAS, while some communities have custom processing available, the service is often limited and time consuming; and

WHEREAS, Representative Robin Taylor has introduced HB60 to allow for the exchange of raw sport caught fish for processed fish of the same species; and

WHEREAS, this measure will not only enhance the attraction of visitors to Alaska, but will also lead to an increase in value-added processing, bringing with it increased employment for Alaska residents;

NOW THEREFORE BE IT RESOLVED THAT THE ALASKA VISITORS ASSOCIATION BOARD OF DIRECTORS FULLY SUPPORTS THE GOALS AND OBJECTIVES OF HB60 AND URGES PASSAGE OF THIS MEASURE.

Adopted by the Board of Directors on February 7, 1991.

PUBLIC OPINION MESSAGE

DEAR: REPRESENTATIVE DAVIDSON

NAME: KEN TEUNE, OWNER/OPERATOR
TITLE: NORTHERN LIGHTS CHARTERS
ADDRESS: P.O. BOX 793
CITY: WARD COVE, AK ZIP: 99928
PHONE: 247-8488

BILL NO: HB 60
SUBJECT: EXCHANGE OF RAW FISH FOR SEAFOOD PRODUCT
MESSAGE: PLEASE MAKE MAXIMUM EFFORT TO PASS HB 60 FOR THIS SEASON. EARLY AL
SPORT FISHERMAN AND MANY PROCESSORS ARE IN FAVOR. OTHER STATES HAV: SIMILAR
LAWS IN EFFECT WITH EXCEPTIONAL BENEFIT TO THE TOURISM INDUSTRY AND NO ADVERSE
EFFECTS ON THE COMMERCIAL INDUSTRY.

POMID: 08133605
DATE: 91/02/18
TIME: 13:36:05
LIONAME: KETCHIKAN LIO

COPIES: REPRESENTATIVES

LINCOLN
IVAN
MOYER
FINKELSTEIN
CARNEY
HUDSON
LEMAN
ZAHACKI

FEB 11 1991

REPRESENTATIVE LOREN LEMAN

District 9 - West Anchorage

2699 Nathaniel Court • Anchorage, Alaska 99517

243-2000

February 8, 1991

John Clifton, Chairman
Overall Economic Development Program
7th & Madison
Ketchikan, AK 99901

Dear Mr. Clifton:

Thank you for your letter regarding House Bill 60, regarding a Raw Fish Exchange Program.

Rep. Taylor has been successful in having the legislation brought up for hearings before the House Resources Committee, on which I serve. Yesterday the bill was before the committee for the first time. We were presented with a good deal of positive testimony. However, the Committee chairman, Rep. Cliff Davidson, is holding the bill over for further review.

I am pleased that Rep. Taylor proposed this legislation. It appears to be both needed and beneficial.

Sincerely,

Loren Leman
Representative

nc020801

cc. Rep. Robin Taylor

January 31, 1991

Resources Committee
House of Representatives
Alaska State Legislature
Box V
Juneau, Alaska 99811

Dear Members:

We are writing to express our support for House Bill No. 60, entitled "An Act relating to the exchange of certain fish for seafood products."

Sport fishing is the number one leisure activity in the United States today. Alaska provides an opportunity for one of the finest sport fishing experiences available. An ever increasing number of visitors are coming to Alaska specifically for the sport fishing, or including sport fishing as a major experience during their visit.

Ketchikan Sportfishing and our associated charter boat operators provided fishing charters to approximately 5600 clients in 1989, and over 7000 clients in 1990. We look forward to similar growth for 1991. In both 1989 and 1990, over 90 percent of our clients were visiting Ketchikan by tour ship. Their time in port is very short, and the fish they catch are a problem for many of the fishermen and the tour ships. In 1990, our clients had 12,427 lbs. of fish custom processed. These clients are in the minority. Many of our clients were unable to take advantage of custom processing because they did not have sufficient fish to meet the custom processors minimum requirement of 20 lbs.. These clients were forced to either carry their fish on board ship to be dealt with by the tour ship crew, or give their fish away. We believe that the exchange program as outlined in House Bill No. 60 will meet a very critical need. We estimate that the amount of fish processed would increase at least three fold, and that this service would make the fishing experience more attractive to visitors, increasing the number of clients requiring charter services.

House Bill No. 60 will provide a much needed service. This service is part of the infrastructure necessary to support the growth of this important part of our visitor industry. We believe the bill will also:

Retain additional visitor dollars in Alaska.

Provide new jobs for Alaskans.

Retain existing jobs which will be lost if legislation is not passed which will allow this practice to continue in those portions of Alaska where it has been ongoing since the early 1970's.

Support the continued growth of the Alaskan added value seafood processing industry.

Expose large numbers of additional visitors to Alaskan added value fishery products, developing and enhancing opportunities for expanded markets for these products.

We urge you to vote for the passage of this bill in a timely fashion to allow this important service to be offered to sport fishermen beginning with the 1991 fishing season.

Thank you for your consideration.

Sincerely,

Margaret S. Hansen
+
Ollie Hansen



KETCHIKAN
VISITORS BUREAU

MAR 15 1991

A RESOLUTION

Relating to the exchange of raw sport and personal use caught fish for processed products as an alternative to custom processing.

BE IT RESOLVED BY THE BOARD OF DIRECTORS OF THE
KETCHIKAN VISITORS BUREAU:

WHEREAS the number of tourists visiting Alaska to enjoy our sport fishery is growing rapidly; and

WHEREAS the number of nonresident sport fishing licenses issued in 1990 increased by 34 percent to 176,433; and

WHEREAS a growing percentage of these sport fishermen arrive via cruise ships with limited time in port; and

WHEREAS fishermen visiting in this manner have a problem dealing with any fish they catch; and

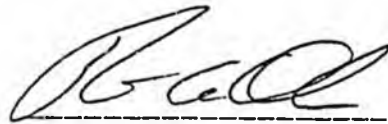
WHEREAS while some communities have custom processing available, the service is often limited and time-consuming; and

WHEREAS Rep. Robin Taylor has introduced HB60 to allow for the exchange of raw sport caught fish for processed fish of the same species; and

WHEREAS this measure will not only enhance the attraction of visitors to Alaska, but will also lead to an increase in value added processing, bringing with it increased employment for Alaska residents;

BE IT RESOLVED BY THE BOARD OF
DIRECTORS OF THE KETCHIKAN VISITORS BUREAU that the
Ketchikan Visitors Bureau fully supports the goals and objectives of HB60
and urges passage of this measure.

ADOPTED THIS 19TH DAY OF FEBRUARY,
1991.

A handwritten signature in cursive script, appearing to read "Ken Dole", is written above a horizontal dashed line.

Ken Dole, Chairman

Alaska State Legislature

COMMITTEES:

MEMBER

RULES

INTERNATIONAL TRADES & TOURISM

LABOR & COMMERCE

ETHICS

WESTERN STATES LEGISLATIVE
FORESTRY TASK FORCE



P.O. BOX 1441
WRANGELL, ALASKA 99929
(907) 874-2316

Written in Juneau
P.O. BOX V
JUNEAU, ALASKA 99811
(907) 465-4905

House of Representatives

ROBIN L. TAYLOR
MINORITY LEADER

MEMORANDUM

TO: Robin

FROM: Joe

DATE: 4/11/91

REF: HB 60

HB 60 has the endorsement of the OEDP Committee, the Ketchikan Visitors Bureau and the Alaska Visitors Assn., along with the personal endorsement of Alec Brindle and Cliff Phillips. The charter boat operators and resort operators also support the bill.

The CS was developed in response to specific concerns raised by Cliff Davidson regarding the apparent misuse of the resource by the Moonies. Other language changes were made at the suggestion of the subcommittee.

IF the commercial fishing industry is concerned, and we have had no such input from District 1, this bill should actually be viewed as an asset. The bill provides a written, dated record of how much fish is exchanged and therefore a record that can be used by Fish and Wildlife Protection as an enforcement tool.

The only testimony against the bill was a concern over how sport fishermen would "view" their catch. The point was, instead of a mess of fish in the bottom of a boat, the fisherman would "see" processed seafood. This would encourage a greater incursion into the "limited" resource.

October 9, 1990

SUBJECT: EXCHANGE OF RAW SPORT, PERSONAL USE, AND
SUBSISTENCE CAUGHT FISH FOR PROCESSED PRODUCTS AS
AN ALTERNATIVE TO CUSTOM PROCESSING

In southeast Alaska, as well as many other areas of the state, the number of tourists visiting Alaska to enjoy our sport fishery is growing rapidly. In the greater Ketchikan area, there were 105 charter boat operations permitted during 1990. This does not include the many small boats available for rent by sport fishermen who do not use the more expensive charter services. In 1987 there were 132,008 nonresident sport fishing licenses issued in Alaska. In 1990 that number increased to 176,433. That is a 34 percent increase (44,425 additional nonresident licenses).

One charter group reported that during 1989, they provided fishing charters to approximately 5600 persons, 5200 of which were visiting Ketchikan by tour ship. Since tour ships are only in port for an average of 24 hours, it is apparent that fishermen visiting in that manner have a problem in dealing with any fish they may catch.

It is estimated by the Alaska Department of Fish & Game that sport fishermen are taking in excess of 630,000 lbs. of fish in the Ketchikan area during a 120 day summer season.

What happens to all of that fish? In some cases, the fishing lodges offer filleting and freezing services, but in most cases, the fish are boxed and taken home by the fisherman as excess baggage, to be dealt with as best possible when he/she gets home. One processor in Ketchikan offers custom processing such as smoking and canning, but most people cannot take advantage of the service due (1) to the time required, (2) the minimum quantity required by the processor to make custom processing practical, (3) the limited capacity of the processor, and (4) the excessively high shipping costs for the finished goods (most often in excess of \$1.50 per lb.). Since a fishing trip to Alaska is often a very expensive, once in a lifetime experience for most visitors, they want to spend their time fishing and enjoying the Alaskan experience. It is not practical to wait the 7 to 10 days or longer for their fish to be properly custom processed. Very often they cannot even get their fish frozen or properly packed for transport home.

Added value processing of the 630,000 lbs. of sport caught fish could add in excess of \$1,000,000.00, as well as many jobs to the Ketchikan economy annually, and many times more than that to other areas of the state. This contribution is severely limited by the cumbersome and costly nature of custom processing.

There is an efficient alternative to custom processing, that is successfully practiced in other states, and was employed by several processors in southcentral Alaska from the early 1970's through 1990. That alternative is an EXCHANGE PROGRAM.

The EXCHANGE PROGRAM allows a fisherman to exchange sport, personal use, or subsistence caught fish for processed fish, i.e., canned, smoked, etc., of the same species. The fish are exchanged on ratios consistent with average yields for processing the fish into the desired finished product. For example: If the normal yield for a kippered (hot smoked) salmon were 60 percent, the fisherman would receive 6 lbs. of kippered salmon for each 10 lbs. of headed and gutted fish delivered for exchange. The fisherman would receive his/her product immediately and pay a fee similar to that paid for custom processing. The fish received by the processor are then processed into more finished goods for exchange. The exchange concept also allows a processor to efficiently process large production lots of products FOR EXCHANGE ONLY. In a properly conducted exchange program, separate inventories of sport caught fish, and finished goods for exchange are maintained, ensuring that sport caught fish do not enter commercial channels.

Custom processing requires that each individual's fish be processed as a separate batch of product. The identity of the owner must be maintained throughout the process, resulting in literally hundreds of small, segregated batches of product.

This results in excessive labor requirements, increased space requirements, and a significant administrative burden in comparison to an exchange type program.

On October 23, 1989 a request for an Attorney General's opinion was submitted by the Dept. of Public Safety, Fish & Wildlife Protection, Statewide Investigations concerning a sport or personal-use exchange process, where a fisherman can exchange his sport or personal caught fish for processed fish products. An opinion was issued by the AG's office stating that the practice was in conflict with current Alaska Statutes and regulations (AS 16.10.265, AS 16.05.940, & 5 AAC 75.013 SALE OF SPORT CAUGHT FISH). Formal announcement and action concerning the opinion were withheld until the fall of 1990 to avoid the impact of the opinion without giving those companies involved adequate time to react to the required changes.

The exchange system is a very valuable service for the Alaskan visitor and the state of Alaska. The statutes and regulations which prohibit sale or barter were intended to prevent sport or personal use fisherman from selling or bartering their catch for personal gain, or in a manner which establishes a value in the market place for their catch. The exchange process does not result in a personal gain to the sport, personal use, or subsistence fisherman, or establish a value for their catch. The fisherman is receiving the same product he would receive through much more complex and impractical (but legally acceptable) custom processing, and is paying only for the service.

We believe that the service which can be provided through a properly structured EXCHANGE program would be valuable to Alaskans and particularly to Alaskan visitors. We also believe this service can make a significant contribution to the state in additional tourism dollars.

We are requesting your support in establishing Alaska state statutes which would permit the exchange of sport, personal use, or subsistence caught fish for processed fish of the same species. The program would also require that the sport caught fish received in exchange for the finished goods be processed and used only for future sport caught exchange.

Statutes providing for a sport, personal use, subsistence exchange program, if worded properly, would not require any significant increase in regulatory work load, or require additional administrative regulations for enforcement.

The Alaska Department of Environmental Conservation (ADEC), Division of Environmental Health, is the state agency responsible for public health regulation of the Alaska seafood industry. Current ADEC FISH INSPECTION REGULATIONS, 18 AAC 34.090 HANDLING OF FISHERIES PRODUCTS, FOOD INGREDIENTS, FOOD ADDITIVES, PACKAGING MATERIALS, AND CHEMICALS, paragraph (b) requires segregation of sport, personal use, or subsistence fish from commercial fish, maintenance of records to maintain the identity of all non-commercial fish processed throughout all

aspects of processing, and 18 AAC 34.170 LABELING REQUIREMENTS requiring labeling of all non-commercial fish and fishery products with the words "NOT FOR SALE".

The Director of the Division of Environmental Health, ADEC, has stated that ADEC would be willing to verify that the yields or recoveries used for the exchange process are an accurate representation of the processing recoveries or yields.

Enforcement of these existing regulations by ADEC, and cooperation with the Alaska Departments of Fish & Game and Public Safety through a memorandum of understanding (much the same as the current MOU for the National Shellfish Sanitation Program), coupled with ADEC verification of exchange recoveries or yields, should satisfy the general regulatory requirements for an exchange program.

A statute to permit a SPORT, PERSONAL USE, OR SUBSISTENCE EXCHANGE PROCESS should provide for the following requirements:

Notwithstanding any other provisions of law, exchange of sport caught, subsistence, or personal use fish in accordance with the following requirements is permitted, and shall not be construed as barter or sale as defined by AS 16.05.940.

1. All establishments or persons custom processing, or processing sport sport caught, subsistence, or personal use fish or fishery products for exchange, must as deemed necessary by the Commissioner of Environmental Conservation, comply with all requirements of the ALASKA FISH INSPECTION REGULATIONS, CHAPTER 34, TITLE 18 of the Alaska Administrative Code, and all subsequent revisions.

2. Commercial fish or fishery products prominently labeled "NOT FOR SALE" may be used in exchange for sport caught, personal use, or subsistence fish to establish the initial inventories of finished goods required for exchange purposes.

3. Sport caught, personal use, or subsistence fish or fishery products produced from sport caught, personal use, or subsistence fish may not be sold or bartered, and are prohibited from entering commerce at any time.

4. In the case that a processor discontinues operations, remaining inventories of sport caught, personal use, or subsistence fish or fishery products produced from sport caught, personal use, or subsistence fish must be disposed of in a manner approved by the Commissioner of ADEC, but may not in any case be sold, bartered, or in any manner be disposed of in commerce. The Commissioner may approved the donation of these materials to a non-profit organization for subsistence use.

5. All sport caught, personal use, or subsistence fish or fishery products produced from sport caught, personal use, or subsistence fish must be maintained in separate, segregated, clearly identified inventories.

6. All sport caught, personal use, or subsistence fish must be inspected upon receipt, and only wholesome fish in good sound condition will be accepted for exchange purposes.

7. Processed products must be exchanged for sport caught, personal use, or subsistence fish at a ratio equal to the actual average yield achieved in the processing of the product from the form received in exchange.

8. Exchange of sport caught, personal use, or subsistence fish or fishery products is limited to the species submitted for exchange. Exchange of sport caught, personal use, or subsistence fish for fish or fishery products of a different species is prohibited.

9. Each individual operating a business which engages in exchange of sport caught, personal use, or subsistence fish for processed fish or fishery products must maintain on the premises for a minimum of 2 years, auditable records of the quantities of sport or personal-use fish products received, processed, and exchanged.

10. All containers and/or packaging containing sport caught, personal-use, or subsistence fish, or fishery products manufactured from sport caught, personal-use, or subsistence fish, or commercial fish or fishery products offered in exchange for sport caught, personal use, or subsistence fish must be labeled "NOT FOR SALE".

PENALTY FOR VIOLATIONS. A person who violates this statute or a regulation adopted under this statute is guilty of a class A misdemeanor.

FISCAL NOTE

STATE OF ALASKA
1992 LEGISLATIVE SESSION

BILL NO. SB 428

Revision Date: _____ Department Affected: Environmental Conservation
 Title: "An Act relating to the exchange of certain fish for seafood products." BRU: Environmental Health
 Sponsor: Lloyd Jones Component: Seafood Industry
 Requestor: _____ COMPONENT SERIAL NO.

6	4	9
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EXPENDITURES/REVENUES: (Thousands of Dollars)

OPERATING	FY 93	FY 94	FY 95	FY 96	FY 97	FY 98
PERSONAL SERVICES	0.0	0.0	0.0	0.0	0.0	0.0
TRAVEL	0.0	0.0	0.0	0.0	0.0	0.0
CONTRACTUAL	0.0	0.0	0.0	0.0	0.0	0.0
SUPPLIES	0.0	0.0	0.0	0.0	0.0	0.0
EQUIPMENT	0.0	0.0	0.0	0.0	0.0	0.0
LAND & STRUCTURES						
GRANTS, CLAIMS						
MISCELLANEOUS						
TOTAL OPERATING	0.0	0.0	0.0	0.0	0.0	0.0

CAPITAL						
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REVENUE						
FUND SOURCE:						

FUNDING: (Thousands of Dollars)

GENERAL FUND	0.0	0.0	0.0	0.0	0.0	0.0
FEDERAL FUNDS						
OTHER						
FUND SOURCE:						
TOTAL	0.0	0.0	0.0	0.0	0.0	0.0

POSITIONS:

FULL-TIME	0	0	0	0	0	0
PART-TIME	0	0	0	0	0	0
TEMPORARY	0	0	0	0	0	0

Estimate of current year impact: None

ANALYSIS: (Attach a separate page if necessary.)
ATTACHED

Prepared By: Kit Ballantine, Acting Director Phone: 465-5280
 Division: Environmental Conservation Date: 3-17-92
 Approved by Commissioner: [Signature]
 Agency: Environmental Conservation Date: 3/20/92