

09-007954



CITY OF SAINT PAUL

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July 7, 2009

The Honorable Gary Locke
Secretary of Commerce
U.S. Department of Commerce
14th Street and Constitution Avenue, N.W.
Washington, D.C. 20230

Re: Continuing Fishery Resource Disaster in the Bering Sea Snow Crab Fishery

Dear Mr. Secretary:

The City of Saint Paul of the Pribilof Island Community of Saint Paul, Alaska, ("the City") hereby petitions for a determination, pursuant to Section 312(a) of the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C. 1861a(a) (2005) (hereafter "the Magnuson-Stevens Act"), that a commercial fishery failure in the Bering Sea snow crab fishery has occurred in the 2007 and 2008 fisheries due to a fishery resource disaster.¹ The Section 312 determination requested herein would be a continuation of the Department's Section 312 determinations made on May 11, 2000, November 29, 2001, November 13, 2002 (announced January 17, 2003), February 10, 2005, and April 13, 2007 (announced July 19, 2007).

A Section 312(a) determination would authorize the Secretary to continue the work commenced under NOAA's previous fisheries disaster determinations, including the assessment of the economic and social effects of the commercial fishery failure, and the efforts of industry, NMFS, and the North Pacific Fishery Management Council ("NPFMC") to restore the fishery and assist the fishing communities affected by the failure. In addition to facilitating its requests for support to pursue infrastructure projects that are responsive to the crab fishery failure, Saint Paul's status as an "affected fishing community" has enabled it to make the case for changes in fisheries management that protect the community's stake in the crab and other commercial fisheries. We, therefore, submit that the information presented herein supports this determination.

¹ In June 2007, the City of Saint Paul submitted a request to Secretary Gutierrez regarding the 2007 Bering Sea snow crab fishery. However, to the best of our knowledge, no action was taken in response to that request. Thus, this request reiterates and supplements that earlier request.

I. A Fishery Resource Disaster in the Bering Sea Snow Crab Resource Continued to Manifest Itself in the 2007 and 2008 Fisheries.

The Bering Sea snow crab fishery, which was the subject of the year 2000, 2001, 2002, 2003, 2004, 2005 and 2006 commercial fishery failure determinations, has continued in a state of severe decline. In its most recent announcement, in July 2007, Assistant Administrator William T. Hogarth stated that NMFS had determined that:

... the situation continued in 2005 and 2006 to constitute a commercial fishery failure under section 312(a) of the Magnuson-Stevens Fishery Conservation and Management Act.²

National Marine Fisheries Service ("NMFS") trawl survey data confirm that the Bering Sea snow crab stocks had not recovered to any significant extent in 2007 and 2008, which is reflected in Guideline Harvest Levels ("GHL") determined by the State of Alaska, which manages the crab fishery: which increased somewhat from 2006, but which continued at consistently low levels relative to 1999:

	<u>GHL (million lbs.)</u>
1999	196
2000	28.6
2001	27.3
2002	30.82
2003	25.61
2004	20.8
2005	20.92
2006	37.18 (TAC for 2005/2006 fishery) ³
2007	36.57 (TAC for 2006/2007 fishery) ⁴
2008	63.03 (TAC for 2007-2008 fishery)
2009	58.55 (TAC for 2008/2009 fishery) ⁵

² Letter to The Honorable Simeon Swetozof, Jr., Mayor of Saint Paul from William T. Hogarth, Ph.D. (July 19, 2007) (*NOAA 2007 Announcement*).

³ Includes CDQ. Alaska Department of Fish and Game Commercial Fisheries News Release (September 29, 2005), <http://www.cf.adfg.state.ak.us/region4/news/2005/nr092905bs2.pdf>.

⁴ Includes CDQ. Alaska Department of Fish and Game Commercial Fisheries News Release (September 29, 2006), <http://www.cf.adfg.state.ak.us/region4/news/2006/nr0929a06.pdf>. The TACs for 2005/2006 and 2006/2007 excluding CDQ, that is, the IFQ fishery only, were 33.5 and 32.9 million pounds, respectively.

⁵ Includes CDQ. Alaska Department of Fish and Game Commercial Fisheries News Releases (September 28, 2007), <http://www.cf.adfg.state.ak.us/region4/news/2007/nr100107snowtac.pdf>, and (September 29, 2008), <http://www.cf.adfg.state.ak.us/region4/news/2008/nr092908b.pdf>. The TACs for 2007/2008 and 2008/2009 excluding CDQ, that is, the IFQ fishery only, were 56.73 and 52.70 million pounds, respectively.

As indicated, these authorities set the 2007 (2006/2007 fishery) Bering sea snow crab total fishery allowable catch ("TAC") at a level below the level for the 2005/2006 fishery which formed the basis of NOAA's most recent determination. The 2008 (2007/2008 fishery) TAC was significantly higher, but this increase was not sustained, and the 2009 (2008/2009 fishery) TAC was lower. Moreover, even the 2008 TAC of 63.03 million pounds remained substantially (68 percent) below the 1999 GHL. The 2009-2010 season is expected to be even worse. While the information is still tentative, the NPFMC's Crab Plan Team projects a much reduced snow crab fishery of 16-24 million lbs.

This analysis is supported by data and discussion included in the 2008 Crab SAFE Report.⁶ For example, the report noted that after a rebuilding plan was implemented in 2000, the model estimates of the population biomass of eastern Bering Sea snow crab:

Continued to decline to 348 million lbs in 2002, then increased to 556 million lbs in 2008. The 2007 observed survey total mature biomass increased to 607.8 million lbs, about 66% of Bmsy. However, in 2008 observed survey total mature biomass declined to 509.4 million lbs (55% of Bmsy).⁷

Interestingly, the observed survey total mature biomass of 509.4 million lbs in 2008 was the lowest such figure since 2004.⁸

In terms of projections and rebuilding scenarios, the 2008 SAFE Report states that:

The rebuilding plan developed for snow crab projected a 50% probability of rebuilding by 2010. The probability of rebuilding to the total survey biomass Bmsy of 921.6 million lbs is 0% in 2010, fishing at F35% or F40% (Table 6). The year of rebuilding to total survey biomass with fishing at the F40% control rule was estimated at 2020.

...

Biomass is expected to be slightly higher in 2009/10 to 2010/11, then decrease due to recent lower recruitment estimates and using autocorrelation to generate future recruitments in the projections.

⁶ North Pacific Fishery Management Council, *Stock Assessment and Fishery Evaluation Report for the King and Tanner Crab Fisheries of the Bering Sea and Aleutian Islands Regions* (September 2008) ("2008 Crab SAFE Report").

⁷ *Id.* at 2.

⁸ *Id.* at 26.

...

The model and observed biomass estimates are below the expected trends in biomass from the snow crab rebuilding plan for 2002 to 2008, due partly to the decrease in observed survey biomass in 2008 (Figures 55 and 56). Catches in the early years of the rebuilding period (2001 to 2006) exceeded the expected catches due to higher realized biomass and to a change in the minimum GHL that kept the snow crab fishery open. Projected catches estimated from the F35% and F40% control rule are lower than the expected values from the rebuilding.⁹

As these data demonstrate, the snow crab stock remains significantly below a condition that could be called rebuilt or restored. In a separate proceeding regarding the City of Saint Paul, the Deputy Under Secretary for Oceans and Atmosphere cited to the 2008 Crab SAFE Report as demonstrating that the "future productivity of the opilio crab fishery remains difficult to predict because of uncertainty in future biomass and catch projections."¹⁰ Consequently, these data support a determination that commercial fishery failures occurred in 2007 and 2008 due to a Bering Sea snow crab fishery resource disaster that continued through those years.

II. The Implementation of the Crab Rationalization Program Should Not Prevent the Secretary from Determining that the Disaster Evidenced in Past Years is Continuing

In its 2005 recommendation regarding a determination under Section 312(a) of the Magnuson-Stevens Act, NMFS stated that while the fishery resource failure "may continue for an undetermined period of time," the Alaska Region

recognizes that the Crab Rationalization Program, which will be in place for the 2006 snow crab fishery, could mitigate many of the negative economic consequences of the low snow crab abundance of Saint Paul. Therefore, we do not anticipate finding a continuation of a commercial fishery failure in 2006, or thereafter, unless new information about the snow crab fishery comes to light.¹¹

⁹ *Id.* At 19.

¹⁰ *Determination On Request for Recommendation of Coastal Energy Impact Program Loan Forgiveness, Appeal by the City of St. Paul, Alaska in the Matter of NOAA CEIP Loan No. 90-8-M01-02A5B(11), Before the Under Secretary for Oceans and Atmosphere, National Oceanic and Atmospheric Administration, United States Department of Commerce* ((March 17, 2009).

¹¹ *NMFS 2005 Determination* at 4-5.

The data discussed above from the 2008 Crab SAFE Report, together with the other data presented in this request, constitute "new information" that supports a determination that the snow crab commercial fishery failure is continuing. Moreover, while the Secretary has proposed regulatory changes that could affect the mechanism used to recognize continuing commercial fishery failure conditions,¹² as of earlier this month, it appears that the Secretary's practice remains to "extend" prior declarations when supported by current data.¹³

Congressional approval of the crab rationalization program in January of 2004 set the stage for ending the derby style crab fishery and has allowed for the consolidation of harvesting and processing activity in the Bering Sea. As the main port in the designated northern region of the Bering Sea, Saint Paul stands to benefit from this program – but only if the crab stocks return to healthy levels. The rationalization program requires that specific shares of six Bering Sea crab fisheries must be landed in Saint Paul.¹⁴

However, at present, only two of the six crab fisheries are open. Of those two, snow crab, as we have discussed, is at historic lows, and BBRKC stocks are "rebuilding," therefore limiting harvest rates in both open fisheries. The other four crab fisheries are closed, but should they reopen, their small stock levels will limit their potential economic benefit to the City. While NMFS may allow limited fisheries due to the enhanced monitoring and regulatory framework created by the crab rationalization program, the limited economic activity that may be generated under the new framework will necessarily be circumscribed by stock levels and will be insufficient to create stable and year round revenue flows.

III. Saint Paul Continues to Experience Significant Economic Losses Due to the Depressed Condition of the Snow Crab Commercial Fishery

As discussed above, the GHL for snow crab in 2007 and 2008 were set well below the 1999 harvest level of 196 million pounds. Moreover, the 2007 and 2008 snow crab fisheries continued the trend of low crab prices. At an average ex-vessel price of \$1.40 per pound, the total value of the 2007 snow crab fishery was approximately \$45 million (nearly identical to the value of the 2005 fishery).¹⁵ For 2008 prices rose somewhat to \$1.59 per pound and, due to a spike in TAC, the value of the fishery

¹² Magnuson-Stevens Act Provisions; Interjurisdictional Fisheries Act; Disaster Assistance Programs; Fisheries Assistance Programs, 74 Fed. Reg. 2467 (January 15, 2009) (the "Proposed Rule Notice").

¹³ See, e.g., "Commerce Secretary Locke extends West Coast salmon disaster declaration," SEAFOOD.COM NEWS (May 22, 2009) (<http://www.seafoodnews.com/>), and "Commerce Secretary Locke extends salmon disaster declaration for California and Oregon", SEAFOOD.COM NEWS (May 1, 2009) (<http://www.seafoodnews.com/>).

¹⁴ Those fisheries are: a) Bering Sea snow crab (*opilio*); b) Bristol Bay red king crab (BBRKC); c) Saint Matthews Blue King Crab; d) Pribilof red king crab; e) Pribilof blue king crab; and f) Bering Sea bairdi crab.

¹⁵ <http://www.cf.adfg.state.ak.us/geninfo/shellfish/05value.php>.

totaled approximately \$100 million. The drop in the TAC for the 2008-2009 fishery indicates that the 2008 value does not represent the beginning of a trend, and the 2007 fishery value remained well below the overall fishery value of over \$58 million in 2000. Furthermore, even the relatively high value of the 2008 fishery remained well below the 1999 fishery value of approximately \$177 million.¹⁶ Consequently, Saint Paul continues to struggle with the substantial loss in revenues that result from these reductions.

Saint Paul is a fisheries-based community, located in the middle of the crab grounds. In 1995, the Saint Paul Harbor became (temporarily at least) the primary crab processing location in the Bering Sea and the number two fishing port in Alaska in generating sales and fish tax revenues for the State of Alaska. In 1998 and 1999, crab deliveries to Saint Paul Harbor exceeded 40% of the total harvest.

Saint Paul's economy is almost entirely dependent on the crab resource. Crab landings and processing accounted for a substantial proportion of the cash entering the community in 2007 and 2008, the years that are the focus of this request. The City receives a portion of the State levied fisheries business tax on all crab delivered and processed at a shoreplant operated by Trident, the Icicle Seafoods floating processor (which is moored within the Saint Paul harbor seasonally), and floating processors – that depending on the season – station within three nautical miles of Saint Paul Island. The City also receives a 3% sales tax on crab delivered to processors inside the Saint Paul Harbor as well as a sales tax on fuel and other supplies sold in the Harbor. Saint Paul derives other revenue and jobs from the crab fishery in-harbor processors and service support to the crab vessels calling on Saint Paul.

The total loss in revenues to the city, based on the fisheries collapse in 2007 and 2008 as compared to 1999, was 85% and 64%.¹⁷ These losses were reflected in continued depressed revenues in several major areas of City revenues – onshore processor revenues, offshore processing, fuel distributors, harbor services, and local businesses – which have not risen to any significant degree from the first year of the fishery collapse in 2000. Those losses are summarized in the following chart as follows (rounded to the nearest thousandth dollar and percentage point):¹⁸

¹⁶ Moreover, our previous request reviewed the dramatic decline in the catch history from 1990 to 2001, in the context of which the 1999 benchmark harvest is significantly below the recent highs of 1991 – 1993.

¹⁷ The percentage figures cited in this paragraph and the accompanying chart are rounded to the nearest percentage point, and value data is rounded to the nearest \$1,000.

¹⁸ Chart created from data in Exhibit 1 to this letter. These figures do not include other revenue sources which are not dependent on the condition of the Opilio crab harvests.

Revenue Source	1999	2000	2007	2008	Revenue Decline 1999 to 2000	Revenue Decline 1999 to 2007	Revenue Decline 1999 to 2008
Onshore Processors	782	113	123	413	86%	84%	47%
Offshore Processors	1,935	298	332	577	85%	83%	70%
Fuel Distributors	85	11	31	69	87%	64%	19%
Harbor Services	759	78	24	213	90%	97%	72%
Local Businesses	110	60	29	66	45%	74%	40%
TOTAL	3,671	560	538	1,338	85%	85%	64%

These revenue losses have been felt directly by the Island's approximately 400 native Aleut inhabitants through loss of jobs, loss of community health and safety services, loss of the community day care facilities, and curtailment in air passenger, cargo and bypass services to the mainland.

As of the date of this letter, the City officially has 36 employees, down from 50 in early 2000. The population of the Island is currently some 450 residents, as some people have moved off the Island due to lack of work and opportunities. The departure particularly hurts the long-term viability of the Island as many of those leaving are educated, skilled, and young. Strengthening of basic infrastructure that will expand the fisheries-based economy is crucial to retaining the younger generation and ensuring the long-term vitality of the Island.

IV. A Determination of a Commercial Fishery Resource Disaster In 2007 and 2008 is Needed to Provide Assistance under the Guidelines of Section 312(a) of the Magnuson-Stevens Act

Section 312(a) of the Magnuson-Stevens Act authorizes the Secretary to exercise discretion in determining whether there is a commercial fishery failure due to a fishery resource disaster as a result of:

- a. natural causes;
- b. man-made causes beyond the control of fishery managers to mitigate through conservation and management measures; or
- c. undetermined causes.

Such a determination would authorize the Secretary to:

assess the economic and social effects of the commercial fishery failure, or any activity that the Secretary determines is appropriate to restore the fishery or prevent a similar failure in the future and to assist a fishing community affected by such failure.

As discussed in sections I through III above, the elements necessary for a commercial fishery failure resource disaster are present in the continuing collapse of the Bering Sea snow crab resource. Significant efforts at national, regional, and community levels currently underway to address the fisheries resource disaster in the crab fisheries need to be continued into the future. A determination that the snow crab fishery resource disaster continued in 2007 and 2008 will make this possible.

At the national level, additional funding is needed for research regarding the biology of snow crab and crab habitat to assist the fisheries managers in developing responsive management measures.¹⁹ At a regional and community level, the State of Alaska administered the 2000 Opilio Disaster Project with funds appropriated for "emergency expenses for fisheries disaster relief . . . for the Pribilof Islands and East Aleutian area of the Bering Sea."²⁰

The City of Saint Paul used its share of the disaster relief funds on three complementary water projects to increase the available water supply to allow multispecies processing on Saint Paul Island for increased economic stability resulting from reduced dependence on crab processing: (1) a study of the sole source Island Aquifer; (2) construction of a new water tank to provide adequate water for processing with retained storage for fire fighting; and (3) improvements in the efficiency of water distribution to the harbor through replacement of failing sections of the old harbor water line with a new, larger, modern line to increase the volume of water to the harbor.

It has become increasingly clear that completing the harbor improvements and other infrastructure projects necessary to enable a multispecies processor to moor and operate its fish processing plant in the Saint Paul Harbor is critical to the island's long-term future. These projects include: 1) the deepening of the berthing site at the breakwater; 2) completion of the Small Boat Harbor; 3) expansion of the landfill/solid waste management facility; and, 4) reconstruction/improvement of the IHS outfall in order to provide an adequate seafood disposal system.

¹⁹ See 66 Fed. Reg. 742, 742-46 (Jan. 4, 2001) (addressing public comments to the Snow Crab Rebuilding Plan and noting NMFS' need for additional scientific research, when funding is available).

²⁰ The affected fishing communities in the Pribilof Islands and the East Aleutian Islands agreed among themselves to an appropriate division of the funds. The State of Alaska, through the Department of Community and Economic Development, is administering a community grant program which approves eligible projects consistent with Section 312 requirements that the funding be used to assist in the restoration of the fishery or prevention of similar failures in the future.

More importantly though, Saint Paul's status as an affected fishing community has enabled it to make the case for the inclusion of community protections in the crab rationalization program; obtain support for the appropriation of federal funds through NMFS to pursue habitat and stock research to understand the conditions necessary to improve the health of the crab fisheries; and, to point to the need for fisheries management policies in the Bering Sea that protect the community's stake in the crab and other commercial fisheries.

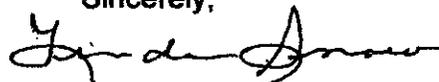
V. Conclusion.

As discussed *supra*, the Secretary of Commerce has determined in response to a series of previous requests by the City that commercial fishery failures occurred in 2000, 2001, 2002, 2003, 2004, 2005 and 2006 due to a Bering Sea snow crab fishery resource disaster that continued through those years. A determination that commercial fishery failures occurred in 2007 and 2008 due to the continuing fishery resource disaster would help to continue the programs that have been commenced to address the collapse of the Bering Sea crab stocks. The need for a Section 312 determination of a commercial fishery failure in 2007 and 2008 is particularly acute for Saint Paul Island, a fishing community which, as the Secretary has recognized in its previous determinations, has already endured several years of severe economic effects due to the collapse of the crab stocks.

The City of Saint Paul requests that, as in past years, it be recognized as an affected fishing community under Section 312(a) of the Magnuson-Stevens Act and that the Secretary make the determination that (1) the fishery resource disaster that has been recognized as having occurred in the Bering Sea snow crab stocks due to natural conditions persists; and (2) the continued collapse of the Bering Sea snow crab resource in 2007 and 2008 resulted in a commercial fishery failure in both of these years.

Thank you for your attention to this matter.

Sincerely,



Linda Snow
City Manager

cc: Jim Balsiger, Assistant Administrator, National Marine Fisheries Service
Senator Lisa Murkowski
Senator Mark Begich
Congressman Don Young
Governor Sarah Palin
Office of the Governor of the State of Alaska, Washington, D.C.

EXHIBIT 1

CITY OF SAINT PAUL
REVENUE IMPACTS
OPILIO CRAB FISHERY COLLAPSE
1999 VS. 2000

	1999					2000					% 2000
	Jan-99	Feb-99	Mar-99	Apr-99	May-99	Jan-00	Feb-00	Mar-00	Apr-00	Total	
ONSHORE PROCESSORS	32,812.00	180,467.00	134,656.00	97,527.00	135,647.00	581,208.00	-	-	140,815.13	140,815.13	
	127,736.00	327,141.00	258,765.00	12.00	68,390.00	782,036.00	48.80	-	113,359.48	113,408.08	
	41,184.00	147,830.74	97,155.00	44,716.00	32,007.00	362,872.74	-	-	-	0	
	237,875.00	671,831.00	526,896.00	180,305.00	272,315.00	1,706,118.00	36,528.00	38,608.00	39,599.00	264,223.00	(65%)
OFFSHORE PROCESSORS	28,684.00	88,898.00	62,772.00	-	19,842.00	199,296.00	-	-	114,237.00	114,237.00	
	42,817.00	122,008.00	64,847.00	-	31,844.00	261,514.00	-	-	11,945.04	119,459.04	
	-	366.00	3,828.00	-	-	3,894.00	-	-	357.25	357.25	
	-	87,022.00	78,369.00	10,829.00	15,588.00	171,828.00	-	-	30,279.41	302,767.41	
	-	58,890.00	44,880.00	6.00	9,720.00	111,276.00	-	-	-	0	
	-	134,053.00	77,577.00	22.00	21,534.00	233,196.00	-	-	-	0	
	88,801.00	470,235.00	381,873.00	10,857.00	88,029.00	1,011,094.00	-	-	158,819.00	1,169,913.00	(64%)
FUEL DISTRIBUTORS	2,218.00	12,772.00	13,802.00	3,778.00	2,055.00	34,826.00	1,823.27	1,174.84	1,070.51	2,968.35	71.9677
	4,255.00	36,346.00	4,185.00	3,767.00	1,850.00	50,418.00	591.00	715.03	2,920.00	4,226.03	
	39,474.00	449,121.00	517,887.00	37,545.00	33,805.00	982,942.00	1,823.00	1,788.00	1,706.00	55,988.00	(67%)
HARBOR SERVICES	12,488.45	18,652.15	28,226.00	3,981.50	2,603.00	62,134.00	250.00	2,282.50	6,895.50	9,028.00	
	12,940.04	39,230.80	80,972.52	11,019.08	11,304.82	132,467.36	-	2,515.80	3,397.72	5,903.52	
	16,848.66	99,651.01	14,830.20	13,853.40	6,834.20	152,018.48	1,800.00	1,811.52	7,589.35	112,101.87	
	6,830.48	59,879.06	20,181.69	40.30	6,052.21	87,983.74	-	1,844.87	8,297.12	824,198.00	
	200.00	360.00	520.00	-	1,080.00	1,960.00	-	440.00	8,500.00	42,600.00	
	20,328.02	88,864.51	87,463.53	37,827.84	24,322.02	239,908.32	8,560.00	8,500.00	17,000.00	42,600.00	
	-	-	96,836.10	36,836.10	73,669.30	-	-	-	-	0	
	72,637.00	283,038.00	247,127.00	66,802.00	88,847.00	759,451.00	8,500.00	10,550.00	25,885.00	32,480.00	(60%)
MUNICIPAL REVENUES	14,303.00	4,000.00	14,303.00	4,000.00	14,303.00	11,297.00	600.00	-	-	11,297.00	
	719,767.63	33,077.80	719,767.63	33,077.80	719,767.63	23,757.04	909.44	-	-	23,757.04	
	42,788.00	42,788.00	42,788.00	42,788.00	42,788.00	-	-	-	-	909.44	
	18,303.00	719,759.00	108,257.00	-	-	847,317.00	234,665.00	680.00	11,287.00	50.00	(68%)
Grand Total:	188,015.00	1,522,151.00	736,254.00	85,204.00	192,360.00	2,702,804.00	35,090.00	12,818.00	39,077.00	195,187.00	(69%)

	1999					2000					% 2000
	Jan-99	Feb-99	Mar-99	Apr-99	May-99	Jan-00	Feb-00	Mar-00	Apr-00	Total	
LOCAL BUSINESSES	1,800.75	4,382.00	12,578.44	1,036.00	1,348.00	21,177.19	813.18	895.97	578.93	2,128.01	4184.08
	1,806.00	6,185.00	12,351.00	13,923.00	1,608.00	36,059.00	127.57	128.48	110.97	86.80	1,958.00
	243.79	288.78	245.17	180.00	460.00	1,418.89	-	-	-	-	455.8
	6,426.71	13,265.71	13,552.63	6,683.00	6,288.00	46,218.05	4,538.00	4,252.85	6,118.43	6,673.81	21,811.00
	10,511.00	24,123.00	40,348.00	23,099.00	11,850.00	108,523.00	5,477.00	5,047.00	6,808.00	11,650.00	28,379.00
	18,015.00	1,522,151.00	736,254.00	85,204.00	192,360.00	2,702,804.00	35,090.00	12,818.00	39,077.00	195,187.00	(69%)

Local Businesses criteria determination:
Five of the highest local businesses that generate the most general sales tax revenue were selected to show how the reduction in crab has affected the community. Their loss of business also has a direct impact on the City.

