



June 19, 2023

Second DRAFT Spend Plan for funds appropriated to address the 2020 Gulf of Alaska Pacific cod fishery disaster determination. NOAA fisheries allocated \$17,772,540 for the 2020 Gulf of Alaska (GOA) Pacific cod fishery disaster on May 6, 2022.

Written comments are requested on all elements of the proposed spend plan and should be as specific as possible. Comments will be posted as received and ADF&G requests that no business proprietary information, copyrighted information, or personally identifiable information be included in written comments. Comments can be submitted by email to: dfg.com.fisheriesdisasters@alaska.gov or by mail to:

ADF&G, Attn: Karla Bush
PO Box 115526
Juneau, AK 99811-5526

Comments must be sent by June 27, 2023, for consideration in the final draft of the spend plan.

Process to develop the spend plan:

ADF&G provided an initial draft spend plan for public comment in May 2023 and received 9 written comments on the initial plan. ADF&G revised the plan based on public comments and is requesting public comments on this second draft spend plan before the plan is finalized and submitted to PSMFC.

In response to comments received on the initial plan, ADF&G is recommending the following revisions:

Allocation

- Based on public comments to mitigate losses in the processor and harvester sectors more equitably, the allocations for the harvester and processor sectors were adjusted. The harvester allocation was reduced by 3% from 57% to 54% and the processor allocation was increased by 3% from 30% to 33%. Funds allocated to the harvesting sector mitigate losses by providing funds to bring the sector up to 30% of their recent historical value. The funds allocated to the processing sector mitigate losses by providing funds to bring sector up to 11% of their recent average wholesale value. ADF&G acknowledges the difference between how losses in each of these sectors are mitigated based on the proposed allocations and notes that the funds allocated to harvesters are proposed to be shared amongst six gear/operation sectors and include vessel owners, captains, and crew. Funds allocated to the processing sector do not include processing crew are proposed to be shared amongst processing companies and tender vessel owners.

Harvesters

- Based on public comments, vessel captains typically receive approximately twice the pay of vessel crew. ADF&G has revised the crew allocations section to specify that captains will receive two shares from the vessel crew allocation while other vessel crew will receive one share of the vessel crew allocation.

- Based on public comments, some vessels use both pot and trawl gear in the GOA Pacific cod fishery and may not meet the minimum participation criterion for either gear sector but were impacted by the fishery disaster. In reviewing the data, ADF&G found that two combination vessels did not meet the proposed landing requirement for the sector in which greater than 50% of their harvest occurred from 2015 to 2020. ADF&G proposes to include these vessels in the pot sector and count the number of years that the vessels participated with either pot or trawl gear toward meeting the first eligibility criteria.
- Based on public comments, ADF&G proposes use the same historical range of years, 2015 to 2019, to meet the participation criterion if a vessel or permit holder did not participate in 2020.

ADF&G has not modified the spend plan to include consideration of License Limitation Permit (LLP) holder history. Eligibility criteria and payment calculations for the pot, longline, and trawl sectors are based on the vessel’s history using the ADF&G number and typically the vessel owner and LLP holder are the same entity. Trawl and non-trawl LLPs are required for most vessels that participate in Pacific cod fisheries in federal waters; state-water fisheries do not require a vessel to be assigned to a federal LLP.

Processors

- ADF&G is proposing to use COAR buying data instead of COAR production data because production data are based on where the fish were processed and buying data area based on where the fish were harvested. This fishery disaster includes only Pacific cod that were harvested in the Gulf of Alaska.

ADF&G is not proposing eligibility based only on participation in 2020, as suggested in public comment, for any of the categories because all directed federal fisheries in the GOA for Pacific cod were closed in 2020. State-managed Pacific cod fisheries were open in 2020 and Pacific cod could be retained in other federal groundfish fisheries up to the maximum retainable allowances.

Guiding principles for disaster fund distribution. Disbursement of funds is intended to: 1) assist fishery participants harmed by the 2020 Pacific cod disaster; and 2) improve fishery information used to assess and forecast future fishery performance and to develop management approaches that avoid and/or mitigate the impacts of future fishery disasters that cannot be prevented.

The proposed categories and allocations reflect comments received from initial stakeholder input.

Category	Allocation	Estimated funds ^a
Research	9%	\$1,590,000
Communities	4%	\$709,000
Harvesters	54%	\$9,590,000
Processors	33%	\$5,840,000
Program support	<0.2%	\$35,000
Total	100%	\$17,764,000

^a Additional funds will be allocated to Pacific States Marine Fisheries Commission (PSMFC) to administer the federal grant.

Research – 9% (~\$1.59 million): The 2020 Pacific cod fishery disaster resulted from warmer than average ocean conditions, among other factors, beyond the control of fishery managers that reduced

biomass and access to the fishery. ADF&G proposes to allocate funds to support projects intended to improve available fishery information and help prevent and/or mitigate future fishery disasters. The following themes informed research projects that were selected for funding under the 2018 GOA Pacific cod fishery disaster and may be relevant for research related to the 2020 fishery disaster:

- 1) Better understanding the effects of warming temperatures on Pacific cod ecology and population dynamics, with a focus on parameters to improve the stock assessment (e.g., mortality, growth, maturity).
- 2) Expanded early life history studies (spawning, larval, age-0) to focus on spatial-temporal variation in stock reproductive output, survival processes, and how these vary with changes in climate.
- 3) Resolving stock spatial structure, migration patterns, and connectivity based on new genetics/genomics approaches. Research may cover a wide range of methods, including understanding early life history, tagging, acoustic telemetry, modelling, genetics, surveys, and maturity.

ADF&G is requesting input on these and other potential research themes for allocation of funds in the 2020 GOA Pacific cod fishery disaster spend plan. ADF&G also requests input on the appropriate award process for research funds. Recent Alaska fishery disaster spend plans have used competitive and non-competitive bid processes to award research funds. A competitive process would be administered by PSMFC and would include a call for proposals, review process, and award of selected projects. A non-competitive process would include identifying the specific research project(s), funding amounts, and research entities receiving the funds in the spend plan as determined by ADF&G after considering public comment.

Communities – 4% (~\$709,000): Municipalities and boroughs rely on revenue generated from GOA Pacific cod landings and other economic activities related to the Pacific cod fishery. Fishery disaster funds allocated to communities impacted by the fishery disaster can only be used for managing, repairing, or maintaining approved infrastructure, services, or habitat that support Pacific cod fisheries in the affected areas. ADF&G proposes that only communities with a demonstrated loss of Pacific cod landings due to the fishery disaster will be eligible for community funds. Fishery disaster funds are Federal funds and cannot be used for projects where matching funds are required and this includes state or local match requirements.

Experience with recent fishery disasters has shown that not all communities eligible for fishery disaster funds are able to participate in the process because the community entity must have capacity to administer the receipt of funds through a federal grant subaward process and the funds may only be used for approved projects directly related to fisheries in the disaster determination. To accommodate the variety of needs and administrative capacities of communities eligible for disaster funds, ADF&G proposes to include a spend plan provision allowing eligible communities to opt-out of receiving disaster funding for the 2020 GOA Pacific cod disaster. Allocations to communities that opt-out will be added to the final allocations for participating communities. This will help ensure that community-designated funds are fully utilized and made available to communities that decide to participate in the disaster funding process.

Communities must meet all proposed eligibility criteria to be eligible:

1. Fish ticket port of landing data must show that GOA Pacific cod were landed in the community in 2020 or in three of five years from 2015 to 2019.
2. Total landings of GOA Pacific cod in the community must have been greater than 10,000 pounds in three of six years, 2015 to 2020.
3. Total 2020 GOA Pacific cod landings in the community must have been less than the 2015 to 2019 average.

Based on the proposed criteria, the following communities may be eligible for community-designated funds: Kodiak, Sand Point, and Akutan. Disaster funds for communities are proposed to be **pro rata** to each community's demonstrated loss.

Harvesters – 54% (~\$9.59 million): ADF&G proposes direct payments to vessel owners, or jig permit holders, and vessel crew who meet all eligibility criteria. The five-year (2015-2019) average exvessel value of the GOA Pacific cod fishery for catcher vessels (CVs) and wholesale value for catcher processors (CPs) was \$36.2 million dollars and the value of the 2020 fishery was \$4.1 million dollars, for a total estimated loss due to the disaster of \$32.1 million dollars. Funds allocated to the harvesting sector are intended to mitigate this loss by providing funds to bring the harvesting sector up to 30% of the sector's recent historical value.

ADF&G proposes to establish a pool for vessel crew with 10% of the harvester funds. The remaining harvester funds (90%) are proposed to be allocated among six fishery harvesting sectors based on gear and operation type: pot CVs, jig vessels, longline CVs, longline CPs, trawl CVs, and trawl CPs. The proposed split between vessel crew and permit holders (jig sector)/ vessel owners (pot, longline, and trawl sectors) and the proposed eligibility criteria and payment distribution methods were informed by the 2018 fishery disaster spend plan and initial public comments on the 2020 fishery disaster spend plan.

Vessel captains and crew (10% of harvester pool): ADF&G proposes that each eligible vessel crew member will receive one share of from the crew pool, while vessel captains receive two shares. Equal share amounts will be determined based on eligible applications received for captain and crew payment. Total allocation divided by the total number of shares will determine the price of one share. The intent is to identify those captains and crew who either participated during the 2020 season or had participated in the GOA Pacific cod fishery as a captain or vessel crew prior to the 2020 fishery disaster in at least two of the four preceding years (2016-2019) and were unable to participate in 2020 because the directed federal fishery was closed.

Vessel captains and crew must meet all proposed eligibility criteria to be eligible for payment:

1. Vessel captain or crew member must have worked for a permit holder (jig sector) or vessel (pot, longline, and trawl sectors) that is eligible to receive funds for the 2020 Pacific cod fishery disaster. This information will be verified based on vessel crew contract, vessel crew settlement, or an affidavit from the permit holder (jig sector) or vessel owner (pot, longline, and trawl sectors).
2. Vessel crew member must have had a 2020 commercial crew license or 2020 CFEC permit for any fishery. If the permit holder (jig sector) or vessel (pot, longline, and trawl sectors) qualified for the 2020 Pacific cod fishery disaster based on prior years' participation, the vessel crew member must

have had a commercial crew license or CFEC permit for any fishery in three of five years from 2015 to 2019. This information will be verified using the ADF&G Licensing database and the CFEC permit database.

3. To be eligible for an additional captain share, an individual must have been the CFEC permit holder, as identified on the ADF&G fish ticket, for a Pacific cod landing on a qualified vessel in 2020 or in three of five years from 2015 to 2019.
4. Vessel captain or crew member must not be eligible for fishery disaster funds under another category of this distribution plan.

Harvester Sectors (90% of harvester pool): Eligibility criteria and fund distribution are informed by data from the NOAA Fisheries Catch Accounting Database and ADF&G fish tickets and from the 2018 GOA Pacific cod disaster spend plan in addition to initial comments received from stakeholders.

ADF&G proposes permit-based direct payments to the individual named on the CFEC commercial fishing permit for the jig sector. ADF&G proposes vessel-based direct payments to the person or entity named as the vessel owner on the 2020 CFEC commercial vessel license for all other sectors.

Proposed allocations to each of the six harvesting sectors are based on the proportion of each sector’s loss resulting from the 2020 fishery disaster. ADF&G used wholesale value rather than exvessel value to compare relative loss across all harvesting sectors because the harvesting sector includes both CVs and CPs. The loss to each sector was determined by comparing the 5-year average adjusted wholesale value (2015 to 2019) to the 2020 wholesale value as shown in the following table:

Sector	Average wholesale value (2015-2019)	2020 wholesale value	Loss	Proportion of total loss	Estimated allocation
Pot CV	\$39,024,975	\$5,447,086	\$33,577,889	59.5%	\$5,704,087
Jig CV and CP	\$1,981,009	\$1,503,745	\$477,264	0.8%	\$81,076
Longline CV	\$4,613,140	\$141,650	\$4,471,490	7.9%	\$759,600
Trawl CV	\$17,367,670	\$6,257,884	\$11,109,786	19.7%	\$1,887,289
Longline CP	\$5,983,492	\$0	\$5,983,492	10.6%	\$1,016,453
Trawl CP	\$1,158,133	\$325,208	\$832,925	1.5%	\$141,494
Total	\$70,128,419	\$13,675,572	\$56,452,847	100.0%	\$9,590,000

Pot catcher vessels (59.5% of harvester funds, ~\$5.7 million): Proposed **vessel-based** distribution.

Pot catcher vessel owners must meet all proposed eligibility criteria to be eligible for payment:

1. Vessel must have been used to harvest GOA Pacific cod with pot gear in 2020 or in any three of five years from 2015 to 2019 using pot gear. Combination vessels that used both pot and trawl gear during the period 2015 to 2019 can include years when the vessel was used to harvest GOA Pacific cod with either pot or trawl gear if more than 50% of their total harvest from 2015 to 2020 occurred using pot gear.

2. Average GOA Pacific cod landings from 2015 to 2020 must be equal to or greater than 70,000 pounds using pot gear.

Proposed payment distribution for pot vessels are based on four tiers as follows: establish four payment tiers based on average annual pounds of retained Pacific cod harvested by the vessel using pot gear in the best three of six years, 2015 to 2020. If a vessel had less than three years of participation, the average includes only years when harvest occurred. Twenty-five percent of the pot CV allocation will be apportioned to each tier and each vessel owner in the same tier would receive an equal payment.

Tier level	Average landings (best 3 of 6 years)	Allocation	Est. number of eligible vessels
1	> 1,500,000 pounds	25%	9
2	900,000 – 1,499,999 pounds	25%	15
3	600,000 – 899,999 pounds	25%	22
4	< 599,999 pounds	25%	48

Jig vessels (0.8% of harvester funds, ~\$81,000): Proposed **permit-based** distribution.

Jig fishery permit holders must meet all proposed eligibility criteria to be eligible for payment:

1. Permit holder must have landed GOA Pacific cod in 2020 or in at least three of five years from 2015 to 2019 on a M05B, M05G, M26B, or M26G CFEC permit card.
2. Total GOA Pacific cod landings from 2015 to 2020 must be equal to or greater than 750 pounds.

Distribution for jig permit holders: eligible jig permit holders are proposed to receive an **equal share** of the jig allocation. An estimated 81 jig permit holders would qualify for disaster funds based on the proposed eligibility criteria.

Longline catcher vessels (7.9% of harvester funds, ~\$759,000): Proposed **vessel-based** distribution.

Longline catcher vessel owners must meet all proposed eligibility criteria to be eligible for payment:

1. Vessel must have retained GOA Pacific cod with longline gear in 2020 or in any three of five years from 2015 to 2019.
2. Average GOA Pacific cod landings from 2015 to 2020 must be equal to or greater than 20,000 pounds.

Proposed payment distribution for longline catcher vessels is based on four tiers as follows: establish three tiers based on average annual pounds of retained GOA Pacific cod harvested by each eligible vessel in the best three of six years from 2015 to 2020. If a vessel had less than three years of participation, the average includes only years when harvest occurred. The proposed allocation from the longline CV pool apportioned to each tier is based on the proportion of total harvest by the vessels in each tier. Each vessel owner in the same tier would receive an equal payment.

Tier level	Average landings (best 3 of 6 years)	Allocation	Est. number of eligible vessels
1	> 250,000 pounds	29%	7
2	150,000 - 249,999 pounds	41%	15
3	< 149,999 pounds	30%	25

Trawl catcher vessels (19.7% of harvester funds, ~\$1.89 million) Proposed **vessel-based** distribution.

Trawl catcher vessel owners must meet all proposed eligibility criteria to be eligible for payment:

1. Vessel must have retained GOA Pacific cod in a trawl fishery in 2020 or in any three of five years from 2015 to 2019.
2. Average GOA Pacific cod landings from 2015 to 2020 must be equal to or greater than 70,000 pounds.

Proposed payment distribution for trawl catcher vessels is based on three tiers as follows: establish three tiers based on average annual pounds of retained GOA Pacific cod harvested by each eligible vessel in the best three of six years from 2015 to 2020. If a vessel had less than three years of participation, the average includes only years when harvest occurred. The proposed allocation from the trawl CV pool apportioned to each tier is based on the proportion of total harvest by the vessels in each tier. Each vessel owner in the same tier would receive an equal payment.

Tier level	Average landings (best 3 of 6 years)	Allocation (from the trawl CV pool)	Est. number of eligible vessels
1	> 1,000,000 pounds	51%	13
2	400,000 – 699,999 pounds	38%	20
3	< 399,999 pounds	11%	16

Longline catcher processors (10.6% of harvester funds, ~\$1.02 million) Proposed **vessel-based** distribution; if a company owns more than one vessel, the payments will be aggregated at the company level.

Longline catcher processor vessel owners must meet the following proposed eligibility criterion to receive a payment:

- Vessel must have retained GOA Pacific cod in a longline fishery in any three of six years from 2015 to 2020.

Proposed payment distribution for longline catcher processors: eligible vessel owners are proposed to receive an **equal share** of the longline catcher processor allocation. An estimated five vessels are estimated to qualify for disaster funds based on the proposed eligibility criterion.

Trawl catcher processors (1.5% of harvester funds, ~\$141,000): Proposed **vessel-based** distribution.

Trawl catcher processor vessel owners must meet the following proposed eligibility criterion to receive a payment:

- Vessel must have retained 100,000 pounds of GOA Pacific cod in any three of six years from 2015 to 2020.

Proposed payment distribution for trawl catcher processors: eligible vessel owners are proposed to receive an **equal share** of the trawl catcher processor allocation. Four trawl catcher processing vessels are estimated to qualify for disaster funds based on the eligibility criteria.

Processors – 30% (~\$5.84 million): Proposed direct payments to processing companies and tender vessel owners who meet all eligibility criteria. The five-year, 2015 to 2019, average wholesale value of the GOA Pacific cod fishery for processors was \$104.1 million dollars and the wholesale value of the 2020 fishery was \$52.7 million dollars, for a total estimated loss due to the disaster of \$51.4 million dollars. The funds allocated to the processing sector are intended to mitigate this loss by providing funds to bring the processing sector up 11% of their recent average wholesale value.

Similar to the 2018 GOA Pacific cod fishery disaster spend plan, ADF&G proposes to include tender vessels by subdividing the processor allocation into two pools: one for tender vessels (2%) and one for processing companies (98%). These allocations match what was used in the 2018 fishery disaster spend plan and are again proposed for the 2020 fishery disaster spend plan.

Tender vessels (2% of processor pool):

Tender vessel owners must meet all proposed eligibility criteria to receive a payment:

1. Vessel must have operated as a tender in a directed GOA Pacific cod fishery in 2020 or in any three of five years, 2015 to 2019.
2. Tender vessel must be able to demonstrate a revenue loss as a result of the disaster by comparing the average pounds of GOA Pacific cod tendered from 2015 to 2019 to the total pounds of GOA Pacific cod tendered in 2020.

Tender vessel owners meeting the eligibility criteria are proposed to receive an **equal payment** of the tender vessel allocation.

Processing companies (98% of processor pool): The proposed allocation to eligible GOA Pacific cod processing companies is based on the average value of GOA Pacific cod processed at facilities owned by each processing company from 2015 to 2019 using Commercial Operator's Annual Report (COAR) buying data. COAR buying data are based on the final exvessel value paid to harvesters for landings of Pacific cod. Processing companies are proposed to be identified based on their nine-digit federal tax identification number.

Processing companies must meet all proposed eligibility criteria to receive a payment:

1. Must currently own a facility that processed GOA Pacific cod in 2020 or in any three of five years, 2015 to 2019.

2. Processing company must have a total exvessel value of \$10,000 or greater for GOA Pacific cod in any three of six years, 2015 to 2020.
3. The COAR data must show that the processing company had a demonstrated exvessel value loss for GOA Pacific cod in 2020 as compared to the company's average exvessel value of GOA Pacific cod from 2015 to 2019.

Disaster payments to processing companies are proposed to be **pro rata** to their demonstrated loss.

Program Support <0.02% (\$35,000): ADF&G is proposing to allocate funds for staff working on fishery disaster plan development and implementation in coordination with Pacific States Marine Fisheries Commission.

Appendix 1. Public comments on the initial draft of the spend plan.

May 29th 2023

Alaska Department of Fish and Game

PO. Box 115526

Juneau, AK 99811-5526

Via email to dfg.com.fisheriesdisasters@alaska.gov

Re: 2020 Gulf of Alaska Pacific Cod Federal Disaster Fund Spend Plan

Dear Ms Karla Bush,

Thank you for the opportunity to comment on the upcoming spend plan for the 2020 Gulf of Alaska Pacific Cod fishery disaster. I am a fisheries business owner here in Kodiak, and own a 58ft combination vessel, [REDACTED]. My business depends on year-round fishing in both Kodiak and the western gulf, and when fishing changed in 2018, it took a major toll on our business and family. As you know, it impacted every aspect of the fishing industry, from owners to crew, to the businesses we support, and the communities we spend our monies in.

Since 2013, we have spent a considerable amount of money to become more competitive within the Trawl fleets in Kodiak and statewide, going as far as to widen our vessel, with the intent of participation in both the state water and federal cod fisheries. As a 58ft vessel, the obstacles have been many, but surmountable. We invested in a complete pot set up - purchasing pots, coiler, block, line, buoys etc - only to have the fishery fall apart in 2018.

We trawled for cod throughout the qualifying years, and as we acquired the necessary gear, we decided to pot fish Cod in 2016 and again in 2017. The 2018 GOA Cod Disaster Plan did not consider a combination vessel such as mine, nor did it allow for a provision whereby, I could have combined my fishing history using multiple gear types - trawl and pot cod landings.

Looking back through the [REDACTED] catch history data:

1. [REDACTED]
[REDACTED]
2. [REDACTED]
[REDACTED].
3. If the [REDACTED] were to be allowed to combine the Pot and Trawl Cod landings, it would meet the 100,000.00 pound threshold for the Trawl sector.

To expedite the spend plan for the 2020 GOA Pacific Cod Disaster, I propose modifying certain aspects of the 2018 plan:

- A. I would like to see all retained Trawl Cod catch included, not just directed Cod. This would also include catch in the limited access trawl fisheries and Cod caught within the Rockfish program and allocated with the trawl sector.
- B. I don't see a need to allocate additional research funds from the 2020 GOA Pacific Cod Disaster Fund and feel that that percentage should be divided amongst harvesting sectors.
- C. Vessel LLP's & LLG's are placed under consideration for eligibility in the 2020 GOA Pacific Cod Disaster Fund, as LLP & LLG history data is more indicative of industry participation than catch history. Many vessel owners / LLP's & LLG's holders must invest considerable monies into the industry, gear, insurance, safety considerations, sponsors, etc leading up to and throughout any of these fisheries. In many cases, LLP & LLG holders have invested more to the industry than CFEC permit holders and crew-members. These LLP & LLG holders must also bear the considerable consequences of a fisheries disaster.
- D. I would like to see an option to combine a vessel fishing history using multiple gear types, for boats that don't fit within the eligibility criteria of the 2018 GOA Cod Disaster Plan, like my combination vessel.

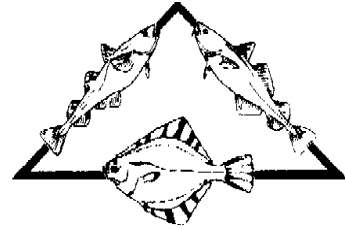
I appreciate the opportunity to share my thoughts and comments, and look forward to reviewing the upcoming draft distribution plan in the future.

Thank you,

Carmel Carty

Alaska Groundfish Data Bank

P.O. Box 788 Kodiak AK 99615
Julie Bonney, Executive Director
Chelsae Radell, Assistant to the ED
Marc Solano, Science Advisor



May 29, 2023

ADF&G Commissioner Vincent-Lang
1255 W. 8th Street
Juneau, AK 99811-5526
dfg.com.fisheriesdisasters@alaska.gov
Attn: Karla Bush

Re: 2020 Gulf of Alaska Pacific cod Federal Disaster Fund Spend Plan

Dear Commissioner Vincent-Lang,

Thank you for the opportunity to comment on the draft spend plan for the 2020 Gulf of Alaska Pacific cod fishery disaster funds. Alaska Groundfish Data Bank, Inc (AGDB) represents shorebased processors and trawl harvesting vessels that are heavily dependent on the federal Gulf of Alaska (GOA) Pacific cod fisheries. AGDB appreciates that the 2020 and 2018 GOA cod disaster spend plans are similar in structure with just a few notable modifications for 2020 plan. We are hoping for a few additional changes, the spend plan to be finalized, and disaster payments made available to participants as quickly as possible.

We appreciate the reduction of funding to the research category from 25% in 2018 to 9% in 2020. We would note that the 16% reduction in the research category was entirely reallocated to the harvesting sector and not shared with two other stakeholder groups – processors and communities. We believe that the 16% reduction in research funding should be shared pro rata based across all three stakeholder groups based on the 2018 spending amounts by group, as opposed to a single sector benefitting from the change in allocation.

We appreciate the modifications made in the 2020 draft spend plan regarding crew compensation and the verification requirements based on a vessel crew contract, vessel settlement, or an affidavit from the vessel owner; we believe this will tighten up the qualifying pool. We continue to advocate that vessel operators with a CFEC permit should receive higher relief payments, 50-100% more than a regular crew member; this would more closely track crew payment practices for operators.

We support the six harvesting sectors as defined in the 2020 draft spend plan – Pot CV, Jig CV and CP, Longline CV, Trawl CV, Longline CP and Trawl CP, as well as the method for allocating across harvesting sectors. For the CV trawl sector, we believe a longer timeframe than 2016 to 2020 may be warranted for internal allocation across participants. Looking further back may better illustrate trawl catcher vessel participants' dependency on Pacific cod, especially for the CGOA trawl catcher vessel sector, since a directed fishery has not occurred since 2017.

Thank you for the opportunity to comment. We look forward to reviewing the second draft distribution plan and providing further public comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Julie Bonney'. The signature is written in a cursive, flowing style.

Julie Bonney



Alaska Whitefish Trawlers Association

PO Box 991 | Kodiak, Alaska 99615

P

May 29, 2023

Alaska Department of Fish and Game
ATTN: Karla Bush
PO Box 115526
Juneau, AK 99811-5526

Via e-mail: dfg.com.fisheriesdisasters@alaska.gov

RE: AWTA Comments on 2020 GOA Pacific Cod Disaster Spend Plan

Dear Ms. Bush:

Alaska Whitefish Trawlers Association (AWTA) is a Kodiak-based trade group representing trawl harvesting vessels that operate primarily in the Gulf of Alaska (GOA). Most AWTA vessels home-port in Kodiak and have Kodiak-resident owners, skippers, and crew. Pacific cod is an important component of our members' business plans and we appreciate this opportunity to comments on the proposed spend plan for the 2020 GOA Pacific Cod Disaster.

AWTA agrees with reducing the allocation to Research and increasing disaster funding for Harvesters. In general harvesters have limited ability to pivot and harvest alternate species due to gear and size restrictions in state waters (particularly for trawl) and lack of access to rationalized or limited access fisheries. When trawl harvesters missed out on cod in 2020 they could not fall back on a good salmon year or other species to make up the difference, unlike operations that deal with a broad range of products and species. We support the proposed plan element that allocates more funds to harvesters.

We recommend allocating double crewshares to captains out of the crew set aside. Captains carry responsibility for the vessel and crew, and usually receive a higher share compared to crew in normal operations. Keeping an equal share basis and giving captains two shares and crew members one share would address this discrepancy.

We suggest using the best 4 of 6 years for calculating payments, and extending the calculation period to encompass 2015-2020. This would use the same number of years as the 2018 Cod Disaster spend plan, and reduce reliance on 2017 and 2018 catch history (which is the last disaster year, and the year immediately prior). These years would more accurately reflect reliance on cod.

Thank you,

A handwritten signature in black ink that reads "Rebecca Skinner".

Rebecca Skinner, Executive Director
Alaska Whitefish Trawlers Association

Pacific cod spend plan comment

From: Mark Fina

Sent: Thursday, May 25, 2023 2:08 PM

Subject: FW: <External Email> - Please review by 5-29-23 for submittal to ADFG (cod disaster comments)

Hello Karla

On the issues that I mentioned earlier concerning processing plants that have changed hands and consolidation of processing activity, the existing language is close but not clear, as it keys off plant ownership. The suggestions highlighted below can address the issue clearly (i.e., make it clear that a new owner is credited from the plant's activity and that consolidating processing in a single plant won't mean walking away from the history at the plant that is idled).

Thanks - Mark

Processing companies (98% of processor pool): The proposed allocation to eligible GOA Pacific cod processing companies is based on the average wholesale value of GOA Pacific cod processed at facilities currently owned by each processing company from 2015 to 2019 using Commercial Operator's Annual Report (COAR) production data.

Processing companies must meet all proposed eligibility criteria to receive a payment:

1. Must currently own a facility that processed GOA Pacific cod in 2020 or in any three of five years (2015- 2019).
2. Processing company's plant(s) must have a total first wholesale value of \$10,000 or greater for GOA Pacific cod in any three of six years (2015-2020).
3. The COAR data must show that the processing company's plant(s) had a demonstrated first wholesale value loss for GOA Pacific cod in 2020 as compared to the company's average wholesale value of GOA Pacific cod from 2015 to 2019.

Disaster payments to processing companies are proposed to be pro rata to their demonstrated loss.

From: Dean Gould

Sent: Friday, May 19, 2023 8:01 PM

To: DFG, ComFisheriesDisasters (DFG sponsored)

Subject: research needs to be done at the right time ,not when codfish are already moved out of area

From: john mccarthy

Sent: Monday, May 22, 2023 4:06 PM

To: DFG, ComFisheriesDisasters (DFG sponsored) <dfg.com.fisheriesdisasters@alaska.gov>

Subject: Skipper

As a general rule the captains get twice what the crew get.You gave the same amount to captains and crew the last time.Being a captain is an earned position with all the responceabilities it bears.Hope you adjust your pay scale accordingly.Thats all i got to say.Captain [REDACTED].

From: ivan stonorov
Sent: Sunday, May 28, 2023 9:56 AM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: 2020 cod disaster

I agree with most parts of the 2020 cod disaster spend plan. The part that I strongly disagree with is where it says that a vessel is still eligible if they participated in 3 out of the last 5 years in the GOA cod fishery. I feel that this is unfair to people that are still actively participating in the GOA fisheries, 2020 participants are the only people who should be receiving the money for the 2020 disaster. The GOA boats that have moved west are taking away from people who have traditionally participated in Bering Sea fisheries, some of these displaced cod boats could be receiving free money for not fishing in the gulf and fishing in the Bering Sea essentially doubling up. I feel that if you didn't fish the gulf in 2020 you should not be eligible for disaster relief money. The eligibility requirements to receive 2020 GOA cod disaster money should be that you participated in the 2020 GOA fishery and made 5 or more deliveries. Please only support active participation.

Thanks
Ivan Stonorov

From: Darius Kasprzak
Sent: Monday, May 29, 2023 12:47 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Alaska Jig Association Comments (2020 GOA P. Cod Disaster Declaration)

Hello,

The Alaska Jig Association (AJA) recently held our regularly scheduled annual meeting. Our members reviewed the initial spend plan (regarding 2020 Gulf of Alaska Pacific cod fishery disaster declaration) and find it to be satisfactory and adequate.. We have no further recommendations as to the proposed categories and allocations, or to the proposed qualifying criteria relating to the Jig sector.

Thank you,

Darius Kasprzak
President, AJA



May 25, 2023

To: ADFG Commissioner Vincent-Lang

Re: Draft spend plan for the 2020 Gulf of Alaska Pacific cod disaster

Thank you for the opportunity to comment on the first draft of the spend plan for federal funds appropriated to address the 2020 Gulf of Alaska Pacific cod disaster declaration. The Pacific Seafood Processors Association (PSPA) represents shoreside processing plants operating across Alaska, including three companies with plants dependent on Gulf of Alaska Pacific cod located in Kodiak, King Cove, and Sand Point. Our general comments are as follows:

- We appreciate the progress made in the development of the plan and support public review of a second draft after initial public comment is considered.
- We support expedited implementation upon completion of the final plan, given the long timeframe from the initial disaster.
- We support inclusion of all the proposed categories for disaster relief funds identified in the draft plan.
- We support the eligibility criteria for the processing sector and the approach to including tenders in draft, which mirrors the 2018 approach.
- We support an allocation that compensates for losses equally across sectors, meaning a plan that attempts to bring both sectors up to the same percentage of their recent historical value.

Shoreside processing of groundfish in Alaska is highly capital intensive, with tremendous and increasing fixed costs required to open our doors and operate, regardless of whether the fishery is strong or weak. The Gulf Pacific cod closure in 2020 was certainly necessary for long-term sustainability and to improve stock status but represented a significant loss to harvesters and processors dependent on Pacific cod. A healthy and viable shoreside processing sector in these remote communities is necessary not just to take Pacific cod deliveries but to provide markets for fishermen in all other fisheries as well. Disaster declarations are intended to assist fishery sectors and communities as they work through fishery failures, in order to increase resiliency and remain viable for future, stronger fisheries.

In the 2018 Pacific cod disaster spend plan, the funds allocated to harvesters brought harvesters to 50% of their estimated historical average value and brought processors to 36%. In the 2020 draft plan, disaster funds allocated to the harvesting sector are intended to mitigate their loss by providing funds to bring the harvesting sector up to 31.5% of their recent historical value, and to mitigate the loss to processors by providing funds that bring the processing sector up to 10.5% of their recent historical value. PSPA continues to support an allocation that compensates for losses equally across sectors, meaning a plan that attempts to bring both sectors up to the same percentage of their recent historical value. If there is a rationale for the distribution to each of the categories, that would be helpful to include.

www.pspafish.net

ANCHORAGE

721 W. 1st Avenue
Suite 100
Anchorage, AK 99501
907 223 1648

JUNEAU

222 Seward Street
Suite 200
Juneau, AK 99801
907 586 6366

SEATTLE

1900 W. Emerson Place
Suite 205
Seattle, WA 98119
206 281 1667

WASHINGTON DC

20 F Street NW
Floor 7
Washington, DC 20001
202 431 7220

	2018 plan (\$24.4 m)		2020 (\$17.8 m)	
	<u>% of total spend / % of average value</u>		<u>% of total spend / % of average value</u>	
Harvesters	40%	/ 50%	57%	/ 31.5%
Processors	30%	/ 36%	30%	/ 10.5%
Communities	5%		4%	
Research	25%		9%	

We also continue to support the inclusion of scientific research projects that help assess GOA Pacific cod stock conditions, have a direct contribution to fisheries management, and offer the potential for restoring the fishery. Comparing the 2018 and the 2020 spend plans, there is a reduction in research funds, which makes sense given the previous research is not yet completed from the 2018 spend plan. However, the entire reduction in research funds appears to have been redistributed to the harvesting sector. An explanation of the approach is warranted. We strongly recommend that the additional funds not being allocated to research be split equally among all three sectors that work in partnership to create a Pacific cod fishery in the Gulf of Alaska: harvesters, processors, and communities.

Thank you for the opportunity to comment. We look forward to reviewing the next draft of the spend plan and hopefully the conclusion of this process in 2023.

Sincerely,



Nicole Kimball
PSPA, Anchorage