THE STATE
of ALASKA
GOVERNOR MIKE DUNLEAVY

Department of Fish and Game

OFFICE OF THE COMMISSIONER
Headquarters Office

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DRAFT Distribution Plan for funds appropriated to address the 2018 Gulf of Alaska Pacific cod disaster declaration. NOAA fisheries has allocated $24,416,440 for the Pacific cod fishery disaster.

Written comments are requested on all elements of the proposed distribution plan and should be as specific as possible to be the most helpful. Comments may be posted online and therefore ADF&G requests that no business proprietary information, copyrighted information, or personally identifiable information be submitted in your written comments. Comments can be submitted by email to: DFG.2018GOAPacificCod@alaska.gov or my mail to: ADF&G, Attn: Kari Winkel
PO Box 115526
Juneau, AK 99811-5526

Comments must be sent by Friday, August 14, 2020 for consideration in the next iteration of the distribution plan.

Proposed guiding principles for disaster funds distribution: Disbursement of funds are intended to: 1) assist fishery participants harmed by the 2018 Gulf of Alaska (GOA) Pacific cod fishery 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.

Proposed categories for disaster relief funds:

- **Harvesters**: Direct payments to commercial fishery participants. This draft plan proposes to divide the harvester funds among six fishery sectors based on gear and operation type: pot catcher vessels (CVs), jig vessels, longline CVs, longline catcher processors (CPs), trawl CVs, and trawl CPs. Eligibility criteria and distribution of funds within each sector will be further developed based on input from participants.
- **Processors**: Direct payments to processing facilities. Fisheries production and value data from the Commercial Operators Annual Report (COAR) will be used to determine eligibility and payments for processors. An option to include Tender vessels is included in this category and more input from participants is needed to further develop eligibility criteria and the distribution process.
- **Communities**: Municipalities and boroughs rely on revenue generated from GOA Pacific cod landings and other economic activities related to the GOA Pacific cod fishery. Funds designated for communities can be used for managing, repairing, or maintaining infrastructure, services, or habitat that support Pacific cod fisheries in the region.
- **Research**: The 2018 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. Funds will be used for scientific research activities to better understand the effects of warming temperatures on GOA Pacific cod and to improve our ability to manage the GOA Pacific cod stock in the future.
- **Program Support**: The Alaska Department of Fish and Game (ADF&G) is proposing to allocate funds for staff time dedicated to fishery disaster plan development and implementation in coordination with Pacific States Marine Fisheries Commission (PSMFC).

Proposed allocations to project categories and eligibility criteria: The proposed categories and allocations reflect comments received from initial stakeholder input and the Governor's office.

Harvesters – 40%: Based on initial comments from stakeholders, ADF&G proposes to divide the allocation to harvesters among six fishery sectors based on the proportion of each sector's loss resulting from the 2018 fishery disaster. Wholesale value was used as a metric to compare relative loss across all sectors, which include both CVs and CPs. The loss to each sector is determined by comparing the 5-year average adjusted wholesale value (2013 to 2017) to the 2018 wholesale value as shown in the following table.

Sector	Average wholesale value (2013-2017)	2018 wholesale value	2018 value compared to average value	Value of Loss	Proportion of total loss
Pot CV	$53,637,455	$17,298,472	-68%	$36,338,983	51%
Jig CV and CP	$3,366,800	$688,894	-80%	$2,677,906	4%
Longline CV	$8,586,895	$2,976,148	-65%	$5,610,746	8%
Trawl CV	$23,702,145	$2,990,845	-87%	$20,711,300	29%
Longline CP	$7,467,919	$2,544,996	-66%	$4,922,923	7%
Trawl CP	$1,206,113	$555,932	-54%	$650,182	1%
Total	$97,967,327	$27,055,288	-72%	$70,912,040	100%

The proposed eligibility criteria in this draft plan for each sector were based on initial input from stakeholders and an evaluation of GOA Pacific cod fishery landings data from the NOAA Fisheries Catch Accounting Database.

ADF&G must determine whether eligibility for payment would be license/permit-based or vessel-based. ADF&G initially proposes vessel-based eligibility for all sectors except the jig sector. For the jig sector, funds for permit-based distributions are proposed to be paid to the individual named on the Commercial Fisheries Entry Commission (CFEC) commercial fishing permit. For all other sectors, funds for vessel-based distributions are proposed to be paid to the person named on the CFEC commercial vessel license. ADF&G requests comments on these proposed eligibility criteria.

Pot catcher vessels (51%): Proposed **vessel-based** distribution.

Proposed eligibility criteria for pot vessels:

1. Vessel must have been used to harvest GOA Pacific cod in a directed fishery in any two of three years from 2016 to 2018.
2. Average directed GOA Pacific cod landings from 2016 to 2018 must be equal to or greater than 100,000 pounds.

Proposed distribution for pot vessels:
Option 1: Equal share – all eligible vessel owners will receive an equal share of the pot allocation.

Option 2: Tiers – establish four tiers based on average annual pounds of directed GOA Pacific cod harvested by the vessel in the best two of three years (2016 to 2018). Twenty-five percent of the pot CV allocation will be apportioned to each tier and each vessel owner receives an equal share of the tier allocation.

Tier level	Average landings (best 2 of 3 years)	Allocation (from the pot CV pool)	Est. number of eligible vessels
1	> 1,240,000 pounds	25%	10
2	900,000 - 1,239,999 pounds	25%	14
3	580,000 - 899,999 pounds	25%	23
4	< 579,999 pounds	25%	51

Jig vessels (4%): Proposed **permit-based** distribution.

Proposed eligibility criteria for jig permit holders:

1. 2018 CFEC M05B, M05G, M26B, or M26G permit holders.
2. Permit holder must have a directed GOA Pacific cod landing in at least one year from 2015 to 2018.
3. Total directed GOA Pacific cod landings from 2015 to 2018 must be equal to or greater than 1,500 pounds.

Proposed distribution for jig permit holders: eligible jig permit holders will receive an **equal share** of the jig allocation. An estimated 207 jig permit holders would qualify for disaster funds based on the proposed eligibility criteria.

Longline catcher vessels (8%): Proposed **vessel-based** distribution.

Proposed eligibility criteria for longline catcher vessels:

1. Vessel must have been used to harvest GOA Pacific cod in a directed fishery in any two of three years from 2016 to 2018.
2. Average directed GOA Pacific cod landings from 2016 to 2018 must be equal to or greater than 20,000 pounds.

Proposed distribution for longline catcher vessels:
Option 1: Equal share – all eligible vessel owners will receive an equal share of the longline catcher vessel allocation.

Option 2: Tiers – establish four tiers based on average annual pounds of directed GOA Pacific cod harvested by the vessel in the best two of three years (2016 to 2018). Twenty-five percent of the longline catcher vessel allocation will be allocated to each tier and each vessel owner receives an equal share of the tier allocation.

Tier level	Average landings (best 2 of 3 years)	Allocation (from the longline CV pool)	Est. number of eligible vessels
1	> 220,000 pounds	25%	6
2	160,000 - 219,999 pounds	25%	9
3	125,000 - 159,999 pounds	25%	12
4	< 124,999 pounds	25%	24

Trawl catcher vessels (29%): Proposed **vessel-based** distribution.

Proposed eligibility criteria for trawl catcher vessels:

1. Vessel must have been used to harvest GOA Pacific cod in a directed fishery in any two of three years from 2016 to 2018.
2. Average directed GOA Pacific cod landings from 2016 to 2018 must be equal to or greater than 100,000 pounds.

Proposed distribution for trawl catcher vessels:
Option 1: Equal share – all eligible vessel owners will receive an equal share of the trawl catcher vessel allocation.

Option 2: Tiers – establish four tiers based on average annual pounds of directed GOA Pacific cod harvested by the vessel in the best two of three years (2016 to 2018). Twenty-five percent of the trawl catcher vessel allocation will be allocated to each tier and each vessel owner receives an equal share of the tier allocation.

Tier level	Average landings (best 2 of 3 years)	Allocation (from the trawl CV pool)	Est. number of eligible vessels
1	> 1,160,000 pounds	25%	4
2	840,000 – 1,159,999 pounds	25%	6
3	575,000 – 839,999 pounds	25%	9
4	< 574,999 pounds	25%	18

Longline catcher processors (7%): Proposed **vessel-based** distribution.

Proposed eligibility criteria for longline catcher processors:
Vessel must have been used to harvest GOA Pacific cod in a directed fishery in any two of three years from 2016 to 2018.

Proposed distribution for longline catcher processors:
Option 1: Equal share – all eligible vessel owners will receive an equal share of the longline catcher processor allocation.

Option 2: Tiers – establish three tiers based on total pounds of directed GOA Pacific cod harvested by the vessel from 2016 to 2018. Vessel owners receive an equal share of the tier allocation.

Tier level	Average landings (best 2 of 3 years)	Allocation	Est. number of eligible vessels
1	> 4,000,000 pounds	40%	1
2	1,000,000 – 3,999,999 pounds	50%	3
3	< 999,999 pounds	10%	2

Trawl catcher processors (1%): Proposed **vessel-based** distribution.

Proposed eligibility criteria for trawl catcher processors:
Vessel must have been used to harvest GOA Pacific cod in a directed fishery in any two of three years from 2016 to 2018.

Proposed distribution for trawl catcher processors: eligible vessel owners will receive an equal share of the trawl catcher processor allocation.

Processors – 26%: Based on initial comments from stakeholders, ADF&G proposes to calculate the allocation to eligible GOA Pacific cod shore-based processing facilities based on the average wholesale value of GOA Pacific cod processed at the facility from 2013 to 2017 using Commercial Operator's Annual Report (COAR) data.

Proposed processing facility eligibility criteria:

1. Processing facilities must have processed GOA Pacific cod in 2018.
2. Processing facility must have a 2018 first wholesale value of $10,000 or greater for GOA Pacific cod.

3. The COAR data must show that the processing facility had a demonstrated revenue loss for GOA Pacific cod in 2018 as compared to their average wholesale value of GOA Pacific cod processed at the facility from 2013 to 2017.

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

Option for Tender vessels: Include Tender vessels by subdividing the processor allocation into two pools: one for processing facilities (X%) and one for tender vessels (X%).

Proposed eligibility criteria for tender vessels:

1. Tender vessel must have been listed on a signed a contract with processing company in 2018 to tender Pacific cod in the GOA.
2. Tender vessel must have been used to tender GOA Pacific cod in two out of three years (2015 to 2017) based on signed contracts with a processing company to tender Pacific cod from the GOA.

Tender vessel owners that meet the eligibility criteria will receive an **equal payment** of the tender vessel allocation.

Communities – 4%: Based on initial comments from stakeholders, ADF&G proposes to allocate a portion of the funds to fishing communities in the GOA that depend on revenue generated from fish landings and other economic activity related to the fishery. These revenues comprise a significant portion of local operating budgets and are used to support education, public works, ports and harbors, and other services.

ADF&G proposes that community entities eligible to receive funds would identify specific expenditures for managing, repairing, or maintaining infrastructure, services, or habitat that support Pacific cod commercial fisheries in the region prior to receiving funds from Pacific States Marine Fisheries Commission.

Proposed eligibility criteria for communities:

1. GOA Pacific cod must have been landed in the community in 2018 based on COAR buying data.
2. GOA Pacific cod landed in the community must have an average exvessel value of $10,000 or greater from 2013 to 2017.
3. Community must have a demonstrated loss in exvessel value for GOA Pacific cod in 2018 as compared to the 2013 to 2017 average.

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

Research - 30%: Information from NOAA Fisheries shows that over the past 6 years, the GOA has been experiencing extended and severe marine heatwaves. From June 2014 to January 2017 the North Pacific, including the GOA, had increased temperatures over a region of approximately 2 million km^2 with more than 2.5 °C warmer than the long-term mean (1982 to 2012). The 2014 to 2016 marine heatwave changed the ecology of the region with reduced phytoplankton production, a shift in zooplankton production from large lipid-rich (higher fat) copepods to small lipid-poor copepods, and reduced forage fish populations such as capelin and Pacific sand lance. Species at the top of the marine food chain, including Pacific cod, experienced lower recruitment (reduced juvenile survival) and increased mortality was documented in fishes, birds, and mammals.

Research funds will be available by competitive bid. Funds will be available for scientific research projects that provide information to help fishery scientists and managers to assess GOA Pacific cod stock conditions and develop conservation and management measures for the GOA Pacific cod fishery in response to warm water and other variable ocean conditions. The primary goals of research funds are to further our understanding of the cause of the 2018 GOA Pacific cod fishery failure and to help managers avoid and mitigate the impacts of future Pacific cod fishery disasters that cannot be prevented.

Based on consultations with GOA Pacific cod assessment scientists and managers, ADF&G recommends funding research projects that are focused around three linked themes:

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, modelling, genetics, surveys, and maturity.

Administrative – <1%: ADF&G is proposing to allocate funds to cover salary and benefits for a Program Coordinator position to oversee the fishery disaster program on behalf of the State of Alaska. Fishery disaster coordination is not expected to require full-time year-round work. Funding for this position is expected to cover an average workload of 37.5 hours per month plus indirect costs.

From:
To: DFG, 2018GOAPacificCod (DFG sponsored)
Cc:
Subject: Goa cod disaster
Date: Sunday, July 26, 2020 8:50:41 AM

To whom it may concern,

I have participated every year since 1992, in GOA cod harvesting. Pots trawl and longline.

I oppose the whole plan as presented.

This disaster fund is for 2018 forward. Not for prior years of fishing.

Past participation has already been rewarded.

The current distribution plan does not account for operations that spent 100s of thousands of dollars In late 2017 to upgrade their operations going forward into 2018 and beyond. Or for operations that purchased LLPs that are endorsed for pcod harvest in late 2017.

Past participation does not guarantee future outcomes.

I would support equal split in all sectors.

I believe all plans should include new purchases of pcod endorsed LLPS In 2017.

The opportunity to participate was diminished because of the 2018 disaster . NOT THE 2016 or 2017 season.

I STONGLY OPPOSE 30% for research funding. There is funding already for research in the form of observer program and surveys that are not being used now.

I would support a 10% research funding. This would be in par with the California crab disaster relief fund of 2015 - 2016. (29 million and 2.6 million for research.)

CRFBC

From:
To: DFG, 2018GOAPacificCod (DFG sponsored)
Subject: disaster relief
Date: Sunday, July 26, 2020 3:08:28 PM

This comment is for the proposed vessel based distribution for pot catcher vessels eligibility criteria;

1. The proposed harvest years of 2016 to 2018 do not represent a fair range for vessels that opted out of fishery after the collapse in 2017 due to attrition. The 2017 season represented the first collapse in the cod fishery as the state managed fishery for pot and jig was down in participation. One third of the combined quota for the pot and jig sector was all that was harvested. The federal /parallel fisheries in the fall of 2016 and early 2017 were showing signs that the quotas set for the state fishery were not likely to be met. Therefore, it is inevitable that some long time participants opted to sit out.

2. The pot fishery is the most costly to execute, and committing to a season is expensive. Gear has to be taken out in multiple trips for the <58 foot class which adds to fuel costs. The pots used can price in excess of 1000 dollars. Bait is around 90 cents a lb. which is more than double what we get paid for the fish itself. Gear loss, insurance, add more the to cost of doing business. A long season is best so you can hedge your expenses.

All this being said, what I am suggesting is that you expand your parameters for pot catcher vessels to five years like you have for jig vessels to be fair.

Franjo

From:
To: DFG, 2018GOAPacificCod (DFG sponsored)
Subject: GOA Cod Distribution plan
Date: Sunday, July 26, 2020 7:43:47 PM

I held a jig permit and actively fished cod from 2012-2019, except 2018. I did not renew in 2018 because my experience in 2017 was that cod stocks were crashing. By the time my boat was ready to fish, it was painfully obvious that there were no cod to catch in 2018. I didn't spend the money to renew a gear card for a fishery that was basically not happening.

The problem with the current jig distribution plan is that it does not reward production and ignores those of us who are active participants but did not renew in 2018. This is not a fair distribution plan and unfairly rewards those who simply renewed and had a handful of pounds, versus those with actual history of cod jigging.

I propose that anyone who did not renew in 2018 but had 4 of 5 previous years and landed at least 10,000 lbs be included in the distribution plan.

Thank you.

Sincerely, Gregory Gabriel
F/V Miss Michelle

Sent from my iPhone

From:
To: DFG, 2018GOAPacificCod (DFG sponsored)
Subject: Cod disaster distribution
Date: Wednesday, August 5, 2020 12:53:54 PM

Hello, my name is Dale Pedersen and I fish cod in the western gulf.
All I am asking for you to do is be fair about this process, use some common sense and treat us all equally.
As you probably know the way things went with the pink salmon disaster money was a joke! The appeals process was an even bigger waste of time.
A good example of how fast things can move is the CARES act distribution of 1200 dollars to just about everyone in the USA.
Keep it simple and fair.
Thank you.

Sent from my iPad

This letter is in regards to the Distribution Plan for funds appropriated to address the 2018 Gulf Of Alaska Pacific Cod Disaster.

As stated in the guidelines, the dispersement of the funds are intended to 1) assist fishery Participants harmed by the 2018 GOA Cod Disaster.
And 2) Improve Fishery information to assess and forecast future Fishery Performance and to develop management approaches that avoid and or mitigate the impact of future disasters that can not be prevented.
Participation and Performance.

I would just like to address the distribution plan for the Harvesters and the 29% proposed for the Trawl Catcher Vessel-based Distribution and the options of 1) Equal Shares or 2) division based on Production "Tiers."

I am of the opinion that Option 2) The Division of funds based on Production "Tiers" is the most prudent option. Such a precedent in dispersement of Disaster funds was set in the 2016 Pink Salmon Disaster Relief program. As stated in the proposal guidelines for funds dispersal, Participation and Performance should be the main principals of dispersement.

Maximum Performance requires initial investment. I bought into this Fishery. I bought a top producing boat because that top of the line equipment tied directly to top tier Production. Production also requires Participation. The effort made by each participant, is shown by their Production History and is represented in the design of Option 2 Tier System. Disaster funds should be appropriated accordingly as the effect of the Loss arguably follows the same tier structure.

Michael Galligan

From:

DFG, 2018GOAPacificCod (DFG sponsored)
Subject: 2018 gulf of Alaska Pacific Cod disaster
Date: Sunday, August 9, 2020 10:30:22 AM

My name is Sidney Wolford and I'm a 25 year pacific cod fisherman.
As a long time hired skipper and permit holder I would support the funds going to the vessel, only if the crew and hired skippers were paid directly from the fund as was the case with the 2016 PWS pink salmon payout. This is the only way that crew can be assured of getting paid.
I do not support any plan that would leave out any vessel or permit holder.
I feel everyone should share in the funds.
I also feel that 30% is much too high for the research sector. It suffered no loss. The fisherman suffered the loss.
I think 10% would be a appropriate share for research. Similar to other recent disaster relief pay outs.
Thank you for considering these ideas
Sidney Wolford
Sent from my iPhone

From:
To: DFG, 2018GOAPacificCod (DFG sponsored)
Subject: Dean Pedersen/ cod disaster
Date: Sunday, August 9, 2020 10:34:08 AM

Hello, my name is Dean Pedersen and I would like you to distribute the cod disaster funds equally among sectors.
We are all in this together and every little bit of help would be appreciated.
Please don't over complicate the process like what happened with 2016 pink salmon disaster money!
Thank you, Dean Pedersen

From:
To: DFG, 2018GOAPacificCod (DFG sponsored)
Subject: Pcod disaster
Date: Sunday, August 9, 2020 8:47:00 PM

I jig fished PWS in 2016 and 2017, in 2018 I didn't renew my permit because all the cod had disappeared and it wasn't worth going fishing anymore.

Now I am reading the draft plan that I will be excluded from the equal split share because I did not hold a permit in 2018. Only fisherman who held a permit in 2018, whether they fished or not will qualify. Qualifying Deliveries are to be taken from any year during 2015-2018.

Please reconsider this and allow for permit holders who held a permit during 2015-2018 and that made deliveries exceeding the 1500 aggregate poundage in 2015-2018 to qualify for the equal split.

Thank you.

Kenneth B Jones
Samani Fisheries LLC

FV Serenity
FV Second Wind

From:
To: DFG, 2018GOAPacificCod (DFG sponsored)
Cc:
Disaster Relief fund 2018 GOA Cod season
Date: Monday, August 10, 2020 11:15:20 AM

To whom it may concern,

My name is Ben Ley, owner and operator of the F/V Cape St Elias. We participate in the cod fisheries in the GOA and appreciate the funding that is going to be available to reduce the burden left by the resource collapse in 2018. I support the eligibility criteria set forth in the draft for the trawl catcher vessels. I also support option 2; Tiers, for distributing the funds allocated. I feel this is an accurate to way to represent the fleets competitiveness and give all participating vessels an accurate stake at their recent historical catch. I also want to stress the importance of the trawl surveys for our fishery. If there is money directed to the resource we would benefit the most from the stock assessment surveys. Thank you for the opportunity to give input, I am always available to answer questions and work together to solve industry problems.

Sincerely,
Ben Ley

Lady Elias LLC

August 11, 2020

RE: Gulf of Alaska Pacific Cod disaster declaration

I am recommending Option 1, equal shares.

As stated in the distribution guidelines, communities rely on these funds. I am a longtime member of the Sand Point community. The majority of my crew is made up of "local hire" with family roots in Sand Point and King Cove area.

Some local vessels may not be as competitive, but their maintenance and gear costs are relevant in these difficult economic times. According to my calculation, the lower tier would barely pay for the fuel at the end of the season, while the top of the tier would pay for fuel, maintenance, gear loss and other expenses. This in my mind is an unfair difference.

In addition to the 2018 Gulf of Alaska Pacific Cod disaster, I would recommend using 2018 as the qualifying year, instead of the 3 years suggested.

Thank you for your time and consideration.

Cherilyn Lundgren

PSPA
PACIFIC SEAFOOD
PROCESSORS ASSOCIATION

August 11, 2020

To: ADFG Commissioner Vincent-Lang

Re: 2018 Gulf of Alaska Pacific cod Federal Disaster Fund Distribution

Thank you for the opportunity to comment on the draft distribution plan for federal funds appropriated to address the 2018 Gulf of Alaska Pacific cod disaster declaration. The Pacific Seafood Processors Association represents shoreside processing plants operating across Alaska, including two companies with shoreside processing plants historically dependent on Gulf of Alaska Pacific cod located in Kodiak, King Cove and Sand Point. We appreciate the progress made in development of the plan and support an expedited implementation. We also support the inclusion of all of the proposed categories for disaster relief funds identified in the draft plan. We have a few specific comments as follows.

Distribution to each category

Our initial comment letter noted that shoreside processing of groundfish is highly capital intensive, with tremendous fixed costs just to open our doors and operate, regardless of whether the fishery is strong or weak. The 80% reduction in 2018 from the previous year's Gulf Pacific cod harvest represented a significant loss to processors dependent on Pacific cod. We proposed an approach that evenly mitigates losses from the 2018 disaster to both harvesters and processors. In effect, harvesters and processors compensated at the same percentage of their 5-year average ex-vessel value and average gross revenues, respectively (i.e., disaster funds plus 2018 actual fishery value = X% of historic average, with the same target percentage of historic average for both harvesters and processors).

The draft distribution plan appears to compensate harvesters for about 14% of their 2018 losses ($9.7m/$70.9m) or 37.5% of their historic 5-year average (($9.7 m + $27.1 m)/$98 m). Similar data are not provided for the processing sector, so it is not possible to determine what percentage of its historic average the processing sector is compensated under this proposal. That information would be helpful in reviewing the next draft, and we continue to support a distribution that equally compensates both sectors. If it necessitates an increase in the processing sector component in order to get closer to an equitable approach, it should come from the research component, not the harvester allocation. Overall, if there is a rationale for the distribution to each of the categories, that would be helpful to include.

Tender options

The draft distribution plan also includes an option to include tender vessels within the processor funding component and specifically asks for input to further evaluate this option. This may be a more complex

situation to standardize. Processor and tender relationships vary, some processors paying a daily rate regardless of pounds of fish tendered and some paying based on pounds tendered. Some processors don't use tenders at all. In our member companies' experience with the GOA Pacific cod fishery, tenders are paid a daily rate to secure their availability, regardless of pounds tendered. Thus, distributing additional funds to tenders out of the overall processing sector allocation, if a loss was not incurred, is not reasonable. The current draft plan does not require tenders to demonstrate any revenue loss associated with the 2018 GOA Pacific cod fishery, it only requires showing that they participated as a tender in two of three years. Given the variable nature of tender and processor relationships, if tenders continue to be included, the State should develop an approach that would benefit only those tenders that were paid on poundage basis and can demonstrate a loss as a result of the fishery disaster, similar to the bar for harvesters and processors.

Research

PSPA continues to support the intent to use a portion of the funds for supplemental research, given the heightened need to better understand continued low stock levels resulting from the marine heatwave in 2014-2016 and subsequent warm water trends in the Gulf of Alaska. We do not support using funds to replace surveys that are historically funded by and the responsibility of NOAA or the State of Alaska. We appreciate and support the three biological research themes in the draft distribution plan, especially those that focus on juvenile survival and recruitment. We hope that the State uses such funds, which would have otherwise been direct assistance payments to fishermen, processors, and communities, to support research that will have a direct contribution to fisheries management and the potential for restoring the fishery.

Thank you for the opportunity to comment, and we look forward to reviewing the second draft of the distribution plan later this month and providing further public comment.

Sincerely,

Chris Barrows
President

From:
To: DFG, 2018GOAPacificCod (DFG sponsored)
Cc: Bush, Karla L (DFG)
Subject: Alaska Jig Association comments (2018 GOA P.Cod Federal Disaster Draft Distribution Plan)
Date: Wednesday, August 12, 2020 7:16:56 AM

Dear Commissioner and all those involved,

The Alaska Jig Association (AJA) appreciates the request from the State for stakeholder organization input, as regarding the first draft distribution plan recommendations for the 2018 Gulf of Alaska (GOA) Pacific cod Disaster Fund. We look forward to working with the State in crafting a fair and equitable distribution plan, for stakeholders affected by the 2018 Pacific cod disaster in the GOA.

AJA represents a wide variety of Jig gear harvesters throughout the State of Alaska, the majority of whom operate in the GOA.

Regarding allocation:

To reiterate, we advocate for 20% to Research, 54% to Commercial sector, 22% to Processors, and 4% to Municipalities.

Regarding eligibility for the Jig sector:

We consider the Jig sector eligibility requirements, as outlined in the first draft; to be adequate and satisfactory.

We reiterate- a valid 2017 Jig permit holder, who subsequently lost his vessel of operation due to sinking during 2017/2018, should be considered eligible despite not holding a valid 2018 Jig permit.

In concluding our initial input to the first draft review of the distribution plan, we would like to express our thanks for the opportunity to be involved.

Sincerely,

Darius Kasprzak
President, Alaska Jig Association

To: ADFG Commissioner Doug Vincent-Lang
From: Under Sixty Cod Harvesters
Date: August 12, 2020
Re: GOA Pacific Cod Disaster Relief Funds

Commissioner Vincent-Lang:

Thank you for this opportunity to comment on the Draft Distribution Plan for Gulf of Alaska (GOA) Pacific Cod Disaster Relief Funds. The Under Sixty Cod Harvesters represents member vessels under 60 feet harvesting Pacific cod with pot gear in Alaska's state and federal waters. Several of our members have historically fished the GOA statewater cod fisheries, and have been impacted by the GOA Pacific cod stock decline.

USCH generally approves of the categories and associated fund percentages proposed in this draft. However, due to the Covid-19 pandemic's effect on canceled bottom-trawl surveys in the Bering Sea and Aleutian Islands (BSAI), we ask that funds be made available towards future data collection and monitoring needs in the Gulf of Alaska potentially impacted by canceled surveys. If the Gulf of Alaska's survey is canceled, management will set the annual Acceptable Biological Catch with last year's information, potentially raising uncertainty buffers impacting the Total Allowable Catch. Funds should be made available to assist with research needs under the first category "GOA Ecosystem Research."

Regarding distribution of funds to the pot catcher vessel sector, we recommend using the tiers mechanism described in Option 2 using catch history for two of the three years from 2015, 2016 and 2017. Using this time period better reflects vessel catch history. In 2018, many vessels opted to not fish in the Gulf of Alaska due to the predicted poor harvest. Therefore using 2018 as a reference in the GOA cod fisheries does not properly capture a vessel's historical participation in the fishery.

Thank you,

Todd Hoppe

President, USCH

Brett Veerhusen

Executive Director, USCH

In your evaluation of the GOA cod stock collapse and the related federal disaster funds to be distributed I would like to share a few comments:

- A third of the funds be dedicated to GOA ecosystem research:
  Knowledge obtained will have a long-term benefit for all species in the Gulf and the communities dependent on these resources.
- An additional third be distributed to communities:
  Processing companies, processing workers and communities' utilities will be compensated for their losses. This is not perfect but should be meaningful to support communities.
- The remaining third be distributed by catch history in the directed cod fisheries: The damage to the fishery was in 2018. I would suggest that the data used in determining proportional vessel damages (including crew) be based on the best three (3) of the previous five (5) years (2013-2017). Using the best 3 of 5 years gives each vessel the opportunity to make their strongest claim and it will smooth seasonal irregularities like vessel breakdowns, crew accidents or market disruption. My experience with other claims programs, as well as developing catch share programs while I was on the Council, has shown that providing fishermen with a "best 3 of 5" option substantially reduces complaints, inequities and appeals. Please note that "catch history" should be defined as actual deliveries of cod for which compensation was paid as recorded on a fish ticket. Catch history should not include cod bycatch, cod discards and/or cod sector allocations.
- Let's not repeat the shortfalls experienced through the Salmon Disaster Relief distribution process. No damage amounts should be determined prior to determining ALL damage awards. The process should allow vessel owners to make a claim for their skipper and crew. Remember, the harm was to the vessel, skipper and crew as a "joint venture" enterprise. The vessel owner has already done the accounting for the joint venture. Skippers and/or crew may not be aware of the claims program or for a host of reasons not engage. If the vessel owner has provided an individual with a 1099 for the 2018 cod season, he has contact information and should be allowed to file a claim or the joint venture enterprise that includes skipper and crew. The claims process will be more efficient and equitable if it is structured this way. With the above vessel/crew allocation being determined disbursements be make directly to skipper, crew and vessel owner.

From:
To: DFG, 2018GOAPacificCod (DFG sponsored)
Subject: comment on distribution plan
Date: Wednesday, August 12, 2020 12:48:08 PM

My name is Bob Martin, I have been active in the Kodiak area Pacific cod/ Rockfish Jig fishery since 1999! This fishery has contributed a large portion to my commercial fishing income.

I have read the Distribution Plan for the 2018 Pacific Cod disaster funds. I have two comments I would like to share.

#1 - Permit Based, Equal share! I do not believe this is the best plan to get the disaster funds to those that need it most! Many of us in the Jig fleet have worked very hard through the years to make this fishery viable and worthwhile. Its difficult, the learning curve is steep and it requires a lot of effort! Someone that buys a permit and doesn't put out the effort should not be awarded the same as a fishermen that dedicated himself to be successful! A permit holder that makes an occasional delivery obviously doesn't have the same stake in the fishery that a guy who has 20 or more deliveries. I would support a "***Delivery***" based tier system! The number of deliveries gives relevance to those that work the hardest, maybe not always delivering the most pounds but doing there share to make it work, those individuals should receive a larger share.

#2- 2018 Permit required to qualify! I believe this requirement needs more thought! Many jig fishermen saw this crash coming! I personally keep good records and noticed how the fish average size was steadily getting smaller and the numbers of fish were going down. I made a decision in 2017 to take the year off and rebuild my vessel, knowing the cod fishery would be marginal. I know others that made that same decision in 2018. My point is, if a fishermen has a history of renewing his permit over a number of years he should not be penalized for taking a year off. My suggestion would be similiar to the plan for the pot sector. If you renewed your permit 3 out of the 4 qualifying years between 2015 and 2018 a permit holder should qualify!

Thank you for considering my comments!

Sincerely, Bob Martin

From:
To: DFG, 2018GOAPacificCod (DFG sponsored)
Subject: Comments on Draft Distribution Plan
Date: Wednesday, August 12, 2020 5:26:25 PM

My comments are directed at the proposed 30% of allocated funds for research.

I would encourage ADFG to allocate funding for multi-year, coordinated projects.

I agree with the three linked themes (understanding warming temperatures, expanded early life history, and resolving spatial dynamics).

In particular, I would like to comment on the third linked theme: stock spatial structure.

Although there appears to be some genetic differentiation within the Gulf of Alaska (GOA) management area and some cross migration between the Western GOA and southeastern Bering Sea, the Pacific cod stock in the GOA region is currently managed as a single stock. The potential exchange of individual Pacific cod between populations or management areas has important consequences to the conservation of population diversity and may affect Pacific cod fisheries productivity and the health of the overall stock. Nevertheless, the understanding of Pacific cod spatial dynamics remains a major data gap.

Traditional tag and recapture methods typically provide poor temporal and spatial resolution of site fidelity, degree of movement or actual timing of large scale migrations. Acoustic telemetry, however, provides an alternative method that is fisheries-independent approach to investigate spatial dynamics. The use of acoustic telemetry allows continuous monitoring for the presence or absence of tagged fishes over the course of several years and provides a means to investigate movement patterns on temporal and spatial scales that are relevant to management while filling in significant gaps in our current knowledge of regional Pacific cod stocks.

Suggested topics:

a. Document seasonal movements and residency patterns of tagged (acoustic or traditional tags) Pacific cod and relate movements and residency to sex, spawning season, water temperature, and food availability.
b. Determine if stock composition changes seasonally within a geographic area does (ie are December Pacific cod in an area, different than cod captured in the same area in March?).
c. Document if there are differences in movement patterns by Pacific cod in coastal waters compared to cod residing in GOA offshore waters

Mary Anne Bichop

To Whom It May Concern:

Thank you for presenting the draft relief plan. We appreciate the strong support for the fishing industry.

- **Allocation of fund**

We noticed that the draft plan allocates approx. $ 7.3 MM (30%, the second most significant portion of the disaster funds) for research projects, the majority of which focus on addressing climate issues.

While we agree on the importance of research, we want to ask if Federal disaster (emergency) money is the appropriate place where such funding should come from, unless such projects would bring actionable information that will make a difference for the GOA Cod fisheries.

The players in this industry (fishermen and plants), have been dramatically affected by the continued Cod disaster, along with the COVID 19 pandemic, threatening the survival of many. If a bigger portion of those research funds were redirected to boats and plants, more jobs would be saved.

- **Tender boat eligibility**

While we recognize the importance of reviewing signed tender agreements associated with the participating Cod tender vessels, we would like to point out that fish processing plants and tender boat operators do <u>not</u> always exchange a written agreement.

The majority of Cod is delivered directly by the fishing vessels rather than tender boats. Because of the limited needs for Cod tendering services, fish processing plants often make a "handshake" agreement with tender vessel operators. It's known as a common practice in the fishing industry, especially for small (and therefore, vulnerable) entities that need the relief fund the most. Please kindly consider removing the requirement.

Fish processing plants have reported to ADFG all fish tickets, which represent legal documents, and ADFG has the Cod delivery history per each of the tender boats to determine the eligibility.

Here is an example of a fishing/tendering vessel that delivered Cod as follows without signed agreements:

(lbs.)	As tender boat	As fishing vessel
2015	936,945	
2016	1,182,219	
2017	369,637	
2018		240,747

Ted Kishimoto

UNITED STATES SEAFOODS

August 11, 2020

Attn: Kari Winkel
Alaska Department of Fish & Game
PO Box 115526
Juneau, AK 99811-5526

Re: 2018 Gulf of Alaska Pacific Cod Federal Disaster

Dear Ms. Winkel:

Thank you for the opportunity to comment on the proposed distribution plan for relief from the Gulf of Alaska Pacific cod fishery disaster. The F/T VAERDAL, a United States Seafoods, LLC-owned vessel, has a long history of operating in the trawl catcher processor directed Pacific cod fishery in the Gulf of Alaska. Prior to the disaster, the VAERDAL regularly participated in the directed fishery at each opportunity. We believe the proposed method of distributing disaster funds to the trawl catcher processor sector is equitable.

Participation in the directed Gulf cod fishery is the proper metric for determining qualification for disaster relief. Directed fishing has completely ended since the disaster. As a small catcher processor, the VAERDAL was able to participate in the Gulf directed Pacific cod fishery, which was infeasible for larger vessels that require higher amounts of catch and throughput to operate. Although small, the directed Gulf Pacific cod catcher processor fishery filled an important niche in the VAERDAL's yearly fishing plan. Importantly, this directed fishery also did not disrupt or constrain others, which often happens with non-directed fishing (i.e., bycatch). For these reasons, compensating losses from the directed fishery are most appropriate.

Vessels that use Pacific cod only as bycatch (rather than depend on it as directed catch) have continued to catch and retain Pacific cod despite the disaster. Their dependence on cod is limited since these incidentally caught Pacific cod supplement catches of their primary targets. Directed Pacific cod fishery participants have no similar continuation of revenues from the directed fishery and have lost all directed access because of the disaster.

In conclusion, we agree with the proposed method of distributing disaster relief funds to the trawl catcher processor sector. Thank you for your consideration.

Sincerely,

Matthew Doherty
President

From: Arthur Holmberg
To: Winkel, Kari M (DFG)
Subject: 2018 cod
Date: Thursday, August 13, 2020 9:26:03 AM

Hello Kari my name is art Holmberg I'm a stake holder for the pot c/v and trawler. F/V Tern out of sand point area610. My concern is that the way this is set up is not even close to being fair therefore I would hope that you would take into consideration that this should be soil equall. Thanks for reconsider this split. Art Holmberg. F/V Tern

These comments address the research portion of the DRAFT Distribution Plan for the 2018 GoA Pacific Cod Disaster Declaration.

Broad comments:
In order to address what variables contributed to the 2018 Pacific cod fishery disaster, I would encourage ADFG to 1) allocate funding for multi-year projects, 2) prioritize projects with existing capacity for addressing themes, and 3) prioritize proposals that can coordinate their efforts.

1) Multi-year projects would allow for repeat data sets from field work which vary significantly by year. This would provide some background information in preparation for the next warm water event in the GoA and insights into what variables contributed to the 2018 decline.

2) Current forage fish research throughout the GoA may provide a means to use existing infrastructure to maximize use of available funds.

3) Projects with collaborators or coordination between individual projects would reduce redundancy between projects and allow for communication between PIs.

I agree with the designated research themes with the following suggestions:

Migration patterns: Acoustic telemetry is a more suitable method for resolving movements (also allows for fin clips for genetic work) than traditional tag and recapture methods which have low recovery rates and resolution. Acoustic-tagging of P. cod would provide 1-2 years of data on movement at target areas (with strategically placed receivers) and could provide temperature/depth data.

Growth: Most research on P. cod growth in response to temperature has focused on embryo-larval stages and has not included multiple life stages. Post-hatch larval growth decreases in response to higher temperatures due to physiological constraints including higher metabolic rate and the onset of exogenous feeding (Hurst et al., 2010). It is unclear if physiology continues to constrain growth at higher temperatures during juvenile and adult stages. Environmental variables like prey quantity/quality may be more important determinants of growth at later life stages. The quality of cold-water vs. warm-water zooplankton should be evaluated further and linked to fat storage, foraging behavior, and growth if we want to better understand how these variables influence survival and recruitment.

References

Hurst, T., Laurel, B., Ciannelli, L., 2010. Ontogenetic patterns and temperature-dependent growth rates in early life stages of Pacific cod (*Gadus macrocephalus*). Fish. Bull. 108, 382–392.

Alysha Cypher

From:	Paul Holmberg
To:	DFG, 2018GOAPacificCod (DFG sponsored)
Subject:	Sea King Paul
Date:	Thursday, August 13, 2020 2:49:02 PM

My name is Paul Holmberg and I participate in the Western Gulf of Alaska pot cod fishery. I feel that everyone should be treated and paid equally.
Paul Holmberg

Robert Puratich

August 14, 2020

ADF&G, Attn: Kari Winkel
PO Box 115526
Juneau, AK 99811-5526

Re: DRAFT Distribution Plan for funds appropriated to address the 2018 Gulf of Alaska Pacific cod disaster declaration.

Dear Board Members,

I am an owner of the FV Marauder which participates in the **Trawl CV** sector for cod. I support **Option 2** of the draft proposal for this sector. The tiered allocation would fairly represent investment in the fishery. The recent years 2016-2018 would best represent the potential loss for 2018, the relevant year of this disaster declaration.

The 30% allocation for research seems grossly excessive. A much smaller allocation would be appropriate

Sincerely,

Robert Puratich
F/V Marauder

From:

DFG, 2018GOAPacificCod (DFG sponsored)
Subject: Cod disaster payments
Date: Friday, August 14, 2020 9:23:54 AM

I think all participants should be paid equally, the 4 tier plan doesn't work. The highliners have already been rewarded and the bottom class are the ones that need the disaster money the most. There is no sense in dividing this country any more than it already is. We are all in this together and it's time to be treated equally.
Thank you.
Dale Pedersen
Sent from my iPad

F/V Pacific Star ~ PacStar, Inc.
Laura Fishereis, JV
F/V Evie Grace ~ Evie Grace Fisheries, LLC

August 14, 2020

To: ADFG Commissioner Vincent-Lang
DFG.2018GOAPacificCod@alaska.gov

Re: 2018 Gulf of Alaska Pacific cod Federal Disaster Fund Distribution Plan

We are a trawl family operating out of Kodiak with two vessels – The F/V Pacific Star and the F/V Evie Grace (Laura Fisheries, JV).

Thank you for the opportunity to weigh in on the proposed Allocation and Distribution of the 2018 Gulf of Alaska Pacific cod disaster funds.

We are in support of the proposal submitted by Alaska Groundfish Data Bank.

In the proposed Trawl catcher vessel sector distribution:

- We support that all retained cod catch should be used, not just the directed cod catch as we depend on the revenue generated from both the directed and incidental cod catches.
- We support using 4 out of 6 qualifying years.
- We **support the tiered approach** and not the equal share

Thank you for your consideration.

Colleen Helligso /s/

Colleen Helligso, Owner

2018 Gulf of Alaska Pacific Cod Disaster Declaration

In response to the eligibility for payment I am the boat owner and also the boat operator so license/permit-based or vessel based would not concern me. I would recommend that, as in the 2016 Salmon disaster relief, the program is vessel based.

As for the proposed eligibility criteria I strongly support Option 2, the tiered approach. There is already precedent for the tiered approach as the 2016 Salmon disaster payout was based on a tiered system.

Also the amount of relief directed to the Harvester sector was based on each gear types historical value of the Cod fishery from 2013 to 2017. It would not make sense to me to use the historical catch of each sector to determine the percentage each sector receives and then allocate the disaster money based on an equal share basis. A vessel that historically caught more Cod would feel a bigger loss from not being able to fish Cod in 2018 and therefore would have earned more compensation than a vessel that historically caught less Cod.

I would also implore the Department to finalize a plan and distribute these funds as quickly as possible. The state of all fisheries in Alaska are suffering due to the Pandemic whether it be lower prices at the dock for fish or a lack of fish to catch. The plan as is using a tiered approach seems the fastest way to provide needed relief to fishermen.

Mike Alfieri

AKUTAN · COLD BAY · NELSON LAGOON
ALEUTIANS EAST
BOROUGH
FALSE PASS · KING COVE · SAND POINT

August 14, 2020

Alaska Department of Fish & Game
Attn: Kari Winkel
PO Box 115526
Juneau, AK 99811-5526

Transmitted by email:

DFG.2018GOAPacificCod@alaska.gov

Thank you for the opportunity to comment again on the proposed distribution plan for funds related to the 2018 Gulf of Alaska Pacific cod fishery disaster. On April 10th the Aleutians East Borough submitted Resolution 20-56, providing recommendations on the plan. The Assembly has reviewed ADFG's proposed plan released July 21 compared to the Aleutians East Borough recommendations:

	AEB Res 20-56	ADFG plan
Admin		1%
Research	10%	30%
Communities	15%	4%
Processors	20%	26%
Harvesters	55%	40%

The Aleutians East Borough Assembly reiterates our recommendations made in Resolution 20-56. The Assembly took action at their meeting yesterday August 13th and I write this letter at the direction of the Assembly. In addition to expressing our support for Resolution 20-56, the Assembly noted that the ADFG proposed plan sends too much to research, and that 10% is the more appropriate amount for research that contributes to stock surveys and assessments. We also strongly feel that 55% is the fair percentage that fishermen receive. The Assembly did not comment on the distribution among the different gear groups as proposed in the ADFG plan.

The Borough appreciates the process the ADFG is following to enable public input. We are anxious for these funds to be distributed before January 2021 if possible. Many cod fishermen and communities are having a particularly difficult time right now. The Borough, along with the Cities and Tribes of King Cove, False Pass and Sand Point signed our original letter December 29th, 2017 requesting consideration of this relief, and the relief is needed, now more than ever.

Please reconsider our recommendations in Resolution 20-56. Thanks for your continued leadership in promoting sustainable fisheries and communities, especially during these challenging times.

Sincerely,

Alvin D. Osterback, Mayor

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ALEUTIANS EAST BOROUGH

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RESOLUTION 20-56

A RESOLUTION OF THE ALEUTIANS EAST BOROUGH ASSEMBLY PROVIDING RECOMMENDATIONS TO THE ALASKA DEPARTMENT OF FISH & GAME ON DEVELOPMENT OF A PLAN TO DISTRIBUTE THE 2018 GULF OF ALASKA PACIFIC COD FISHERY DISASTER RELIEF FUNDS.

WHEREAS, an 80% reduction in the 2018 Gulf of Alaska Pacific Cod fishery total allowable catch from the previous year prompted a disaster declaration request by the State of Alaska to the Secretary of Commerce, who made a fishery disaster determination in September 2019, and

WHEREAS, the State of Alaska is working with the National Marine Fisheries Service and affected stakeholders to distribute $24,416,440 for the disaster relief effort through the Pacific States Marine Fisheries Commission, and

WHEREAS, the Alaska Department of Fish & Game is currently soliciting input from affected stakeholders on developing a distribution plan for the disaster relief funds, and

WHEREAS, Pacific cod harvested in the Gulf of Alaska are of high importance to fishermen, processors and communities of the Aleutians East Borough, and

WHEREAS, the Aleutians East Borough Assembly understands that continued surveys and research that contribute to stock assessments are most critical to the sustainability of all Pacific cod stocks.

NOW THEREFORE BE IT RESOLVED, the Aleutians East Borough Assembly recommends that:

- 10 % of the 2018 Gulf of Alaska Pacific cod disaster relief funds be dedicated to funding Pacific cod research, including for stock surveys and assessments
- 55 % of the 2018 GOA Pacific cod disaster relief funds should be direct payments to fishermen.
- 20 % of the 2018 GOA Pacific cod disaster relief funds should be direct payments to processors.
- 15 % of the 2018 GOA Pacific cod disaster relief funds should be direct payments to impacted communities.

BE IT FURTHER RESOLVED, the Aleutians East Borough Assembly supports a simpler approach that would be better for disbursements to fishermen, using low, medium or high rankings, and using 2017 through 2019 as qualifying years.

PASSED AND APPROVED by the Aleutians East Borough on this 9th day of April, 2020.

Alvin D. Osterback, Mayor

ATTEST: **Tina Anderson, Clerk**

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Peninsula Fishermen's Coalition

P.O. Box 116

Sand Point, AK 99661

August 14, 2020

To: Kari Winkel

Peninsula Fishermen's Coalition supports the following changes to the 2018 GOA Cod Disaster Distribution Plan:

- Research: Allocate 15-20% of funds towards research.
- Communities: Adjust community disbursement upward by 10-15%. The communities in the gulf, particularly in the Western Gulf, have basically seen the end of winter fisheries with the cod crash and are in deep trouble. The current 4% allocation makes no meaningful contribution to local governments.
- Harvesters: Peninsula Fishermen's Coalition strongly supports an equal share disbursement to catcher vessels. The current tier system places the majority of the funds in the hands of a few vessel owners. The small vessels in our organization are severely handicapped by this system. Furthermore, the 2018 Cod CV trawl sector in the WGOA operated under an equal catch share agreement, so basing a 2018 disaster on previous history is not the way the fleet operated during the year of the disaster declaration. We are a fleet of 58' vessels that depend on cod heavily in both the trawl and pot sectors and the tier system favors larger vessels that have other trawl fisheries in the Bering Sea and the Gulf.

The 2018 cod disaster and the continuing cod decline in the Gulf has been particularly difficult in the Western Gulf. This has resulted in the closing of the processing facility in the winter of 2020 and most likely in 2021. Spreading as much relief money evenly to as many participants as possible makes the most sense to our organization.

Respectfully,

Kiley Thompson

President, Peninsula Fishermen's Coalition

Revised:

August 14, 2020

RE: Gulf of Alaska Pacific Cod disaster declaration

As a participant in the cod pot/trawl, I am recommending Option 1, equal shares.

As stated in the distribution guidelines, communities rely on these funds. I am a longtime member of the Sand Point community. The majority of my crew is made up of "local hire" with family roots in Sand Point and King Cove area.

Some local vessels may not be as competitive, but their maintenance and gear costs are relevant in these difficult economic times. According to my calculation, the lower tier would barely pay for the fuel at the end of the season, while the top of the tier would pay for fuel, maintenance, gear loss and other expenses. This in my mind is an unfair difference.

In addition to the 2018 Gulf of Alaska Pacific Cod disaster, I would recommend using 2018 as the qualifying year, instead of the 3 years suggested.

Thank you for your time and consideration.

Cherilyn Lundgren

Alaska Groundfish Data Bank

P.O. Box 788 Kodiak AK 99615 (907) 486-3033
Julie Bonney, Executive Director jbonney@gci.net
Katy McGauley, Fisheries Biologist agdb@gci.net

August 14, 2020

To: ADFG Commissioner Vincent-Lang
DFG.2018GOAPacificCod@alaska.gov

Re: 2018 Gulf of Alaska Pacific cod Federal Disaster Fund Distribution

Thank you for your July 21, 2020 letter requesting further input from stakeholders regarding distribution of 2018 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. We appreciate the progress made in development of the plan, particularly your eye towards avoiding the pitfalls experienced with the 2016 pink salmon spend plan and meeting your goal of expedited implementation and payments.

Our comments are structured to address two broad groupings: 1) The allocation of the disaster funds to the four primary funding categories – harvesters, processors, communities and research; 2) Allocations for harvesters and eligibility requirements, particularly the trawl sectors.

Allocation of the disaster funds to the four proposed categories

In our initial comment letter, we advocated that disaster funding between the processing and harvesting sectors should be based on available economic data to mitigate loss equitably across the two sectors. We suggested that harvesters and processors should be compensated at the same percentage of their 5-year ex-vessel value and average gross revenue, respectively. These comparisons have been used in the past for disaster funding to measure equity. Once the recent spend plan was released, AGDB requested this information directly from ADF&G which the department provided.

According to the state, the 2013 – 2017 adjusted average wholesale value is $82.55 million and the 2018 wholesale value was $21.2 million, so the wholesale revenue loss for the shoreside processing sector was $61.35 million. This suggests that shoreside processors would be compensated at 10% of their 2018 losses or made 33% whole (receive in total 33% of their average 2013 – 2017 wholesale value). Based on the draft spend plan, allocations to processors would be 26% or $6.3 million. For ex-vessel value, based on the same data query that was used to allocate the harvester funds among the six catcher vessels sectors (using wholesale value), the 2013 – 2017 average ex-vessel value is $36.5 million and the 2018 ex-vessel value was $10.7 million, so the ex-vessel revenue loss for the catcher vessel sector was $25.8 million. Based on the draft spend plan, allocations to harvesters would be 40% or $9.7 million. This comparison suggests that harvesters would be compensated at 37.8% of their 2018 losses or made 56% whole (receive in total 56% of their average 2013 – 2017 ex-vessel value):

	Ex-Vessel/Wholesale Value			Allocation as:	Alloc+2018 $ as
Sector	2018 loss	2018 Value	2013-17 Avg	% of 2018 loss	% of 13-17 avg
Harvester	$25,765,067	$10,703,598	$36,468,665	37.8%	56.1%
Processor	$61,350,000	$21,200,000	$82,550,000	10.3%	33.4%

It appears that the processing sector needs to be compensated at a higher level to be at or near the same compensation level as the harvesters. AGDB members believe that the research allocation should be adjusted to a lower level (i.e. 15 to 20%) to more fairly compensate the processing sector. The harvester allocation should not be reduced. For example, if the research allocation was 18%, the processing sector at 38% would receive $9.7M, more on par with the harvesters in actual money received yet still compensated far below their average 5-year wholesale value:

	Ex-Vessel/Wholesale Value			Allocation as:	Alloc+2018 $ as
Sector	2018 loss	2018 Value	2013-17 Avg $	% of 2018 loss	% of 13-17 avg
Harvester	$25,765,067	$10,703,598	$36,468,665	37.8%	56.1%
Processor	$61,350,000	$21,200,000	$82,550,000	15.1%	36.9%

Of the three themes suggested for research funding, AGDB members support expanded early life history studies, especially recruitment and juvenile survival, and better understanding of the effects of warming temperatures on Pacific cod ecology to improve the stock assessment; resolving stock spatial structure, migration patterns and connectivity are on the bottom of the list. Stock surveys (NOAA or ADF&G) should not be funded with research dollars nor should any social-economic studies be included.

Allocation for harvesters and eligibility requirements, particularly the trawl sectors

We support the six harvesting sectors as defined in the draft spend plan – Pot CV, Jig CV and CP, Longline CV, Trawl CV, Longline CP and Trawl CP. Dividing the harvester allocation across the sectors based on wholesale value for directed catch versus total retained catch (both directed and incidental) may or may not be fair understanding that only the trawl sectors have significant incidental retained catches of cod. For a trawler, the vessel revenue and economic reliance depends on gross revenue from cod fishing regardless of whether it is caught incidentally in non-cod trawl fisheries or in a directed cod fishery. AGDB did examine GOA total allowable catches (TAC) for cod trawl in comparison to the spend plan catcher vessel trawl allocation: 28.5% versus 29% respectively suggesting the allocation may be equitable. However, our members would appreciate a comparison of allocations across the six harvesting sectors if total retained catch is used versus directed cod catch as presently proposed in the spend plan to understand the affect.

The draft spend plan suggests vessel-based allocation for the trawl sector which we support and gives two options for catcher vessels – tiered payments or equal share payments. Our members support vessel-based allocations and tiered payments. Tiered payments are more representative of the economic dependency of a vessel than equal shares. We would also recommend using 2018 CFEC vessel ownership information to determine who will get the disaster check since that's the year of the disaster.

For the catcher vessel trawl sector eligibility, we would propose the following:

1) Years of qualification: 2013 – 2018
   Note: The funds allocated to harvesters are based on the loss to each sector by comparing the 5-year average adjusted value (2013 to 2017) to the 2018 wholesale value. Truncating the qualifying years to a subset (2016 to 2018) means a vessel's fishing activity contributes to the sector's allocation yet that vessel would not be eligible if it only participated prior to 2016 (2013-2015 for example). As noted in our comments for the first round of public comment, there was no directed fishing for the CGOA catcher trawl sector in 2018 and there has been no directed cod fishing for trawl CPs in CGOA in recent memory. Both communities and processors are operationally different than a harvesting vessel when considering eligibility. Compared to the salmon fisheries (a ten-year look-back and a larger amount of latency), participation in the GOA cod fisheries is much more stable so a 5-year look-back period results in a reasonable outcome.
2) All retained cod catch should be used (not just directed cod catch)

Note: Many of the Kodiak trawl vessels fishing plans depend of mixed species fishing trips. These types of fishing operations are highly dependent on revenue generated from both directed and incidental cod catches.
Must deliver 100,000 pounds or more cod in:

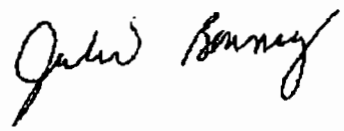
a) 4 of the 6 qualifying years or
b) 3 of the 6 qualifying years

Note: AGDB members supports dropping either two or three years (no consensus) during the qualification time period 2013 – 2018 to account for vessel operational hardships – breakdowns, shipyards, and drastically reduced cod quota in 2018. Dropping two years moves the needle towards qualifying the more highly dependent vessels versus dropping three years. The 100,000 pounds threshold is the same as what was proposed in the draft spend plan.

3) Tiers based on the average of the best 3 or 4 years of cod landings based on the decision point above.

Other comment (tendering):
The draft distribution plan contains an option to include tender vessels within the processor funding component. This compensation for tenders is not straight forward for multiple reasons. Tenders can be paid on a daily rate or pounds of cod tendered. Sometimes harvesters pay for the tenders or processors and harvesters split the costs or the processor pays the costs. Not all tenders have contracts; not all processors utilize tenders. From a CGOA view, it does not make sense to include tenders. If tenders continue to be included, the state should develop criteria that benefit only those tenders that were paid on a poundage basis and can demonstrate a loss as a result of the fishery disaster. It also may make more sense to incorporate them under who actually pays them - the individual processor or individual harvesters.

Thank you for the opportunity to comment. We look forward to reviewing and commenting on your revised distribution plan later this month.



Julie Bonney
Alaska Groundfish Data Bank, Inc
P.O. Box 788
Kodiak AK 99615
jbonney@gci.net

After reading the draft distribution plan for the 2018 GOA Cod disaster declaration , I am in support of the tier approach, option 2. I am specifically writing in regards to the Trawl Catcher Vessels proposed vessel based distribution. I support four tiers based on average pounds for directed GOA Cod, using the best two of three years, from 2016-2018.

One of the most important parts of running a successful fishing operation is making sure all of your machinery and fishing gear is maintained, kept up to date, and upgraded. Preventative maintenance helps you not miss any fishing time. Upgrading your deck equipment, electronics, gear (nets,pots, trawl doors, etc.) helps catch more fish and be more competitive. To keep up on all these aspects takes a very large financial investment in the fishery . Most of the time there seems to be a direct relationship with the amount of your investment in your operation vs. how many fish you catch. Investment in a fishery not only refers to a dollar amount but the time and effort you put into a fishery. A vessel who has worked longer and harder will most of the time come out ahead of others.

Therfore, I feel a vessel in a top tier has a larger investment in the fishery and should receive more disaster relief. I think it is only fair that a tier option is selected for distributing the funds for the cod fishery disaster.

Alex Jackson

ALASKA
WHITEFISH
TRAWLERS

Alaska Whitefish Trawlers Association
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http://www.alaskawhitefishtrawlers.org

August 14, 2020

Commissioner Doug Vincent-Lang
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Via e-mail: DFG.2018GOAPacificCod@alaska.gov

Re: Comments on Final Pacific Cod Disaster Distribution Plan

Dear Doug:

Alaska Whitefish Trawlers Association (AWTA) represents small independently-owned trawl catcher vessels based out of Kodiak and operating mainly in the Gulf of Alaska. We appreciate the opportunity to review and comment on the proposed cod disaster spend plan.

Kodiak trawlers are particularly vulnerable right now. Trawlers had no directed trawl cod fishery in 2018 or 2019, tariff wars with China are impacting fish prices, pollock TAC and prices are in decline, and COVID-19 is disrupting supply chains, driving down prices and increasing costs.

Getting the cod disaster money into the hands of the people actually impacted by the fishery failure should be the priority. Carving off 30% of the money for research is ridiculous, short-changes the industry participants who need the help now, and without clear guardrails and expectation will not help the cod stock or the fishery. The 30% currently allocated to research should instead be divided between fishery participants, 80% to harvesters and 20% to processors.

Research Funding Guardrails. If any money is allocated to research then it should be used to augment current NMFS surveys to provide annual bottom trawl surveys in the Gulf of Alaska. To be clear, AWTA does not support using cod disaster money to supplant federal funding for core surveys, which occur every other year. However, annual surveys would provide more data for the Pacific cod stock assessment, reduce uncertainty buffers, and ensure earlier warning of stock declines. The 30% currently in the plan, combined with ongoing federal funding, could pay for annual Gulf surveys for over a decade.

If research funding moves forward outside of surveys, then any project funded by these disaster monies should be required to demonstrate a direct tie to stock assessments and actual management of Pacific cod. Funneling money to projects whose outcomes may, or may not, be used by stock assessment authors is a waste of money and not acceptable. General research into the effects of warm water on cod might produce interesting results, but if this information is not incorporated into the stock assessment models then it's really not being used in fishery management, or positively impacting the fishery participants this money is intended to help.

State and federal fishery manager cannot control warm Blobs in the ocean; what can be controlled is the amount and frequency of data feeding into the stock assessment model. Quality data from more frequent surveys reduces the need for large uncertainty buffers and mitigates data blind-spots – like the blind spot that led to the drastic 80% cut in Pacific cod TAC in 2018. If research money is allocated, but will not be used for surveys, then a basic requirement of all grant applications should be that the applicant demonstrates they consulted with the Alaska Fisheries Science Center prior to submitting the project, and that results will be used in stock assessments models. Anything short of that is a slap in the face to commercial fishermen.

Payment Eligibility. Establishing payment eligibility at the vessel level makes the most sense for the federal trawl fishery. As opposed to Alaska limited entry permits the right to fish in federal trawl fisheries stems from an LLP, which is held at the vessel level, often by a corporation or other legal entity. Issuing payments to the owner of the vessel more closely aligns with the structure of the fishery than trying to use individually-held CFEC permit.

Allocation Methodology. The spend plan proposed two allocation structures, one uses an equal share allocation to all participants in the trawl class, and the second uses a quartile approach where participants are tiered based on historical catch. Either approach has merit, given the relatively large dollar amounts potentially available to participants[1]. The choice of which approach is better rests on the catch history of each individual vessel, and therefore AWTA as an association is not stating a preference for either methodology.

In closing, we appreciate the opportunities to better understand and comment on the State's plan to allocate and distribute the cod disaster monies. We believe the focus should be helping fishery participants who were hurt by the cod disaster. Thank you for considering our comments.

Thank you,

Rebecca Skinner

Rebecca Skinner, Executive Director
Alaska Whitefish Trawlers Association

[1] This contrasts with CARES Act fisheries assistance where payments are likely to be small, in the $2,000 range, in which case an equal shares approach seems to make more sense.

From:
To: DFG, 2018GOAPacificCod (DFG sponsored)
Subject: 2018 GOA Pacific Cod Disaster Relief
Date: Friday, August 14, 2020 4:06:29 PM

To whom it may concern,

My name is Greg Wallace and as a lifelong Goa cod fisherman I am very disturbed by the recent draft distribution plan that was released. I agree with the categories. I do not agree on the distribution of funds. Harvesters should be allocated 70%, processors 16%, communities 4%, administrative.05% and the rest for research. Payments in all fishing sectors should either follow the proposed jig guidelines of payments to permit holders or split 50/50 between vessels and permit holders. I'm referring to the cardholders needed on each vessel to make landings. The proposed 30% for research is ridiculous. If money for research is needed, there are other ways to get funding besides raiding disaster funds.

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August 14, 2020

RE: Gulf of Alaska Pacific Cod Disaster Declaration

I am a small cod pot/trawl boat owner of the Western Gulf, I am recommending option 1, equal shares. I would also like to recommend using 2018 as the qualifying year, instead of the 3 year recommendation.

Myself and my crew are made up of a majority of long time locals. The impact this has on our community is devastating.

In 2018 an equal catch share was established in the Western Gulf to execute the fishing. This demonstrated that equal share was appropriate for these difficult times to ensure community vessel survival. Thus equal share in a disaster fund, would be equally beneficial to the local fleet.

Thank you for your time.

Cherilyn Lundgren

Cordova District Fishermen United
PO Box 939 | 509 First Street | Cordova, AK 99574
phone. (907) 424 3447 | fax. (907) 424 3430
web. www.cdfu.org

August 14, 2020

Alaska Department of Fish and Game
Attn: Kari Winkel
P.O. Box 115526
Juneau, AK 99811-5526

RE: 2018 Gulf of Alaska Pacific Cod Disaster Distribution

Ms. Winkel,

Cordova District Fishermen United is a 501 c(5) non-profit membership-driven organization, which advocates on behalf of the commercial fishing fleet of the Copper River, Prince William Sound and northern Gulf of Alaska region. Our membership is diverse and many members are involved in multiple fisheries, including Pacific cod fisheries and other groundfish fisheries. As such, we would like to offer the following comments on behalf of the CDFU Groundfish Division members.

CDFU Groundfish Division advocates for the inclusion of eligibility for permit holders who fished in 2017 and 2016 in the PWS state-waters pacific cod fishery, but who did not fish in 2018 due to the significantly lower GHL announced before the start of the season.

In 2017, the PWS state-waters pacific cod season guideline harvest level (GHL) was 4,338,141 pounds, allocated 15% (650,721 pounds) to pot and jig gear combined, and 85% (3.7 million pounds) to longline gear. In 2018, the total PWS state waters pacific cod season GHL had dropped to 992,080 lb, allocated 85% (843,268 lb) to longline gear and 15% (148,812 lb) to jig and pot gear combined. This represents a loss of 78% of the GHL before the 2018 season even began.

Due to this significantly lower GHL, many interim-use permit holders did not register for the 2018, as for many, the expenses of participation in the fishery outweighed the ability for regional fishermen to profitably participate in the fishery, despite having prior history in the fishery and a prior investment in necessary gear. Though these permit holders were not active in the disaster year, they are still representative of the loss felt by the fishery disaster and this should be taken into consideration when evaluating the distribution plan. In fact, it is this drop in participation that is partially indicative of the fishery disaster itself.

Cordova District Fishermen United
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The CDFU Groundfish Division also supports an even distribution and equal share of the disaster funding in both the pot/jig and longline groups. The nature of fishery disaster declarations is to help provide aid to meet basic expenses and provide relief to participants in those fisheries, therefore an even distribution in these user groups will meet the need of all participants, rather than a disproportionate amount of aid provided to those at the top. To reference our recent experience with the 2016 pink salmon disaster, that spend plan unfortunately heavily weighted catch history for participants, and because of an oversight regarding the difference in major gear groups (seine and gillnet) and how they target pink salmon historically, many newer entrants to the seine fishery -- those most likely to have the highest permit and vessel payments and the least stability in the fishery, and those likeliest the need the relief the most -- were inadvertently left out and have continued to struggle. This is a situation we hope to avoid in the current disaster declaration for pacific cod.

Thank you for your time and consideration of our comments, please do reach out to CDFU Groundfish Division if you have any questions or concerns regarding our comments. Our office can be reached at: director@cdfu.org

Sincerely,

Chelsea Haisman

Chelsea Haisman
Executive Director

Freezer Longline COALITION

Ph. 206.284.2522
2303 W Commodore Way Suite 202
Seattle, WA 98199
www.freezerlonglinecoalition.com

August 31, 2020

Commissioner Doug Vincent-Lane
Alaska Department of Fish & Game
1255 West 8th Street
Juneau, AK 99811-5526

RE: DRAFT Distribution Plan - 2018 Gulf of Alaska Pacific Cod Disaster Funds

Dear Commissioner Vincent-Lane:

The Freezer Longline Coalition (FLC) wishes to follow up on the State of Alaska's (the State) request for stakeholder input on their draft plan for the distribution of federal disaster relief funds tied to the 2018 GOA Pacific cod fishery.

The FLC represents the owners of ~20 active (2020) commercial fishing vessels that participate in the freezer longline (HAL-CP) sector of the federal Pacific cod fishery in the Gulf of Alaska (GOA), Bering Sea, and Aleutian Islands. Our fishermen are almost entirely dependent on the annual harvest of Pacific cod to support themselves, their families and their communities. Our 10 member companies employ over 1,000 crew on their vessels each year, with about 20-25 crew deployed on a vessel on a given trip. Our membership includes Alaska-owned seafood companies who harvest more than half of the Alaska cod allocated to our sector each year. We are partners in Alaska's future, the health of its fisheries and in the well-being of communities across the state.

FLC members have been historic participants in the federal GOA Pacific cod fishery, with annual harvests in the Western and Central GOA dating back nearly to the inception of the federal fishery. Annually, the HAL-CP sector is apportioned 19.3% of the WGOA and 5% of the CGOA Pacific cod total allowable catch. In 2015, FLC participants in the GOA voluntarily joined with the other participants in the HAL-CP sector of the fishery to form the Gulf of Alaska Freezer Longline Conservation Cooperative (GFLCC). As a cooperative, GFLCC participants work collaboratively to be responsible stewards of the resource, including to minimize bycatch and promote sustainable management of the fishery.

We have reviewed the State's proposed distribution of disaster relief funds between the harvesting sectors and, within the HAL-CP sector, between participants. We do not have concerns with the 7% of the harvester share to be distributed to our sector, nor any substantial objections to the proposed distribution of the funds to sector participants. Between the two

options on the distribution of the funds to eligible harvesters, we would request that all eligible harvesting vessels receive an equal share of the allocation (Option 1). The one request we would make is that Pacific States Fisheries Commission (PSFC) distribute the funds to the companies operating the qualifying harvesting vessels, rather than directly at the vessel level. For example, if a company operates two qualifying vessels, they will receive one payment for both vessels. This will make for a cleaner receipt of the funds by the eligible companies. We can work with the State and PSFC to clarify any questions on where specific checks should be sent.

We appreciate the State's willingness to grant us some additional time to submit comments on this distribution plan to build consensus within our sector on a path forward. GFLCC members are in agreement on this response to the State and that the funds should be further distributed across sector participants by way of a private agreement within the GFLCC. We are nearing consensus on specific details of an agreement, to be in place prior to our sector's initial receipt of the funds from PSFC.

In addition to the distribution of the funds to our sector, we also reviewed the proposed allocation of relief dollars for research priorities related to better understanding the GOA Pacific cod stock. We appreciate the importance of research work to support the long-term health of the fishery and would recommend that research projects are focused on hard science aimed at collecting and analyzing needed data about the fishery and the changing dynamics of the GOA ecosystem, much as is proposed in the State's draft plan. Examples might include an update to tagging studies for Pacific cod and an examination on the impacts of warming ocean temperatures on the dynamics of the stock. Further, we suggest that any disaster funds set aside for research work be placed in a dedicated account that may not be redirected toward other State/ADFG funding needs in the future. This will provide assurances to stakeholders that these dollars, while retained by the State, will be used as proposed.

Thank you for your consideration. Please be in touch if you have any questions.

Sincerely,

Chad I. See
Executive Director
Freezer Longline Coalition

Office Phone 206-284-2522
Cellular Phone 202-487-3562
chadisee@freezerlongline.biz

cc: Karla Bush, Federal Fisheries Coordinator, ADFG

8/7/20

TO: ADF&G
ATTN: Karl Winkel
FAX: 907-465-2832

FROM: Seldovia Seacatch, Inc.
Michael R. Miller. Pres

RE: eligibility for a share of the 2018 Gulf of Alaska Pacific Cod Disaster NOAA allocation.

Our Vessel "Spitfire") is the authorized vessel to fish NOAA License # , held by Seldovia Seacatch, Inc, Pacific Cod endorsements: CG CV AOT.

Our Corp. originally owned the vessel "INDEPENDENCE" (ADF&G . NOAA issued to be fished on that vessel. In 2011, we sold the vessel & transferred the permit to the new owners - Fish Lots, LLC. In 2016, they sold the vessel to S&F Fisheries, and transferred the back to Seldovia Seacatch INC. We subsequently fished "spitfire" with that permit, but sold to S&F Fisheries in 2019.

We then purchased LLG 1956 from Brian Blondin. (vessel "Nomad",) including the fishing history.

We did not attempt to fish Pacific Cod in 2018 ( ) because the fishing forecast & Quota reduction generated negative income.

Would we be eligible for a share of the allocation?

Sincerely,
Michael R. Miller. Pres