



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Fish and Game

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October 2, 2020

Second 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 fishery disaster assistance for the Pacific cod fishery in the Gulf of Alaska. The distribution plan informs the federal grant application submitted by Pacific States Marine Fisheries Commission (PSMFC) to NOAA Fisheries and is subject to change based on approval of the final grant.

Written comments are requested on all elements of the draft distribution plan and should be as specific as possible to be the most helpful. Comments may be posted online and therefore the Alaska Department of Fish and Game (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 Monday, October 19, 2020 for consideration in the final draft distribution plan.

Process to develop the distribution plan: ADF&G posted an initial draft distribution plan for public comment in August 2020 and received 35 written comments on the draft plan. ADF&G revised the plan based on public comments and is requesting public comment on this second draft distribution plan before the plan is finalized and submitted to the PSMFC.

In response to these comments, ADF&G is recommending the following major revisions:

- Vessel crew are included as a separate category under the allocation to harvesters. While we recognize there are differences in the number of crew and crew compensation depending on operation type, treating all crew the same significantly expedites and simplifies the distribution process when compared to a process links crew with individual fishing operations.
- Tender vessels are included as a separate category under the allocation to processors. Public comment recommended including only those tender vessels that are paid on a poundage basis. We are continuing to evaluate the available data to verify which vessels may qualify. The proposed allocation to tender vessels is intended to be commensurate with the lower tier allocations in the trawl CV and pot CV sector distributions.
- An evaluation of the allocations to harvesters and processors relative to their loss is provided to demonstrate that the sectors experienced similar GOA Pacific cod fishery value losses in 2018. The processor allocation was increased from 26% to 30% and the allocation to research was reduced by 4% to moderate the disparity between the harvester and processor allocations.
- Eligibility criteria were revised based on sector-specific comments. In most cases, these changes resulted in an expansion of the years to earlier than 2016.
- Equal share distributions for all eligible participants are proposed for the jig, longline CP, and trawl CP sectors based on consensus support within those sectors. Tiered distributions are recommended for

sectors where there was no consensus on the approach in recognition of the various levels of dependency on the Pacific cod fishery within those sectors.

- The allocation to communities was increased from 4% to 5% by reducing the allocation to research by 1% in response to comments to increase the community allocation.
- We acknowledge the comments opposed to allocating disaster funds for research. Research funds provide a balance between meeting the immediate needs of fishery participants and the long-term fishery benefits to prevent or mitigate the impacts of future disruptions to the fisheries consistent with the intent of the Magnuson-Stevens Fishery Conservation and Management Act.

Proposed guiding principles for disaster funds distribution: Disbursement of funds are intended to 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 mitigate the impacts of future fishery disasters that cannot be prevented.

Proposed categories for disaster relief funds:

- **Harvesters:** Direct payments to commercial fishery participants and vessel crew who meet all eligibility criteria. This draft plan proposes to allocate 10% off the top for vessel crew and then subdivide the remaining 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 are developed based on input from participants within each sector and are therefore not consistent among sectors.
- **Processors:** Direct payments to shore-based processing facilities and tender vessel owners who meet all eligibility criteria. This draft plan proposes to allocate 2% off the top for tender vessels and the remaining 98% will be available to eligible processing facilities. Fisheries production and value data from the Commercial Operators Annual Report (COAR) will be used to determine eligibility and payments for shore-based processing facilities. ADF&G fish ticket information will be used to determine eligibility for tender vessel owners.
- **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 management of the GOA Pacific cod stock in the future. Research funds will be distributed through an open competitive bid process administered by PSMFC. Entities authorized to receive federal grant funds may submit proposals for the research funds.
- **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 PSMFC.

Proposed allocations to project categories:

Harvesters – 40%: The five-year (2013-2017) average exvessel value of the GOA Pacific cod fishery for catcher vessels is \$39.5 million dollars and the exvessel value of the 2018 fishery was \$10.7 million dollars, for a total estimated loss due to the disaster of \$28.8 million. The proposed funds allocated to the harvesting sector are intended to mitigate this loss by providing funds to bring the harvesting sector up to 50% of their recent historic value.

In response to comments, ADF&G is proposing to establish a pool for vessel crew with 10% of the harvester funds. The remaining harvester funds (90%) will be allocated among six fishery harvesting sectors.

Vessel crew (10% of harvester pool): Vessel crew that meet the eligibility criteria are proposed to receive an equal payment from the vessel crew pool. The intent is to identify those crew who participated during the 2018 season and were impacted by the fishery disaster.

Proposed eligibility criteria for vessel crew:

1. Crew member must have held a 2018 commercial crew license or 2018 CFEC permit for any fishery. This information will be verified using the ADF&G Licensing database and the CFEC permit database.
2. 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 2018 Pacific cod fishery disaster. This information will be verified based on 2018 crew contract, crew settlement, or affidavit from the permit holder or vessel owner.
3. Crew member must not be eligible for fishery disaster funds under another category of this distribution plan.

Based on an estimate of the number of vessels that would qualify under the proposed eligibility criteria and a coarse estimate of the average number of crew utilized by each operation type, approximately 600 crew members may qualify under this category.

Fishery 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 the comments received from sector stakeholders.

Depending on the sector, the proposed distribution of payments is either permit-based or vessel-based. Permit-based distributions will be paid to the individual named on the CFEC commercial fishing permit. Vessel-based distributions will be paid to the person or entity named as the vessel owner on the 2018 CFEC commercial vessel license.

Allocations to each of the six fishery harvesting sectors are based on the proportion of each sector's loss resulting from the 2018 fishery disaster. ADF&G used wholesale value rather than exvessel value to compare relative loss across all harvesting sectors because the harvesting sectors includes 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%

Pot catcher vessels (51% of Fishery Sector pool): Proposed vessel-based distribution.

Proposed eligibility criteria for pot vessels:

1. Vessel must have been used to harvest GOA Pacific cod with pot gear in a directed fishery in any three of five years from 2014 to 2018.

2. Average directed GOA Pacific cod landings from 2014 to 2018 must be equal to or greater than 80,000 pounds.

Proposed distribution for pot vessels will be based on four tiers as follows: establish four tiers based on average annual pounds of directed GOA Pacific cod harvested by the vessel in the best three of five years (2014 to 2018). 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 2 of 3 years)	Allocation (from the pot CV pool)	Est. number of eligible vessels
1	> 1,880,000 pounds	25%	9
2	1,080,000 - 1,879,999 pounds	25%	16
3	680,000 – 1,079,999 pounds	25%	23
4	< 679,999 pounds	25%	50

Jig vessels (4% of Fishery Sector pool): Proposed permit-based distribution.

Proposed eligibility criteria for jig permit holders:

1. Permit holder must have landed GOA Pacific cod in at least three of five years from 2014 to 2018 on a M05B, M05G, M26B, or M26G CFEC permit card.
2. Total GOA Pacific cod landings from 2014 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 72 jig permit holders would qualify for disaster funds based on the proposed eligibility criteria.

Longline catcher vessels (8% of Fishery Sector pool): Proposed vessel-based distribution.

Proposed eligibility criteria for longline catcher vessels:

1. Vessel must have been used to harvest GOA Pacific cod with longline gear in a directed fishery in any three of five years from 2014 to 2018.
2. Average directed GOA Pacific cod landings from 2014 to 2018 must be equal to or greater than 20,000 pounds.

Proposed distribution for longline catcher vessels will be based on four tiers as follows: establish four tiers based on average annual pounds of directed GOA Pacific cod harvested by the vessel in the best three of five years (2014 to 2018). Twenty-five percent of the longline catcher vessel allocation will be allocated to each tier and each vessel owner in the same tier would receive an equal payment.

Tier level	Average landings (best 2 of 3 years)	Allocation (from the longline CV pool)	Est. number of eligible vessels
1	> 280,000 pounds	25%	8
2	194,000 - 279,999 pounds	25%	10
3	150,000 - 193,999 pounds	25%	13
4	< 149,999 pounds	25%	25

Trawl catcher vessels (29% of Fishery Sector pool): Proposed vessel-based distribution.

Proposed eligibility criteria for trawl catcher vessels:

1. Vessel must have retained GOA Pacific cod in a trawl fishery in 2018.
2. Vessel must have retained a minimum of 100,000 pounds of GOA Pacific cod in any four of six years from 2013 to 2018.

Payment distribution for trawl catcher vessels will be 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 four of six years (2013 to 2018). Each vessels' average retained catch from their best four years were ranked from smallest to largest and breakpoints between the tiers were established based on the largest 'breaks' in the data, i.e. where the average harvest from one vessel had the greatest difference from the next vessel on the list. Based on this evaluation, the data separated into three tiers. The allocation from the trawl CV pool apportioned to each tier is based on the total proportion of harvest by the vessels in each tier. Each vessel owner in the same tier would receive an equal payment.

Tier level	Average landings (best 4 of 6 years)	Allocation (from the trawl CV pool)	Est. number of eligible vessels
1	> 1,300,000 pounds	47%	11
2	720,000 – 1,299,999 pounds	31%	12
3	< 719,999 pounds	22%	17

Longline catcher processors (7% of Fishery Sector pool): Proposed vessel-based distribution; if a company owns more than one vessel, the payments will be aggregated at the company level.

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: eligible vessel owners will receive an equal share of the longline catcher processor allocation. An estimated six vessels would qualify for disaster funds based on the proposed eligibility criteria.

Trawl catcher processors (1% of Fishery Sector pool): 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.

A single trawl catcher processing vessel is estimated to qualify for disaster funds based on the proposed eligibility criteria.

Processors – 30%: The five-year (2013-2017) average wholesale value of the GOA Pacific cod fishery for shorebased processors is \$82.5 million dollars and the wholesale value of the 2018 fishery was \$21.2 million dollars, for a total estimated loss due to the disaster of \$61.3 million. The proposed funds allocated to the harvesting sector are intended to mitigate this loss by providing funds to bring the harvesting sector up to 35% of their recent average wholesale value.

Based on stakeholder comments, ADF&G is proposing to include tender vessels by subdividing the processor allocation into two pools: one for tender vessels (2%) and one for processing facilities (98%).

Tender vessels:

Proposed eligibility criteria for tender vessels:

1. Vessel must have operated as a tender in a directed GOA Pacific cod fishery in 2018 and have been paid on a poundage basis.
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 2017 to the total pounds of GOA Pacific cod tendered in 2018.

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

Shore-based processing facilities: Based on 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. If a company owns more than one facility, then payments will be aggregated at the company level.

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 first wholesale value loss for GOA Pacific cod in 2018 as compared to their annual 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.

Communities – 5%: 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 PSMFC.

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 annual average.

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

Research - 25%: Research funds will be available through an open and competitive bid process administered by PSMFC. Entities that are authorized to receive federal grant funds are eligible to submit proposals for research projects based on the themes outlined below. Allowable expenses for selected research projects are qualified for reimbursement by PSMFC up to the amount awarded through the competitive bid process.

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 km² 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.

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.

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 (c.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.

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: Steven Gould
To: DFG, 2018GOAPacificCod (DFG sponsored)
Subject: Pot cod distaster plan
Date: Friday, October 2, 2020 8:56:53 PM

Hello,

I have been pot cod fishing 18 years out of King Cove. I was on deck for ten years and a captian for the last eight years. I ran 2 boats in the 8 years as a captian. I'm not the boat owner therefore with this proposal, all the fish I caught will result in the owner receiving all the money. I will be classified as crew when I am not. I would like to propose that for Pot Cod sector it would be half vessel based and half permit based distribution. There are alot of boat owners who do not fish in the winter. I bet there is more permit holders than owners fishing. I know this is the case is in my town of King Cove, AK.

Thanks for your time and consideration.

Steven Gould

Sent from my Samsung Galaxy smartphone.

From: Steven Gould
To: DFG, 2018GOAPacificCod (DFG sponsored)
Subject: Crew money
Date: Sunday, October 4, 2020 11:31:32 AM

Should give all my to owner then he or she can give the percentage they fish for not 10 straight across. For example Im the captian I get 35 percent and my deckboss gets 15, the rest of crew gets 10 so we should get payed our share not just put in pool. So I still think you should do half permit holder and half vessel owner so I can give my deckboss more who has been with me for 15 years. All boats are different most crews only get 8 to 5 percent of fish caught.

Thanks
Steven Gould

Sent from my Samsung Galaxy smartphone.

From: Dean Gould
To: DFG, 2018GOAPacificCod (DFG sponsored)
Subject: Comments
Date: Saturday, October 3, 2020 10:39:07 AM

Money for research in our area is a waste of time , they tell us their is no cod and keep opening the bearing sea for area o 100 percent of gulf cod come from there,cod fishing has been the best we have ever seen in the last two years

From:

Date: Sunday, October 4, 2020 10:33:39 AM

Kari,

On the subject of the 2018 cod disaster. I still do not agree with the distribution plan as laid out. I have been fishing pcod since 1992 every year including the present year.

For one reason I purchased my LLP for pot fishing in mid 2017 for 150,000 with no idea that there would be a cod collapse of 80% to the quota. The way the distribution plan is laid out I will have no allocation to disaster funds. This is completely wrong, the expense to buy the licenses proves intent without knowledge and absolutely no way to recoup any investment in the fishery I purchased the right too.

I feel that any purchase of an LLP in 2017 needs to be included, THIS IS THE ULTIMATE DISASTER IN EVERY-WAY. The purchase of the right to fish and the inability to participate.

Again I strongly object to the research percentage.

What makes an entity authorized to receive Federal grant opportunity's?

Who will determine the scope of the research?

Who will determine the research really has any bearing or help for the pcod fisheries?

Fishermen need help now!

As it is laid out, the main group, the HARVESTER receives 9,760,000 and some random research idea to who knows who receives 6,100,000. I OPPOSE 25% for research.

This research percentage is way to high and open ended especially when we look at the disaster to the fishing sectors and the current economic decline in fishing due to covid and market conditions.

I believe 10% is appropriate for research, such as the amount set aside for the recent disaster in the dungeness fishery in California.

We need to keep the fishing sector afloat before we add and any new agency's or bureaucracy.

From: Buck Laukitis
To: DFG, 2018GOAPacificCod (DFG sponsored)
Subject: Quick comments on second distribution plan
Date: Sunday, October 11, 2020 8:35:59 AM

Dear Kari Winkelman,

Thanks for the opportunity to comment on the second draft of the 2018 pacific cod disaster plan.

First of all it is not at all clear what cod is included in the pot sector landings. Is it federal only or federal and state water cod landings? As you know there are state water cod fisheries for pot, jig and longline. Do the average landings to determine tiers include state water cod?

I think the tier approach is much too specific, and I don't agree that it is the best approach. I think every vessel should qualify on its actual pounds over a series of years (or best years) as you have proposed. That approach best represents that vessel's GOA dependency on cod for purposes of this disaster. You have to calculate actual landings for each vessel. Why then shift to tiers? What can be more equitable than every vessel using their actual historical catch? The quartile approach does not give the most accurate representation of any individual vessel's landings. I doubt it is really any easier to administer.

It is not clear to me why harvesters have a crew pool and processors do not have a processor worker pool? There is no recognition of the importance of processor workers if you grant disaster funds to processor firms/facilities with no requirement that they compensate workers. Why crewmen and not processing workers? I do not agree with allocating to processing firms (many of them foreign owned) without a pool for workers as you are proposing for crew members in the harvester sector. With the draft plan money will flow to the firm and parent company rather than to the workers who actually were impacted.

I agree that ADFG should take an administrative fee for coordinating this and other disaster programs.

I am much less enthusiastic about a quarter of fishery disaster relief going to research. This approach basically puts research on par with harvester and processing sectors. When I think of the purpose of federal fishery assistance I think of serious economic impacts for fishermen and their communities. This is a NMFS program for much needed economic relief to fishermen and processors who have undoubtedly suffered economic harm.

<https://www.fisheries.noaa.gov/national/funding-and-financial-services/fishery-disaster-assistance> I am sure you have the authority to take research monies out of the program, but I think Alaska interests would be better served by designating more money for harvesters, processors and communities. NMFS already has research monies for studying pacific cod declines. I think 25% is much too high. Ten percent seems more appropriate.

Sincerely,
Buck Laukitis
Homer, Alaska

Sent from my iPad

From: Sidney Wolford
To: DFG, 2018GOAPacificCod (DFG sponsored)
Subject: 2018 GOA COD disaster
Date: Wednesday, October 14, 2020 7:51:56 PM

Hello

My name is Sidney Wolford and I'm a stakeholder in the 2018 cod disaster.

I see nothing in the latest proposal about a provision for hired skippers who were also permit holders. And in some cases even owned the gear used in fishery.

I think it would be very open to abuse if this group wasn't paid directly from the fund.

I would suggest a system like the salmon dispersal where the vessel owner had to document the percentage paid to hired skippers. Then the skippers confirmed it.

Other wise this group may end up with nothing.

Thanks for your attention.

Sent from my iPhone



October 16, 2020

To: ADFG Commissioner Vincent-Lang

Re: Second draft distribution plan for the 2018 Gulf of Alaska Pacific cod disaster

Thank you for the opportunity to comment on the second draft of the distribution plan for federal funds appropriated to address the 2018 Gulf of Alaska Pacific cod disaster declaration. The Pacific Seafood Processors Association (PSPA) represents shoreside processing plants operating across Alaska, including two companies with 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 the clear response to public comment in the second draft. We continue to support expedited implementation.

Our previous comment letter noted that shoreside processing of groundfish is highly capital intensive, with tremendous fixed costs required 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. The second draft distribution plan notes an increase in the processor allocation from 26% to 30%. We support this slight shift from the research component to the processing sector and do not want to see the processing component reduced in the final draft. The plan shows that the current distribution results in the harvest sector being compensated to equate to 50% of its historic value while the processing sector is compensated to equate to 35% of its historic value. We support continued effort to get closer to a more equitable approach in the final draft, and if so, it should come from a slight reduction in the research component.

PSPA is supportive of the eligibility criteria for the processing sector and the approach to including tenders in the second draft. 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. If the purpose of the research cannot be contained in such a way as to directly benefit the fishery, the State should redirect those funds to direct assistance payments to fishermen, processors, and communities.

Thank you for the opportunity to comment. We look forward to the final distribution plan and the conclusion of the process.

Sincerely,

Chris Barrows, President

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To Whom It May Concern:

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

- **Allocation of funds**

We acknowledge that the revised draft plan reflects a reduced allocation of funds (approx. \$6.1MM, 25% of the whole budget) for research projects. However, our question remains the same. We want to ask if Federal disaster (emergency) money is the appropriate place where such funding should come from. Research activities are meant to provide the long-term benefits rather than actional information that will make an immediate difference for the GOA Pacific Cod fisheries.

The players in this industry (fishermen and plants) have been dramatically affected by the continued Cod disaster, threatening the survival of many. While we appreciate the adjusted allocation of funds, if a more significant portion of those research funds were redirected to the players in this industry (both fishermen and plants), more jobs in the community would be saved.

- **Tender vessel eligibility**

Not all tender boats are paid on a poundage basis. Payment methods are irrelevant for determining eligibility as revenue loss can be also measured by the reduced tendering days.

Not all tender boats were able to participate in tender activities in the 2018 season due to lack of GOA Pacific Cod quota; It was not financially feasible to operate. Some of the vessels that opted out from tendering did contribute to the fishing industry by harvesting GOA Pacific Cod in the 2018 season. Considering the relief fund's spirit, those tender boats that could not operate as a tender in the 2018 season should also be eligible.

Ted Kishimoto
International Seafoods of Alaska, Inc.

From: greg.wallace
To: DFG, 2018GOAPacificCod (DFG sponsored)
Subject: 2018 GOA P COD FISHERIES DISATER RELEIF
Date: Saturday, October 17, 2020 4:14:23 PM

Sorry I'm a day late on comments due to the fact that I was out fishing. I think that the relief money for the pot cod sector should be split 50/50 between permit holders and vessels. 20% should be used for research with 1% administrative fees. This money should be used to give immediate relief to those of us that have a long history in this fishery and were greatly impacted by the decline and ultimate closure of GOA Cod. There are some of us that don't own boats but we're the permit holders and primary driving force of the boats success. Under the current form of relief I personally fall into a gray area and am concerned Thank you.

Greg Wallace
Sent from my iPhone

From:
To: DFG, 2018GOAPacificCod (DFG sponsored)
Subject: 2018 GOA P.Cod 2nd Draft Distribution Plan
Date: Sunday, October 18, 2020 6:23:13 PM

To whom it concerns,

I am looking at the current distribution draft plan and I noticed a few factors that I would like to be taken into consideration.

Firstly, I own a 58ft commercial fishing vessel here in the gulf, and over the last seven years there have been many upgrades and improvements both to the vessel and it's equipment in order to be competitive and stay ahead of the curve. I have invested thousands of dollars on various gear types in those years; a complete pot set up (pots, launcher, block, coiler, line, buoy, etc), and a complete trawl set up (net reel, bottom net, etc). I switched gear types often over the years as fishing permitted, but as I look at the distribution draft plan, that is not taken into consideration.

In light of this I would ask:

#1. That the qualifying years in the pot category be the same as the trawl category 2013-2018

#2. For the opportunity for fishermen to be allowed to combine catch across categories, i.e. Pot and Trawl

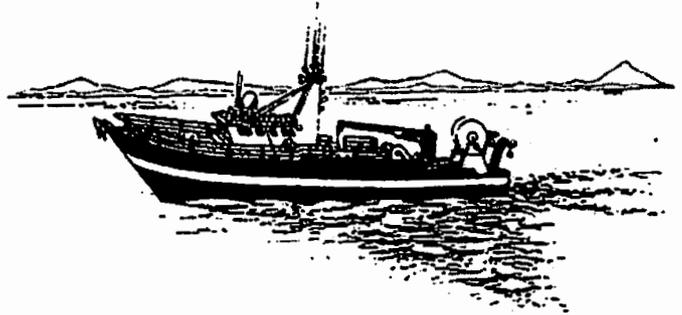
#3. To be then placed into the category of predominate catch.

These adjustments would take into account the vessels that fish across gear types.

Thank you for the opportunity to have my concerns voiced.
Sincerely
Carmel Carty
Loughbeg Fisheries, Inc.

**Golden Fleece, Inc. c/o
F/V Golden Fleece**

P.O. Box 226
South Bend, Washington 98586
(360) 875-5672
Fax (360) 942-2157



Doug Vincent-Lang
ADF&G
PO Box 115526
Juneau, AK 99811-5526
DFG.2018GOAPacificCod@alaska.gov
October 19, 2020

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

Dear Mr. Vincent-Lang:

Thank you for the opportunity to weigh in on the most recent plan to distribute the 2018 Gulf of Alaska Pacific cod fishery disaster funds. The F/V GOLDEN FLEECE

is a small catcher processor solely dependent on the Central Gulf of Alaska (CGOA) flatfish trawl fisheries but we also catch and depend on a significant amount of Gulf Pacific cod caught incidentally and retained in our flatfish trips.

The F/V GOLDEN FLEECE has been operating in the GOA since 1994 and exclusively in the GOA since 2006. As a small entity and family owned business, we are writing that because of the uniqueness of our vessel it must be included in this spend plan. As it currently stands, we will be left out because we did not have any directed cod catch. The language for trawl catcher processors states, "*Vessel must have been used to harvest GOA Pacific cod in a directed fishery in any two of three years from 2016 to 2018. A single trawl catcher processing vessel is estimated to qualify for disaster funds based on the proposed eligibility criteria*". Clearly, that CP is not the Golden Fleece, the only trawl catcher processor that is 100% dependent on GOA catch.

The F/V GOLDEN FLEECE and its LLP are Amendment 80 qualified (BSAI non-pollock catcher processor limited access program) but the vessel has never opted into the A-80 program due to its extremely low BSAI catch history. The F/V GOLDEN FLEECE is the only vessel that received a GOA sideboard exemption due to the vessel's extremely high dependency on the GOA flatfish fisheries. The Final Rule for Amendment 80 prohibits the F/V GOLDEN FLEECE from directed fishing for Pacific cod, pollock, or in any rockfish fishery in the GOA. Therefore, our vessel would never qualify using directed cod catch.

Our ask is simple: modify the qualification for the CP trawl sector spend plan allocation as follow: vessels must have been used to harvest GOA Pacific cod in a directed fishery in any two of three years from 2016 to 2018 or have 100,000 pounds of incidentally retained cod catch in any two of three years and only fished in the GOA. Thank you.

Sincerely,
William Bisbee
Owner/ Golden Fleece Inc.

William M. Bisbee "Wig"

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

In Regards To: **2018 Gulf of Alaska cod Federal Disaster Fund Distribution**

My name is Jody Cook. I have trawled for cod in the Gulf of Alaska for 30+ years.

I am strongly apposed to a 6.1 million dollar take away from the cod disaster fund, for "research".

In regards to research, I believe that 6 million dollars, 1/4 of the appropriated Disaster funds, is far beyond what would be required to be consistent with Magnuson Stevens Fishery and Management Act. I could not find any place in the MSA that specified a 25% take away of disaster funds from those impacted by a disaster. I cannot imagine anyone who the funds were actually intended for, proposing this big of a take away. It was most likely bureaucrats.

In the last years in Western Gulf, we have watched as surveys for cod get canceled due to government shutdowns or corona virus. We have watched as very little effort has gone to surveying the status of the cod stocks in Western Gulf. Even, in the last month, for the pollock "D" season, instead of being directed to increase analysis of incidental caught cod, we were directed to collect shark eyeballs for analysis. So,.. not only is it hard to have faith that the "research" funds will benefit the fishing industry or the cod, in any way, it is just wrong to have such a large amount of the pie taken away from the intended recipients.

I am all for research and stock assessment. I believe that it is a crucial part of the effective management of the sustainability of all fish stocks and the fisheries that effect those stocks. That's why I propose that 5% of the appropriated disaster funds be allocated to "research". 1.2 million dollars to help include some new programs in currently scheduled Gulf Cod surveys.

It would be nice if after all the cancelations of surveys in the last 3 years, there would be a healthy surplus of budgeted funds that were earmarked for Cod surveys. I'm confident that this is not the case. Usually, government controlled money does not "store" well. I have no reason to believe that cod stocks or cod fishermen will see any significant gain from this 6 million dollar allocation. In my unscientific opinion, (just 30years fishing cod), the 3 "linked themes" noted for "scientific research", need much more than 6 million dollars.

#1. Reinventing the Cod stock assessment wheel in relation to warming temperatures. (this depends on results from #2 and #3, so 2-10 years)

#2. Monitoring cod development through changes in climate, (3-10 years). Climate change usually takes time.

#3. A comprehensive study of migration patterns and general cod lifestyle patterns involving tagging, surveys, and lots of samples and analysis over a long period of time, (2-5 years).

Of course these research projects are grand ambitions. I worry that the proposed distribution plan would result in a feeding frenzy for this 6 million dollars. That there would be 1 or 2 years of unbridled spending for the monetary benefit of a few. That these programs would need several years to meet the stated objectives, but would run out of money in one or two years, without reaching any of the goals. And, lastly, even if all projects were completed,

It's possible that not one cod would be saved, beyond what the current studies and shutdowns have saved. We are currently closed down in most Federal water fisheries.

I believe that these programs can all be implemented to a much much smaller degree, in the cod survey programs that are currently part of the FMP for cod, in the gulf of Alaska. Of course it would not result in an exhaustive understanding of climate change and cod. But, it would move the meter in that direction. It would also put 20% , (4.88 million dollars), back to the processors and the fishermen. There are approximately 750 fishermen who were actually impacted by the Cod disaster. There were about 1500 Kodiak processor workers . And at least 400 workers between Sand Point and King Cove.

The disaster fund is not intended to be a windfall for research, (in my un-politically connected opinion). It is an "aid" package meant to help monetary shortfalls from 2018 cod shortages. I would urge the department to at least consider funding research at a level that is relative to the other recipients of the funds. For example, according to the proposed distribution plan, my trawl vessel will have enough for about 2 months of survival. We will pay half of the proceeds to the crew and skipper. The other half of the proceeds will pay insurance and boat payments for about 2 months. So, for a comparable application to research, maybe fund a Cod Survey for 2-3 months. I believe one survey may run around 1.1 - 1.2 million. I'm not sure how much time that usually involves.

There are about 750 fishermen. 40% of distribution is proposed to Harvesters. If split equally that would be $40\% / 750 = .05333\%$. So, each fisherman gets .05333% compared to 25% for Research. I know that Research involves a few crews and labs and some high priced professionals, but still , that's \$13,000 for each fisherman with expenses from 194 vessels. Compared to \$6,100,000, for the Research teams and maybe 5 to 10 vessels. That is a huge disparity. I know these Research numbers are speculative because there is no plan that has specific costs calculated. Just the known number of 6.1 million, taken from the fund. There is no accountability for spending or results as everything is too vague, and not 1 single dollar is accounted for in any kind of budget for operations.

Again, it just leaves a nasty taste to see that when the government shut down, a Western Gulf cod survey was not important enough to reschedule. When corona virus came, many of the surveys were not important enough to execute, even though fishermen fished without consequence. Now,.. when there is money sitting on the table and bureaucrats have the power to portion it out, for some reason, cod research becomes incredibly important. To the tune of 6 million dollars, (25% of the disaster fund).

I know it has been a precedent now,.. but that does not make it right. In the 2nd draft of the Distribution Plan, dated October 2nd, there were 7 bullet points noting revisions by ADFG, in response to comments on the 1st Distribution plan. The 7th bullet, on page 2, from ADFG, read as follows:

- We acknowledge the comments opposed to allocating disaster funds for research. Research funds provide a balance between meeting the immediate needs of fishery participants and the long-term fishery benefits to prevent or mitigate the impacts of future disruptions to the fisheries consistent with the intent of the Magnuson-Stevens Fishery Conservation and Management Act. (end of copied text)

Here is what I read.. (between the lines):

- We saw there was a bunch of comments apposed to disaster funds for research. We don't care. Fishermen are simple and don't understand what is good for themselves in the long run. This is way too much money to pass through our hands without slicing off as much as possible for our friends in research. We will use it to cool the planet, so this cod mortality doesn't happen again. This will create a balance between the Fisherman and those of us with a higher education.... MSA matters, (end of reading between lines)

We deserve more than a copied and pasted section from past distribution plans. Every situation has its differences. In this case, you would literally have to cool the gulf waters, or a region of approximately 2 million square km., by NOAA estimates, to prevent or mitigate similar future disruptions.

Again, In the 2nd draft of the Distribution Plan, dated October 2nd, there was an explanation on the bottom of page 6-7, addressing the proposed 25% Research allocation. It reads as follows:

Information from NOAA Fisheries show 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 square km with more than 2.5 degree C warmer than the long term mean (1982 - 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. (end of copied text)

It just seems to me that whatever studies produced this analysis worked, in regards to monitoring and protecting the Gulf of Alaska Cod stocks, and detecting the damaging effects of warmer water. In the October pollock "D" season, there seemed to be an abundance of large spawning size cod, in Western Gulf. We only fish a very small area, so I assume there are more in other areas. So, these cod have survived to spawn another day, or to be specific, 2018, 2019 and 2020 and depending how old they can be to spawn, for a few more years. They just need regular monitoring. Regular surveys that have not been happening. More of the same research and analysis that produced the above information from NOAA Fisheries.

In these current times of pandemic and government aid, could you imagine congress sending 25 million dollars to Alaska for Covid Relief to pay un-employment, lost wages, and to assist losses to small businesses, etc. Then the State takes 6 million away from financial aid to research the cause of Covid, even though the CDC, (\$11 billion budget) does this already.

Right now, in these times when processors are taking costly measures to contain the virus, they can use any help possible. Fishers are suffering from terribly low prices for fresh market products and price cuts from processors because of increased covid costs for operations. It is just not a good time to try and reinvent the wheel for stock assessment for cod. I believe we can just enhance the current survey programs at a fraction of the cost and everyone can still be a winner. No big windfall for anyone, but a significant benefit for everyone.

I know that its possible that this 25% take away could be fueled by good intentions. By someones zealous desire to save the cod world in the gulf or someones secret ambition to understand and fund climate change studies. But, **in reality, it is a tax.** It is a tax for research, levied on a disaster fund. And right now, it is "taxation without representation". No amount of money will cool the ocean, or prevent future cod mortality during ocean heatwaves.

The tax is way too high, and against the will of stakeholders. Again,.. I propose 5% be levied for research. 1.2 million dollars is still a significant amount of money.

Thankyou for the opportunity to comment on this issue.

Jody R Cook

From: Ben Ley
To: DFG, 2018GOAPacificCod (DFG sponsored)
Subject: 2018 Cod Disaster Declaration
Date: Monday, October 19, 2020 11:06:59 AM

Thank you for taking the time to gather industry input to ensure proper distribution of funds. I would like to reiterate the importance of these funds to all involved and the prompt distribution when the process is completed. The economic impact of 2018 hasn't been relieved, only sustained, by continued years of low or no GOA cod harvests therefore increasing the dependence of these funds. I feel Alaska is setting the standard for disaster relief by having transparency while taking public comment into consideration.

For the trawl sector I support the second option for the eligibility criteria. This option doesn't exclude a vessel historically dependent on the fishery who voluntarily opted out of 2018 participation because of the lack of production opportunity. Survival of a business is necessary, if a fishery falls flat and vessels need to adapt to other opportunities, they should not be excluded by option 1.

I support the revised 3 tier distribution platform but not the best 4 of 6 year criteria. All other sectors have a 5 year pool which I feel should also be reflected in the trawl sector. The further you go back from 2018 the more diluted and less relevant participation becomes. Personally, to best represent 2018 disaster I support looking no further than 2016 and 2017 but that no longer seems to be an option. I will still advocate for as much recency to 2018 as possible while keeping participation to directed fishing activities.

I support the reduction in research allocation but still wonder if it couldn't be reduced even further. I support sound research that helps give management useful tools to assess and manage this fishery. So often we see research that is not used to help management successfully manage and set harvest levels. Therefore I would like to see money go directly to those needs or back to the fishermen, communities and processors that were effected. I support the 3 linked themes outlined in the proposal and feel that they all represent beneficial science. That being said, if management can't directly use this information to strengthen the fishery funding for this science should come from somewhere else. I would support some sort of industry input or comment period for the science allocated funds once they become available. Knowing that this will most likely be a short term grant we would like to have it be as useful as possible for the continued success of the cod fishery.

Sincerely,
Ben Ley
F/V Cape St Elias

From: Tom Marios
To: [REG_2018GOAPlan1stCont \(REG sponsored\)](#)
Subject: GOA Cod
Date: Monday, October 19, 2020 11:52:50 AM

ADF&G, Attn: Karl Winkel,

I appreciate your effort and time gathering industry input to help fairly allocate disaster relief funds. I have been involved in the GOA Cod fishery since 1991 and currently with my partners we have three vessels involved. We have five equal partners two are my sons and two are crew members that have moved up. All of us actively participate in the fishery and other than myself and I am old, all are young safe productive skippers, owners and operators in Alaska.

For the trawl sector I support the second option for the eligibility criteria. This option doesn't exclude a vessel historically dependent on the fishery who voluntarily opted out of 2018. We were involved long enough in the fishery to know in advance that the trawl fishery in 2018 was likely to be a loser in the GOA and opted to pot fish in the Bering Sea with two of our vessels.

I support the revised 3 tier distribution platform but not the best 4 of 6 year criteria. All other sectors have a 5 year pool which I feel should also be reflected in the trawl sector. The further you go back from 2018 the more diluted and less relevant participation becomes. Personally, to best represent 2018 disaster I support looking no further than 2016 and 2017 but that no longer seems to be an option. I will still advocate for as much recency to 2018 as possible while keeping participation in directed fishing activities.

I support the reduction in research allocation.

Sincerely,

Thomas Marios
F/V Alaskan Lady, F/V Cape St Elias, F/V Scotch Cap

From: [carla_streng](#)
To: [DFG_2018GOAPacificCod_\(DFG_sponsored\)](#)
Cc: [Bob_Jacobson](#)
Subject: Comments on 2nd draft distribution plan for funds to address the 2018 GOA Pacific Cod disaster declaration
Date: Monday, October 19, 2020 12:34:57 PM

Oct. 18, 2020

Dear Commissioner Vincent-Lang,

One of our vessels, F/V Jeanoah, is a long-time participant in the GOA Pacific Cod pot fishery. We are certainly interested, therefore, in the details of the final plan. Following are my comments on two issues:

1. The goal of the disaster relief funds is to keep fishing businesses viable. I am therefore advocating for vessel-based payments as proposed currently in the second draft. In my opinion the vessel owner is more likely to share with the skipper than vice-versa if payments went directly to the skipper.
2. Since we were heavily dependent on GOA Pacific Cod for many years, we strongly support the tiered payment approach. That would seem to be a more equitable distribution of funds and would reward those vessels that harvested more cod during the base period.

Respectfully,

Bob Jacobson, president Fairweather Fisheries, Inc.

To the ADFG commissioner and all those involved

Thank you for taking to the time to solicit and review public comment from the stakeholders. I know it adds more overall work and time to the process, but I do think that it will result in a more relevant and equitable relief program. I have participated as a pot cod vessel and as a trawl vessel starting in 2010 in the WGOA. During that time GOA cod became a significant part of our annual income, followed by a precipitous drop in 2018. Starting in 2018 my boat was forced to fish cod in the Bering Sea. My input for the distribution of the 2018 cod disaster relief funds is as follows and only pertains to the fisheries that I participated in.

A three-tiered approach makes sense in both the trawl and pot cod fisheries due to the discrepancies in vessels and gear that participate in the GOA fisheries. However, we need a slightly more equitable distribution than 25% of the funds going to the top 10 pot vessels with the remaining 75% being split among 88 vessels.

Only cod harvested in a directed cod fishery should count towards overall pounds.

There should be no requirement for vessels to have participated in the 2018 GOA P-Cod season. A vessel should not be penalized for choosing to fish in other areas when the 2018 GOA TAC Had an 80% decline.

I would like the qualifying years to be the 3 of 5 from 2014 to 2018 for both trawl and pot. I believe that recency supports relevancy in this program.

Lastly, research funds need to be spent in a meaningful way for management of the GOA cod fishery. Maybe a fisherman/community board could be established to help give direction and feed back for the allocation of research funds. Stakeholders in the fishery generally have good idea on current trends and changes that may be harder to identify to those not directly involved in a fishery.

Disaster relief is necessary to maintain competitive local fleets. Thanks for the opportunity to comment,

Sincerely,

Andrew Manos

Alaska Groundfish Data Bank

P.O. Box 788 Kodiak AK 99615
Julie Bonney, Executive Director
Katy McGauley, Fisheries Biologist

(907) 486-3033
jbonney@gci.net
agdb@gci.net



October 19, 2020

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

Re: 2018 Gulf of Alaska Pacific cod Federal Disaster Fund Distribution (second draft of the spend plan)

Thank you for your Oct 2, 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 applaud the continued progress made in development of the plan and look forward to the final draft later this month. We also appreciate ADFG addressing our concerns about the first draft of the spend plan and incorporating some of our suggestions, especially using retained cod catch for the shoreside trawl catcher vessels instead of directed catch since only the trawl sectors have significant incidental retained catches of cod.

We support the increase in the processor allocation from 26% to 30% with a corresponding reduction in the research component. Whereas the funds distribution as proposed results in the harvester sector being compensated to about 50% of its historic value, the processing sector is compensated to about 35% of its historic value. We support continued effort to get closer to a more equitable approach in the final draft, if feasible. Additional funds should continue to come from the research component which we still think is a bit too high. We support taking a small percentage off the top of the processor allocation for tender vessels.

We emphasize that the vessel-based payment approach as proposed for all harvesting sectors except jig is the best way to keep the local fishing dependent businesses viable. We also support the tiered approach and expansion of years for the CV trawl sector. We favor using either the best 3 or best 4 years of the six-year qualifying year suite.

Although adding crew into the mix was not expected, we agree with equal treatment of crew members which we hope simplifies what could be a complicated process. We do believe, however, that the majority of the vessel owners will share their spend plan payments appropriately with their crew members. If the crew payment process is deemed too complicated, easily abused, or results in slowing down the distribution process, the state may wish to reconsider their decision to include crew.

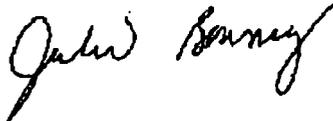
According to the spend plan, crew eligibility requires that an individual crew member have a crew license in 2018. We anticipate this will be far more than 10,000 individuals across all the fisheries in the state. The mechanism to limit the number of crew to approximately 600 individuals, as suggested by ADFG, is the requirement that a crew member must have worked for a permit holder (jig) or vessel (all other sectors) that is eligible to receive funds for the cod disaster relief. As proposed, proof of eligibility must come from "2018 crew contract, crew settlement, or affidavit from the permit holder or vessel owner". As an aside, we suspect that the number of crew that could qualify may far exceed 600 individuals since some vessels use rotational crews or temporary crew members during a calendar year.

We believe that the affidavit option could be abused and should be dropped. We suggest adding a 1099-Misc to the list instead. Even though the 1099 lists the fishing company name which may or may not reflect the fishing vessel name, the names can be cross-checked, if needed, in the ADFG database.

The three required documents (crew contract, crew settlement, 1099) can be provided by the vessel owner since they need to be retained for business record keeping purposes. Any affidavit would need to be provided by these same individuals. The likelihood that there will be enforcement or a cross check of the submitted affidavits appears low. In conclusion, we suggest that the option for an affidavit be dropped and replaced with a 1099-misc.

For communities, we would be interested in seeing which communities qualify for funds and a transparent accounting of how the funds are spent in each community – similar to accounting how funds will be spent on research.

Thank you for the opportunity to comment. We look forward to reviewing the final distribution plan later this month and a quick and efficient application process through PSMFC.

A handwritten signature in black ink that reads "Julie Bonney". The signature is written in a cursive, flowing style.

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

F/V Northern Endurance, LLC

October 19, 2020

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

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

Dear Ms. Winkel:

My name is Bernie Burkholder, and I am a Managing Member of F/V Northern Endurance, LLC, the owner and operator of the F/V Northern Endurance a 78 ft. commercial fishing vessel, homeported in Kodiak, Alaska that was fully licensed and permitted, to fish Pacific Cod in pots during the specified qualifying years in the Gulf of Alaska.

I am in full support of the tiered system proposed. Additionally, I am in support of the vessel and ownership structure receiving the award and corresponding funding. It is my belief that vessel owners will support their captains and crews and the communities they have traditionally done business in.

Thank you for this opportunity to comment.

Respectfully submitted,

Bernie Burkholder

Bernie Burkholder, Managing Member
F/V Northern Endurance, LLC

From: Keith Williams
To: DFG, 2018GOAPacificCod (DFG sponsored)
Subject: GOA Cod Disaster Declaration
Date: Monday, October 19, 2020 3:41:15 PM

ADF&G, Attn: Kari Winkel,

Thank you for all the work you have done to gather input from fisherman and other industry professionals on this topic. I think everyone in the industry realizes how difficult it can be to ensure proper distribution of these funds and we appreciate you taking our opinions into consideration.

I realize that every sector is different and unique in its own way however, I think having a more standardized eligibility criterion would ensure a fair and equal distribution of funds. Specifically, the trawl criteria on the second draft requires vessels to have retained GOA Pacific cod in a trawl fishery in 2018. This would exclude vessels that have historically been dependent on catching GOA trawl cod. Some vessels chose not to participate in the 2018 GOA trawl cod fishery because the TAC was so low and I don't think they should be excluded from these funds because of that decision. Making the trawl eligibility criteria similar to the pot catcher eligibility criteria would be more fair and include vessels that have historically been dependent on GOA trawl cod.

I prefer the revised three tier distribution platform, however I do not think eligibility should be based on best four of six years (2013-2018). Taking the best three of five years (2014-2018) similar to the pot cod sector seems the most fair. This would include vessels that were most effected by the 2018 disaster and also make some standardization across the sectors.

I am a strong advocate for science and understand the importance of collecting and analyzing data to figure out how we can make our fishery as strong and healthy as possible. I think its very important that this money be allocated to research that directly effects and benefits GOA Pacific cod. We have all seen research that is simply not relevant or helpful in making a stronger management strategy, if that's going to be the case maybe these funds would be more beneficial elsewhere.

--

Keith Williams
F/V Alaskan Lady

To: ADFG Commissioner Doug Vincent-Lang
From: Under Sixty Cod Harvesters
Date: October 19, 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, we would have liked to see research funds remain at the previously established level. We appreciate the guidance in the draft that expands upon research focus areas that seek to better understand changes to the Gulf Pcod stock. As we commented on earlier this year, we also ask that funds be made available towards future data collection and monitoring needs in the Gulf of Alaska potentially impacted by surveys canceled due to Covid-19.

Regarding changes to qualifying years, we are generally supportive but request that the Department not go beyond the already expanded qualifying years. It is important that recipients of disaster funds be reasonably recent participants in the fishery.

Finally, we urge the Department to direct relief funds to participants in the directed Pacific cod fishery only, and not to participants harvesting Pacific cod as incidental catch. As always it remains important to incentivize incidental catch reductions. Awarding relief funds based on harvest of incidental catch does not achieve that.

To accomplish this, we recommend simply aligning the trawl catcher vessel sector category requirements to those in all of the other sectors — which all specify that distribution will be based on harvest of GOA cod in a directed cod fishery.

Thank you,

Hannah Heimbuch

Hannah Heimbuch
Policy Director, Under Sixty Cod Harvesters

From: Andrew Wilson
To: DFG, 2018GOAPacificCod (DFG sponsored)
Subject: 2018 cod
Date: Monday, October 19, 2020 4:52:59 PM

I think for f/v's it's should be 4 different things category boat owners,boat captains permit holders ,crews that made a full seasons,crews,captains and owner percentage shares of total gross and all benefit for this

Sent from my iPad

From: [Darius Kasprzak](#)
To: [DFG, 2018GOAPacificCod \(DFG sponsored\)](#)
Cc: [Bush, Karla L \(DFG\)](#)
Subject: 2018 Gulf of Alaska Pacific Cod Federal Disaster 2nd Draft Distribution Plan Comments- Alaska Jig Association
Date: Monday, October 19, 2020 6:42:01 PM

Dear Commissioner and all those involved,

The Alaska Jig Association (AJA) appreciates the request from the State for stakeholder organization input, as regarding the second 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 suggested by the State in the second draft distribution plan; to be adequate and satisfactory.

Proposed eligibility criteria for jig permit holders:

1. Permit holder must have landed GOA Pacific cod in at least three of five years from 2014 to 2018 on a M05B, M05G, M26B, or M26G CFEC permit card.
2. Total GOA Pacific cod landings from 2014 to 2018 must be equal to or greater than 1,500 pounds.

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
[\(907\) 654-5863](tel:9076545863)