

March 28, 2025

North Pacific Fishery Management Council  
1007 West 3rd Ave, Suite 400  
Anchorage, AK 99501

Subj: National Marine Fisheries Service (NMFS) 2024 Cost Recovery Report for Alaska

Chair Drobnic, Mr. Kurland, and Members of the Council,

We appreciate the Council reviewing the 2024 Cost Recovery Report for Alaska (the Report) under agenda item D-1 and thank you for the opportunity to comment. This letter represents participants of the 5 limited access privilege programs (LAPPs) and the Western Alaska Community Development Quota (CDQ) Program who pay cost recovery program fees to the National Oceanic and Atmospheric Administration (NOAA) as required by 16 U.S.C. 1854 (d)(2) of the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act).<sup>1</sup> These payments are for NOAA (and its partner agencies) to recover costs that are “directly related to the actual costs directly related to the management, data collection, and enforcement” of catch share programs. Signatories to this letter represent vessel owners, captains, and thousands of crew, processors and community residents who rely on the fisheries off Alaska for our livelihood.

We are submitting this comment at a time when our industry is clearly struggling. NOAA’s 2024 study on the Alaska seafood industry concluded that “first-wholesale values dropped by \$1.2 billion (26 percent) from 2022 to 2023 for a total direct loss of \$1.8 billion. This shock to the Alaska seafood industry resulted in a loss of more than 38,000 fishing and non-fishing jobs in the United States and a loss of \$4.3 billion in total U.S. output (the total dollar value of all goods and services produced) and a total decrease of \$269 million in state and local tax revenues.”<sup>2</sup> Against this backdrop of economic decline, the impacts of these ever-increasing fees on our communities, vessel owners and crew are particularly challenging given the unprecedented difficulties the seafood industry is now facing. We have been forced to make painful decisions to tighten our belts by deferring maintenance, limiting investment in our vessels, processing plants, and communities, and even tying up vessels and letting crew go.

Over the years we have individually and collectively provided oral and written testimony to the Council expressing our concerns and recommendations regarding the administration of the cost recovery program, most recently in February 2024. We are again engaging the Council and NOAA on this issue with an extreme sense of urgency. We believe NOAA, through publication

---

<sup>1</sup> Cite to MSA Section 304(d)(2).

<sup>2</sup> [NOAA, Alaska Seafood Snapshot, August 24, 2024: https://www.fisheries.noaa.gov/s3/2024-10/ak-seafood-industry-snapshot-10-31-2024-afsc.pdf](https://www.fisheries.noaa.gov/s3/2024-10/ak-seafood-industry-snapshot-10-31-2024-afsc.pdf) (p. 2).

of previous policy, has effectively demonstrated the clear determination and application of the “but / for principle” relating to the cost recovery program in the Alaska region.<sup>3</sup> We also believe a number of questions and previously stated concerns remain unanswered – NOAA has still not clearly establish a link between the fees we are required to pay and the administration of these cost recovery programs across several management offices that are assessing costs. **We are requesting in this letter that the Council encourage NOAA to improve transparency, emphasize accountability, and achieve greater efficiencies and cost reductions within these cost recovery programs. Our recommendations follow at the end of each section.**

## Transparency

*Improve transparency by clearly demonstrating how costs are determined, categorized, and assessed across program.*

We appreciate NOAA’s efforts to explain the key criteria that apply in order for a cost to qualify as “incremental” and therefore a recoverable expense. We also appreciate that NOAA defined specific agency management tasks and how various activities (such as catch monitoring, quota share administration, dockside monitoring, in-season quota management, regulations and rule-making, development and maintenance of IT) are assessed with a “but / for” analysis.

While we view this as a step forward, we had previously requested that transparency be improved for each of these categories by adopting the approach taken in other regions through detailed reporting of numbers of personnel and hours spent on cost recovery activities. As an example of where this is needed, the Report makes a reasonable case that cost recovery fees should be applied to catch monitoring, including inspection and approval of flow scales, observer stations, and video monitoring equipment. Full transparency then requires disclosure of how many personnel and hours are needed to perform these functions in order to truly understand the cost calculation. Given that “personnel costs are either directly tracked in 15-minute increments or distributed via annually updated formulas for NOAA OLE, SFD eLandings support staff, and IT system application development programmers” it seems that providing this data should be a relatively simple task. This additional level of information would ensure transparency and is a standard that can and should be adopted uniformly for Alaska cost recovery programs.

### Recommendations to improve transparency:

- *Request that NOAA provide consistent and detailed descriptions of personnel costs by specific offices, categories, tasks, and hours consistent with NMFS West Coast Reports.*

---

<sup>3</sup> According to the NOAA Technical Memorandum on Design and Use of Limited Access Privilege Programs “only incremental costs – those that would not have been incurred but for the existence of a LAPP or CDQ Program – are eligible for cost recovery.

- *Request that NOAA provide consistent and detailed descriptions of contract and training costs, including numbers of employees and hours engaged in these activities.*
- *Request that NOAA provide the documentation it provides to all staff, including its management partners, on how cost recovery costs should be applied (e.g. business rules) using NMFS well-established incremental costs and “but / for” policies and procedures.*
- *Request that the Council and NOAA provide rationale and clearly state when regulations or rulemaking will be subject to cost recovery fees. Also request that NOAA provide a listing of which regulatory projects from 2019 – 2024 met the rationale to have cost recovery fees imposed.*
- *Request that NMFS undertake this improved reporting without imposing that cost on the regulated public. Transparent reporting of fees is a reasonable expectation of any management program and does not represent a unique “but / for” cost.*

## **Accountability**

*Emphasize accountability by carefully scrutinizing and documenting costs across all entities and programs to ensure that only incremental costs are subject to cost recovery;*

The costs to administer cost recovery programs in Alaska are extremely high, particularly in comparison to other cost recovery programs nationally. We made this assessment using cost recovery and management data from NOAA and other Regional Fishery Management Councils and data specific to Alaska Region catch share programs (Table 1 and 2). Collectively, the 8 non-Alaska catch share programs manage approximately 1,750 permits and 890 vessels (Table 1) and assessed total fees of \$4.2M in 2023. By comparison, the 6 Alaska catch share programs manage approximately 2,800 permits and 1,170 vessels at a cost of nearly \$10.9M in 2023 (Table 2).

***Catch share program management in Alaska costs about 2.5 times more than all other LAPPs in all other regions for a similar number of permits and vessels.*** We believe that this significant discrepancy of program costs warrants additional review by NOAA and the Council to determine whether these increases costs are justifiable and appropriate.

With regards to specific cost recovery categories, costs for office lease and rent are significantly higher in Alaska as compared to the rest of the country and rent is typically the 3<sup>rd</sup> largest cost category in Alaska LAPPs. We noted in our previous comment letter other regions generally do not consider office space rental to be a recoverable cost, and recommend that the same consistent approach be applied in Alaska. While NOAA states within the Report that rent “includes a portion of the rent or utility cost for offices or equipment **that would not exist or would require a smaller space if not for the LAPP supported by that office,**” it is our observation that the same square footage of office space had been leased for years by NOAA (prior to cost recovery programs being implemented) and as such recovering cost for leases and rent is not appropriate.

Our programs were being charged for leases, rent, and utilities during the height of the COVID-19 pandemic when employees were working remotely. We also note that typically office space is leased on a square foot / month basis and that federal lease agreements are typically made for at least several years. However, data in the Report shows significant year to year variances across cost recovery programs (annual declines of up to 73% and annual increases up to 59%), suggesting something other than this typical lease agreement is being used to determine rent / lease costs.

### **Recommendations to improve accountability:**

- *Request that the NOAA Alaska region cease charging rent, lease, and utility costs to align with administration of cost recovery in LAPPs outside of Alaska.*
- *Request that NOAA Alaska region provide greater clarity on how it is able to administer cost recovery programs outside of Alaska with lower overall costs.*
- *Request that NOAA explain how the agency lease footprint has changed since cost recovery programs went into place and tie specific increases in office space costs to new LAPP programs.*
- *Request that NMFS improve its cost recovery reports to provide consistent and detailed descriptions of costs by specific offices, categories, tasks, and hours consistent with NMFS Pacific Region Reports (repeated from Transparency Section).*
- *Consider a Council regulatory action to define “direct program costs” and “incremental costs” to ensure consistent application of costs across programs and ensure efficiency.*

## **Efficiency and Cost Savings**

*Achieve greater efficiency of cost recovery administration consistent with NOAA’s own policy guidance. Wherever possible, NOAA and its partners should seek efficiency and reduce the costs associated with all cost recovery programs.*

A key development in the establishment of several LAPP programs has been the creation of fish cooperatives whose staff greatly facilitate and simplify NOAA’s management functions. Most Alaska LAPP programs have high functioning cooperatives which should have greatly reduced NOAA’s management costs that were in place prior to each LAPP program.<sup>4</sup> The 2007 Design and Use of Limited Access Privilege Programs states:

*“The relevant costs to recover are the incremental costs, i.e., those costs that would not have been incurred but for the (LAPP) program. Conceptually, measuring these costs*

---

<sup>4</sup> With the exception of halibut and sablefish IFQ programs.

*involves a “with and without” comparison, i.e., what is the cost of running the management program for the specified fishery under the status quo (non-LAP) regime, and what is the cost of running the management program under the LAP program? The difference is the incremental costs attributable to implementing the LAP program.”*

The Report does not follow this direction as it provides no information on baseline costs associated with the management of pre-LAPP fisheries. Instead of acknowledging pre-LAPP costs, the Report seems to make broad assumptions that despite the creation of cooperatives and downstream efficiencies the industry achieved through cooperative management, LAPPs (across all programs and cost categories) have greatly increased management complexity, “necessitating additional administrative functions that are unique to these programs.” This message is frequently repeated under each description of costs, stating something to the effect that LAPP fisheries require a “more detailed and resource-intensive approach” which is then used to justify cost recovery.

It seems NOAA’s rationale for ever-increasing cost recovery expenses is incorrectly rooted in the broad assumption that LAPPs have greatly increased costs of fishery management across all programs, but this conclusion fails to consider the workload reduction achieved through cooperatives and does not adequately conduct a required “but / for” and “with / without” analysis for each program.

An example of inconsistent and inequitable cost burdens includes the collection of data through Economic Data Reports (EDRs). Some LAPPs are required to submit them, while other LAPPs never had EDR requirements, including recently implemented programs (i.e., the Pacific Cod Trawl Cooperative Program). Regardless, NOAA and the Council have been able to produce high-quality data necessary for management despite the lack of EDRs in all LAPPs. Clearly, maintaining an inconsistently applied and costly EDR reporting requirement is not required for effective management of LAPPs in Alaska. Only one other LAPP outside of Alaska requires an EDR. Over the years, the Council, NOAA, and industry have recognized the challenges of these reports, and removing this requirement will not diminish our ability to provide high quality analyses.

**Recommendation to achieve greater efficiency and reduce costs:**

- *Ensure fair and consistent treatment of LAPPs with a focus on minimizing costs. As an example, this could include considering regulatory action to remove EDR requirements for those LAPPs still subject to this requirement and identify ways to maintain high quality economic data without the burdensome and high costs imposed by EDRs.*
- *Request that NOAA engage in efforts to minimize costs in all cost recovery programs. Consider ways to minimize costs that are not essential for supporting the necessary*

*management of the fishery. Provide documentation of those efforts to the affected industry and the Council.*

- *Request that NOAA establish a clear policy that ensures if there is uncertainty in the appropriateness in attributing a cost to the industry, that minimizing the burden on the directly regulated public should be the objective consistent with existing NOAA policies.*
- *Request that NOAA ensure that administrative challenges, procurement delays, or other administrative issues that are unrelated to the fishery, but are due to unforeseen costs (e.g., contract overruns, programming errors requiring correction, equipment failures) are not attributed to cost recovery. Such costs are not “incremental” and are not “but/for” the program.*
- *Request that NOAA engage in an independent audit of costs and fees to ensure best practices are followed.*

## **Compliance Monitoring and Enforcement**

The largest single source of fees among catch share programs in Alaska are costs from the Office of Law Enforcement (OLE). To facilitate comparison of OLE costs for Alaska LAPPs with Non-Alaska LAPPS, we put together Table (2). In Alaska, OLE costs comprised over \$3.9M and 36% of total catch share program costs in 2023. This is significantly higher than the \$0.6M and 15% of total catch share costs incurred by OLE in programs administered outside of Alaska in 2023. For 3 of the Alaska catch share programs (Amendment 80, CDQ, and Halibut & Sablefish IFQ), OLE costs are the largest single cost category, and it is the second largest cost category for the Crab Rationalization Program in 2023. In contrast, at least 2 catch share programs outside Alaska did not assess any additional OLE costs due to the implementation of the catch share program.<sup>5</sup> In the case of the Pacific trawl IFQ Program -- a highly complicated catch share program that includes allocations of quota share to multiple sectors, over 2 dozen different quota categories, complex allocation limits, increased observer coverage and scale provisions -- the total enforcement costs for all three IFQ sectors with over 130 permits and nearly 100 vessels was less than \$100,000 in 2023 (Table 1).

Given the significant costs associated with this element of cost recovery in Alaska, the Report fails to provide adequate transparency or accountability documenting how NOAA OLE costs billed to cost recovery meet the criteria of the “but / for” principle. Specific and detailed costs

---

<sup>5</sup> <https://www.fisheries.noaa.gov/s3/2024-06/2022-Tilefish-IFQ-Report.pdf> (page 3) and <https://www.fisheries.noaa.gov/new-england-mid-atlantic/commercial-fishing/2023-annual-report-atlantic-sea-scallop-individual>

associated with each program should be provided in terms of enforcement of quota overages, or any other program-specific reporting regulation. That level of transparent accounting is not currently presented. The only detailed information on OLE activities appears to be annual enforcement report provided to the Council.

In lieu of providing this level of detail, the Report simply reviews the basic roles, responsibilities, and functions of NOAA OLE and justifies cost recovery of those listed activities by stating “the activities would not be necessary in a non-LAPP fishery, where enforcement efforts are focused on fleet wide limits rather than individual participant accountability.” We strongly disagree with this overly broad interpretation. Rather than go line by line through this section disputing what should or should not be charged to cost recovery, it would make more sense going forward that NOAA increase transparency and accountability as follows:

### **Recommendations for Compliance and Enforcement:**

- *Request that NOAA provide for each investigation, the following information: 1) whether or not the case is subject to cost recovery and how much was billed, 2) how many hours were spent on the case, and 3) the number of people assigned to the case.*
- *Request that NOAA provide a similar level of detail adding the aforementioned information to the regular enforcement reports that are given at the Council meeting.*
- *Request that NOAA make public those business rules used to determine how NOAA characterizes or attributes recoverable costs to a single or multiple management programs.*

### **Conclusions**

***In 2024, our sectors are subject to nearly \$11,000,000 in cost recovery fees for these programs and we have paid nearly \$175,000,000 since 2000.<sup>6</sup>***

For decades we have considered ourselves, as industry participants and stakeholders, to be collaborators and partners with the Council and NOAA as we jointly manage our sustainable fisheries in an accountable manner. While we continue to fully embrace our roles as collaborators and partners, we must stress again that our industry is facing enormous challenges, and ask that NOAA also be accountable. We believe that during these times of great economic and regulatory uncertainty for Alaska’s fishing industry, it is incumbent upon NOAA and the Council to support our requests for increased transparency and accountability. It is imperative to

---

<sup>6</sup> See NMFS Report, Table 4-2 (p. 24) and Table 3 in our letter for total costs.

the health of our industry that NOAA and the Council join us in striving to be efficient and to rationally reduce the costs imposed on our sectors.

Thank you for supporting our requests and supporting Alaska's fisheries.

*Robert Alverson*

*Executive Director  
Fishing Vessel Owners' Association*

*Chris Woodley*

*Executive Director  
Groundfish Forum*

*Julie Bonney*

*Executive Director  
Alaska Groundfish Data Bank*

*Andrea Keikkala*

*Executive Director  
United Catcher Boats*

*Rebecca Skinner*

*Executive Director  
Alaska Whitefish Trawler Association*

*Annika Saltman*

*President  
Gulf of Alaska Best Use Cooperative*

*Malcolm Milne*

*President  
North Pacific Fisheries Association*

*Jim Johnson*

*Executive Director  
Deep Sea Fishermen's Union*

*Jeff Kauffman*

*Vice President  
Western Alaska Community Development Association*

*Heather Mann*

*Executive Director  
Midwater Trawlers Cooperative*

*Linda Behnkin*

*Executive Director  
Alaska Longline Fishermen's Association*

*Rob Wurm*

*President  
Kodiak Vessel Owners' Association*

*Nels Evens*

*Executive Director  
Petersburg Vessel Owner's Association*

*Gabriel Prout*

*President  
Alaska Bering Sea Crabbers*

**Table 1: Comparison of Limited Access Privilege Program (LAPP) Costs, OLE Costs, and Participation in LAPPs Outside of Alaska**

Program & Sector	Year	Total Program Costs	OLE Costs	OLE Staff Hours	Participation -- Number of Permittees & Vessels (where available)
<b>Pacific Fishery Management Council (PFMC)</b> See Notes for Additional Detail					
Trawl IFQ (Inshore Sector)	2023	\$1,605,925.79	<b>\$87,363.13</b>	1253.5	119 Eligible IFQ Vessel Accounts, ~75 active vessels (non-Pacific whiting & Pacific whiting catcher vessels)
Trawl IFQ (Catcher/Processor Sector)	2023	\$50,051.31	<b>\$5,982.43</b>	83.25	1 cooperative permit, 10 active vessels (Pacific whiting only)
Trawl IFQ (Mothership Sector)	2023	\$241,123.93	<b>\$3,811.85</b>	53	1 cooperative permit, 4 Mothership vessels, 17 active catcher vessels (Pacific whiting only)
<b>New England Fishery Management Council (NEFMC)</b> See Notes for Additional Detail					
Sea Scallop IFQ Program	2023	\$117,373	<b>\$0</b>	0	109 Limited Access General Category IFQ permit holders.
<b>Mid-Atlantic Fishery Management Council (MAFMC)</b> See Notes for Additional Detail					
Golden Tilefish IFQ Program	2023	\$46,892	<b>\$0</b>	0	~10 IFQ holders, 8 active vessels, 8 dealers (2021 data).
Surf Clam Individual Transferable Quota (ITQ) Program	2023	\$51,696	<b>Not Provided</b>	N/A	~62 ITQ Permits with harvestable bushels and tags (2024 data).
Ocean Quahog ITQ Program	2023	\$76,686	<b>Not Provided</b>	N/A	~31 ITQ Permits with harvestable bushels and tags (2024 data).
<b>South Atlantic Fishery Management Council (SAFMC)</b> See Notes for Additional Detail					
Wreckfish IFQ Program	IFQ Program subject to cost recovery but <b>no cost recovery program in place.</b>				
<b>Gulf of Mexico Fishery Management Council (GMFMC)</b> See Notes for Additional Detail					
Red Snapper IFQ Program	2023	\$1,303,834	<b>~\$524,746</b>	N/A	624 Allocation holders, 404 vessels, 97 dealers
Grouper-Tilefish IFQ Program	2023	\$714,420	Est. 26% of Combined Cost.		790 Allocation holders, 371 vessels, 98 dealers
<b>Total for All non-Alaska LAPP Programs</b>		<b>\$ 4,208,002</b>	<b>~\$ 621,903</b>		<b>~1,747 Permits, ~ 889 Vessels (Upper Bound Estimate).</b>

**Table 1: Notes and Data Sources**

<p><b>PFMC Data Notes:</b></p> <p><u>Cost Recovery Data Sources:</u></p> <ul style="list-style-type: none"> <li>2023 Cost Recovery Annual Report (see pp. 10 – 13): <a href="https://www.fisheries.noaa.gov/s3/2024-03/2023-CR-annualreport-final.pdf">https://www.fisheries.noaa.gov/s3/2024-03/2023-CR-annualreport-final.pdf</a></li> </ul> <p><u>Permit and Vessel Participation Data Sources:</u></p> <ul style="list-style-type: none"> <li>Inshore Vessel Data: IFQ Vessel Account database (sorted for 2023 only) <a href="https://www.webapps.nwfsc.noaa.gov/apex/ifaq/f?p=155:4:::; ; &amp; 2025-2026 Pacific Coast Groundfish Harvest Specifications EA/RIR, (2023 data in Table 1, p. 45) https://www.fisheries.noaa.gov/s3/2024-12/SpexA33-EA-MSA-RIR-IRFA-FONSI-FINAL.pdf">https://www.webapps.nwfsc.noaa.gov/apex/ifaq/f?p=155:4:::; ; &amp; 2025-2026 Pacific Coast Groundfish Harvest Specifications EA/RIR, (2023 data in Table 1, p. 45) https://www.fisheries.noaa.gov/s3/2024-12/SpexA33-EA-MSA-RIR-IRFA-FONSI-FINAL.pdf</a></li> <li>Catcher/Processor Permit and Vessel Data: 2024 Pacific Whiting Conservation Cooperative Report (for 2023 season): <a href="https://www.pcouncil.org/documents/2024/06/supplemental-informational-report-5-6.pdf#:~:text=In%202023%2C%20none%20of%20the,set%2D%20aside%20of%20100%20mt.">https://www.pcouncil.org/documents/2024/06/supplemental-informational-report-5-6.pdf#:~:text=In%202023%2C%20none%20of%20the,set%2D%20aside%20of%20100%20mt.</a></li> <li>Mothership Permit and Vessel Data: 2024 Whiting Mothership Report 2024 (for 2023 Season): <a href="https://www.pcouncil.org/documents/2024/06/supplemental-informational-report-4-june-2024.pdf/">https://www.pcouncil.org/documents/2024/06/supplemental-informational-report-4-june-2024.pdf/</a></li> </ul>
<p><b>NEFMC Notes:</b></p> <p><u>Cost Recovery and Permit Data Sources:</u></p> <ul style="list-style-type: none"> <li>Sea Scallop Cost Recovery Website: <a href="https://www.fisheries.noaa.gov/new-england-mid-atlantic/commercial-fishing/2023-annual-report-atlantic-sea-scallop-individual">https://www.fisheries.noaa.gov/new-england-mid-atlantic/commercial-fishing/2023-annual-report-atlantic-sea-scallop-individual</a></li> </ul> <p><u>Note on OLE Costs from website:</u></p> <ul style="list-style-type: none"> <li>"OLE determined there were no increased enforcement activities as a result of the scallop IFQ program for the 2023 fee period, and, therefore, there were no recoverable expenses for enforcement."</li> </ul>
<p><b>MAFMC Notes:</b></p> <p><u>Cost Recovery Data Sources:</u></p> <ul style="list-style-type: none"> <li>2023 Tilefish Cost Recovery Report: <a href="https://www.fisheries.noaa.gov/s3/2024-06/2023-Tilefish-IFQ-Report.pdf">https://www.fisheries.noaa.gov/s3/2024-06/2023-Tilefish-IFQ-Report.pdf</a></li> <li>2023 Surf Clam &amp; Ocean Quahog Cost Recovery Website: <a href="https://www.fisheries.noaa.gov/bulletin/2023-cost-recovery-surflam-and-ocean-quahog-cage-tag-fees">https://www.fisheries.noaa.gov/bulletin/2023-cost-recovery-surflam-and-ocean-quahog-cage-tag-fees</a></li> </ul> <p><u>Note on OLE costs from Golden Tilefish IFQ Report:</u></p> <ul style="list-style-type: none"> <li>"OLE determined there were no increased enforcement activities as a result of the tilefish IFQ program and; therefore, there were no recoverable expenses during 2022." (p. 2-3).</li> </ul> <p><u>Permit and Vessel Participation Data Sources:</u></p> <ul style="list-style-type: none"> <li>Tilefish, 2023 Presentation (2021 latest data available), see slides 13-18: <a href="#">12-year Review of the Golden Tilefish IFQ Program</a></li> <li>Surf Clam, 2024 NMFS Data base (2023 data not available), only permits with ITQ ratios included in estimate: <a href="#">Atlantic Surfclam ITQ Allocations   NOAA Fisheries</a></li> <li>Ocean Quahog, 2024 NMFS Data base (2023 data not available), only permits with ITQ ratios included in estimate: <a href="#">Ocean Quahog ITQ Allocations   NOAA Fisheries</a></li> </ul>
<p><b>SAFMC Notes:</b></p> <p><u>Wreckfish IFQ Cost Recovery Presentation by NMFS to SAFMC</u></p> <ul style="list-style-type: none"> <li><a href="https://safmc.net/documents/sg_a7c_wreckfishcostrecoverypresentation-pdf/">https://safmc.net/documents/sg_a7c_wreckfishcostrecoverypresentation-pdf/</a></li> </ul>
<p><b>GMFMC Notes:</b></p> <p><u>Cost Recovery, Permit, and Vessel Participation Data Sources:</u></p> <ul style="list-style-type: none"> <li>Gulf of Mexico Red Snapper IFQ Report (2023 update); see pages 42 for cost recovery total (3% of total) and p. 45 for permit and vessel data: <a href="https://noaa-sero.s3.amazonaws.com/drop-files/cs/2023_RS_AnnualReport_FINAL.pdf">https://noaa-sero.s3.amazonaws.com/drop-files/cs/2023_RS_AnnualReport_FINAL.pdf</a></li> <li>Gulf of Mexico Grouper-Tilefish IFQ Report (2023 update); see pages 62 for cost recovery total (3% of total) and p. 65 for permit and vessel data: <a href="https://noaa-sero.s3.amazonaws.com/drop-files/cs/2023_RS_AnnualReport_FINAL.pdf">https://noaa-sero.s3.amazonaws.com/drop-files/cs/2023_RS_AnnualReport_FINAL.pdf</a></li> </ul> <p><u>Method for Estimating OLE Costs:</u></p> <ul style="list-style-type: none"> <li>The 2021 Red Snapper Grouper-Tilefish IFQ Review estimated that OLE cost recovery costs represented 26% of total average aggregated Red Snapper &amp; Grouper-Tilefish IFQ program costs from 2012 -2018 (see Figure 11.1.1, p. 185). Applying the same percentage to combined 2023 costs form the basis for the estimates here.</li> </ul>

**Table 2: Comparison of OLE Costs across LAPPs**

(All data from 2023 unless otherwise specified)

<b>Program</b>	<b>Total Program Costs</b>	<b>Total OLE Costs</b>	<b>Number of Permits and Participation in Program</b>
All 8 Non-Alaskan LAPPs (see Table X)	\$ 4,208,002	~\$ 621,903  Data provided for PFMC, Estimate for GMFMC LAPPs, no costs included for all NEFMC, MAFMC, and SAFMC LAPPs)	~1,747 Permits, ~ 889 Vessels (Upper Bound Est.).  Total number of active vessels will be likely be less than 889 vessels because some vessels may participate in more than one LAPP (e.g., Red Snapper and Grouper-Tilefish IFQ Programs)).
Amendment 80 Program	\$ 1,361,951	\$ 589,450	1 Permit, 17 catcher/processors , 1 non-AFA catcher vessel
American Fisheries Act – Inshore Cooperatives	\$ 610,384	\$ 164,627	6 Permits, 85 catcher vessels
CDQ Program	\$ 881,105	\$ 476,557	6 CDQ Group Permits, Comprehensive list of vessels harvesting CDQ not available.
Crab Rationalization Program (2022/2023)	\$ 2,888,997	\$ 630,767	9 cooperatives issued IFQ, ~6 non-cooperative IFQ recipients (~340 QS holders). ~23 PQS/IPQ holders. ~51 active vessels
Halibut & Sablefish IFQ Program	\$ 4,586,041	\$ 2,000,036	1,791 Halibut IFQ permit holders, 690 vessels. 644 Sablefish IFQ permit holders, 275 vessels.
Rockfish Program	\$ 344,120	No Costs Reported	7 Permits, ~22 catcher vessels & ~7 catcher/processors (2020 cooperative data latest publically available)
<b>Total Alaska LAPP Program Costs</b>	<b>\$ 10,672,598</b>	<b>\$ 3,861,437</b>	<b>~ 2,821 Permits, ~1,170 Vessels (Upper Bound Est.).</b>  Total number of active vessels will be likely be less than 1,170 vessels because some vessels may participate in more than one LAPP (e.g., Halibut and Sablefish IFQ Programs)). Additional vessels participating in CDQ Program fisheries are unlikely to be substantial relative to halibut and sablefish fishery vessel overlap.

**Table 2: Notes and Data Sources**

<p><b>Amendment 80 Data Notes:</b>  <b>Cost Recovery Data Sources:</b></p> <ul style="list-style-type: none"> <li>2023 Cost Recovery Annual Report: <a href="https://www.fisheries.noaa.gov/s3/2024-02/A80-Cost-Recovery-Fee-Report-2023.pdf">https://www.fisheries.noaa.gov/s3/2024-02/A80-Cost-Recovery-Fee-Report-2023.pdf</a> (note summation error in the report that incorrectly reports total OLE costs).</li> </ul> <p><b>Permit and Vessel Participation Data Sources:</b></p> <ul style="list-style-type: none"> <li>Amendment 80 Cooperative Report (2023): <a href="https://www.npfmc.org/wp-content/PDFdocuments/catch_shares/CoopRpts2023/AKSC.pdf">https://www.npfmc.org/wp-content/PDFdocuments/catch_shares/CoopRpts2023/AKSC.pdf</a></li> </ul>
<p><b>AFA Inshore Cooperative Data Notes:</b>  <b>Cost Recovery Data Sources:</b></p> <ul style="list-style-type: none"> <li>2023 Cost Recovery Annual Report: <a href="https://www.fisheries.noaa.gov/s3/2024-02/AFA-Cost-Recovery-Fee-Report-2023.pdf">https://www.fisheries.noaa.gov/s3/2024-02/AFA-Cost-Recovery-Fee-Report-2023.pdf</a></li> </ul> <p><b>Permit and Vessel Participation Data Sources:</b></p> <ul style="list-style-type: none"> <li>AFA Inshore InterCooperative Report (2023): : <a href="https://www.npfmc.org/wp-content/PDFdocuments/catch_shares/CoopRpts2023/Intercooperative.pdf">https://www.npfmc.org/wp-content/PDFdocuments/catch_shares/CoopRpts2023/Intercooperative.pdf</a></li> </ul>
<p><b>CDQ Data Notes:</b>  <b>Cost Recovery Data Sources:</b></p> <ul style="list-style-type: none"> <li>2023 Cost Recovery Annual Report: <a href="https://www.fisheries.noaa.gov/s3/2024-02/CDQ-Cost-Recovery-Fee-Report-2023.pdf">https://www.fisheries.noaa.gov/s3/2024-02/CDQ-Cost-Recovery-Fee-Report-2023.pdf</a></li> </ul> <p><b>CDQ Vessel Participation:</b></p> <ul style="list-style-type: none"> <li>Many CDQ allocations are harvested on vessels already active in other LAPPs. There is additional CDQ allocations harvested primarily on some AFA catcher/processors, freezer longiners, and Norton Sound crab vessels not captured in vessel counts from other LAPPs. However, because the vessel count for these additional vessels is likely small relative to total vessel counts, particularly as compared to all halibut and sablefish IFQ vessels.</li> </ul>
<p><b>Crab Rationalizaion Data Notes:</b>  <b>Cost Recovery Data Sources:</b></p> <ul style="list-style-type: none"> <li>2023 Cost Recovery Annual Report: <a href="https://www.fisheries.noaa.gov/s3/2024-02/Crab-Cost-Recovery-Fee-Report-2022-2023.pdf">https://www.fisheries.noaa.gov/s3/2024-02/Crab-Cost-Recovery-Fee-Report-2022-2023.pdf</a> <a href="https://www.fisheries.noaa.gov/s3/2024-02/Crab-Cost-Recovery-Fee-Report-2023.pdf">very-Fee-Report-2023.pdf</a></li> </ul> <p><b>Permit and Vessel Participation Data Sources:</b></p> <ul style="list-style-type: none"> <li>17 year review, Table 6-1 cooperative and QS holders (p. 106), Table 6-9, Number of active vessels in CR Program fisheries (p. 124), and Table 7-3 Number of PQS holders (p. 139). <a href="https://www.npfmc.org/wp-content/PDFdocuments/Publications/CrabProgramReviewFinal.pdf">https://www.npfmc.org/wp-content/PDFdocuments/Publications/CrabProgramReviewFinal.pdf</a></li> </ul>
<p><b>Halibut and Sablefish IFQ Data Notes:</b>  <b>Cost Recovery Data Sources:</b></p> <ul style="list-style-type: none"> <li>2023 Cost Recovery Annual Report: <a href="https://www.fisheries.noaa.gov/s3/2024-02/IFQ-Cost-Recovery-Report-2023-0.pdf">https://www.fisheries.noaa.gov/s3/2024-02/IFQ-Cost-Recovery-Report-2023-0.pdf</a></li> </ul> <p><b>Permit and Vessel Participation Data Sources:</b></p> <ul style="list-style-type: none"> <li>Halibut and Sablefish IFQ Program 2023 Report to the Fleet: Table 2-1, Total halibut IFQ landings and participation (p. 3). Table 2-2, Total sablefish IFQ landings and participation (p. 4). <a href="https://meetings.npfmc.org/CommentReview/DownloadFile?p=fc80f442-995d-46a8-8f8a-2b938a200bec.pdf&amp;fileName=B1%20IFQ%20Report%20to%20the%20Fleet.pdf">https://meetings.npfmc.org/CommentReview/DownloadFile?p=fc80f442-995d-46a8-8f8a-2b938a200bec.pdf&amp;fileName=B1%20IFQ%20Report%20to%20the%20Fleet.pdf</a></li> </ul> <p><b>IFQ Vessel Participation:</b></p> <ul style="list-style-type: none"> <li>The total number of IFQ vessels participating on an annual basis will be less than the sum of the halibut and sablefish vessels because many vessels participate in both fisheries. NMFS landings data from 2023 indicates that roughly ~15% of landings include both halibut and sablefish (<a href="https://www.fisheries.noaa.gov/sites/default/files/akro/23ifqland.htm">https://www.fisheries.noaa.gov/sites/default/files/akro/23ifqland.htm</a>)</li> </ul>
<p><b>Rockfish Program Data Notes:</b>  <b>Cost Recovery Data Sources:</b></p> <ul style="list-style-type: none"> <li>2023 Cost Recovery Annual Report: <a href="https://www.fisheries.noaa.gov/s3/2024-02/Rockfish-Cost-Recovery-Report-2023.pdf">https://www.fisheries.noaa.gov/s3/2024-02/Rockfish-Cost-Recovery-Report-2023.pdf</a></li> </ul> <p><b>Permit and Vessel Participation Data Sources:</b></p> <ul style="list-style-type: none"> <li>Rockfish Program Cooperative Reports at: <a href="https://www.npfmc.org/cooperative-reporting/">https://www.npfmc.org/cooperative-reporting/</a></li> </ul>

**Table 3: Total Cost Recovery Payments for all Alaska Programs**

Year	Amendment 80 Program	AFA Inshore Sector	CDQ Program	Crab Rationalization Program	Halibut & Sablefish IFQ Program	Rockfish Program	All Programs
2000					\$3,474,111		\$3,474,111
2001					\$3,430,357		\$3,430,357
2002					\$3,513,827		\$3,513,827
2003					\$3,407,118		\$3,407,118
2004					\$3,326,607		\$3,326,607
2005				\$4,270,881	\$2,789,047		\$7,059,928
2006				\$3,939,841	\$2,739,602		\$6,679,443
2007				\$2,133,758	\$3,468,590		\$5,602,348
2008				\$3,195,760	\$4,302,026		\$7,497,786
2009				\$3,927,062	\$5,203,411		\$9,130,473
2010				\$3,210,189	\$5,065,748		\$8,275,937
2011				\$3,364,442	\$4,896,232	\$194,562	\$8,455,236
2012				\$3,516,592	\$4,920,803	\$224,059	\$8,661,454
2014				\$3,095,352	\$4,530,572	\$345,948	\$7,971,872
2015				\$3,392,286	\$5,593,603	\$361,790	\$9,347,679
2016*	\$322,158	\$166,154	\$203,384	\$3,650,178	\$5,902,497	\$304,684	\$10,549,055
2017	\$836,923	\$339,667	\$447,580	\$2,950,043	\$4,659,869	\$208,666	\$9,442,748
2018	\$962,757	\$439,292	\$565,050	\$3,038,830	\$4,573,407	\$321,411	\$9,900,747
2019	\$1,048,481	\$430,649	\$544,438	\$3,017,069	\$4,488,393	\$319,324	\$9,848,354
2020	\$1,058,661	\$378,550	\$559,418	\$2,616,001	\$4,414,604	\$280,222	\$9,307,456
2021	\$1,094,144	\$481,120	\$549,601	\$2,387,593	\$3,978,894	\$285,252	\$8,776,604
2022	\$992,935	\$502,984	\$567,984	\$2,594,226	\$4,223,487	\$308,955	\$9,190,571
2023	\$1,361,951	\$610,384	\$881,105	\$2,888,897	\$4,856,041	\$344,120	\$10,942,498
<b>Total (All Years)</b>	<b>\$7,678,010</b>	<b>\$3,348,800</b>	<b>\$4,318,560</b>	<b>\$57,189,000</b>	<b>\$97,758,846</b>	<b>\$2,372,634</b>	<b>\$172,665,850</b>
<b>Notes:</b>							
*2016 Cost Recovery for Amendment 80, AFA Inshore, and CDQ was implemented mid-year.							
All data from NMFS Cost Recovery Annual Reports accessed at:							
<a href="https://www.fisheries.noaa.gov/alaska/commercial-fishing/cost-recovery-programs-fee-collection-and-fee-payment-alaska">https://www.fisheries.noaa.gov/alaska/commercial-fishing/cost-recovery-programs-fee-collection-and-fee-payment-alaska</a>							