2024 Cost Recovery Report for Alaska

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1. Introduction

Cost recovery is an essential component of fisheries management under the Magnuson-Stevens Fishery Conservation and Management Act (MSA). Specifically, section 304(d) of the MSA requires the collection of cost recovery fees so that National Marine Fisheries Service (NMFS) can recover actual costs directly related to the management, data collection, and enforcement of Limited Access Privilege Programs (LAPPs) and the Community Development Quota (CDQ) Program. LAPPs are fishery management strategies that allocate a specific portion of the total allowable catch to individuals, cooperatives, or communities. These programs aim to enhance economic efficiency, promote sustainability, and support long-term resource management. In Alaska, the North Pacific Fishery Management Council (NPFMC) and NMFS and have implemented multiple LAPPs:

- Crab Rationalization (CR) Program – Bering Sea and Aleutian Islands (BSAI) crab fisheries.
- Rockfish (RP) Program – Central Gulf of Alaska rockfish fisheries.
- Amendment 80 (A80) Program – BSAI non-pollock trawl catcher/processors.
- American Fisheries Act (AFA) Program – Bering Sea directed pollock fishery.
- Community Development Quota (CDQ) Program – Allocates a portion of total allowable catch to eligible Western Alaska communities.
- Individual Fishing Quota (IFQ) Program – Pacific halibut and sablefish fixed-gear fisheries.
- Pacific Cod Trawl Cooperative (PCTC) Program - BSAI trawl catcher vessel Pacific cod fishery during the A and B seasons.
- Aleutian island Pollock (AIP) - Aleutian Islands Pollock fishery allocated to the Aleut Corporation

The cost recovery programs in Alaska's federally managed fisheries were put into place at different times and each has distinct regulatory requirements outlined in 50 CFR Part 679 and 50 CFR Part 680, detailing fee calculations, payment responsibilities, and administrative oversight (Table 1-1). All of the programs implement a recovery fee process to offset the actual costs directly related to the management, data collection, and enforcement of the program. The MSA mandates that cost recovery fees not exceed three percent of the annual ex-vessel value of fish harvested by a program subject to a cost recovery fee, and that the fee be collected either at the time of landing, filing of a landing report, or sale of such fish during a fishing season or in the last quarter of the calendar year in which the fish is harvested. Each year, NMFS determines the annual fee percentage for each program, ensuring that collections align with actual program costs while remaining within statutory limits.

This report consolidates cost recovery data and analysis across all programs, providing a comprehensive view of fisheries cost recovery in Alaska for the 2024 fiscal year. The content and format of this report was based on stakeholder engagement and feedback from industry representatives (see section on Stakeholder Engagement below). By integrating data from multiple programs, the report aims to:

- Provide a clear explanation of the methods for calculating cost recovery fees.
- Present a consolidated financial summary, including direct program costs and total ex-vessel values.
- Enhance transparency regarding cost allocation and program management.

Stakeholder Engagement

At the February 2024 meeting of the NPMFC, representatives of all catch share programs in Alaska presented a letter requesting increased transparency from NMFS in the cost recovery reports. In response, NMFS committed to an iterative process to improve the information included in the agency's cost recovery reports.

As a first step, NMFS attended a meeting organized by representatives from all the catch share programs on March 15, 2024. This initial meeting was focused on explaining some of the internal NMFS processes and setting up an avenue for specific questions to be submitted to NMFS. NMFS staff also attended a meeting with representatives of the PCTC fishery on Sept 12, 2024 and representatives from the A80 fleet on Jan 21, 2025 to discuss questions specific to those programs. NMFS also responded to a number of ad hoc individual conversations to discuss the cost recovery process and got feedback on information that would be most useful for industry.

As a result of input from these meetings, NMFS decided to consolidate the individual cost recovery reports into this single report. This allows the process steps that are followed by all programs to be explained in far greater detail without duplicating effort and will provide participants in multiple programs a unified report, while still providing program specific information.

Table 1-1. Summary of programs subject to cost recovery fees in the Alaska Region, date the cost recovery component was established, and the relevant regulations.

	PCTC	CR	CDQ	AIP	A80	AFA	IFQ	RP
Date Established	8/8/2023	3/2/2005	1/5/2016	1/5/2016	1/5/2016	1/5/2016	3/20/2000	11/27/2011
Citation	88 FR 53704	70 FR 10174	81 FR 150	81 FR 150	81 FR 150	81 FR 150	65 FR 14919	76 FR 81248

2. Defining Incremental Costs

The MSA ensures that industry participants contribute to the expenses incurred by regulatory agencies in administering LAPPs and the CDQ Program, with a cap on fees set at a maximum of three percent of the total ex-vessel value of fish harvested under each program. Cost recovery fees recover the actual incremental costs that are directly related to the management, data collection, and enforcement of the programs.

According to the NOAA Technical Memorandum on *Design and Use of Limited Access Privilege Programs*[1], 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. NMFS's Alaska Region (AKR) has developed, and maintains, internal guidance for agency staff in tracking incremental costs, which describes specific administrative, compliance, and enforcement activities that arise due to the existence of a LAPP or CDQ Program. The *NMFS Catch Share Policy*[2] further clarifies that fees must be directly tied to the program's operation, ensuring that costs recovered do not extend beyond what is necessary to maintain the system.

[1] NOAA Technical Memorandum, NMFS-F/SPO-86. Available at: https://spo.nmfs.noaa.gov/sites/default/files/tm86.pdf
[2] NMFS Policy Directive 01-12. Available at: https://media.fisheries.noaa.gov/dam-migration/01-121-01.pdf

The key criteria for a cost to qualify as incremental and therefore a recoverable expense include:

1. Direct Association with the LAPP or CDQ Program – The cost must be incurred specifically because the program exists and would not be necessary otherwise.
2. Beyond General Fisheries Management – The cost must exceed standard fisheries management practices, which apply to all fisheries.
3. Essential for Effective Program Oversight – The cost must contribute to the ongoing administration, monitoring, enforcement, or development of LAPP-specific policies.

The incremental costs differ from general fisheries management expenses, which are typically covered by federally appropriated funds. Cost recovery ensures that those who benefit from the privilege of access to a LAPP fishery contribute equitably to its administration.

Agency Management Tasks Associated with LAPPs and CDQ

When NMFS provides reports on cost recovery, the agency identifies expenses in the following categories:

- **Personnel and benefits** are costs directly proportional to the amount of labor an employee spends on a given LAPP. 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 (see Appendix A for more details). Examples of costs that are directly tracked are: issuing or transferring permits, analyzing fishery management issues directly relevant to a LAPP, or analyzing and drafting documents necessary to implement regulatory or FMP changes to a LAPP or CDQ program.
- **Travel** costs include flight, lodging and rental vehicles (as needed). These costs are apportioned based on the purpose of the travel and staff work with their supervisors to determine the appropriate percentages based on LAPP participation. For example, flying staff into Dutch Harbor to conduct at-sea scale inspections would be applied to AFA costs and a portion that is not eligible for cost recovery. Staff travelling for an in-person eLandings training event would primarily bill to the LAPP(s) that would be reasonably expected to attend. For example, the agency would expect that a training held in Southeast Alaska would primarily be attended by participants in the IFQ LAPP and would primarily be billed to IFQ.
- **Transportation** costs are primarily the shipment of items, such as the calibration weights for scale inspections and materials used by IPHC port samplers in the IFQ program.
- **Printing** costs would include training materials for observers to reference while at sea and outreach materials describing LAPP responsibilities. Examples of these materials can be made available on request.
- **Contracts/training** is an aggregate of contracts, contract fees and training costs. This cost category includes the contract for eLandings support staff and the contract for the OLE data technicians, both of which provide front line support outside of normal business hours. This also includes costs for development and maintenance of IT systems that enable LAPPs, including eLandings, the Catch Accounting System and the Integrated Fisheries Application (IFA). Appendix A provides a more detailed description of how contracting costs (including the costs for IFA) are distributed across cost recovery programs.

- **Supplies** include items associated with implementation of a LAPP that can be reasonably expected to be replaced on an annual or biennial basis. This mainly includes sampling supplies for AFSC observers and IPHC port samplers.
- **Equipment** category includes items needed for administering a LAPP that are expected to last through multiple seasons and would include things such as purchasing a knackbox for dry storage of sandbags, calibration weights for scale inspections in Dutch Harbor, and electronic devices used by fisheries observers and port samplers.
- **Rent/utilities** 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. For example, IFQ is landed in many small ports, and the agency would not maintain offices in many of those ports without the enforcement needs of the IFQ program. Maintaining these offices saves on travel costs (see Appendix B for more detailed information).
- **Other** costs are any additional incremental costs of a LAPP that can not be applied to one of the other categories.

The following section and Table 2-1 provide more details about the types of tasks associated with these cost categories and further explanation about how these tasks meet NOAA's cost recovery policy requirement that agency costs must be incremental (i.e. "in addition") and specifically tied to the management of a LAPP.

This list of tasks is a reference of tasks that have been charged to cost recovery throughout the cost recovery program management and may not reflect tasks identified for cost recovery in 2024. For example, costs associated with inseason management were not collected in 2024 for the groundfish program. However, in the past, some of these costs have been identified as incremental to specific LAPP programs.

Quota Share Administration

These administrative functions are unique to a LAPP program and essential for ensuring the program's effectiveness. Unlike general fishery management, which deals with setting overall catch limits and monitoring compliance, quota share administration involves individualized allocations to specific participants or entities, such as cooperatives. Under LAPPs, the agency must process cooperative and individual applications, perform the quota allocation process, issue permits, process transactions and lease agreements for quota shares. The work for quota allocation, permitting, and processing transactions and leases requires dedicated personnel to verify, approve, and document these activities while ensuring compliance with ownership limits established to prevent excessive consolidation.

Additionally, the maintenance of centralized IT systems and infrastructure to support permitting, quota share allocation, and landings are necessary to implement LAPPs. These IT systems must be updated in real-time to track ownership changes, monitor quota use, and prevent unauthorized transfers. Developing and refining electronic systems for quota tracking improves transparency and efficiency, reducing errors and disputes between quota holders and regulatory agencies.

Customer support services for quota holders ensure that industry participants understand their rights and responsibilities under the LAPP framework. This includes responding to inquiries, assisting with permit renewals, and troubleshooting technical issues related to electronic quota tracking systems. Without these services, the program would face compliance challenges and potential misallocations of quota shares.

Audits of quota ownership structures are essential to ensure that program rules regarding consolidation limits and transfer restrictions are upheld. These audits require significant administrative effort and are a direct result of implementing a LAPP program. Finally, training and outreach programs help quota holders navigate regulatory requirements, reducing the likelihood of inadvertent violations and improving overall program compliance.

These actions would not be necessary if there were no LAPP program. In a non-LAPP-managed fishery, quota shares would not exist, and management would focus solely on overall catch limits and enforcement at the fleet level. The complexity of individual allocations and transfers necessitates a dedicated administrative structure, justifying the use of cost recovery fees to support these functions.

Catch Monitoring

LAPPs require specific accounting and tracking of individual quota holders' or cooperatives' harvests. In addition, many of the Alaska LAPPs allocate prohibited species catch (PSC) to entities (e.g. cooperatives) that are enforced through regulatory provisions that prevent the fishery participants from exceeding a PSC allocation. These program elements require robust catch monitoring with a combination of observer coverage and monitoring tools (e.g. at-sea flow scales, compliance video) to ensure accurate accounting of catch and bycatch under a LAPP and compliance with LAPP regulations. While observers were deployed prior to some cost recovery program implementation, the high level of observer coverage and the number of observers needed to support all the Alaska LAPPs and CDQ Program create costs to the agency that go beyond general fisheries monitoring.

LAPPs also necessitate the implementation, support and tracking of specific tools tailored to catch monitoring of a LAPP program. For example flow scales used to weigh fish precisely and accurately in some LAPP fisheries. These systems must be tested and certified annually. The use of video monitoring systems such as scale video monitoring and halibut deck sort monitoring are implemented to ensure compliance with regulations. Without these systems to support LAPP fisheries, the potential for tampering or practices that affect the accuracy and precision of LAPP catch would be diminished. The use of video compliance systems provide additional oversight in cases where observers may not be present, ensuring catch is sorted and accounted for appropriately and accurately. This includes, providing training to vessel operators and observers on proper use of these video systems and refining data storage and retrieval methods.

NMFS incurs the cost for the inspection and approval of these catch monitoring tools. In addition inspection and approval of observer sampling stations necessary to collect the data in the LAPP program is also a cost to the agency. These inspections and approvals would likely not be required in the general fishery.

NMFS incurs costs in maintaining, reviewing, and completing quality checks on observer reports. This work is critical to ensuring that participants do not exceed their allocated quotas and that all reported landings accurately reflect what was harvested. Additionally, electronic monitoring programs involve developing software tools that track vessel activities and catch data, ensuring that all harvests align with the permitted quotas.

The implementation of LAPPs requires dedicated personnel for reviewing and validating data. LAPP program managers consistently engage with agency staff to ask for research into data when CAS differs from their data. Depending on the questions raised, these can range from quick conversations, to multi day exploration of the

data. LAPP programs also require subject matter experts to respond and research potential violations. Cost recovery fees ensure that these specialized compliance and verification functions remain fully funded.

Additionally, cost recovery funds support audits of observer data against electronic reports, ensuring consistency between human and automated monitoring systems. This dual-verification approach strengthens compliance efforts and reduces disputes over quota violations.The ability to conduct independent reviews of video footage ensures that instances of misreporting or noncompliance are identified and addressed promptly.

All of these catch monitoring activities would not be necessary without a LAPP program. In a non-LAPP fishery, enforcement and monitoring efforts would focus on broad-scale fleet activity rather than individual vessel compliance. Since LAPPs allocate specific quotas to individual participants, a higher level of oversight is essential to maintain the integrity of the program. The costs associated with these monitoring activities directly support the unique requirements of LAPPs, justifying their inclusion in cost recovery fees.

Dockside Monitoring

Dockside monitoring and enforcement are critical to ensuring that landings correspond accurately to allocated quotas and that illegal or misreported landings do not undermine the integrity of the LAPP framework. These activities extend beyond general fisheries management as they focus on individual accountability within a LAPP, necessitating a higher level of oversight and enforcement.

Dockside monitoring ensures that each vessel offloading catch does so in compliance with LAPP regulations. This requires dedicated personnel to inspect catch upon arrival at port, verify weights using certified scales, and reconcile the physical catch against electronic and paper-based landing reports. Without this level of verification, the potential for misreporting or quota evasion would increase significantly. The length of fisheries under a LAPP program necessitate more staff in more locations to support this level of inspection. For example IPHC port samplers must be in multiple locations throughout the year.

The IFQ program includes a Prior Notice of Landing requirement which enables dockside monitoring of landings. Enforcement personnel are stationed at key landing sites to oversee offloading procedures and confirm compliance with quota allocations. They conduct random checks and targeted audits based on risk assessments, ensuring that vessels are not exceeding their permitted take. These measures provide an additional layer of accountability, reducing the risk of quota violations.

Cost recovery funds also support the review and reconciliation of logbooks, sales receipts, and fish tickets to detect discrepancies between reported and actual harvests. Inspectors work to identify patterns of misreporting or potential fraud, referring violations for further investigation if necessary. These tasks are essential in preventing abuses of the quota system and maintaining fair market competition among participants.

Additionally, investments in technology allow for real-time catch reporting through electronic landing systems, which improve the efficiency and accuracy of data collection. By integrating dockside enforcement with electronic reporting tools, NMFS can quickly identify anomalies and take corrective actions when necessary.

These activities would not be required in a non-LAPP fishery, where enforcement typically focuses on overall fleet-wide quotas rather than individual vessel accountability. The individualized nature of LAPPs necessitates a more detailed and resource-intensive approach to catch monitoring, making these functions a justifiable cost

recovery activity. Without these measures, the potential for quota mismanagement would increase, reducing the effectiveness of the LAPP system.

In-Season Quota Management and Bycatch Reduction

While in-season management existed prior to LAPP implementation, the introduction of LAPP-specific allocations necessitated additional administrative functions that are unique to these programs. Unlike traditional fleet-wide quotas, LAPP fisheries require continuous oversight of individual and cooperative quota usage to ensure compliance with program rules and efficient allocation of available harvest.

Facilitating inter-sector and intra-cooperative quota transfers is a key function enabled by LAPPs, allowing for the efficient reallocation of unused quota within established regulatory guidelines. NMFS provides administrative support to review, approve, and document these transactions, ensuring transparency and compliance with allocation limits.

Real-time tracking and reporting for LAPP participants differ from general fishery-wide monitoring, as allocations must be reconciled at an individual or cooperative level rather than across an entire sector. This requires dedicated staff to maintain accurate records, process adjustments, and respond to participant inquiries regarding quota status. The harvest specification processes are more complex with LAPPs as well. For example in Amendment 80, evaluation and entry of sideboards into the Catch Accounting System (CAS) takes dedicated effort from staff.

Processing quota carryovers, where permitted, ensures that unharvested allocations from one season can be applied in subsequent years without exceeding conservation limits. This function is specific to LAPPs, as traditional fishery management does not typically provide for such flexibility in allocation adjustments.

Monitoring cooperative compliance within LAPPs is critical to ensuring that quota is harvested in accordance with program rules. Unlike pre-LAPP enforcement, which focused on fleet-wide limits, compliance efforts under LAPPs target specific entities and may involve additional auditing of transactions and quota usage.

Targeted outreach to quota holders provides direct support for LAPP participants, ensuring they understand and adhere to in-season regulatory changes. This outreach is an essential component of effective LAPP management, helping quota holders navigate evolving requirements and maximize the value of their allocations.

These activities would not be required in a non-LAPP fishery, where in-season management focused only on broad seasonal limits rather than individual allocations. The added complexity of LAPP fisheries justifies the allocation of cost recovery funds to support these functions, ensuring efficient and compliant management of quota holdings. It should be noted that in 2024, NMFS did not charge many of these tasks to cost recovery.

Development and Maintenance of IT systems to enable reporting and catch accounting

The development and maintenance of IT systems and electronic reporting systems are crucial to the effective management of LAPP fisheries. These systems enable NMFS to monitor individual participant compliance with LAPP regulations more efficiently, reducing the likelihood of quota overages or misreporting.

As each LAPP was developed, NMFS has implemented electronic reporting and catch accounting systems to ensure that all catch share program catch information (of both target and non-target species) could be estimated

on a timely basis. This is necessary to allow catch share fishery participants to have the information needed to manage the catch of all of their allocations, in order not to exceed any particular quota.These IT systems enable LAPP participants to actively monitor the harvest of their allocations (landing ledgers) and take action to constrain their fishing activities should they reach or approach a particular allocation. The IT systems also enable fishery participants to complete transfers and other program specific-functions such as vessel replacements.

Designing and maintaining IT systems requires ongoing software development and infrastructure support. NMFS invests in user-friendly interfaces that streamline reporting for quota holders while ensuring regulatory compliance. These systems integrate multiple data sources, including observer reports and electronic monitoring data, to create a comprehensive view of fishery activity.

Integrating real-time data transmission tools allows NMFS to receive and process catch reports instantly. This capability is essential for ensuring that landings remain within allowable limits and that any discrepancies can be addressed promptly. By providing near-instant feedback to fishery managers and participants, electronic reporting systems help prevent costly enforcement actions and disruptions in fishing operations. NMFS also maintains on-call contracted staff between the hours of 6 AM and 12 AM to assist industry with discrepancies and act as a backup for electronic reporting outages.

Ensuring seamless data transfers between industry and NMFS databases minimizes administrative burdens and enhances data reliability. NMFS maintains and updates these systems to support high volumes of data submission, ensuring that information flows efficiently between stakeholders and regulators and protects the confidentiality of these data.

Troubleshooting reporting errors is a critical component of maintaining system integrity. NMFS dedicates resources to identifying and resolving technical issues that could lead to inaccurate quota accounting. This includes providing support to fishery participants experiencing technical difficulties, ensuring they can fulfill reporting obligations without undue delays. Since landings can occur 7 days a week, 24 hours a day, user support and troubleshooting frequently occur outside standard business hours.

Updating IT systems to comply with regulatory changes and maintain their operation ensures these systems remain aligned with LAPP requirements. NMFS must update systems to meet modern needs and NMFS frequently revises reporting tools to accommodate new rules, additional data fields, and enhanced validation protocols that improve data quality and enforcement capabilities. NMFS also updates reporting platforms in response to changes in available technology to increase usability and efficiency or to maintain consistent operation. These updates can require maintenance of an older system alongside the new system to give industry time to adapt (Appendix A).

Training fishery participants on system usage is essential for maximizing compliance and system effectiveness. NMFS conducts workshops, produces instructional materials, and provides direct support to ensure that quota holders can accurately report landings using electronic platforms. Proper training reduces reporting errors and enhances industry cooperation with regulatory requirements.

Implementing cybersecurity measures to protect sensitive data is a growing priority as electronic reporting expands. NMFS must safeguard confidential business information and quota transaction details from

unauthorized access or cyber threats. This requires continuous investment in security protocols, system monitoring, and data encryption technologies.

Analyzing system performance for continuous improvement ensures that IT systems remain efficient and responsive to industry needs. NMFS assesses user feedback, system uptime, and data accuracy to refine reporting tools and optimize performance over time.

These activities would not be necessary in a non-LAPP fishery, where reporting typically relies on less sophisticated methods. The complexity and real-time nature of LAPP fisheries necessitate robust electronic reporting systems and other IT systems, justifying the use of cost recovery funds to develop, maintain, and enhance these platforms.

Regulations and Rulemaking

Rulemaking and regulatory adjustments are essential to maintaining the effectiveness and adaptability of LAPP programs. Unlike traditional fisheries management, which establishes static regulations, LAPPs require frequent refinement to address market conditions, biological conservation needs, and stakeholder concerns. These efforts ensure that LAPPs remain functional, equitable, and aligned with overarching fishery management goals.

Evaluating fishery performance under existing regulations enables NMFS to identify inefficiencies, loopholes, or unintended consequences that could hinder the program's success. Regular assessments ensure that quota allocation and transfer mechanisms operate as intended and support sustainable fishing practices. Drafting amendments to program rules is necessary to implement changes that enhance the LAPP structure. This involves extensive legal and policy work to ensure that new regulations align with statutory requirements and stakeholder interests while balancing economic viability and conservation priorities.

Coordinating regulatory actions with the NPFMC ensures that adjustments to LAPP regulations are developed with input from relevant stakeholders and aligned with broader management objectives. This collaborative approach helps integrate scientific, economic, and industry perspectives into decision-making. Preparing Federal Register notices for public comment is a critical step in the regulatory process. NMFS must ensure that all proposed changes are transparent and available for public review. This fosters engagement with industry participants, environmental organizations, and other interested parties. Analyzing stakeholder feedback on proposed rule changes ensures that regulatory adjustments consider the real-world impact on fishery participants. NMFS reviews public comments, industry concerns, and scientific recommendations to refine proposed regulations before implementation.

Conducting economic and environmental impact assessments of new regulations ensures that policy changes do not create unintended hardships for fishery participants or negatively impact marine ecosystems. These analyses are crucial for balancing sustainability with economic growth in LAPP fisheries.

Implementing program modifications based on data-driven analysis ensures that adjustments are not arbitrary but rather grounded in sound science and economic reasoning. This iterative approach helps maintain the long-term effectiveness of LAPP programs. Ensuring compliance with evolving federal policies requires NMFS to integrate new legislative directives or executive orders into existing LAPP regulations. This may include updates to cost recovery mechanisms, monitoring requirements, or sustainability mandates.

These activities would not be necessary in a non-LAPP fishery, as they are specific to the LAPP program.. The dynamic nature of LAPP programs necessitates continuous regulatory oversight, justifying the use of cost recovery funds to support rulemaking and policy refinement.

Compliance Monitoring and Enforcement

Compliance monitoring and enforcement actions are critical to ensuring that LAPP participants adhere to established regulations and that quota allocations are not abused. Unlike general fisheries enforcement, which primarily monitors aggregate sector-wide activity, LAPP enforcement focuses on individual permit holders and cooperative groups, requiring more granular oversight and targeted investigations.

Conducting dockside compliance monitoring and audits allows NMFS to systematically review quota transactions, landings, and operational practices of LAPP participants. This process helps identify discrepancies between reported and actual catch, ensuring that quota holders comply with their allocated shares and do not engage in unauthorized activities.

Reviewing vessel activity reports for potential violations provides NMFS with real-time oversight of LAPP participants' fishing behaviors. These reports, submitted electronically or manually, help flag potential instances of exceeding quota limits, fishing in restricted areas, or failing to comply with observer and monitoring requirements.

Investigating quota overages and noncompliant landings involves a detailed examination of reported landings versus quota allocations. NMFS staff must work closely with dockside monitors, observers, and electronic monitoring systems to verify that catch records are accurate and that participants are not circumventing regulatory controls.

Lower level enforcement actions, including Compliance Assistance and Fix-It notices, serve as deterrents against minor infractions before they escalate into more serious violations. These actions provide fishery participants with formal warnings and opportunities to correct noncompliant behavior before more punitive actions are pursued.

Coordinating with law enforcement agencies regarding serious infractions ensures that the most egregious violations—such as intentional quota fraud, illegal discarding, or unreported landings—are properly investigated and prosecuted. NMFS works with NOAA’s Office of Law Enforcement, the U.S. Coast Guard, Alaska Wildlife Troopers,and other federal and state agencies to uphold the integrity of LAPP fisheries.

Administering penalties, seizures, and sanctions for rule violations ensures that noncompliant behavior is met with appropriate consequences. Sanctions may include quota reductions, fines, or permit suspensions, depending on the severity of the infraction. Cost recovery funds help sustain the administrative and legal processes necessary for effective enforcement.

Maintaining compliance databases is essential for tracking historical infractions, monitoring trends in noncompliance, and supporting future enforcement actions. These databases provide regulators with a standardized and uniform process to track participant compliance records, facilitating efficient oversight and felicitous and consistent decision-making.

Facilitating educational outreach on regulatory requirements helps LAPP participants understand their obligations and avoid unintentional violations. NMFS conducts workshops, provides written guidance, conducts company-specific, cooperative-specific, and individual vessel-specific compliance meetings, and offers direct assistance to quota holders to improve awareness of compliance expectations.

These activities would not be necessary in a non-LAPP fishery, where enforcement efforts are focused on fleet-wide limits rather than individual participant accountability. The detailed nature of LAPP compliance monitoring requires specialized personnel, investigative procedures, and enforcement mechanisms, justifying the allocation of cost recovery funds to these functions.

Economic Data Collection and Cost Recovery Reporting

Economic data collection and reporting are critical components of some of the Alaska LAPP programs' management and go beyond general fisheries monitoring. Unlike traditional fishery management, LAPPs introduce market-based allocation mechanisms that necessitate a deeper understanding of financial performance, quota trading impacts, and economic sustainability of participants. Gathering financial performance data enables NMFS to assess the effectiveness of quota allocations, ensuring that LAPP programs meet economic efficiency goals. This includes evaluating whether quota allocations create unintended market distortions or barriers to entry that could undermine program objectives.

Compiling revenue and operational cost reports provides stakeholders with transparency regarding the economic viability of LAPP fisheries. This data is crucial for understanding trends in profitability, investment, and financial resilience among different sectors within the LAPP framework. Assessing the economic impacts of quota trading helps evaluate how efficiently market-based mechanisms are functioning. NMFS monitors trade activity to determine whether quota transfers promote flexibility and economic optimization or result in excessive consolidation that may warrant regulatory intervention. Evaluating market trends specific to LAPP fisheries ensures that regulatory adjustments remain relevant to industry conditions. NMFS analyzes changes in ex-vessel prices, leasing rates, and trading volumes to provide real-time insights into market dynamics affecting participants.

Managing industry surveys related to program participation allows NMFS to collect qualitative and quantitative feedback directly from quota holders. These surveys help measure stakeholder satisfaction, identify emerging challenges, and refine program operations to enhance efficiency and fairness. Ensuring confidentiality of proprietary financial data is a necessary administrative function however that is not unique to LAPPs. Since economic data collection involves sensitive information, NMFS must implement stringent data security measures to protect individual business records while still enabling meaningful economic analysis. These measures require additional programming and support.

Integrating economic data with biological stock assessments enhances decision-making by linking financial outcomes with resource sustainability. This holistic approach ensures that management decisions balance economic performance with conservation goals, preventing overcapitalization that could lead to resource depletion.

Developing policy recommendations based on financial trends allows NMFS to adapt LAPP regulations to evolving industry needs. By analyzing financial patterns over time, NMFS can propose adjustments to quota allocation formulas, transferability rules, or cost recovery fee structures to improve overall program efficiency.

Cost Recovery Billing Process

At the end of each cost recovery program's fishing season, NMFS does the work to implement the cost recovery process, including calculating standard prices, compiling and reviewing agency costs, and sending and processing invoices and payments. Section 3 of this report (NMFS Cost Recovery Process) provides more details about the process and what is included in each of the steps.

Table 2-1. Examples of the tasks that are directly related to the management, data collection, and enforcement of LAPPs and the CDQ Program that are incremental costs and cost recoverable.

Activity type	Examples of specific tasks appropriate for cost recovery	Relevant Cost categories	Billing entities that could have recoverable costs
Quota Share Administration	- Processing cooperative and individual applications, - Processing transactions and lease agreements for quota shares, - Reviewing ownership transfers, ensuring compliance with ownership caps, - Conducting audits to verify ownership structures, - Processing vessel replacement applications - Providing customer support for quota holders; responding to inquiries and data requests; and providing outreach for fishery participants. - Developing and maintaining IT systems for issuing permits related to quota shares, tracking quota allocations, and conducting transfers	Personnel & benefits; Contracts	AKR
Catch Monitoring	- Support monitoring tools used to weigh catch and the video systems implemented to prevent tampering - Inspection and approval of at-sea scales and observer sampling stations; - Inspection and approval of compliance monitoring video equipment	Personnel & benefits; Contracts	AKR, AFSC
	- Management of Prior Notice of Landing system and conducting dockside monitoring of landings, - Verifying reported weights against actual harvests, preventing unauthorized landings, reviewing logbooks and landing reports, - Ensuring compliance with offloading regulations, - Inspecting fish tickets and sales receipts, and conducting random audits of reported landings.	Personnel & benefits, Contracts; Travel; Rent	OLE
	- Analyzing compliance video footage, verifying catch and bycatch sorting and compliance with catch monitoring regulations.	Personnel & benefits Contracts	AKR, OLE
	- Observer training, debriefing, and data management; reviewing observer reports - The Special Agent with OLE assisting in observer affidavits	Personnel & benefits; Contracts Printing Supplies Equipment	AFSC, OLE
	- Travel for staff to conduct at-sea scale inspections. - Deploying FMA staff to the field to support deployment of observers to fulfill increased observer coverage under LAPP programs; - Travel for enforcement personnel to complete dockside monitoring at key landing sites, patrols and boarding.	Travel	AKR, AFSC, OLE

	- Equipment necessary for at-sea scale inspections (e.g. sand bags, certified weights, etc); Maintenance of observer gear	Supplies; Equipment	AKR, AFSC
InSeason Quota Management and Bycatch Reduction	- Facilitating inter-sector and intra-cooperative quota transfers, - managing real-time tracking and reporting specific to LAPP participants, - ensuring LAPP-compliant allocation adjustments, processing quota carryovers where applicable, monitoring cooperative compliance with individual allocations - Inseason management of non-sideboarded fisheries - Monitoring PSC bycatch and reporting on web - Respond to data requests…	Personnel & benefits	AKR
	Development and Maintenance of IT Systems necessary to enable LAPP fisheries and near real-time accounting of catch and bycatch	Personnel & benefits; Contracts	AKR
	Travel to plan team and Council meetings to present harvest specs (partially funding through cost recovery	Travel	AKR
Development & Maintenance of IT systems to enable reporting & catch accounting	- Application development and maintenance of electronic reporting systems (landings, elog,); IT infrastructure and servers, - Training and user support for industry. - Catch accounting system maintenance to support catch share harvest, including PSC, and updating the system for program changes.	Personnel & benefits; Contracts	AKR
Regulations and Rulemaking	- Evaluating fishery performance under existing LAPP regulations, - drafting amendments to program rules, - Preparing Federal Register notices for public comment, - Coordinating regulatory actions with the NPFMC and the IPHC, analyzing stakeholder feedback on proposed rule changes, - Conducting economic and environmental impact assessments of new regulations, - Implementing program modifications based on data-driven analysis, and ensuring compliance with evolving federal policies; - Targeted outreach to quota holders regarding regulatory changes	Personnel & benefits	AKR
	- LAPP specific program annual tasks related to harvest specifications - Renewal of PRA approval for information collections (every 3 years) review of forms and instructions - Provide input to LAPP program reviews	Personnel & benefits	AKR
	Attend Council meetings to participate in regulatory and policy discussions and provide reports, track issues specific to the program	Travel	AKR

Economic Data Collection	- Economic Data Reports: Gathering and analyzing financial data from LAPP participants, compiling revenue and operational cost reports, assessing the economic impacts of quota allocation and trading, - Evaluating market trends specific to LAPP fisheries, - Managing industry surveys related to program participation, integrating economic data with biological stock assessments, and developing policy recommendations based on financial trends.	Personnel & benefits Rent	AFSC, PSMFC
Cost recovery billing process	- Developing standard prices, - Outreach and volume and value reporting - Verifying and data checking - Review of agency costs - Publishing annual cost recovery fee notices, - Calculation of standard prices - Billing, support to industry, collection of fees - Development and maintenance of IT systems that generate fees and invoices, enable cost recovery payment; connect to pay.gov, and track payments	Personnel & benefits; Contracts	AKR

3. Cost Recovery process and responsibilities

Industry Responsibilities

It is the responsibility of the entity that first processes the fish from an LAPP fishery to submit a timely and accurate volume and value report and/or State of Alaska COAR report as applicable for each LAPP. This information is necessary to determine the total ex-vessel volume and standard price for each species, month and port group if applicable. Once the standard prices are calculated, they are multiplied by the total landing volume to calculate the ex-vessel value for the applicable LAPP. See Table 3-1 for the reporting period and deadline for submission for each program.

Payment Responsibility

Permit holders are responsible for fees owed for all landings recorded on their permits. For the IFQ program, this includes IFQ pounds from their own quota share (QS), QS that was leased from another QS holder, landings made by hired skippers and halibut landed through the guided angler fish (GAF) program by persons who hold a Charter Halibut Permit issued by NMFS. See Table 3-1 for payment due dates by program. Payment must be made electronically in U.S. dollars by automated clearing house, credit card, or electronic check drawn on a U.S. bank account.

Table 3-1. Overview of the reporting regulations, reporting period, and submission deadlines volume and value reports as well as the timing of fees and the fisheries for each of the cost recovery programs.

Program	Volume and Value (V & V) report regulations	V&V Reporting period	V&V Submission Deadline	Publication of standard prices and fee percentage	Payment Due Date	Fishery Timing	Fee percentage calculated relative to Fishing season
IFQ	IFQ Buyer Report § 679.5(l)(7)(i)	Oct 1 - Sept 30	October 15	Oct 1 - Dec 31	January 31	Variable (March - Dec)	After
Crab	CR Registered Crab Receiver Ex-vessel Volume and Value Report § 680.5(m)	Aug 1 - May 31	May 31	July 1 - Sept 30	July 31	July 1 - June 30	Before
Rockfish	Rockfish Ex-vessel Volume and Value Report § 679.5(r)(10)	April 1 - Nov 15	December 1	Jan 1 - March 31	February 15	April 1 - Nov 15	After
CDQ	Pacific Cod Ex-vessel Volume and Value Report § 679.5(u)(1) COAR § 679.5(p)	Jan 1 - Dec 31	COAR: April 1 (1-year lag)	December 1	December 31	Jan 1 - Dec 31	During
AFA	COAR § 679.5(p)	Jan 1 - Dec 31	COAR: April 1 (1-year lag)	December 1	December 31	Jan 20 - Nov 1	After
AI Pollock	ADF&G Commercial Operator's Annual Report (COAR) § 679.5(p)	Jan 1 - Dec 31	COAR: April 1 (1-year lag)	December 1	December 31	Jan 20 - Nov 1	After
Amendment 80	First Wholesale Volume and Value Report § 679.5(u)(2)	All SPP Jan 1 - Oct 31 Rocksole: Jan 1 - March 31 and April 1 - Oct 31	Nov 10	December 1	December 31	Jan 20 - Dec 31	During
PCTC	Pacific Cod Volume and Value Report § 679.5(u)(1)	Jan 1 - Oct 31	November 10 (1-year lag)	August 1	August 31	Jan 1 - June 10	After

NMFS Cost Recovery Process

At the end of each cost recovery program's fishing season, NMFS does the following steps:

- Compiling and validating program specific landings by species and month;
- Validating volume and value report submissions
- Calculating and validating standard ex-vessel prices;
- Applying standard ex-vessel prices;
- Deriving and validating the total fishery ex-vessel value;
- Compiling and reviewing the incremental agency costs;
- Calculating the annual fee percentage;
- Publishing notice of standard ex-vessel prices and fee percentage in the Federal Register
- Applying the fee percentage and calculating fees;
- Generating and validating invoices; and
- Mailing permit holders or cooperatives invoices, tracking payments, and sending notices for non-payment.

The following section provides more information about each of these steps.

Compiling and validating program specific landings

Reports in the catch accounting system and quota debits are checked in season against landing reports in eLandings and any discrepancies are corrected as soon as possible. Once a season is complete, a final check is done on overall pounds landed under a program as recorded in eLandings, transmitted to the catch accounting system and compared to total quota share debits. While ensuring catch has been correctly attributed to a management program is necessary regardless of the existence of an LAPP or CDQ program, catch share programs are inherently more complex. Therefore, this is considered an incremental cost. Tracking this task specifically to each LAPP would be extremely time consuming; therefore, this is billed under a formula which is updated annually.

Validating volume and value submissions

Once the due date for volume and value submissions has passed, NMFS staff first validates that all required submitters have submitted a report. This is done by comparing the submissions to the landing reports attributed to the program. Non-submitters are contacted and requested to complete their submission immediately. Continued failure to submit may be forwarded to OLE for enforcement action. Since this task is specific to a LAPP, it is considered an incremental cost.

NMFS staff validate that submitted reports are reasonable. For example, if the majority of reports indicate a price of $0.25/pound and one submitter indicates a price for the same species of $2.50, NMFS staff will contact the outlier to request they check their report for data entry errors. The overall volume reported on all volume and value reports is also checked against the total volume reported through eLandings and any significant discrepancies are investigated and resolved before generating standard prices. This task is specific to a LAPP and is considered an incremental cost.

Calculating and validating standard ex-vessel prices

Once volume and value reports are validated, NMFS staff generate standard prices as applicable for the program. Once the prices have been generated, those prices are compared to the volume and value reports, landing reports and prior seasons to ensure those prices were generated correctly. Discrepancies or large differences as compared to prior seasons are investigated and resolved. For some fisheries there is a single price per species for the year that can be easily checked against the average price for all landing reports attributed to that program to determine if the price generated correctly. Other programs have monthly prices per species and the IFQ program has separate prices per month and port of landing. This requires NMFS staff to check each price and validate both that it is reasonable as compared to reported volume and value reports and landing reports and that all confidentiality checks have been passed.

Applying standard ex-vessel prices

Once the standard prices have been validated, they are applied to each landing associated with the program. This process is largely automated, but NMFS staff conduct reviews to ensure the correct application of prices. For programs with a limited number of participants or landings, this review can be comprehensive. However, for programs with a high volume of landings, NMFS primarily conducts spot checks within specific groups of landings. If the spot-checked landings are accurate, it is assumed that the rest of the group is also correct.

Deriving and validating the total ex-vessel value for the Cost Recover program

Starting in 2025, NMFS has added a step to the cost recovery review process. This change came about as a result of an issue that arose in December 2024 when NMFS sent invoices to halibut and sablefish IFQ permit holders and a technical issue affected certain fee liability statements. Due to an error, the value of some landings were incorrectly calculated as zero, leading to an undervaluation of the IFQ fishery and omissions in the fee liability statements. Staff resolved this issue and resent corrected statements.

Going forward, a step to derive and validate the total ex-vessel value has been implemented as a safeguard and will be done in future years for all cost recovery programs. The issue in the 2024 IFQ cost recovery process was not due to inaccuracies in the volume or standard price calculations themselves, as each of these components passed all validation checks and quality assurance methods. The issue arose only when the system aggregated these individual values to generate the total ex-vessel value for landings across the program and a system malfunction resulted in many landings being assigned a value of zero. The complexity of the IFQ program, the fragility of the legacy IFQ IT systems, and short-timelines for agency review caused significant discrepancies in total ex-vessel value calculations. The error highlighted the need for a more rigorous review of landing values and a systematic comparison to historical data at this step to detect anomalies before finalizing assessments. By instituting this additional step, NMFS aims to prevent similar issues, ensuring accurate valuation of landings and reliable cost recovery calculations in future cycles.

Compiling and reviewing incremental agency and partner agency costs

Compiling and reviewing costs is a structured and collaborative process involving multiple internal and external partners. The NMFS AKR collects cost submissions not only from its own operational units but also from partner agencies that incur incremental costs associated with managing and enforcing LAPPs. These costs are gathered in a centralized system, allowing for efficient comparison across prior years, different agencies, and

various cost categories. This centralized approach ensures transparency, consistency, and a structured method for identifying trends, anomalies, or areas requiring further explanation.

The AKR cost recovery coordinator plays a key role in validating these cost submissions through ongoing back-and-forth communication with each agency. This process involves reviewing the submitted figures, requesting additional details, and seeking clarification on how specific costs were determined to be valid under cost recovery guidelines. The coordinator ensures that costs are directly attributable to the management and enforcement of the program and that they align with historical trends and established agency policies. If any discrepancies or significant changes in cost categories are identified, the program manager works closely with agency representatives to resolve questions before moving forward in the review process.

Validation of agency costs is not limited to document review alone; it also involves formal discussions through scheduled meetings with key program management and finance staff. These meetings provide a forum for NMFS to review cost submissions, compare expenditures across multiple years, and ensure consistency in reporting. Depending on the nature of the questions raised during these discussions, partner agencies may be required to provide additional justification for specific costs, particularly if they deviate significantly from prior year expenditures.

At the conclusion of this process, each partner agency is required to sign an affidavit affirming that the costs they have submitted comply with agency policies regarding cost recovery. This affidavit serves as a formal acknowledgment that the reported costs are accurate, justified, and consistent with regulatory guidelines. By requiring this final certification, the agency reinforces accountability and ensures that all cost recovery fees are based on verified, documented, and defensible expenditures.

As outlined in the Draft Discussion paper to be presented to the Council in April 2025, the time limitations due to changing fishery seasons impose significant constraints on the NMFS review process, requiring staff to work within tight deadlines to compile, validate, and evaluate cost submissions. To meet regulatory deadlines, the review process is often strained as agencies and program management must quickly address inquiries, provide additional documentation, and resolve discrepancies before NMFS must finalize the cost recovery calculations. When time runs short, NMFS must ultimately proceed with the information available, even if some details remain unresolved, underscoring the need for efficiency and proactive communication throughout the process.

Calculating the annual fee percentage

The annual fee percentage is calculated using direct program costs and total fishery value with the following formula:

$$[100 \times (DPC/V)]$$

NMFS divides the direct program cost (DPC) by the total fishery value (V) of the program, and then multiplies by 100 to calculate the fee percentage. If this fee percentage is greater than the statutory cap of 3.0 percent, the actual percentage is overridden and invoices are generated based on an adjusted fee percentage of 3.0 percent.

Publishing notice of standard ex-vessel prices and fee percentage in the Federal Register

The process of publishing the notice of standard ex-vessel prices and the fee percentage begins with drafting the notice, which includes how the standard prices and fee percentage were calculated for the cost recovery program. The draft undergoes internal review to ensure accuracy and compliance with regulatory requirements. Once reviewed and approved within the agency, it is submitted to the Federal Register, where it is officially published, providing public notice of the fee percentage and standard prices.

Applying the fee percentage and calculating fees

Once the fee percentage has been published, NMFS applies it to the verified total ex-vessel values for each entity to determine their individual cost recovery fee. This calculation ensures that fees are proportionate to the value of landings within the program. The resulting fee amounts are reviewed for accuracy and consistency before being used to generate invoices.

Generating and validating invoices

Once the fee percentage is applied to the cost recovery process, cost recovery fees are calculated, invoices are generated based on the prior steps completion. In order to mitigate issues that have occurred, improvements have been proposed to the cost recovery process. NMFS will implement a new step to ensure the accuracy of invoices before issuance. This process validates total ex-vessel values, ensuring that all cost recovery fees are correctly calculated and align with actual landings and historical trends.

While it is not feasible to review every invoice individually, NMFS will select a portion at random for validation prior to issuance. This review involves cross-checking fee calculations against verified ex-vessel values, individual landing reports, and partner agency records. Any discrepancies identified will trigger a secondary review before invoices are finalized. Additionally, a structured review period allows internal program management to assess fee consistency across permit holders and cost recovery programs, with further validation if unexpected variances arise.

Mailing invoices, tracking payments, and sending notices for non-payment

Invoices are printed and mailed to the address of the permit holder or cooperative manager as listed in the official record. Permit holders log into eFISH to see their fee liabilities and make payment through Pay.gov. For the IFQ and Crab programs, permit holders are able to submit Fee Calculation Forms up until the payment due date if they disagree with the values identified in their Fee Liability Summary. Adequate documentation must be provided to support the actual value(s) and if accepted, the fee liability amount will be modified to reflect the new balance due. Validating these submissions and adjusting fee liabilities where warranted require staff time and is an incremental cost.

Initial Agency Determination (IAD) letters are generated on or after the missed payment due date. After 30 days the IAD becomes the Final Agency Action for the fee liability and every 30 days notices are sent outlining the balance due to include interest, fees, and penalties. After 181 days, the outstanding debt will be referred to the Department of Treasury Debt Management Services.

4. Cost Recovery summary tables for fishing year 2024

This section provides information on the agency costs, fishery values and fee percentage for each of the cost recovery programs in 2024.

Table 4-1. Direct program costs, fishery value and fee percentage in 2024 for the CDQ Program and Alaska LAPPs.

Program	Direct Program Costs	Fishery Value	Fee Percentage
PCTC	$363,659	$18,926,230	1.92%
CR	$2,846,958	$85,711,838	3.32%[1]
AFA	$522,437	$216,914,375	0.24%
A80	$1,689,769	$90,675,288	1.86%
AIP[2]	-	-	-
CDQ	$971,118	$70,209,542	1.38%
IFQ	$4,275,244	$125,153,355	3.40%[1]
RP	$432,994	$5,763,628	7.51%[1]
Total	**$10,991,326**	**$613,354,256**	**-**

[1]The actual fee percentage was higher than the statutory cap, therefore a fee percentage of 3.0 was applied
[2] No fishing activity occurred during 2024, therefore there were no direct program costs

Table 4-2. Direct program costs per cost category for each LAPP and the CDQ Program for 2024.

Cost Category*	PCTC	CR	AFA	A80	CDQ	IFQ	RP	Total
Personnel/ Benefits	$180,910	$1,854,210	$304,163	$1,162,063	$508,334	$2,840,269	$209,216	**$6,964,393**
Travel	$0	$26,457	$7,898	$11,320	$9,290	$44,936	$7,214	**$104,366**
Transportation	$0	$19,392	$0	$0	$0	$28,065	$5,432	**$ 52,889**
Printing	$0	$0	$5,000	$11,500	$4,000	$488	$500	**$ 21,488**
Contracts/ Training	$182,749	$876,572	$187,127	$418,917	$425,272	$1,101,865	$203,766	**$3,394,095**
Supplies	$0	$4,813	$3,316	$7,641	$2,527	$10,060	$316	**$28,673**
Equipment	$0	$0	$2,600	$5,980	$2,080	$1,117	$260	**$12,037**
Rent/Utilities	$0	$64,872	$11,8079	$72,128	$19,616	$239,431	$3,287	**$399,983**
Other	$0	$ 644	$ 523	$218	$0	$9,013	$3,004	**$13,402**
Total	**$363,659**	**$2,846,960**	**$522,437**	**$1,689,767**	**$971,119**	**$4,275,244**	**$432,995**	**$10,991,326**

*See Chapter 2 of this report for explanation of cost categories.

Table 4-3. Total costs for each program management billing entity from 2020 through 2024. (NMFS AKR = NMFS Alaska Regional Office; OLE = NOAA NMFS Office of Law Enforcement; AFSC = NMFS Alaska Fisheries Science Center; IPHC = International Pacific Halibut Commission; ADFG = Alaska Department of Fish and Game; PSMFC = Pacific States Marine Fisheries Commission; FSD = NMFS Financial Services Division).

Year	NMFS AKR	NMFS OLE	NMFS AFSC	NMFS FSD	ADF&G	IPHC	PSMFC	Total
2024	$3,282,413	$3,808,422	$679,075	$44,070	$1,560,825	$796,106	$340,800	**$10,991,328**
2023	$3,767,233	$3,875,151	$690,586	$97,295	$1,327,227	$891,527	$256,797	**$10,905,816**
2022	$2,893,419	$3,104,721	$686,920	$120,548	$1,432,403	$779,247	$173,311	**$9,190,569**
2021	$2,539,577	$3,037,597	$735,129	$133,616	$1,646,654	$626,316	$140,230	**$8,859,119**
2020	$2,538,563	$3,392,391	$779,641	$202,481	$1,786,935	$543,666	$131,221	**$9,307,455**

Table 4-4. Number of invoices and number of unique vessels for each cost recovery program in 2024.

Program	Entity Invoiced	# of Invoices	Vessels in program
IFQ Program	QS holders	1,579	703
Crab Rationalization	Processor representative	14	38
Rockfish	Rockfish cooperative representative	6	22
CDQ	CDQ group representatives	6	54
AFA	AFA inshore cooperative representatives	7	76
Aleutian Islands Pollock	Aleut Corporation authorized representative	0	0
Amendment 80	Amendment 80 cooperative representative	1	16
Pacific Cod Trawl Cooperative	PCTC Program cooperative representative	6	27

5. Program Specific Cost Recovery Information

Pacific Cod Trawl Cooperative

On August 8, 2023, NMFS published a final rule to implement the PCTC Program (88 FR 53704), which is the latest Alaskan limited access privilege program. The PCTC Program allocates total allowable catch (TAC) of Pacific cod to trawl catcher vessels and processors in the BSAI. Participants in the PCTC Program must form a cooperative and associate with a processor. The PCTC Program includes a process for calculating and administering cost recovery fees under 50 CFR 679.135. The annual PCTC Program cost recovery process builds on other existing cost recovery requirements implemented under other programs. The fee liability is based on the ex-vessel value of fish harvested in the PCTC Program. Each year, the Regional Administrator publishes a notice announcing the fee percentage in the Federal Register and sends invoices to cooperatives before July 31. The fee notice for the first season of fishing under the PCTC program was published on August 1, 2024 (89

FR 62724) with a fee percentage of 1.92 percent. Because this was the first year of fishing under the PCTC program, direct costs were not tracked until after the final rule implementing the program became effective. For this first season, direct costs were tracked from October 1, 2023 through June 30, 2024 (Table 5-1). For future seasons, costs will be tracked from July 1 through June 30.

Table 5-1. PCTC Direct Program Costs from October 1, 2023 - June 30, 2024.

Year	Total Pounds Landed	Total Value (V)	Average price /pound	Total Direct Program Costs (DPC)	Fee Percentage [100 x (DPC)/V
2024	45,062,452.62	$18,926,230	$0.42	$363,659	1.92%

Table 5-2 provides additional details on the PCTC costs by billing agency. This was the initial year of PCTC landings and some costs are directly related to the additional staff resources required to implement a new LAPP.

The highest direct program costs were attributed to NMFS AKR. Implementing PCTC required developing systems for initial quota share/permit issuance, recording and tracking cooperative membership, processes required for correctly assessing fees, staff time to ensure initial quota share issuance was correct and development of outreach materials to ensure participants understood the PCTC program. The majority of these costs are "startup" costs and should see a reduction in future years. Ongoing costs will include maintenance of the developed systems and processes, staff time for permit/quota share issuance and costs associated with managing a LAPP.

The second highest direct program costs were attributed to OLE. Costs accrue to support personnel engaged in enforcing fines, investigation, and outreach efforts. OLE officers and agents have dynamic and unpredictable work schedules so labor costs associated with OLE will vary from one fiscal year to the next.

AFSC also submitted costs for staff time spent training observers on the requirements of the PCTC program.

Table 5-2. 2024 PCTC direct program costs, by category, for each of the program management billing entities.

Cost Recovery Category[a]	NMFS AKR	NMFS AFSC	NMFS OLE	Total
Personnel Costs[b]	$113,819	$1,958	$65,133	$180,910
Contracts/Training	$182,749	-	-	$182,749
Total	$296,568	$1,958	$65,133	$363,659

[a] This table only displays cost recovery components that incurred direct costs
[b] Personnel includes costs of locality pay, benefits, and overhead.

Crab Rationalization

NMFS implemented a cost recovery program for the CR Program in 2005 (70 FR 10174, March 2, 2005). CR Program cost recovery authorizes the collection of actual management and enforcement costs for up to three percent of ex-vessel gross revenues. Under the regulations implementing the CR cost recovery program, cost recovery fees must be paid in equal shares by the harvesting and processing sectors. The processing sector, specifically registered crab receivers (RCRs), are responsible for collecting the fee from the harvesters and submitting this and their own self-collected fee amount to NMFS. Catcher/processors, i.e., (vessels that harvest and process crab) pay the full fee.

Receipts from the cost recovery fee collection are deposited into two accounts. Up to twenty-five percent of the collections are deposited into the U.S. Treasury and are available to Congress for annual appropriations to support the BSAI Crab Quota Share Loan Program described below. The other remaining funds are deposited into the Limited Access System Administrative Fund. Funds in this account are available only to the Secretary and must be spent on CR Program management and enforcement. The BSAI Crab Quota Share Loan Program was implemented in 2011 (75 FR 78619, December 16, 2010). The program provides low interest loans to assist captains and crew in the purchase of quota shares (QS) for the CR Program. The loan program is accessible only to active fishery participants and can be used to purchase either CR Program QS or Crew QS. The NMFS Financial Services Branch administers the BSAI Crab Quota Share Loan Program and additional information is available by calling 206-526-6122.

Prior to the start of the crab fishing year, NMFS published the annual fee percentage in the Federal Register (89 FR 54785 July 2, 2024). The fee percentage is used by RCRs to collect fee liabilities from harvesters, and then self-collect, throughout the fishing year. The fee percentage is projected forward before management costs are finalized, therefore, any overpayment or underpayment is accounted for in the next year's fee percentage.

Table 5-3. Total of CR Direct Program Cost by Year. Direct program costs for CR are tracked from mid-April to mid-April of each calendar year.

Cost Recovery Category	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024
Personnel/Overhead	$1,702,116	$1,416,699.00	$1,364,650	$1,542,457	$1,854,210
Travel	$55,946	$11,665.00	$15,010	$35,676	$26,457
Transportation	-	-	-	-	$19,392
Printing	-	-	-	$36	-
Contracts/Training	$723,961	$880,405.00	$1,132,909	$1,238,100	$876,572
Supplies	$15,617	$4,351.00	$2,475	$2,235	$4,813
Equipment	$4,375	-	-	-	-
Rent/Utilities	$112,639	$72,601.00	$78,676	$69,675	$64,872
Other	$1,347	$1,872.00	$506	$818	$644
Total Direct Costs	**$2,616,001**	**$2,387,593**	**$2,594,226**	**$2,888,997**	**$2,846,958**
Fishery Value[a]	**$199,226,271**	**$218,768,971**	**$116,366,089**	**$48,717,841**	**$85,711,838**
Fee Percentage [b]	**1.31**	**1.09**	**2.23**	**5.93 [c]**	**3.32 [c]**

[a] Fishery Value is the projected ex-vessel value of the catch subject to the crab cost recovery fee liability for the current year. For this table, the value amount is rounded.
[b] Fee liability percentages are noted here for the crab fishing year from which they were derived. The fee percentage was applied to the following crab fishing year.
[c] These billed percentages were limited by the Magnuson-Stevens Act statutory three percent cap of the ex-vessel value of the fishery in any Program year.

Management of CR fisheries is delegated to the State of Alaska. As a result, ADF&G incurs the highest costs of all management units involved in the program. ADF&G's largest cost component is personnel to support the added duration and complexity of management, stock assessment, and monitoring programs implemented

through rationalization. Personnel, and the associated administrative overhead costs increased between FY2023 and FY2024. Contract and training expenses, which support crab observer deployment and training, increased considerably from FY 2023, but are lower than prior years. Overall ADF&G's costs increased approximately 22 percent between FY2023 and FY2024.

OLE is tasked with inspections, boardings, investigations and enforcement activities. The two largest cost categories are for personnel and contracting. Costs are reflective of the number of participants (75-80 boats), complexity of the program, and duration of CR fisheries. Costs decreased between FY2023 and FY2024, primarily due to a revision to the percentage of contract, training, rent and utilities billed to the CR program. Overall, OLE's costs decreased by approximately 29 percent.

AKR supports eLandings, provides maintenance of the catch accounting system, develops and implements regulatory actions, determines fees and collection processes, provides training and outreach for electronic reporting of crab harvest, issues permits, handles transfers of QS and IFQ, and answers questions about permits and transfers. Costs decreased by approximately 15 percent from FY 2023 due to a reduction in IFA development work attributed to the CR program.

The AFSC and PSMFC support administration of the CR Program Economic Data Reports. AFSC costs decreased by approximately 64 percent between FY2023 and FY2024. This was primarily due to the completion of work on the EDR in FY 2023. PSMFC costs increased approximately 75 percent between FY 2023 and FY 2024, primarily due to increased personnel and benefits costs.

Table 5-4. The 2023/2024 CR direct program costs, by category, for each of the program management billing entities.

Cost Recovery Category	ADFG	OLE	AKR	FSD	AFSC	PSMFC	Total
Personnel/Benefits [a]	$939,095	$242,521	$325,677	$8,187	$11,635	$134,472	**$1,582,300**
Travel [b]	$13,588	-	$11,072	-	$1,518	$278	**$26,457**
Transportation [c]	$19,392	-	-	-	-	-	**$19,392**
Printing	-	-	-	-	-	-	**-**
Contracts/Training	$125,957	$184,299	$10,969	-	-	$4,879	**$876,572**
Supplies	$3,927	-	$415	-	-	$472	**$4,813**
Equipment	-	-	-	-	-	-	-
Rent/Utilities [d]	$12,006	$18,822	$32,270	-	-	$1,773	**$64,872**
Overhead	$253,462	-	-	-	-	$18,448	**$271,910**
Other [e]	-	-	-	-	-	$644	**$644**
Total	**$1,367,426**	**$447,681**	**$849,544**	**$8,187**	**$13,153**	**$160,967**	**$2,846,958**

[a]Personnel Costs/Overhead includes locality pay and all benefits.
[b]Travel includes per diem payments.
[c]Transportation includes shipment of items.
[d]Rent/Utilities includes costs of space and utilities and shared common space and services.
[e]Other includes administrative costs associated with eligible CR program management and observer activity.

The NOAA Financial Services Division (FSD) costs increased in FY2024 due to an increased number of requests for payment relief. NOAA FSD[3] provides long term financing for purchasing CR quota and administers the fishing capacity reduction program (commonly referred to as the "buy back" program). Under section 312(b) of the Magnuson-Stevens Act, NMFS has the authority to conduct a fishing capacity reduction program if funds are provided and such a program is necessary to prevent or end overfishing, rebuild stocks of fish, or achieve

[3] NOAA FSD's Fishing Capcity Reduction program website: https://www.fisheries.noaa.gov/national/funding-financial-services/fishing-capacity-reduction-programs

measurable or significant improvements in the conservation and management of a fishery. A capacity reduction program must be consistent with any state and Federal fishery management plans in place for a fishery. Funding for such programs is authorized under section 312(c) of the Magnuson-Stevens Act and allows NMFS to obtain funding through specific appropriations from industry fee systems and public, private, or nonprofit sources. Under this authority, regulations implementing the BSAI King and Tanner Crab Fishing Capacity Reduction Program was implemented in 2005 (68 FR 69331, January 12, 2004). Under administration of the FSD, NMFS bought back 25 BSAI crab fishing vessels, associated fishery histories, and 62 licenses to achieve the maximum sustained reduction in BSAI crab fishing capacity at the least cost and in minimum time. In the BSAI King and Tanner Crab Fishing Capacity Reduction Program, the FSD administers an industry-funded, 30-year loan of $97,399,357.00 at a fixed rate of 6.54 percent. Additional information is available on the NMFS BSAI King and Tanner Crab Fishing Capacity Reduction Program web page.

American Fisheries Act

NMFS manages the American Fisheries Act (AFA) Program as a LAPP. On January 5, 2016, NMFS published a final rule to implement cost recovery for the AFA program (81 FR 150, January 5, 2016). The AFA allocates the Bering Sea directed pollock fishery Total Allowable Catch (TAC) to three sectors: inshore, catcher/processor, and mothership. Each sector has established cooperatives to harvest their pollock allocation. Only the inshore cooperative is responsible for paying a fee for that sector's Bering Sea pollock landed under the AFA, which is due on December 31 of the year in which the landings were made. Cost recovery requirements for the AFA sectors are at 50 CFR 679.66. The total dollar amount of the annual fee is determined by multiplying the NMFS published fee percentage by the ex-vessel value of all landings under the program made during the fishing year. NMFS calculates the fee percentage each year according to the factors and methods described in this report and at 50 CFR 679.66(c)(2). The 2024 notice of the fee percentages for the AFA program was published in the Federal Register on November 29, 2024 (89 FR 94710).

Only AFA direct program costs incurred by the inshore sector are included in the fee calculation. AFA direct program costs that are attributable to the catcher/processor and mothership sectors are excluded. This means $221,739 of direct program costs associated with the catcher/processor and mothership sectors are not recovered by NMFS or included in the fee percentage calculation.

Table 5-5 Comparison of direct costs for the AFA Program Inshore Sector from 2020 - 2024.

Cost Recovery Category	Inshore Sector				
	FY 2020	FY 2021	FY 2022	FY2023	FY2024
Personnel/Overhead	$ 233,484	$ 287,518	$309,541	$377,958	$304,163
Travel	$ 322	$ 644	$494	$8,465	$7,898
Printing	-	-	$4,500	$5,000	$5,000
Contracts/Training	$ 29,152	$ 118,691	$167,646	$197,669	$187,127
Supplies	$ 2,177	-	$738	$3,043	$3,316
Equipment	$ 26,028	$ 210	$2,000	$850	$2,600
Rent/Utilities	$ 42,200	$ 11,208	$17,868	$18,418	$11,807
Other	$ 45,157	$ 62,830	$198	$828	$523

Total Direct Costs	**$ 378,550**	**$ 481,120**	**$502,984**	**$610,384**	**$522,437**
Fishery Value	**$ 176,889,942**	**$ 190,527,567**	**$ 164,631,479**	**$242,979,836**	**$216,914,376**
Fee Percentage	**0.21**	**0.25**	**0.32**	**0.26**	**0.24**

Overall, direct program costs decreased between FY 2023 and FY 2024. Total fishery value also decreased, which resulted in the fee percentage decreasing from 0.26 to 0.24 percent between FY 2023 and FY 2024.

The highest direct program costs were attributed to NMFS AKR and primarily due to contract and personnel costs. Contract costs are related to development, support, and maintenance of data flow for the trawl electronic monitoring (EM) and cost recovery programs. Personnel category costs support eLandings and maintenance of the Catch Accounting System. These costs were apportioned based on a formula that includes weighting factors for the degree of complexity, amount of integration, time sensitivity, and workload for eLandings maintenance tasks. These are then used to calculate the proportion of eLandings tasks that can be attributed to each program sector. Additionally, there are NMFS personnel costs for at-sea scale inspections and general program administration. Overall NMFS AKR costs increased by approximately 2.34% between FY 2023 and FY2024.

The second highest direct program costs were attributed to the AFSC. Overall costs between FY 2023 and FY 2024 decreased by 20 percent. FY 2023 costs were increased due to travel to cover vacant staff positions in Dutch Harbor and the need to purchase specific observer sampling supplies that are not annual purchases. Those costs were not repeated in FY 2024. Costs related to the AFA Program were incurred by the Fisheries Monitoring and Analysis (FMA) and Resource Ecology and Fisheries Management (REFM) Divisions. The FMA division operates the North Pacific Observer Program, which deploys observers onboard fishing vessels to collect catch data. The Observer Program also provides quality control and quality assurance on data provided by the observers. The REFM division operates the Economic and Social Sciences Research Program which administers the Chinook Salmon Economic Data Report (EDR) Program, providing NMFS AKR with data to assess the effectiveness of the Amendment 91 Chinook salmon bycatch management measures.

PSMFC costs are for personnel that support data collection, analysis, the administration of AFA EDRs and time spent on updates to the website. ADF&G costs are for eLandings support.

Table 5-6. Direct costs, by category, for AFA CV sector in FY2024 for each of the program management billing entities.

Cost Recovery Category	AKR	AFSC	OLE	PSMFC	ADF&G	Total
Personnel/Benefits [a]	$67,730	$102,771	$77,918	$50,027	$5,717	**$304,163**
Travel [b]	$5,416	$1,922	-	$303	$232	**$7,898**
Printing	--	$5,000	---	-	--	**$5,000**
Contracts/Training	$166,183	$17,465	$2,173	$1,307	-	**$187,127**
Supplies	--	$3,158	-	$157	-	**$3,316**
Equipment	--	$2,600	---	-	--	**$2,600**
Rent/Utilities [d]	$2,740	-	$8,418	$649	-	**$11,807**
Other [e]		-	-	$523	-	**$523**
Total	**$242,094**	**$132,916**	**$88,509**	**$52,968**	**$5,949**	**$522,437**

[a] *Personnel Costs* includes locality pay, benefits, and overhead
[b] *Travel* includes per diem payments.
[d] *Rent/Utilities* includes costs of space and utilities and shared common space and services
[e] *Other* includes costs allocated for grants & other/misc. category costs

Amendment 80

NMFS manages the Amendment 80 Program as a LAPP. Amendment 80 allocates a portion of the total allowable catches of specific BSAI non-pollock groundfish species to cooperatives of trawl catcher/processors. On January 5, 2016, NMFS published a final rule to implement cost recovery payments for the Amendment 80 program (81 FR 150). The Amendment 80 cooperatives are responsible for paying the annual fee for groundfish landed under the Amendment 80 Program. The total dollar amount of the fee liability is determined by multiplying the NMFS published fee percentage by the ex-vessel value of all landings made under the program made during the fishing year. NMFS calculates the fee percentage each year according to the factors and methods described at 50 CFR 679.95(c)(2).

The 2024 notice of the fee percentages for the A80 program was published in the Federal Register on November 29, 2024 (89 FR 94710). Payments are due on December 31 of the year in which the landings were made.

Table 5-7. Comparison of A80 Direct Program Costs by Year.

Cost Category	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Personnel/ Overhead	$ 777,789	$ 840,785	$ 726,241	$ 1,010,216	$1,162,063
Travel	$ 11,453	$ 1,460	$ 1,086	$ 13,897	$13,897
Transportation	-	-	-	-	-
Printing	-	-	$ 9,900	$ 11,000	$11,500
Contracts/Training	$ 95,499	$ 117,322	$ 187,640	$ 236,133	$418,917
Supplies	$ 24	$ 113	$ 2,141	$ 7,078	$7,641
Equipment	-	$ 350	$ 4,400	$ 1,870	$5,980
Rent/Utilities	$ 74,484	$ 61,545	$ 61,197	$ 81,584	$72,128
Other	$99,412	$ 72,569	$ 329	$ 192	$218
Total Direct Costs	**$ 1,058,661**	**$ 1,094,144**	**$ 992,935**	**$ 1,361,951**	**$1,689,769**
Fishery Value	**$ 89,235,457**	**$ 76,254,313**	**$ 113,604,377**	**$ 99,604,629**	**$90,675,288**
Fee Percentage	**1.19**	**1.43**	**0.87**	**1.37**	**1.86**

Direct program costs for A80 increased by approximately 24 percent between FY 2023 and FY2024. When combined with a fishery value decrease of approximately 9 %, this resulted in a fee increase from 1.37 % in FY 2023 to 1.86 % in FY 2024.

OLE costs increased by 5 percent from FY 2023 through FY 2024. 'Personnel' is the largest cost category for this division, these costs are substantial due to the number of program participants, the diversity of fishery species for this program, and compliance risk for prohibited species bycatch sampling. Due to the complex nature of the catch, the volume of landings, and crew size, investigations are often complex and time-consuming. Additionally, enforcement officers engage in assessing fines, investigations, and outreach.

NMFS AKR costs increased by 105% between FY 2023 and FY 2024. This cost increase is due to contract costs for work on the IFA project as discussed in Appendix A. Development efforts in FY 2024 were focused on modernizing all aspects of A80 permit and cooperative management.

AFSC costs decreased by approximately 4 percent between FY 2023 and FY 2024. Costs were primarily attributed to personnel and for fisheries management of the program. Personnel costs account for monitoring, inseason operations, debriefing and quality control, gear inventory and deployment, and training and curriculum

development for the observer program. Personnel and printing costs increased, but these increases were offset by decreases in all other cost categories.

PSMFC costs increased by approximately 6 percent between FY 2023 and FY 2024 primarily in personnel costs. ADF&G costs also increased by approximately 6 percent in FY 2024. Similar to previous years, costs were attributed to eLandings program management and information technology.

Table 5-8. Direct costs, by category, for A80 in FY2024 for each of the program management billing entities.

Cost Category	AKR	ADF&G	PSMFC	AKFSC	OLE	Total
Personnel Costs[a]	$163,139	$8,037	$105,591	$325,330	$543,394	**$1,162,063**
Travel[b]	$5,375	$797	$728	$4,421	-	**$11,320**
Transportation[c]	-	-	-	-	-	**-**
Printing	-	-	-	$11,500	-	**$11,500**
Contracts/Training	$358,530	-	$3,915	$40,170	$16,302	**$418,917**
Supplies	-	-	$377	$7,264	-	**$7,641**
Equipment	-	-	-	$5,980	-	**$5,980**
Rent/Utilities[d]	$9,858	-	$1,558	-	$60,712	**$$72,128**
Other[e]	-	-	$218	-	-	**$218**
Total	**$536,901**	**$10,930**	**$126,865**	**$394,665**	**$620,409**	**$1,689,769**

[a] *Personnel costs* includes locality pay, benefits, and overhead.
[b] *Travel* includes per diem payments.
[c] *Transportation* includes shipment of items.
[d] *Rent/Utilities* includes costs of space and utilities and shared common space and services.
[e] *Other* includes costs for grants & other/misc category costs.

Aleutian Islands Pollock

The AIP Program allocates the Aleutian Islands directed pollock fishery TAC to the Aleut Corporation, consistent with the Consolidated Appropriations Act of 2004 (Pub. L. 108-109) and implementing regulations. Annually, prior to the start of the pollock season, the Aleut Corporation provides NMFS with the identity of its designated representative for harvesting the Aleutian Islands directed pollock fishery TAC. The same individual is responsible for the submission of all cost recovery fees for pollock landed under the AIP Program. Cost recovery requirements for the AIP Program are at § 679.67.

NMFS calculates the standard price for pollock using the most recent annual value information reported to the Alaska Department of Fish and Game for the Commercial Operator's Annual Report and compiled in the Alaska Commercial Fisheries Entry Commission Gross Earnings data for Aleutian Islands pollock. As explained above, due to the time required to compile the data, there is a 1-year delay between the gross earnings data year and the fishing year to which it is applied.

For the 2024 fishing year, the Aleut Corporation did not select any participants to harvest or process the Aleutian Islands directed pollock fishery TAC, and most of that TAC was reallocated to the Bering Sea directed pollock fishery TAC. Since there was no fishery for the AIP Program in 2024, there were no direct costs and the fee percentage is zero.

Community Development Quota

On January 5, 2016, NMFS published a final rule to implement cost recovery for the CDQ Program (81 FR 150). The CDQ Program allocates a portion of the total allowable catches of BSAI groundfish species and

halibut to CDQ groups. The CDQ groups are responsible for paying the fee for fish landed under the CDQ Program, due on December 31 of the year in which the landings were made. Cost recovery requirements for the CDQ groups are at 50 CFR 679.33. The total dollar amount of the fee due is determined by multiplying the NMFS published fee percentage by the ex-vessel value of all landings under the program made during the fishing year. NMFS published a notice of the fee percentages for the CDQ Program in the Federal Register on November 29, 2024 (89 FR 94710. NMFS calculates the fee percentage each year according to the factors and methods described at 50 CFR 679.33(c)(2). NMFS determines the fee percentage that applies to landings made during the year by dividing the total costs directly related to the management, data collection, and enforcement of each program (direct program costs) during the year by the fishery value.

Table 5-9. Comparison of CDQ Direct Program Costs by Year.

Cost Category	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Personnel/ Overhead	$ 289,909	$321,299	$327,906	$467,269	$508,334
Travel	$ 1,112	$531	$395	$7,881	$9,290
Transportation	-	-	-	-	-
Printing	-	-	$3,600	$4,000	$4,000
Contracts/Training	$ 211,012	$ 181,128	$ 225,149	$ 387,119	$425,272
Supplies	$ 53	-	$1,600	$2,537	$2,537
Equipment	-	-	$ 573	$ 680	$2,080
Rent/Utilities	$21,182	$ 20,257	$8,761	$8,726	$19,616
Other	$ 36,150	$ 26,386	-	-	-
Total Direct Costs	**$ 559,418**	**$ 549,601**	**$ 567,984**	**$881,105**	**$971,118**
Fishery Value	**$ 66,902,630**	**$66,402,272**	**$ 67,080,329**	**$ 82,731,219**	**$70,209,542**
Fee Percentage	**0.84**	**0.83**	**0.85**	**1.07**	**1.38**

Total CDQ Program costs increased by approximately 10 percent in FY 2024 relative to FY 2023. Total fishery value for the CDQ Program decreased by approximately 15 percent in FY 2024 relative to FY 2023. The fee percentage increased from 1.07 to 1.38 percent.

The highest contributor of direct program costs for CDQ is OLE, which increased by approximately 4.3 percent relative to FY 2023. Contract/Training costs decreased, but personnel costs increased and a review of billing related to all cost recovery programs resulted in a portion of rent for the Dutch Harbor office being attributed to CDQ. Contract costs include the observer program and data service contracts also increased. Personnel costs were attributed to patrols, investigations, outreach and education efforts, and compliance assistance.

The second largest contributor to direct program costs for CDQ is AKR. AKR costs increased by approximately 40 percent relative to FY 2023. These increased costs are attributed to increased staff and contract time on the IFA project as discussed in Appendix A.

AFSC costs decreased by approximately 5 percent relative to FY 2023. There were increased travel costs in FY 2023 that were not required in FY 2024. Costs were incurred by the FMA division which operates the North Pacific Observer Program. Personnel work on inseason operations, debriefing, quality control, gear inventory, deployment, and training specific to the CDQ Program.

ADF&G costs cover eLandings program management and decreased by approximately 25 percent relative to FY 2023. FY 2023 costs were higher due to a one-time contract supporting the CDQ Program while staff vacancies were filled.

Table 5-10. Direct costs, by category, for CDQ in FY2024 for each of the program management billing entities.

Cost Category	AKR	ADFG	AFSC	OLE	Total
Personnel Costs[a]	$87,387	$35,838	$104,218	$280,891	**$508,334**
Travel[b]	$7,753	-	$1,538	-	**$7,881**
Transportation[c]	-	-	-	-	**-**
Printing	-	-	$4,000	-	**$4,000**
Contracts/Training	$207,935	-	$13,972	$203,365	**$425,272**
Supplies	-	-	$2,527	-	**$2,527**
Equipment	-	-	$2,080	-	**$2,080**
Rent/Utilities[d]	$6,574	-	-	$13,042	**$19,616**
Other[e]	-	-	-	-	**-**
Total	**$309,648**	**$35,838**	**$128,335**	**$497,298**	**$971,118**

[a] *Personnel costs* includes locality pay, benefits, and overhead.
[b] *Travel* includes per diem payments.
[c] *Transportation* includes shipment of items.
[d] *Rent/Utilities* includes costs of space and utilities and shared common space and services.
[e] *Other* includes costs for grants & other/misc category costs.

Halibut and Sablefish Individual Fishing Quota (IFQ) Program

NMFS Alaska Region administers the IFQ Program in the North Pacific. The IFQ Program is a limited access system authorized by the Magnuson-Stevens Act and the Northern Pacific Halibut Act of 1982 (Halibut Act). Fishing under the IFQ Program began in March 1995. Regulations implementing the IFQ Program are set forth at 50 CFR part 679.

In 1996, the Magnuson-Stevens Act was amended to, among other purposes, require the Secretary of Commerce to collect a fee to recover the actual costs directly related to the management and enforcement of any individual quota program. This requirement was further amended in 2006 to include collection of the actual costs of data collection and to replace the reference to "individual quota program" with a more general reference to "limited access privilege program" at section 304(d)(2)(A) of the Magnuson-Stevens Act. Section 304(d)(2) of the Magnuson-Stevens Act also specifies an upper limit on these fees, when the fees must be collected, and where the fees must be deposited.

On March 20, 2000, NMFS published regulations at § 679.45 to implement cost recovery for the IFQ Program (65 FR 14919, March 20, 2000). Under the regulations, an IFQ permit holder must pay a cost recovery fee for every pound of IFQ halibut and sablefish that is landed on their IFQ permit(s), including any halibut that is landed as guided angler fish. The IFQ permit holder is responsible for self-collecting the fee for all IFQ halibut and sablefish landings on their permit(s). The IFQ permit holder is also responsible for submitting IFQ fee payments(s) to NMFS on or before January 31 of the year following the year in which the IFQ landings were made. The total dollar amount of the fee is determined by multiplying the NMFS published fee percentage by the ex-vessel value of all IFQ landings made on the permit(s) during the IFQ fishing year. As required by § 679.45(d)(1) and (d)(3)(i), NMFS publishes this notice of the fee percentage for the IFQ halibut and sablefish fisheries in the Federal Register during or prior to the last quarter of each year. The 2024 fee notice was published on December 26, 2024 (89 FR 105006).

Table 5-11. Comparison of the annual IFQ direct program costs from 2020 through 2024.

Cost Category	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Personnel/ Overhead	$2,872,831.00	$2,666,199.00	$2,767,777.00	$2,877,981.00	$2,840,269.00
Travel	$13,343.00	$7,699.00	$41,667.00	$22,268.00	$44,936.00
Transportation	$16,896.00	$32,189.00	$24,912.00	$28,001.00	$28,065.00
Printing	-	-	$1,350.00	$17,348.00	$488.00
Contracts/Training	$1,269,731.00	$996,801.00	$1,171,522.00	$1,496,351.00	$1,101,865.00
Supplies	$72,490.00	$77,030.00	$1,522.00	$34,424.00	$10,060.00
Equipment	-	$3,027.00	$705.00	$28,716.00	$1,117.00
Rent/Utilities	$149,786.00	$189,296.00	$209,253.00	$247,989.00	$239,431.00
Other	$3,662.00	$6,654.00	$4,781.00	$9,233.00	$9,013.00
Total Direct Costs	**$4,414,604.00**	**$3,978,894.00**	**$4,223,487.00**	**$4,856,041.00**	**$4,275,244.00**
Fishery Value	**$103,127,774.00**	**$171,017,323.00**	**$216,771,279.00**	**$144,038,414.00**	**$125,153,355.00**
Fee Percentage	**4.28***	**2.3**	**1.9**	**3.4***	**3.4***

*These billed percentages were limited by the Magnuson-Stevens Act statutory 3% cap of the ex-vessel value of the fishery in any Program year.

IFQ direct program costs decreased by approximately 12 percent relative to FY 2023. Combined fishery value for the IFQ program decreased by approximately 13 percent. The calculated fee percentage remained 3.40 percent, resulting in invoices being issued at a 3.00 percent rate, as required under MSA.

OLE has high direct costs for the IFQ Program due to the high number of participants and regulatory complexity. OLE's primary cost is personnel for enforcement monitoring and investigations of the IFQ program due to the high number of participants (1100+ vessels), landings (5000+), and offload ports (30+), as well as the duration of IFQ fisheries. There is also a secondary cost for the IFQ data clerk contract. Further, OLE is responsible for shoreside enforcement and provides after-hours surveillance.

The US Coast Guard (USCG) also refers labor costs to OLE for at-sea enforcement; when the USCG documents at sea violations, it refers the offence to OLE for appropriate action. Additionally, the IFQ Program does not require the use of vessel monitoring systems when fishing for halibut, which contributes to higher enforcement costs. VMS would be a useful tool for OLE to assess fishing activity in IFQ regulatory areas.

OLE employs a multifaceted strategy to maximize compliance in the IFQ fisheries. This strategy includes educational outreach, partnerships, patrols, inspections, and investigations. OLE spends thousands of hours annually providing marine resource users with compliance assistance, including staffing booths at organized events, daily contacts in communities, ports, harbors, and at-sea to ensure that the most current and accurate regulatory information is widely distributed and understood. OLE also spends thousands of hours annually conducting patrols to provide a visible deterrence, monitor fishing, detect violations, conduct compliance inspections, and provide compliance assistance. OLE personnel investigate reports or complaints of IFQ violations as well as regularly analyze IFQ data that may lead to investigations of abnormal activity and missing or questionable information. Overall, OLE costs increased by approximately 9 percent from FY 2023 to FY

2024 due to a 5.2% increase in salaries across government for most of FY24, the addition of a Special Agent (SA) in Ketchikan, one SA and one Enforcement Officer (EO) in Sitka, and a new EO position in Kodiak.

NMFS AKR costs decreased by approximately 35 percent relative to FY 2023. This decrease is primarily due to the IFA project shifting away from infrastructure work that was billed proportionally to all programs now being directed towards program specific work. There are significant personnel costs for issuing the large number of IFQ permits and processing transfers of quota shares, including transfers related to medical leases and right of survivorship and maintaining the necessary electronic systems to track permits, transfers and landings.

FSD costs support the loan program for purchasing IFQ quota. For FY 2024, FSD costs decreased by approximately 61 percent due to lower loan volumes and fewer servicing requests.

Costs incurred by the IPHC are primarily attributed to personnel and benefits. Personnel supports the IFQ fishery and IPHC administrative duties associated with the IFQ fishery. IPHC costs for FY 2024 decreased from FY 2023, largely due to purchases of necessary equipment in FY 2023 that were not repeated in FY 2024. Nearly all ADF&G costs are related to maintaining the eLandings catch accounting program. FY 2024 costs increased by approximately 1 percent.

Table 5-12. Direct costs, by category, for the IFQ program in FY2024 for each of the program management billing entities.

Cost Recovery Component	AKR	FSD	OLE	IPHC	ADF&G	Total
Personnel/benefits[a]	$555,969	$35,883	$1,420,790	$686,894	$140,733	**$2,840,269**
Travel[b]	$11,299	-	-	$33,637	-	**$44,936**
Transportation[c]	-	-	-	$28,065	-	**$28,065**
Printing	-	-	-	$488	-	**$488**
Contracts/ Training[d]	$478,233	-	$607,016	$16,617	-	**$1,101,865**
Supplies	-	-	-	$10,060	-	**$10,060**
Equipment	-	-	-	$1,117	-	**$1,117**
Rent/Utilities [e]	$70,650	-	$150,095	$18,686	-	**$239,431**
Other	$8,470	-	-	$543	-	**$9,013**
Total	**$1,124,621**	**$35,883**	**$2,177,901**	**$796,106**	**$140,733**	**$4,275,244**

[a] Personnel includes costs of locality pay, benefits, and overhead.
[b] Travel includes per diem payments. IPHC uses a scalar to determine costs so IPHC travel expenses reflect costs derived by a separate cost formula.
[c] Transportation includes shipment of items.
[d] Contracts/Training are an aggregate of contracts, contract fees, and training costs.
[e] Rent/Utilities includes costs of space and utilities and shared common space and services.

Rockfish Program

The rockfish fisheries are conducted in Federal waters near Kodiak by trawl and longline vessels. Regulations implementing the Rockfish Program are set forth at 50 CFR part 679. Exclusive harvesting privileges are allocated as quota share under the Rockfish Program for rockfish primary and secondary species. Each year, NMFS issues rockfish primary and secondary species cooperative quota (CQ) to rockfish quota share holders to

authorize harvest of these species. The rockfish primary species are northern rockfish, Pacific ocean perch, and dusky rockfish. The rockfish secondary species include Pacific cod, rougheye rockfish, shortraker rockfish, sablefish, and thornyhead rockfish. Rockfish cooperatives began fishing under the Rockfish Program in 2012.

The Rockfish Program is a LAPP established under the provisions of section 303A of the Magnuson-Stevens Act. NMFS is required to collect fees for the Rockfish Program under sections 303A and 304(d)(2) of the Magnuson-Stevens Act.

Table 5-13. Comparison of RP direct program costs by year from 2020 through 2024.

Cost Category	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Personnel/ Overhead	$194,593.00	$217,227.00	$210,970.00	$199,497.00	$209,216.00
Travel	$5,915.00	-	$647.00	$6,892.00	$7,214.00
Transportation	$4,702.00	$4,466.00	$6,132.00	$4,364.00	$5,432.00
Printing	-	-	$450.00	$500.00	$500.00
Contracts/Training	$69,030.00	$54,806.00	$80,880.00	$123,006.00	$203,766.00
Supplies	$54.00	-	$200.00	$4,027.00	$316.00
Equipment	-	-	$772.00	$85.00	$260.00
Rent/Utilities	$3,495.00	$4,827.00	$8,902.00	$5,741.00	$3,287.00
Other	$2,433.00	$1,776.00	-	$7.00	$3,304.00
Total Direct Costs	**$280,222.00**	**$285,252.00**	**$308,955.00**	**$344,120.00**	**$432,994.00**
Fishery Value	**$7,658,264.00**	**$10,308,123.00**	**$12,187,846.00**	**$9,597,377.00**	**$5,763,628.00**
Fee Percentage	**3.66***	**2.77**	**2.53**	**3.59***	**7.51***

*These billed percentages were limited by the Magnuson-Stevens Act statutory three percent cap of the ex-vessel value of the fishery in any Program year.

Overall, RP direct program costs for FY 2024 were an approximately 26 percent increase from FY 2023. When combined with an approximately 40 percent decrease in fishery values, this results in an actual fee percentage of 7.51 percent, resulting in a 3.00 percent fee percentage being applied to FY 2024 landings.

NMFS AKR has the highest billing costs which are attributed to personnel for catch accounting, inspections, permit issuance and fisheries management. The majority of the increased costs for FY 2024 is attributable to focused work from the IFA project on modernizing all aspects of managing this fishery as discussed in Appendix A.

The AFSC and ADF&G had slightly higher costs for FY 2024 compared to FY 2023. However, both the AFSC and ADF&G make up a small percentage of the total direct program costs for rockfish cost recovery.

Table 5-14. Direct costs, by category, for RP in FY2024 for each of the program management billing entities.

Cost Recovery Component	AKR	AFSC	ADF&G	Total
Personnel Costs[a]	$198,092	$5,226	$5,898	$209,216
Travel[b]	$7,214	-	-	$7,214

Transportation[c]	$5,432	-	-	$5,432
Printing	-	$500	-	$500
Contracts/Training	$202,019	$1,747	-	$203,766
Supplies	-	$316	-	$316
Equipment	-	$260	-	$260
Rent/Utilities[d]	$3,287	-	-	$3,287
Other[e]	$3,004	-	-	$3,004
Total	**$419,048**	**$8,048**	**$5,898**	**$432,994**

[a] Personnel includes costs of locality pay, benefits, and overhead.
[b] Travel includes per diem payments.
[c] Transportation includes shipment of items.
[d] Rent/Utilities includes costs of space and utilities and shared common space and services.
[e] Other includes costs for grant staff supporting Rockfish Program cost recovery

Appendix A. Apportioning personnel and contracting costs for IT systems

As described in chapter 2 of this paper, development and maintenance of IT systems is extremely important for implementation of LAPPs and the CDQ Program. These IT systems are necessary to compute and allocate quota, issue permits, enable transfers, monitor catch and bycatch amounts in near real-time, track catch relative to allocations, and accomplish program specific functions (e.g. vessel replacements). Application development and maintenance of these systems is an incremental cost for cost recovery and the work is accomplished by NMFS staff and contractors.

NMFS determines the incremental cost of employees' time and contracting costs by using those costs directly attributable to data collection and management for the LAPPs and CDQ Program. Personnel and contracting costs are directly proportional to the amount of time an employee or contractor spends on a given LAPP and codes are used to track salaries and benefits and contracting costs (tracked in 15 minute increments). Some activities, like software software development, support all the cost recovery programs as well as non-cost recovery programs. In these situations, the costs cannot be distinguished and tracked for specific programs so NMFS applies a standardized approach to account for the cost recovery expenses.

For example, a NMFS application programmer has spent 40 hours modifying the programming for eLandings, which is an application that is used to report landings for the Crab Rationalization, PCTC, CDQ, halibut and sablefish IFQ, Rockfish, and AFA Programs, but eLandings is also used to report landings that are not subject to cost recovery. Because the application is used for multiple fisheries, it is difficult for a staff person to accurately calculate how much time should be attributed to each cost recovery program and instead a formula is used. The formulas include weighting factors for the degree of complexity, amount of integrations, time sensitivity, etc for tasks, then calculating the portion of those tasks that can be attributed to each of the LAPPs. In this case, a programmer would keep track of their total time working on eLandings and NMFS would apply the percentages (see Table A-1 for an example) to determine how to allocate time among the cost recovery programs and non-cost recovery. The same approach is used for other IT systems (e.g. Catch Accounting System, eFISH, etc) and each year the agency reviews and updates the percentages based on an assessment of the amount of effort attributable to each program.

Table A-1. The percentages used to apportion costs for eLandings application development and support among each of the LAPPs and CDQ Program as well as the percentage of costs that are not cost-recoverable.

elandings Support Cost Recovery Breakout	
A80	5%
AFA inshore (CV)	8%
CRAT	10%
IFQ	33%
RP	1%
CDQ	5%
PCTC	1%
AIP	0%*

Non-cost recovery	37%
TOTAL	100%

*There was no fishery for the AIP Program in 2024.

Integrated Fisheries Application

One of the recent application development efforts in AKR is the development of the Integrated Fisheries Application (IFA). This is a large-scale IT project to completely re-engineer our fisheries management business processes that support all catch share programs in Alaska. This project is streamlining AKR internal fisheries management processes, which cross multiple divisions. This is creating more efficient data processing workflows, including increasing efficiency of review and approval of permit/transfer applications and improving data quality and providing robust, accurate reports. These improvements will increase customer service to the fishing industry and public. Additionally, the IFA is expected to facilitate easier implementation of future Council actions, and may accommodate new management tools.

Why do we need IFA?

AKR has been implementing catch share programs over the past 30 years; over time, the existing systems were created as separate "silos" that are hard to maintain and challenging to ensure data accuracy. The legacy systems are 'end-of-life', no longer capable of adapting to modern technology and fisheries management, and need to be replaced. This technical debt in the existing fishery permitting infrastructure has created weaknesses in our permitting processes and IFQ accounting and represents a significant risk to NMFS and to each of the LAPP fisheries. In addition, AKR's aging on-site IT infrastructure is unreliable and this project will move to the Cloud to increase scalability and dependability.

Many of the processes that are needed for LAPPs and the CDQ Program have been managed manually in spreadsheets which is inefficient and prone to errors and inconsistency. Manual processes (including review and approval of fisheries permits & transfer applications) also facilitate mistakes that have to be detected and re-done. Paper applications with manual data entry are time consuming for industry and staff and don't provide validation against applicable rules/regulations.

What is the scope of the IFA?

- Modernizing infrastructure to move to the Cloud and off of NMFS's fragile on-site infrastructure
- Redesign of internal software applications (at a future step in the project, we will also provide external access to the system for fishery participants)
- Streamlining permit intake and processing of permit applications
- Transforming quota allocation, quota tracking and management, accounting for LAPPs (IFQ and catch share cooperative programs)
- Fee computation, cost recovery billing, tracking payments

What is the status of IFA and how does that impact Cost Recovery?

- This is a large-scale effort over multiple years and work is ongoing.

- Cost recovery fees from all the catch share programs are supporting some of the development of the base infrastructure of IFA. This covers aspects of the system like the Cloud servers and user authentication that are necessary for all users of the system.
- As NMFS incrementally builds program modules into the system, the agency tracks the costs associated with the development for each specific program. For example, development of PCTC functions in IFA are complete. Currently programming efforts are focused on A80 and Rockfish permitting, so there have been specific IFA cost recovery expenses for both those programs in 2024 and 2025. As the project moves on to IFQ or Crab, then the majority of cost recovery charges will shift to those programs.

Appendix B. Discussion of OLE Costs to Maintain Remote Field Offices Versus Travel

In fiscal year 2024 and prior, NOAA's Office of Law Enforcement (OLE) has not billed staff travel to perform investigative work to any Cost Recovery Program, though they have authority to do so. Alaska is vast, with 66,000 miles of coastline, and 93 different ports spread across remote expanses. Our EEZ is 1,455,613 square miles, one third of the United States' 4,383,000 square mile EEZ. In 2022, 58% of the United States' commercial catch by weight was landed by Alaskan fisheries. OLE maintains offices in three central locations: Juneau, Anchorage, and Kodiak.[4] OLE in Alaska also has staffed field offices in Dutch Harbor, Homer, Seward, Sitka, Ketchikan, and Petersburg, all of which bill varying percentages of rent/utilities to Cost Recovery programs. Due to its vast geographic spread and the remoteness of its ports, traveling to the remote ports from the three main offices would be very costly.

In FY 2024, 24 OLE officers and agents opened 1,659 incidents (Table B-1); a sworn personnel on average opened 1.33 incidents per week. Of note, each incident may involve investigating a single or several potential violations for a vessel, processing facility, or business. Complex investigations involve more investigative work, time, and resources. Exclusively concerning LAPP cases for which OLE may bill cost recovery for staffing labor, rent/utilities/storage (patrol vessel and equipment), and contracts, and could bill for travel expenses, the following table breaks down the number of incidents for each staffed remote port. Note that sworn staff do travel to remote ports during pulse operations throughout the year.

Table B-1. Number of FY24 Incidents by port and Cost Recovery Program.

Port	IFQ Hal and Sab	IFQ Crab	A80	AFA	CDQ	PCTC	Sum
Dutch Harbor	31	17	63	90	26	11	238
Ketchikan	45		1	2			48
Sitka	137						137
Petersburg	38	1			1		40
Homer	100	3	1		1		105
Seward	37			8			45

In order to predict estimated costs to continue to provide Law Enforcement services for Alaska's federally managed fisheries, while NOT maintaining offices at the above remote ports, we examine costs to travel to each port from the main offices in Juneau, Anchorage, and Kodiak. Travel to Homer and Seward are calculated based on vehicular travel;[5] costs between other ports incorporate airfare. One week of travel for one sworn personnel is used. Personnel labor and benefits are excluded from the calculation as they are paid and not dependent on

[4] Of these, Anchorage is the only office that bills rent/utilities for Cost Recovery.
[5] GSA per mile charges for vehicles and travel reimbursement rate per mile. Excludes vehicle monthly rent and fuel costs.

location. Airfare costs are based on government refundable ticket costs. The GSA's per diem rates are used to calculate the weekly per diem cost by port.

Table B-2. GSA Per Diem rates in 2025 for fishing ports in Alaska.

Locality	Maximum Lodging	Local Meals	Proportional Meals	Local Incidental	Maximum Per Diem	Per diem 1 week[6]
DUTCH HARBOR	230	103	61	26	359	$2333.50
HOMER	274	99	59	25	398	$2587
KETCHIKAN	275	95	57	23	393	$2554.50
PETERSBURG	230	86	52	22	338	$2197
SEWARD	284	131	75	33	448	$2912
SITKA	274	93	56	23	390	$2535

Airfare costs (round trip)[7]
Kodiak > Anchorage = $606
Anchorage > Dutch Harbor = $2078
Juneau > Anchorage = $549
Juneau > Sitka = $360
Juneau > Ketchikan = $454
Juneau > Petersburg = $382

If OLE billed for travel to remote ports instead of maintaining the facilities, the estimated billable costs, based on the number of incidents opened for each LAPP program in each port, are shown in Table B-3. Note that travel costs to Dutch Harbor are only calculated from Anchorage, Alaska; although OLE often fly personnel from Kodiak, and, to a lesser degree, other field offices as well. These cost breakdowns illustrate that the rent and utility facility charges benefit industry by maintaining staffed offices in geographically dispersed remote ports that require high resource/staffing allocation to monitor and enforce the largest fisheries in the nation.

Table B-3. The estimated billable costs, based on the number of incidents opened for each CR program in each port if OLE billed for travel to remote ports instead of maintaining facilities and paying for rent in each port.

Port	Estimated Billable cost factors	IFQ Hal and Sab	IFQ Crab	A80	AFA	CDQ	PCTC
Dutch Harbor	Number of Incidents	31	17	63	90	26	11
	Personnel investigation weeks: divide by 1.329327 (incidents per week)	23.32	12.79	47.39	67.70	19.56	8.27

[6] Travel days equal 0.75x daily per diem.
[7] Estimated.

	Multiple of flight plus per diem ($4411.5 est.)	$102,876	$56,423	$209,061	$298,659	$86,289	$36,483
Ketchikan	Number of Incidents	45		1	2		
	Personnel investigation weeks: divide by 1.329327 (incidents per week)	33.85		.75	1.50		
	Multiple of flight plus per diem ($3008.5 est.)	$101,837		$2,256	$4,512		
Sitka	Number of Incidents	137					
	Personnel investigation weeks: divide by 1.329327 (incidents per week)	103.06					
	Multiple of flight plus per diem ($2895 est.)	$298,359					
Petersburg	Number of Incidents	38	1			1	
	Personnel investigation weeks: divide by 1.329327 (incidents per week)	28.59	.75			.75	
	Multiple of flight plus per diem ($2579 est.)	$73,723	$1,934			$1,934	
Homer (mileage from Anchorage)	Number of Incidents	100	3	1		1	
	Personnel investigation weeks: divide by 1.329327 (incidents per week)	75.22	2.26	.75		.75	
	Multiple of vehicle cost plus per diem ($2715.84 est.)	$204,301	$6,129	$2,043		$2,043	
Seward (mileage from Anchorage)	Number of Incidents	37			8		
	Personnel investigation weeks: divide by 1.329327 (incidents per week)	27.83			6.02		
	Multiple of vehicle cost plus per diem ($2986.16 est.)	$82,615			$17,971		