July 29, 2020

Jessica McCawley
Director, Marine Fisheries Management Division
Florida Fish and Wildlife Conservation Commission
2590 Executive Center Circle E, Suite 201
Tallahassee, FL 32301

Dear Ms. McCawley,

On behalf of the Gulf of Mexico Reef Fish Shareholders' Alliance (Shareholders' Alliance), please accept the following comments regarding Florida's spend plan for the Coronavirus Aid, Relief, and Economic Security (CARES) Act.

The Shareholders' Alliance is the largest organization of commercial snapper and grouper fishermen in the Gulf of Mexico, with most of our membership on the west coast of Florida. Our organization is dedicated to sustainable management of the Gulf's marine resources and to supporting American commercial fishing and seafood businesses in our region. We have members in all five Gulf States that rely on state and federal agencies to ensure fisheries management is based on sound science so that our fisheries and businesses can provide the American public with wild-caught, fresh, domestic seafood.

The commercial seafood industry is facing an unprecedented crisis due to the global COVID-19 pandemic that has impacted American citizens on every level. The closure of restaurants across the nation had a tangible trickle-down impact on commercial fishermen who no longer had a strong supply chain for their fish.

We thank Florida Fish and Wildlife Conservation Commission (FWC) for providing a formal process for public comment on the spend plan. Florida is the <u>only</u> state in the Gulf region to do so. Input from the very industries this spend plan will help and collaboration with FWC is critical to ensuring the money is distributed in a way that helps those who most need it. We also applaud the FWC for allocating 100% of the money it received from the CARES Act to fishermen and fishing business relief without diverting any for agency overhead.

We do, however, have some concerns and request clarification on several aspects of the draft spend plan, which are outlined below.

- We recommend that the FWC continue to keep this process public and maximize opportunities for industry input. FWC has already set itself apart from the other Gulf state agencies by creating a dedicated public comment process for the spend plan and we encourage the FWC to continue making this process as transparent as possible. Therefore,

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we request that any changes made to the spend plan after the public comment period be publicized prior to submission to Gulf States Marine Fisheries Commission. By doing so, the FWC will continue to lead by example through its efforts to engage those whose livelihoods have been impacted by COVID-19 and have a fair and transparent process for developing the state's plan for CARES Act Funds.

- Furthermore, we suggest the monitoring plan be made public and have an abbreviated comment period (2 weeks) so businesses can provide rapid input on the most appropriate types of documentation that will demonstrate loss.
- What will be the process for auditing applications and verifying revenue loss? The spend plan states that "applicants will be able to self-certify their losses" (page 3) and that "Fishery and marine aquaculture participants must attest to having documentation/records to support the losses…Further, the eligible fishery or marine aquaculture participant agrees to maintain these records for a period of no less than 3 years after the close of the primary grant award to the Atlantic States Marine Fisheries Commission and that these records will be provided to state or Federal auditors if requested" (page 2-3). Why did the FWC chose to go with self-certification for eligible participants? What are the repercussions if an applicant cannot provide the requested records?
- It's unclear to us what the rationale is for listing recipients and their contact information publicly. Is this a requirement of the CARES Act or FWC? Also, it's unclear whether or not the final distribution amounts will be listed as well.
- The current spend plan projects that aid will be delivered in January 2021. We understand that this process takes time to execute properly and know that FWC is working as fast as possible to deploy these funds. We ask that FWC consider any opportunity to shorten the timeline on fund distribution while maintaining the thoroughness and transparency of this program.

Thank you for the opportunity to comment on Florida's spend plan. We appreciate your leadership and engagement with the fishing industry on this important issue.

Sincerely,

Eric Brazer
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Gulf of Mexico Reef Fish Shareholders' Alliance
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