California Whale Entanglement Discussion Dungeness Crab Fishing Gear Working Group Charter

Updated October 23, 2020

Background

The Dungeness Crab Fishing Gear Working Group (Working Group) was established in September 2015 by California Department of Fish and Wildlife (CDFW), in partnership with the Ocean Protection Council (OPC) and National Marine Fisheries Service West Coast Region (NMFS WCR), in response to increasing trends in large whale entanglements. This document serves as the Working Group's charter, outlining the group's charge, objectives and priorities, and procedures.

Information about the Working Group's activities is available at http://www.opc.ca.gov/whale-entanglement-working-group. Information about the Working Group and the state of California's broader efforts to address entanglements can also be found at https://www.wildlife.ca.gov/Conservation/Marine/Whale-Safe-Fisheries.

Section I. Purpose and Charge

The Working Group serves as an advisory body to the CDFW Director, along with other state and federal partners, to address the risk of whale entanglements in California commercial Dungeness crab fishing gear¹. The Working Group's purpose is to provide the state of California with innovations, strategies, and management recommendations that support thriving whale and sea turtle populations along the West Coast, as well as a thriving and profitable Dungeness crab fishery.

A. Goals and Objectives

The Working Group's goals and objectives are informed by the <u>Risk Assessment and Mitigation Program (RAMP)</u> <u>regulations</u> (*Section 132.8, Title 14, CCR*), as well as the Working Group's priority to advance and support an increased understanding of the complex issue of marine life entanglements. Specifically, the Working Group operates within three priority areas related to RAMP implementation:

- RAMP Management Actions Work: In cases where risk is deemed elevated by CDFW and its agency partners based on thresholds defined in the RAMP regulations, the Working Group (in the form of an Evaluation Team, as a subset of the Working Group (see Section C)) will provide recommendation(s) regarding the appropriate management action(s) for the CDFW Director's consideration, as required by Fish and Game Code (FGC) § 8276.1 and Section 132.8, Title 14, CCR. Key steps include:
 - Determine the Scope of Risk: Based on CDFW's initial management recommendation—
 including management considerations and recommended action(s), best available science, and
 other relevant information—review and evaluate the management considerations to gain a
 more thorough understanding of the scope of identified risk (reference RAMP regs code section,
 once available 132.8 (d)).
 - Develop Recommended Management Action: Based on the determined scope of risk, review management action recommendations (reference RAMP regs code section, once available 132.8(e)) and develop a recommended management action for the CDFW Director's review and consideration to minimize entanglement risk.
- **RAMP Innovations Work:** Using Project Teams (see Section D), work with researchers and others to increase the understanding of marine life entanglements, improve RAMP operations (e.g., risk assessment process, including management considerations and actions), and minimize potential impacts to marine life and the commercial Dungeness crab fleet.

¹ The recreational Dungeness crab fishery will not be included in the RAMP regulations for the 2020-21 fishing season. This may be updated beyond 2020-21 based on the California Fish and Game Commission's decision making regarding management of the recreational fleet. Changes to the Working Group's Charter may be required to reflect this update in the future.

- Prioritize RAMP-related ecological and socioeconomic data collection, improve data organization and interpretation, inform entanglement forensic reviews, and lend expertise in the design and testing of gear innovations and other strategies to reduce entanglement risk.
- As innovations work develops, track the development of goals, key tasks/deliverables, evaluation
 metrics, funding opportunities, and associated timelines for priority projects. Where appropriate
 and expertise/capacity exists within Working Group Members, actively participate in grant
 writing and the active solicitation of funding to support innovations priorities and secure data
 sources, together with other Working Group recommendations.
- **Communications Work:** Provide peers, interest groups, and/or other outside organizations with information about the Working Group's process and regular evaluations of progress towards achieving goals, meeting discussion highlights, and recommendations through various means of networking and interaction, as appropriate and in alignment with Working Group communication protocol. See Section J for more information.
 - Review, discuss, and where appropriate make recommendations on Working Group and/or Project Team proposals to help advance innovations and other RAMP-related work with the support of OPC, CDFW, Fish and Game Commission, the Legislature, Dungeness Crab Task Force (DCTF), etc.
 - Conduct an annual review/assessment of Working Group activities relative to the group's charge (management recommendations, innovations work, communications, etc.).
 - Solicit ideas, strategies, and innovations from peers and outside organizations and experts to inform and advance the Working Group's charge.
 - Communicate with target audiences to share Working Group recommendations, encourage widespread participation of voluntary actions, broadly distribute key messaging and communications products (e.g. Best Practices Guide).

When possible, the Working Group will aim to connect across goals and objectives to maximize efficiency and coordination. The Working Group will further prioritize objectives and related tasks and identify specific timeframes and/or deadlines associated with key deliverables. Objectives may also be evaluated and updated regularly (e.g., annually) to reflect new information and the Working Group's progress.

Section II. Composition and Roles

The Working Group is comprised of the following:

- Working Group Members represent a diverse range of interests including commercial and recreational
 fishermen and industry representatives, environmental organization representatives, members of the
 whale entanglement response network, and relevant agencies. The role of the Working Group is to carry
 out the goals and objectives outlined in Section A. Working Group Members are requested to serve a 2-3
 year term in an effort to stagger the appointment of new participants.
- Working Group Advisors are select individuals with additional expertise or perspective beyond Working Group Members (e.g., legislative or agency staff, fishing gear manufacturer/distributor, data analysts).
 Advisors provide guidance, expertise, and information that help inform recommendations by the Working Group, but they are not included in the recommendation-making processes for management recommendations or innovations work.
- Working Group Alternates can attend meetings that his/her respective Working Group Member cannot
 attend and participate on his/her respective Member's behalf. When possible, Alternates should
 participate as 'observers' in at least two management action discussions (or relative experience) before
 being permitted to actively participate and inform recommendations. Alternates are expected to be fully
 educated by his/her respective Working Group Member prior to the meeting they are attending, as the

- Working Group (or Evaluation Team) will not spend meeting time to provide background on any agendaized items. Alternates should ideally be consistent throughout the Member's term. Alternates may be selected to replace the Member should they step down or their term be completed.
- Agency staff who work for government agencies (CDFW, NMFS WCR, OPC, and United States Coast Guard (USCG)) may help support the planning and administration of the Working Group. They may provide information or perspectives to help inform the development of Working Group recommendations, but are not included in the recommendation-making needed to make a recommendation (see Section x for more information). Agency staff provide guidance, expertise, and information that help inform the development of recommendations by the Working Group, but they are not included in the recommendation-making processes for management actions or innovations work.

The roles of each agency are outlined below:

- CDFW is the trustee agency and responsible for managing the state's commercial Dungeness crab fishery. CDFW provides scientific expertise and is also the convener of the Working Group. They are responsible for performing regular risk assessments in coordination with their agency partners and as outlined by Section 132.8, Title 14, CCR to identify when risk is elevated. CDFW will strive to provide sufficient staffing and funding to support Working Group operations and RAMP function, select Working Group Members, inform Working Group priorities, compile and make publicly available information for Working Group consideration, and provide strategic support for Working Group and Project Teams. CDFW will work with NMFS WCR, the Fish and Game Commission, and fishery stakeholders to address marine life entanglement risk in other California fixed gear fisheries and other marine species of interest. CDFW will maintain the Whale Safe Fisheries webpage, which includes updates and outputs from risk assessments, including CDFW Director preliminary determinations and declarations.
- NMFS provides advice and strategic support for Working Group and Project Teams through participation of NMFS staff as advisors to the Working Group. NMFS may assist the Working Group with collection, review, and analysis of entanglement data, along with other biological, environmental, and socioeconomic data, to better understand the factors that influence entanglement risks. Current or promising initiatives regarding specific topics, priorities, and recommendations made by or brought to the Working Group (e.g. Bycatch Reduction Engineering Program (BREP) funding and gear research, fishing effort data collection) may be provided by NMFS and/or NMFS partners. NMFS may help facilitate research and/or idea development to collect missing information and test ideas to reduce entanglement risk, and help identify entities capable of pursuing and accepting funding for potential project ideas. They may help the Working Group provide outreach to the community about the overall issue of whale entanglements in California waters, including progress and priorities of the Working Group. NMFS may also help CDFW consider how to integrate other California fixed gear fisheries and other marine species of interest into a more comprehensive approach within California to address the entanglement issue.
- OPC supports CDFW in convening the Working Group. They provide neutral support for Working Group and Project Teams and have provided funding to support Working Group priorities in alignment with the Strategic Plan to Protect California's Coast and Ocean and the Strategy for Reducing the Risk of Entanglement in California Fishing Gear, which guides investment of OPC's allocation of General Fund for whale and sea turtle entanglement. OPC also provides strategic support for the Working Group and Project Teams, as appropriate, and facilitates coordination to share updates among state agencies, as appropriate. OPC maintains the Working Group's webpage which includes an online record of Working Group products and summaries.
- USCG provides support for CDFW risk assessments and operational support, the Working Group and Project Teams. USCG will continue to provide support for disentanglement efforts.

The selection of the Working Group Members, Advisors, and Alternates is at the discretion of the CDFW Marine Region Manager. In appointing Working Group Members, the Regional Manager may consider professional

expertise or experience, diversity of perspectives, geographic location, willingness to express fundamental interests as opposed to fixed positions, ability and willingness to share Working Group updates with peers, willingness to convey the interests of one or more groups and to integrate diverse interests, capacity to work with diverse viewpoints, and ability to work constructively and collaboratively. All Working Group Members must have an active email address and phone number to facilitate timely communication. A list of active Working Group Members and Advisors is available at http://www.opc.ca.gov/whale-entanglement-working-group.

B. Management Action: Operations

CDFW staff will lead the administration of the Working Group's efforts to develop management actions to circumstances where entanglement risk is elevated (as outlined by Section 132.8, Title 14, CCR). This involves all internal information sharing, communications, and coordination with Working Group members in advance of and following management action phone calls. CDFW will also be responsible for communicating the Working Group's management action publicly through identified channels as identified in the RAMP regulations (Subsection (f)(3)). CDFW will monitor implementation of any management actions, assess their deployment, and report back to the WG on the results.

To help support the Working Group's management action discussions, the following approach will be taken:

- October 2020-January 2021: Ryan Bartling, CDFW staff, will act as a Chair during management action
 meetings. The role of the Chair is to ensure meeting participants have access to available information,
 identify areas of agreement, and advance discussions in a timely manner. As schedules allow, Sonke
 Mastrup and Morgan Ivans-Duran will act as advisors.
- January-February 2021: During this time, Working Group Members and Advisors will review and
 evaluate the management action process to date including the quality of recommendation making,
 the role of the Chair (need/value of a Vice-chair), and possible public perceptions and make any
 necessary changes. Steps will be taken to ensure the evaluation is conducted through a neutral lens. As
 needed, the Working Group will consider the need for neutral, 3rd party facilitation support, including
 the availability of resources to support this need.
- **February-July 2021:** The Working Group's management action process will move forward to reflect any adjustments or changes made during the evaluation step and agreed to by the Working Group.

Throughout the course of the 2020-21 fishing season, CDFW will coordinate with the other state and federal agencies to ensure available information is being reviewed relative to RAMP risk factor thresholds. Working Group questions or concerns are encouraged to be brought to CDFW lead staff for further discussion.

Executive Committee

Working Group Members are interested in cultivating more transparent dialogue and collaboration with the state and federal agencies engaged in this issue. To help promote this, an Executive Committee consisting of 2-3 Working Group Members, agency staff, and others (e.g., advisors) will be established to support meeting planning (e.g., agenda development), internal coordination, and longer-term planning. Interested Working Group Members will self-identify to CDFW lead staff and participation would be voluntary. Participants will be selected by the Working Group on a rotational basis, with the goal to have an array of participation that reflects the diversity of the Working Group representatives. The convening of an Executive Committee, including confirming the committee's form/function, participation, meeting schedule, etc. will be discussed during a Working Group meeting in November. The work of the Executive Committee will be evaluated in January-February 2021, in alignment with the above mentioned review of the management actions operations.

C. Management Action: Evaluation Team, Recommendation Making, Caucuses, Participation *Evaluation Team*

Upon the request of CDFW under circumstances of elevated risk, an Evaluation Team—or a subgroup of the full Working Group—will hold a conference call to review available information including CDFW's initial management

recommendation, determine the scope of the relative risk, and develop an appropriate management action for the Director's consideration. A good-faith effort will be made by CDFW to ensure Evaluation Teams are comprised of two commercial fishermen or industry representatives (including a minimum of one commercial fisherman from the zone(s) of concern), one recreational/CPFV representative, two representatives from conservation organizations, and one agency representative (CDFW). Specific attention to geographic areas of concern and other factors anticipated to be discussed during the assessment will inform the composition of an Evaluation Team. The Evaluation Team will be given a minimum of 48-hours notice before the conference call will be held. The full Working Group will be notified of the meeting request and based on availability (and other criteria noted above) an Evaluation Team will be reconvened for each meeting. All Evaluation Team meetings will be held via conference call.

Management Action Recommendation Making Process

In the spirit of collaboration and developing recommendation(s) that reflect the Working Group's shared vision, an Evaluation Team will strive towards consensus (no opposition) for all recommendation(s) forwarded to the Director. Recommendation(s) with no opposition will be identified as 'consensus' and likely to be prioritized by the Director in their deliberations. All recommendation(s) developed by an Evaluation Team, including any that do not have consensus support, will be captured in a Recommendations Memo and submitted to the Director. To help focus the Director's review, an Evaluation Team will aim for no more than five (5) management recommendations. The memo will not specify the number of individuals supporting a particular recommendation and no formal voting will take place. Each recommendation presented will include its rationale, including its conservation and socioeconomic benefits/merits and any limitations or tradeoffs to consider for each option and how the option was arrived at, as well as how broadly supported a recommendation was.

Informal Caucuses

Informal caucuses of two (2) or more individuals may meet in advance of a management action meeting to consider and identify shared areas of interests. The results of caucus discussions will be conveyed at a high-level during the management action meeting and will help inform an Evaluation Team's recommendation development process. Caucus meetings would be led by any individual Working Group member(s) or Advisor(s).

Participation During Management Action Conference Calls

All management recommendation meetings will be closed to the public. The recommendations memo and other related materials developed to inform the Director's management response will be posted publicly and act as a record of the Evaluation Team's discussions. A CDFW senior staff member is required to be present on all management action calls. If a CDFW senior staff member has to leave the call or meeting early, then the call or meeting will adjourn at that time unless another CDFW senior staff member is present.

D. Innovations: Project Teams

Project Teams meet to further innovations work, including priority projects, and involve a subset of self-selected Working Group Members and Advisors. Each Working Group Member is requested to participate on at least one Project Team.

- Data Project Team: Involved in data review, organization and interpretation, scientific analysis, identification of and suggestions for addressing data gaps, facilitating/informing model development, advise on and support survey design (e.g., aerial, vessel, citizen science), and advancing electronic monitoring priorities.
- **Gear Innovations Project Team:** Provide guidance for and, where appropriate, implementation of gear innovation testing to help support RAMP and, potentially, available management measures for consideration.
- **Communications Project Team:** Available to collaborate with CDFW 1-2x per year to update the Best Fishing Practices Guide and other outreach materials.

The activities of each Project Team, including the merits of adding/removing Project Teams, will be reviewed by the Working Group during its annual meeting. Each Project Team is anticipated to be active on an annual basis, however, teams may be dormant due to limited activity/priorities, the height of the fishing season, etc.

E. Innovations: Project Team Operations

CDFW staff, together with Project Team Leads, will advance the administration of the Working Group's innovations activities. This involves developing and maintaining related materials and communications to plan for, design, and/or carry out innovations priorities as identified by the Working Group and its Members. Project Leads, together with each Project Team, will determine how frequently the team will meet being conscious of capacity limitations.

To help support the Working Group advance its innovations work, the following approach will be taken:

- October 2020-November 2020: Project Leads will be confirmed and limited work will be conducted in
 advance of the start of the 2020-21 fishing season, with specific attention placed on any activities that
 need to be advanced to support/inform management action discussions (e.g., data review).
- **November-December 2020:** Project Team work will be paused in reflection of the start of the 2020-21 fishing season.
- January-October 2021: Project Leads will work with CDFW staff to re-establish their respective Project
 Teams to continue advancing priority work. Where appropriate, work will build on activities conducted
 prior to the start of the 2020-21 fishing season. Considerations for additional coordination support may
 also be considered at this time.

Project Teams are identified by the Working Group and reviewed and confirmed in partnership with CDFW staff. Based on Working Group priorities, there may be a need to establish additional Project Teams (or subcommittee(s)) for the short-term. The need for a new Project Team can be raised by Working Group Members, Advisors, or agency staff. Once raised, considerations for administrative support needs, agency staff capacity, and Working Group workload will be considered by the Working Group and CDFW. CDFW, in partnership with the Project Team Lead, will approve any new teams/subcommittees). CDFW staff are not required to participate in all Project Team meetings. All Project Team meetings will be held via conference call.

F. Innovations: Advancing Ideas & Recommendation Making

All work, suggestions, and ideas of the Project Teams will be reported back to the full Working Group for consideration. Agreement within or across Project Teams is not necessarily an endorsement of the full Working Group. Some Project Team advancements may be presented to the Working Group and a request for a formal recommendation to be made. Ideas generated by Project Teams may also be carried out by individual(s) and/or small groups composed of Working Group Members or Advisors outside of the Working Group; these will not be considered Working Group product(s). Innovations work recommendations can be forwarded in the following ways:

- Informed by Project Team recommendations, the Working Group can make a formal recommendation to target audiences, including CDFW, OPC, the Fish and Game Commission, the Legislature, and/or the Dungeness Crab Task Force (see Section G for additional details); and
- Individuals and/or small groups composed of Working Group Members or Advisors outside of the formal Working Group can forward an idea from a Project Team.

Each Project Team will consider funding and resource needs specific to their respective projects/programs which will be shared with the full Working Group (and others) for additional input.

G. Non-Management Recommendation Making

Non-management recommendations made by the Working Group and forwarded to decision makers and posted publicly will aim to reflect the diverse perspectives held by all Members. Members will be encouraged to reach

"broad support" with the goal for none opposed while at all times expressing his/her/their self-interest. If a Member cannot support an option or recommendation, they are responsible for proposing an alternative that legitimately attempts to achieve their interest and the goals of the Working Group. In efforts to reach broad support, all voices will be heard and creative solutions will be sought to resolve issues and craft recommendations that encompass the diversity of viewpoints. Non-management recommendations include those related to advancing research priorities, funding priorities, external communications products, legislative guidance to decision makers, and other non-management action recommendations.

CDFW will schedule full Working Group meetings (e.g., annual meeting) to maximize attendance. However, in the case where full Working Group meetings do not have full attendance, broad support reached will be deemed by the individuals present and recommendations will move forward. CDFW staff will work with Working Group Members to ensure regular meetings have broad participation, and actions and/or recommendations that are arrived at are inclusive. Recommendations/ideas that *do not have broad support* will still be reflected in the recommendations memo and/or key themes summaries (and other Working Group products). In most cases, state and federal representatives will recuse themselves from weighing in on Working Group products; this will not prevent a full agreement product from moving forward.

Between Working Group meetings/calls, email communication will be utilized to gain full support on written products. In the case where a Working Group Member is unable to attend a meeting, it will be the responsibility of the Member to contact CDFW staff prior to the meeting to provide input or send their alternate to attend the meeting in their place. A product will be deemed to be supported by the full Working Group if no member transmits their objection by the established deadline. All Working Group recommendations will be posted on the OPC and CDFW webpages, and shared via CDFW's email list.

Section III. Procedures

H. Ground Rules (Meeting Agreements)

Working Group Members agree to:

- Participate in each meeting prepared to constructively discuss agenda items. This includes reviewing
 materials and information distributed in advance of the meeting or conference call, connecting with
 CDFW to talk through questions or concerns, and soliciting input from constituents between meetings;
- Focus the discussion on strategies and solutions that move the conversation forward and avoid revisiting
 agreements and/or topics that have been addressed by the group (or agencies) previously;
- Engage in a cross-interest dialogue focused on working with other Working Group Members and Advisors to support constructive discussions focused on interests rather than fixed positions;
- Approach discussions from a place of diversity and inclusion, considering voices and perspectives of each Member's respective constituencies and/or organizations;
- Listen for understanding, acknowledge and seek clarification of others' perspectives and verify assumptions, and openly discuss issues with others who hold diverse views;
- Participate in a problem-solving approach based on respectful and constructive discussion; and
- When necessary, identify any personal/professional conflicts of interest (e.g., financial) related to any subject of discussion and/or recommendation-making.

I. Attendance and Meeting Requirements

Members (or Alternates) and Advisors are expected to serve to their best ability and are expected to attend all full Working Group conference calls and the annual meeting. Failure to attend the annual meeting and/or up to two (2) full Working Group conference calls will result in an evaluation of an individual's ability to serve on the Working Group by the CDFW Marine Region Manager and may be cause for the Member to step down.

Some full Working Group calls (via conference line) and in-person meetings (in-person or via conference line) will include a 'listen only' option for interested stakeholders and members of the public when needed. The Working Group and its Advisors retain the option to hold closed-door sessions to discuss sensitive issues/topics prior to or following public meetings. Attendance to closed-door sessions by individuals other than Working Group Members listed in the table above (including advisors) is at the discretion of CDFW.

Meeting Schedule and Logistics

The schedule for Evaluation Team meetings will be determined as outlined in RAMP regulations, with no more than two meetings per month. CDFW will work with RAMP risk factor leads to develop and prepare meeting materials, including a compilation of available data, CDFW's initial management recommendation.

Project Team calls will be scheduled as needed to provide focused attention to each topic as needed based on priorities of the Working Group in consultation with CDFW. Efforts will be made to avoid scheduling Project Team calls during the fishing season (i.e., not to overlap with management action calls).

Attempts will be made to schedule conference calls in advance and in consideration of other priorities (e.g., Fish and Game Commission meetings, Pacific Fishery Management Council meetings, DCTF meetings, other fishing seasons, etc.) to encourage broad participation from the Working Group.

CDFW will work to develop materials for all Evaluation Team calls; Project Team Leads will lead agenda development, next steps emails, and quarterly written updates for respective Project Team calls. Public-facing materials will be posted online by CDFW. Additionally, the Chair and/or Project Team lead will work with meeting presenters and others to develop and prepare meeting materials. Call-in information, meeting agenda, and meeting materials will be circulated to an Evaluation Team or Working Group Members in advance of meetings with adequate time to review by Members.

J. Communications: Protocols and Information Sharing

To achieve its goals and objectives, the Working Group is committed to transparency and open lines of communication among Agencies, Members and Advisors, and with their peers and the broader interested public. Between or in preparation for meetings, the Working Group may receive materials such as meeting agendas and notes, Project Team updates, entanglement data, project proposals and results, and draft key findings or recommendations memos. All information received is considered public. The Working Group will work collaboratively to identify how/when information is shared with peers, and will work with the intention to share materials externally through unified communications and messaging. This may include, but is not limited to, developing joint announcements, press releases, blog and social media posts, etc. Working Group Members will act in good faith to communicate with the Working Group their ideas for how to share information, and will extend invitations to have information sharing be a Working Group "product".

Working Group Members and Advisors are strongly encouraged to keep their peers, interest groups, and/or organizations informed about the Working Group process, discussions, and recommendations through various means of networking and interaction, as appropriate. This communication should align with the Working Group's communication protocol. In circumstances where there is not a unified Working Group message, Members and Advisors will use their best judgement of how and when to distribute information to their peers.

Through the RAMP, the Working Group may make management recommendations to CDFW which could result in adverse impacts to the Dungeness crab fleet. In these instances, CDFW will develop and share official communications to the fleet and other stakeholders regarding the implemented management measures rather than relying on Working Group Members. CDFW communications will emphasize that while the Working Group makes recommendations, ultimately CDFW decides when and how to implement management measures for the fishery.

Working Group Members and Advisors may provide their perspectives to peers, media, etc. as individuals, but may not speak on behalf of the full Working Group; such communication will not be considered a Working Group product. Any correspondence, reports, or other written documents developed on behalf of the full Working Group that constitutes a "Working Group product" will be shared with the Chair for final approval prior to circulating publicly. Public summaries of full Working Group deliberations and outcomes will be made available on the OPC website. Project Team summaries will not be posted online.

When corresponding via email, please "reply all" to maintain inclusivity and transparency in all Working Group communications. Members and Advisors are expected to abide by the ground rules across all forms of communication (see above).

K. Travel Reimbursements and/or Stipends

Travel reimbursements and/or stipends will be provided to Working Group Members and non-federal Advisors as funds are available. Travel reimbursements and/or stipends will be prioritized for Working Group Members and is intended to provide financial support to those Members who do not receive travel reimbursements or wages by their place of employment for attending Working Group meetings. Members must submit a request for funding support via email seven (7) days prior to a scheduled meeting. A point of contact will be identified when funds are available. Reimbursement of travel funds and/or stipends will be at the discretion of the fiduciary agent and will be based on distance travelled, etc.