



April 14, 2023

Updated April 25, 2024 based on administrative fee assessment

Final DRAFT Spend Plan for funds appropriated to address the 2020 Norton Sound, Yukon River, Kuskokwim River, Chignik, Southeast Alaska; and 2021 Yukon River salmon disaster determination. NOAA Fisheries has allocated \$55,928,849 for these salmon fishery disasters. The spend plan informs the federal grant application submitted by Pacific States Marine Fisheries Commission (PSMFC) to NOAA Fisheries and is subject to change based on approval of the final grant.

Process to develop the spend plan: ADF&G posted an initial draft spend plan for public comment in September 2022 and received 27 written comments on the initial plan (Appendix 1). ADF&G revised the plan based on public comments and posted a second draft plan for public comment on January 31, 2023. Twenty-nine additional comments were received and in response, ADF&G is recommending the following revisions:

Research: Projects were selected from the list provided in the Appendix of the second draft spend plan for direct funding. These research projects are all responsive to the research themes developed by ADF&G and public comments and cover all geographic areas affected by this fishery disaster.

Subsistence: Clarified that households may only qualify for a direct payment in one subsistence fishing area included in this disaster: Norton Sound, Yukon River, or Kuskokwim River.

Vessel crew: Clarified that direct payments to minors are not authorized by the terms of the Federal grant but may be authorized to guardians in the same household on behalf of an eligible minor.

Communities: Funds for communities that meet all eligibility requirements will be made available pro rata to their demonstrated loss. The loss will be calculated as the communities' 2017-2019 average exvessel value for salmon compared to the 2020 exvessel value for salmon. The estimated loss must be greater than \$50,000 because losses less than this amount result in very small allocations.

Southeast: Clarified that persons may qualify as crew and/or a permit holder in more than one gear sector but may not qualify as a crew and permit holder in the same gear sector.

The Harvester/Processor allocation was adjusted from a 75/15 split in the initial draft spend plan to 85/15 split in the second draft spend plan and adjusted to a 80/20 split in the final draft spend plan.

Allocations between the seine, gillnet, and troll gear sectors are based on the median value of two recommended approaches for calculating the historical 5-year average value of the fishery; one approach uses the most recent 2015-2019 average for all species and the other approach uses the 2010-2018 even-year average value for all species.

Troll sector eligibility – based on public comments, added a minimum value threshold of \$2,500 for 2020 chum and coho salmon landings.

Guiding principles for disaster fund distribution: Disbursement of funds is intended to:

1) assist fishery participants harmed by the 2020 and 2021 salmon fishery disasters and 2) improve fishery information used to assess and forecast future fishery performance and to develop management approaches that avoid and/or mitigate the impacts of future fishery disasters that cannot be prevented.

Proposed allocations to project categories: The proposed categories and allocations reflect comments received from stakeholder input.

Category	Allocation	Estimated funds
Research	12%	\$6,729,522
Communities	3%	\$1,659,461
Commercial and subsistence participants	85%	\$47,018,052
Program support	0.05%	\$27,573
Total		\$55,434,608

Research - \$6,729,522: Funds will be allocated to support projects that improve available fishery information and help prevent and/or mitigate future fishery disasters. The scope of this fishery disaster is statewide and includes all species of salmon, specifically: chum and coho salmon in Norton Sound, Chinook and chum salmon in the Yukon River and Kuskokwim River, Chinook, chum, coho, sockeye, and pink salmon in Chignik, and chum, coho, sockeye, and pink salmon in Southeast Alaska.

The following research projects are responsive to the research themes that were developed by ADF&G staff and fishery participants and are proposed to be funded directly in the federal fishery disaster grant. Directing fishery disaster research funds to these projects in the spend plan expedites the administrative process and maximizes the amount of time for investigators to conduct research.

Salmon Ocean Ecology Program projects:

1. Juvenile marine salmon survey in the Southern Bering Sea to assess ocean/climate condition impacts on future Kuskokwim Chinook and chum salmon runs and estimate non-adult abundance that can be used for developing forecasting tools. This survey is modeled after other surveys that have proven useful in the northern Bering Sea and southeast Alaska for predicting run size up to three years in the future and for evaluating how marine conditions impact future runs. ADF&G \$1,337,636 total.
2. Juvenile marine salmon survey in the western Gulf of Alaska to assess ocean/climate condition impacts on future Chignik salmon runs and estimate non-adult abundance that can be used for developing forecasting tools. This survey is modeled after other surveys that have proven useful in the northern Bering Sea and southeast Alaska for predicting run size up to three years in the future and for evaluating how marine conditions impact future runs. ADF&G \$1,385,899 total.
3. Assess early marine food availability, zooplankton and diet analysis, for Norton Sound, Yukon and Kuskokwim chum salmon and Chignik salmon in the Bering Sea and Western Gulf of Alaska, respectively. Stakeholders have expressed concern for the role of warm water temperatures and competition affecting the available food and survival of Alaskan salmon stocks. This project would assess the quantity and quality of food available and how much diet overlap exists among salmon and non-salmon species in their early marine life. ADF&G and UAF for zooplankton component is built into the Project 1 and Project 2 costs.

Arctic Yukon Kuskokwim Area projects:

1. Structured evaluation of Yukon River Chinook salmon management strategies. This project would allow for a facilitated stakeholder outreach and engagement program to occur concurrently with data simulations to evaluate escapement goal and management strategies for co-occurring Chinook and summer chum salmon. Expected products include 1) documentation of stakeholder objectives

and priorities for salmon resources, 2) evaluation of tradeoffs associated with alternative management strategies, and 3) recommendations for consideration by management agencies and stakeholder advisory groups. Successful implementation of this project would require a dedicated facilitator, agency/non-agency/academic partnerships, and extensive stakeholder engagement. ADF&G \$778,848.94 total.

2. Kuskokwim chum salmon radiotelemetry abundance estimation. Drainage wide estimates of Kuskokwim River chum salmon are not available; however, the existing Kuskokwim River sonar program provides an index of abundance of unknown magnitude. This project would use radiotelemetry and mark-recapture techniques to estimate the total abundance of Kuskokwim River chum salmon upriver from the mainstem sonar location. Results would provide important context for interpreting and possibly correcting bias associated the annual sonar estimates. Results would be expected to dramatically improve understanding and annual monitoring of Kuskokwim River chum salmon abundance to inform harvest management, set biological escapement goals at spatial scales appropriate for management, and inform run forecast models. Funds would allow for mainstem tagging, tracking, and subsidize the cost of tag recapture efforts within spawning tributaries. ADF&G \$1,499,999.73 total.
3. Unalakleet River coho salmon sonar extension project to expand escapement estimates of Unalakleet River coho salmon beyond the normal weir operational period by installing a sonar and initiating species apportionment methods. Unalakleet River coho salmon escapement monitoring is hindered during much of the run due to high water conditions that prevent operation of the Unalakleet River weir. This project would improve escapement counts by providing more robust information for evaluating total run, escapement, stock production, and consideration of harvest management options. ADF&G 285,000.52 total.

Chignik Area projects:

1. Analyze 20 years of limnological and juvenile sockeye salmon data and enhance this data set with genetic, diet, bioenergetic, and high-resolution limnological data to evaluate drivers of Chignik River watershed sockeye salmon population productivity to understand critical linkages between ecological conditions in time and space that are key drivers to annual salmon production. Results will benefit the maintenance and conservation of Chignik sockeye salmon by identifying the importance of lake rearing habitats for survival, mediated by habitat quality effects on juvenile sockeye salmon condition and growth, which will assist in identifying factors affecting future returns. ADF&G \$425,258.96 total.
2. Study the seasonal Chignik Lake habitat utilization by juvenile sockeye salmon within the watershed using split-beam hydroacoustics. Greater understanding of the sockeye salmon life history and migrations within the watershed will yield important information about key timeframes and parameters while estimating abundance, size and condition are particularly useful in assessing productivity of the entire watershed. ADF&G \$326,878.95 total.

Southeast Area projects:

1. Southeast Coastal Monitoring Survey (SECM) work in Stephens Passage, Upper Chatham Strait, and Icy Strait. The primary objective of SECM is to evaluate the status of the pelagic ecosystem, including juvenile salmon and other pelagic fish species, in the northern region of Southeast Alaska (SEAK). SECM surveys support research on the marine ecology of salmon, provide data for harvest forecast models for SEAK pink salmon, and support ecosystem research in the Gulf of Alaska. ADF&G \$300,000.13 total.
2. Chum salmon helicopter surveys throughout Southeast Alaska. ADF&G maintains a standardized survey program to index spawning chum salmon abundance at 87 summer-run and seven fall-run

streams. Chum salmon may be masked by high densities of pink salmon on the spawning grounds, particularly in years of low chum salmon abundance, which makes monitoring wild chum salmon populations challenging. Helicopter surveys provide surveyors improved views of these streams, validate observations of chum and pink salmon abundance, identify primary chum salmon spawning areas, and improve managers' ability to identify chum salmon during routine aerial surveys of other index streams in the area. ADF&G, \$60,000 annually over three years = \$180,000 total.

- McDonald Lake sockeye mark-recapture study. McDonald Lake sockeye salmon are a current *Stock of Concern* in Southeast Alaska, and an *Action Plan* is in place to reduce the commercial fisheries harvest on this stock. Escapements are estimated from standardized foot survey counts at Hatchery Creek, the primary spawning tributary. The expansion factor was based on comparison of peak foot survey counts to six years of population estimates from weir counts and mark-recapture studies. This project would fund additional years of mark-recapture population estimates to improve the current foot survey expansion and allow for improved age composition data and other relevant data to be collected at the lake. ADF&G, \$70,000 annually over three years = \$209,999.79 total.

Total for all research projects: \$6,729,522.02.

Communities - \$1,659,461: Municipalities and boroughs rely on revenue generated from salmon landings and other economic activities related to the salmon fisheries. The impact of the fishery disaster created significant loss of income to the communities in which the cultural and basic economic structure is the marine economy. Funds can be used to help assist the fishing communities that were affected by this fishery resource disaster by recognizing the loss of income. Historically one of the purposes of disaster funding was to get funds to communities and fishermen as fast as possible. Direct payments provide that method.

Direct payments will be made to municipalities and boroughs based on the port of landing where salmon deliveries occurred.

Eligibility criteria for communities:

- ADF&G fish ticket data must show that the salmon species included in this fishery disaster in the affected areas were landed in the community, based on port of landing, in either 2019 or 2020. The year 2019 is used for areas where there were minimal or no commercial fishery landings in 2020.

Area/Year	Salmon species
Norton Sound (2020)	chum and coho
Yukon River (2019)	Chinook and chum
Kuskokwim River (2019)	Chinook and chum
Chignik (2019)	All salmon
Southeast (2020)	Sockeye, chum, coho, and pink

- Estimated loss in 2020 must be at least \$50,000 as compared to the 2017-2019 average.

Disaster funds are distributed pro rata to each community's demonstrated loss relative to the total loss of all eligible communities. Based on these criteria, the following communities may be eligible for community-designated funds: Unalakleet, Emmonak, Chignik, Kodiak, Sand Point, Craig, Haines, Hoonah, Juneau, Ketchikan, Petersburg, Sitka, Wrangell, and the Metlakatla Indian Community.

Commercial and subsistence participants - \$47,018,052: This category includes commercial harvesters, crew, and processors in the Norton Sound, Yukon River, Kuskokwim River, Chignik, and Southeast areas. It also includes subsistence households that rely on subsistence fisheries in the Norton Sound, Yukon River, and Kuskokwim River areas.

Allocations, eligibility criteria, and payment distribution methods were informed by public comment and therefore are not the same across the fishery management regions or across all gear sectors in the same region. Comments from fishery associations were weighted more heavily than those from individuals based on the premise that fishery associations represent majority interests of those stakeholders.

- **Subsistence households:** Direct payments to subsistence households that rely on subsistence fisheries in the Norton Sound, Yukon, and Kuskokwim River areas. Revenue losses in the subsistence fisheries were estimated using an average of the urban and rural food replacement costs for salmon species where harvest in the disaster year was at least 35%¹ lower than the previous five-year average (2015-2019). Available data show that the value of subsistence losses in the Norton Sound, Yukon River, and Kuskokwim River area in the disaster years were significant. In the Norton Sound area, the estimated replacement value of subsistence losses in 2020 were approximately 25% of the commercial fishery losses. In the Kuskokwim River area nearly all the estimated losses in 2020 were in the subsistence fishery. Likewise, the estimated replacement value of subsistence salmon losses on the Yukon River in 2020 and 2021 were far greater than the losses to the commercial fishery.

ADF&G is not proposing to include subsistence as a category for direct payments in the 2020 Chignik and Southeast areas. The 2018 Chignik fishery disaster spend plan did not include subsistence as a category based on public input that providing funds for commercial permit holders and their crew mitigated subsistence fishery losses. The estimated replacement value of subsistence losses in Chignik due to the 2020 disaster was less than 2% of the commercial fishery losses. For these reasons, ADF&G is not proposing to include a subsistence category for the Chignik area in the 2020 disaster spend plan. Similarly, the estimated replacement value of subsistence losses in the Southeast area was less than 0.2% of the commercial fishery losses and subsistence fisheries in the Southeast region were not restricted in 2020. For these reasons, ADF&G is not proposing to include a subsistence category for the Southeast area in the spend plan.

- **Commercial harvesters:** Direct payments to commercial fishery permit holders and their vessel crew who meet all eligibility criteria. Direct payments to minors are not authorized by the terms of the Federal grant but may be authorized to guardians in the same household on behalf of an eligible minor. Commercial Fisheries Entry Commission (CFEC) permit data, fish ticket data from commercial salmon landings, and CFEC gross revenue value information will be used to determine eligibility and payment for permit holders.
- **Processors:** Direct payments to processing companies. COAR fisheries production and value data will be used to determine eligibility and payment for processors based on their federal operational identification number.

Program Support: ADF&G is proposing to designate funds for staff working on fishery disaster plan development and implementation in coordination with Pacific States Marine Fisheries Commission.

ADF&G is proposing to allocate commercial and subsistence harvester funds proportional to the estimated losses. The estimated loss due to the fishery disaster was calculated by subtracting the gross

¹ The 35% threshold is used in [NMFS policy guidance on Disaster Assistance](#) to determine whether a commercial fishery failure occurred.

revenue value of the fishery in the disaster year from the previous five-year average (2015-2019) gross revenue value for the species of salmon included in the disaster.

Fishery	Estimated loss due to fishery disaster	Proportion of total loss	Proposed allocation
2020 Norton Sound commercial chum and coho salmon	\$2,084,944	1.9%	\$913,819
2020/2021 Yukon River & 2020 Kuskokwim River commercial Chinook and chum salmon	\$5,723,606	5.3%	\$2,508,625
2020 Chignik commercial all salmon	\$7,243,729	6.8%	\$3,174,886
2020 Southeast commercial chum, coho, pink and sockeye salmon	\$61,805,783	57.6%	\$27,089,130
2020 Norton Sound subsistence	\$535,440	0.5%	\$234,680
2020/2021 Yukon River subsistence	\$28,629,992	26.7%	\$12,548,366
2020 Kuskokwim River subsistence	\$1,251,548	1.2%	\$548,547
Total	\$107,275,042	100%	\$47,018,052

The 2020 and 2021 Yukon River and 2020 Kuskokwim River commercial fisheries are combined into one category because there has been one commercial fishery participant on the Kuskokwim River in recent years and therefore harvest and revenue information are confidential. To include the Kuskokwim River participant in the spend plan, the area must be combined with another area.

Subsistence Fisheries

Subsistence households in the Norton Sound, Yukon River, and Kuskokwim River areas are eligible for direct payments based on the number of shares they qualify for, and the total amount of proposed funds allocated to each area as follows:

- 2020 Norton Sound: \$234,680
- 2020/2021 Yukon River: \$12,548,366
- 2020 Kuskokwim River: \$548,547

Subsistence households may only qualify for disaster funds in one area.

Eligibility criteria for subsistence households are based on criteria that were developed for Section 12005 CARES Act Fisheries Assistance. To receive fishery disaster assistance, one household member would submit an application for the household. Eligible applicants will be placed into tiers based on household size in 2020 and/or 2021 for Yukon River households. Smaller households with 1-3 members will be eligible for one share and larger households with four or more members will be eligible for two shares. Once all applications have been received, the total number of shares in each area will be determined and payments for applicants will be calculated accordingly.

Household size	Number of Shares
1-3	1
4 or more	2

Proposed subsistence household eligibility requirements:

1. All eligible household members MUST be Alaskan residents, this will be verified by meeting at least one of the following criteria:
 - a) Eligible to receive an Alaska Permanent Fund Dividend in 2021 for calendar year 2020*.

- b) Possessed or eligible to receive a 2020* Alaska resident sport fishing license from the Department of Fish and Game.
 - c) Registered as a resident during 2020* with the Commercial Fisheries Entry Commission.
 - d) Held a subsistence or personal use permit issued by the Alaska Department of Fish and Game in 2020* in either the Norton Sound – Port Clarence Area defined at 5 AAC 01.150; the Yukon Area as defined at 5 AAC 01.200; or the Kuskokwim Area as defined at 5 AAC 01.250. Personal use fishery permits are NOT eligible for relief under this spend plan. They may ONLY be used to prove residency.
2. Applicant for household MUST be at least 18 years old to apply per federal requirements.
 3. MUST self-certify that they are not de-barred from receiving federal funds and are not on the federal government “do not pay list”.
 4. Eligibility will be determined by Alaskan household.
 - o A household is defined as a person or persons having the same permanent residence.
 - o All Alaskan households participating in subsistence fisheries may apply regardless of physical household address.
 - o Only one application may be submitted per household.
 5. MUST self-certify that one or more members of the household participated in a salmon subsistence fishery in at least two of the previous four years (2016-2019) in the area for which they are applying: Yukon River, Kuskokwim River, or Norton Sound-Port Clarence Area.
 - o Participation includes harvesting, sharing, and/or using salmon subsistence fishery resources. Subsistence harvest does NOT require the use of a sport fishing license.
 - o Subsistence fisheries are defined as fisheries on salmon stocks for which the Alaska Board of Fisheries has found there are positive customary and traditional uses, in addition to federal subsistence fisheries that have no state equivalent.
 6. Eligible applicants MUST self-certify that their household has incurred a negative impact on their ability to access subsistence salmon fishery resources in 2020* that was directly or indirectly related to the fishery disaster.

*Criteria for Yukon River subsistence households can be met for either 2020 or 2021.

Commercial Fisheries

2020 Norton Sound commercial
(\$913,819):

2020 Norton Sound commercial		Estimated funds
Harvesters (85%)	S04Z permit holders (90%)	\$699,072
	Crew (10%)	\$77,675
Processors (15%)		\$137,073

Total gross revenue losses for harvesters in the Norton Sound coho and chum salmon fishery are estimated at \$2.08 million dollars. The proposed funds allocated to the harvesting sector are intended to mitigate this loss by providing funds to bring the harvesting sector up to 38% of their recent average value.

Total losses for the processing sector are confidential because there are less than three processing companies. The funds allocated to the processing sector are less than 5% of the recent average first wholesale value.

Norton Sound Harvesters – 85%. The harvester allocation will be divided into two pools, one for S04Z permit holders (85%) and one for vessel crew members (10%). The split between permit holders and crew members is based on a typical crew size of one person earning a 10% crew share.

Norton Sound Permit holders (90% of harvester pool). Proposed eligibility criteria for Norton Sound permit holders:

1. S04Z permit holder must have made a ~~been used to make Norton Sound~~ chum or coho salmon landing in 2020.

Funds are proposed to be paid to the person listed as the 2020 ‘Permit holder’ and temporary emergency transfer permit holders (transferees) in the CFEC database. Permit holders who **did not make any landings and** certified they were unable to participate in 2020 in order to qualify for an emergency transfer or permit holders who permanently transferred a permit away **and did not make any landings** in 2020 will not receive payments.

Permit holder funds will be distributed based on the following four tiers. Four tiers are established based on the 2017-2019 average estimated CFEC gross revenue value for chum and coho salmon landed ~~on~~ **each permit by each individual based on their unique CFEC identification number.** Landings from 2020 will be used for permit holders who do not have a 2017-2019 average. Each eligible permit holder in the same tier would receive an equal payment.

Tier level	2017-2019 average CFEC gross revenue value of chum and coho salmon landings	Tier allocation	Est. number of eligible permit holders
1	≥ \$30,000	40%	24
2	\$20,000 - \$29,999	26%	25
3	\$10,000 - \$19,999	27%	43
4	≤ \$9,999	7%	29

Norton Sound Crew (10% of harvester pool). Crew that meet all criteria are eligible to receive an **equal payment** from the crew member pool. Direct payments to minors are not authorized by the terms of the Federal grant but may be authorized to guardians in the same household on behalf of an eligible minor.

Proposed eligibility criteria for Norton Sound fishing crew:

1. Crew member must have held a 2020 commercial crew license or a 2020 CFEC permit for any fishery. This information will be verified using the ADF&G Licensing database and the CFEC permit database.
2. Crew member must provide information to show they participated as fishing crew in the 2020 commercial Norton Sound salmon fishery for a qualified permit holder, based on an affidavit from the permit holder.
3. Crew member must not be eligible for fishery disaster funds as a Norton Sound permit holder.

Norton Sound Processors – 15%. Norton Sound salmon processing companies that meet all criteria are eligible for payment based on the average wholesale value of Norton Sound chum and coho salmon

processed by the company, based on federal operational identification number, from 2017 to 2019 using COAR production data.

Proposed Norton Sound Processor eligibility criteria:

1. Processing company must have processed Norton Sound chum and/or coho salmon in 2020.
2. Processing company must have a 2020 wholesale value of \$10,000 or greater for Norton Sound chum and/or coho salmon.

Disaster payments to processing companies are **pro rata** to their demonstrated loss. The loss is proposed to be calculated as the company’s 2017-2019 average wholesale value for Norton Sound chum and/or coho salmon compared to the 2020 wholesale value for Norton Sound chum and/or coho salmon.

2020/2021 Yukon River and 2020 Kuskokwim River commercial (\$2,508,625):

2020/2021 Yukon River & 2020 Kuskokwim River commercial		Estimated funds
Harvesters (85%)	S04Y and S04W permit holders (90%)	\$1,919,098
	Crew (10%)	\$213,233
Processors (15%)		\$376,294

Total gross revenue losses for harvesters in the 2020 and 2021 Yukon River and 2020 Kuskokwim River Chinook and chum salmon fisheries are estimated at \$5.77 million dollars. The proposed funds allocated to the harvesting sector are intended to mitigate this loss by providing funds to bring the harvesting sector up to 37% of their recent average value.

Total losses for the processing sector are confidential because there were less than three processing companies operating in either 2019 or 2020. The funds allocated to the processing sector are less than 5% of the recent average first wholesale value.

Yukon River and Kuskokwim River Harvesters – 85%. Funds provided for this fishery disaster cover both the 2020 and 2021 fishing seasons on the Yukon River and the 2020 fishing season on the Kuskokwim River. For that reason, ADF&G is proposing that the eligible Kuskokwim River permit holder and their crew receive 50% of the payment that eligible Yukon River permit holders and crew receive.

The harvester allocation is proposed to be divided into two pools, one for S04Y and S04W permit holders (90%) and one for crew members (10%). The split between permit holders and crew members is based on a typical crew size of one person earning a 10% crew share.

Yukon River and Kuskokwim River permit holders (90% of harvester pool). Proposed eligibility criteria for Yukon River and Kuskokwim River permit holders:

1. S04Y or S04W permit **holder** ~~card~~ must have **made a** ~~been used to make~~ Chinook and/or chum salmon landings in either 2019 or 2020. Landings on an S04W permit must have been from the Kuskokwim River (ADF&G statistical area 033511, 033512, 033513, 033514, or 033520).

Funds are proposed to be paid to the person listed as the 2020 ‘Permit holder’ and temporary emergency transfer permit holders (transferees) in the CFEC database. Permit holders who **did not make any landings and** certified they were unable to participate in 2020 in order to qualify for an emergency transfer or permit holders who permanently transferred a permit away **and did not make any landings** in 2020 will not receive payments.

Permit holder funds will be distributed based on the following four tiers. Four tiers are proposed based on the 2017-2019 average estimated CFEC gross revenue value for Chinook and/or chum salmon landed ~~on each permit~~ **by each individual based on their unique CFEC identification number**. Landings from 2020 will be used for new permit holders who do not have a 2017-2019 average. Each eligible S04Y permit holder in the same tier would receive an equal payment. The eligible S04W permit holder would receive 50% of an equal tier payment because this fishery disaster covers only the 2020 fishing year for the Kuskokwim River.

Tier level	2017-2019 average CFEC gross revenue value of Chinook and chum salmon landings	Tier allocation	Est. number of eligible permit holders
1	≥ \$14,000	23%	41
2	\$10,000 - \$13,999	25%	65
3	\$6,000 - \$9,999	29%	113
4	≤ \$5,999	23%	221

Yukon River and Kuskokwim River Crew (10% of harvester pool): Crew that meet all criteria are eligible to receive an **equal payment** from the crew member pool. Direct payments to minors are not authorized by the terms of the Federal grant but may be authorized to guardians in the same household on behalf of an eligible minor.

Crew that worked for a Kuskokwim River permit holder are eligible to receive 50% of an equal payment. Proposed eligibility criteria for Yukon River and Kuskokwim River fishing crew:

1. Crew member must have held a 2019 or 2020 commercial crew license or a 2019 or 2020 CFEC permit for any fishery. This information will be verified using the ADF&G Licensing database and the CFEC permit database.
2. Crew member must provide information to show they participated as fishing crew in the 2019 or 2020 commercial Yukon River or Kuskokwim River salmon fishery for a qualified permit holder, based on an affidavit from the permit holder.
3. Crew member must not be eligible for fishery disaster funds as a Yukon River or Kuskokwim River permit holder.

Yukon River Processors – 15%: Yukon River salmon processing companies that meet all criteria are eligible for payment based on the average wholesale value of Yukon River Chinook and/or chum salmon processed by the company, based on federal operational identification number, from 2017-2019 using COAR production data. No commercial processing companies have operated on the Kuskokwim River since 2015 and so none are proposed to be included in this fishery disaster spend plan.

Proposed Yukon River Processor eligibility criteria:

1. Processing company must have processed Yukon River Chinook and/or chum salmon in 2019 or 2020.
2. Processing company must have a 2019 or 2020 wholesale value of \$10,000 or greater for Yukon River Chinook and/or chum salmon.

Disaster payments to processing companies are **pro rata** to the company’s demonstrated loss. The loss is proposed to be calculated as the company’s 2017-2019 average wholesale value for Yukon River

Chinook and/or chum salmon compared to its 2020 average wholesale value for Yukon River Chinook and/or chum salmon.

2020 Chignik commercial
(\$3,174,886):

2020 Chignik commercial		Estimated funds
Harvesters (85%)	S01L permit holders (80%)	\$2,428,788
	Crew (20%)	\$269,865
Processors (15%)		\$476,233

Total gross revenue losses for harvesters in the Chignik salmon fishery are estimated at \$7.24 million dollars. The proposed funds allocated to the harvesting sector are intended to mitigate this loss by providing funds to bring the harvesting sector up to 38% of their recent average value.

Total losses for the processing sector are confidential because there were less than three processing companies operating in 2019 and the 2020 fishery was closed. The funds allocated to the processing sector are less than 5% of the recent average first wholesale value.

Chignik Harvesters – 85%: The harvester allocation will be divided into two pools, one for vessel permit holders (80%) and one for vessel crew members (20%). The split between permit holders and crew members is based on average crew size and crew shares and considers the higher initial costs borne by the vessel operators that are typically reimbursed through standard deductions to crew pay when the fishery is open.

Chignik Permit holders (80% of harvester pool). Proposed eligibility criteria for Chignik permit holders:

1. Permit holder must have had a valid S01L permit card in 2020. A permit is considered valid if fees were paid to renew the permit in 2020 **as evidenced by a start/stop date in the public CFEC permit database.**
2. Permit holder did not make landings in another 2020 salmon seine fishery.

Funds are proposed to be paid to the person listed as the 2020 ‘Permit holder’ and temporary emergency transfer permit holders (transferees) in the CFEC database. Permit holders who certified they were unable to participate in 2020 in order to qualify for an emergency transfer or permit holders who permanently transferred a permit away in 2020 will not receive payments.

Each permit holder who meets both eligibility criteria above will receive a minimum payment of \$30,000, except those eligible permit holders who made landings on the same vessel in 2019. If more than one eligible permit holder made landings on the same vessel in 2019, the total payment will be calculated at the vessel level and divided between eligible permit holders pro rata to the value of their 2019 salmon landings. Fifty-six permit holders across 55 vessels are estimated to be eligible for minimum payments based on the proposed criteria.

Additional tier payments for permit holders who made Chignik salmon landings in 2019 will be distributed as described below. Estimated gross revenue value for all salmon species will be used to establish tiers because all salmon species were included in the fishery disaster for the Chignik area. Four tiers are proposed based on the estimated gross revenue for salmon landed in 2019 on each permit, or vessel if more than one permit holder landed salmon on the same vessel. Twenty-five percent of the remaining funds, after accounting for minimum payments, will be allocated to each tier and each eligible permit holder in the same tier would receive an equal payment. Forty-six permit holders across 45 vessels are estimated to be eligible for an additional tier payment.

Tier level	2019 average CFEC gross revenue value of salmon landings	Tier allocation	Est. number of eligible permit holders
1	≥ \$299,000	25%	6
2	\$245,000 – \$298,999	25%	8
3	\$140,000 – \$244,999	25%	12
4	≤ \$139,000	25%	19

Chignik Vessel Crew (25% of harvester pool). Vessel crew that meet all criteria are eligible to receive an **equal payment** from the crew member pool. Direct payments to minors are not authorized by the terms of the Federal grant but may be authorized to guardians in the same household on behalf of an eligible minor.

Proposed eligibility criteria for vessel crew:

1. Crew member must have held a 2019 or 2020 commercial crew license or a 2019 or 2020 CFEC permit for any fishery. This information will be verified using the ADF&G Licensing database and the CFEC permit database.
2. Crew member must provide information to show they participated as fishing crew for a qualified permit holder, based on an affidavit from the permit holder or vessel owner.
3. Crew member must not be eligible for fishery disaster funds as a Chignik permit holder.

Chignik Processors – 15%. Chignik salmon processing companies that meet all criteria are eligible for payment based on the average wholesale value of Chignik salmon processed by the company from 2015 to 2017 using COAR production data. Proposed processor eligibility criteria:

1. Processing company must have processed Chignik salmon in 2019.
2. Processing company must have a 2019 wholesale value of \$10,000 or greater for Chignik salmon.

Disaster payments to processing companies are **pro rata** to the company’s demonstrated loss. The loss is proposed to be calculated as the company’s 2015-2017 average wholesale value for Chignik salmon compared to 2019 average wholesale value for Chignik salmon.

2020 Southeast commercial (\$27,089,130):

2020 Southeast commercial		Estimated funds
Harvesters (80%)	S01A, S03A, S05B, S15B permit holders and crew	\$21,671,304
Processors (20%)		\$5,417,826

Total gross revenue losses for harvesters in the Southeast salmon fishery are estimated at \$64.4 million dollars. The proposed funds allocated to the harvesting sector are intended to mitigate this loss by providing funds to bring the harvesting sector up to 34% of their recent average gross revenue value.

Total first wholesale revenue losses for the Southeast salmon processing sector are estimated at \$143.87 million dollars. The proposed funds allocated to the processing sector are intended to mitigate this loss by providing funds to bring the harvesting sector up to 4% of their recent average first wholesale value.

Southeast Harvesters – 80%: Salmon are commercially harvested in Southeast Alaska with purse seines and drift gillnets and in both the Yakutat and Southeast Alaska areas with hand troll and power troll gear. A salmon fishery with set gillnet gear also occurs in the Yakutat area and the Governor did not receive any requests to include the Yakutat set gillnet fishery in the fishery disaster. Therefore, the Yakutat set gillnet fishery was not included in the State’s fishery disaster request to the Secretary of Commerce and it is not included in this spend plan.

Public comments received on the second draft spend plan supported using the same historical base period for all species when calculating the relative loss of fishery value for each gear sector due to the disaster. Allocations that use the 2015-2019 historical average value for all species provide higher allocations for the seine gear sector while allocations that use the 2010-2018 even-year value for all species provide higher allocations for the gillnet and troll gear sectors. ADF&G is recommending the median value of these two approaches to allocate funds between the gear sectors.

	<u>Estimated Loss: 2020 fishery value compared to historical value</u>				
	2015-2019 average	2010-2018 even-year average	Median value	Proportion of loss	Estimated funds
Seine	-\$38,826,233	-\$40,344,478	-\$39,585,355	59.6%	\$12,907,441
Gillnet	-\$17,969,694	-\$23,062,049	-\$20,515,872	30.9%	\$6,689,530
Troll	-\$5,009,856	-\$7,713,535	-\$6,361,695	9.6%	\$2,074,333
Total	-\$61,805,783	-\$71,120,062	-\$66,462,922	100%	\$21,671,304

The three gear sectors include seine (S01A) permit holders and crew, drift gillnet (S03A) permit holders and crew, and troll (S05B/S15B) permit holders and crew. Funds for vessel crew will be provided within each gear sector allocation and consider both the average crew size by gear type and comments for suggested allocations received on the draft spend plans.

Southeast seine sector:

S01A permit holders (80% of seine sector allocation or ~\$10.3 million): On average over 91% of the salmon harvested in Southeast seine fisheries are pink and chum salmon. Therefore, ADF&G is proposing to use pink and chum salmon landings for the seine permit holder eligibility criteria.

Funds are proposed to be paid to the person listed as the 2020 permit holder and temporary emergency transfer permit holders (transferees) in the CFEC database. Permit holders who certified they were unable to participate in 2020 in order to qualify for an emergency transfer or permit holders who permanently transferred a permit away in 2020 will not receive payments. Crew must have worked for an eligible permit holder and meet all crew criteria.

Proposed eligibility criterion for seine (S01A) permit holders:

1. The S01A permit holder must have made a landing of chum and/or pink salmon in 2020.

Every S01A permit holder for whom a recent average fishery value could be calculated (i.e. 2020 was not their first year fishing), experienced a loss in their estimated gross revenue for chum and pink salmon due to the disaster. Therefore, no additional criteria are proposed for eligibility.

An estimated 204 permit holders meet the above criterion and based on public comment, ADF&G is proposing an **equal payment** distribution based on public comments received from the seine fishery association. Equal payments are proposed to be limited to no more than one payment per vessel; if multiple permit holders made landings in 2020 on the same vessel, the equal payment will be split pro rata to the value of each permit holders' pink and chum salmon landings in 2020. **No individual may receive more than the equivalent of one equal payment.**

Seine vessel crew (20% of seine sector allocation or ~\$2.6 million). Seine vessel crew must meet the following proposed criteria to be eligible for an **equal payment** of the seine crew pool. Direct payments to minors are not authorized by the terms of the Federal grant but may be authorized to guardians in the same household on behalf of an eligible minor.

The split between permit holders and crew members is based on average crew size and crew shares and considers the higher initial costs borne by the vessel operators that are typically reimbursed through standard deductions to crew pay when the fishery is open.

Proposed Southeast seine crew eligibility criteria:

1. Crew member must have held a 2020 commercial crew license or a 2020 CFEC permit for any fishery. This information will be verified using the ADF&G Licensing database and the CFEC permit database.
2. Crew member must provide information to show they participated as fishing crew in the 2020 commercial Southeast salmon fishery for a qualified S01A permit holder, based on an affidavit from the permit holder or vessel owner.
3. Seine crew member may not be eligible for fishery disaster funds as a seine permit holder but may be eligible as crew and/or a permit holder in the gillnet and/or troll sectors.

Southeast gillnet sector:

S03A permit holders (85% of the gillnet sector allocation or ~\$5.7 million): On average over 93% of the salmon harvested in Southeast drift gillnet fisheries are chum, sockeye, and coho salmon. Therefore, ADF&G is proposing to use chum, sockeye, and coho salmon landings for the gillnet permit holder eligibility criteria.

Proposed criterion for Southeast gillnet (S03A) permit holders:

1. The S03A permit holder must have made a landing for chum, sockeye and/or coho salmon in 2020.

Every S03A permit holder for whom a recent average fishery value could be calculated (i.e. 2020 was not their first year fishing), experienced a loss in their estimated gross revenue for chum, sockeye, and coho salmon due to the disaster. Therefore, no additional criteria are proposed for eligibility.

S03A permit holder funds are proposed to be distributed based on the following four tiers. Four tiers are established based on the 2017-2019 average estimated CFEC gross revenue value for chum, sockeye, and coho salmon landed by each permit holder **based on their unique CFEC identification number**. Based on public comments received from Southeast harvesters, ADF&G is proposing to use the annual fleet average for permit holders that do not have a fishery value in 2017, 2018, and/or 2019. Each eligible permit holder in the same tier would receive an equal payment.

Tier level	2017-2019 average CFEC gross revenue value of chum, sockeye, and coho salmon landings	Tier allocation	Est. number of eligible permit holders
1	≥ \$102,000	25%	44

2	\$70,000 - \$101,999	25%	73
3	\$54,000 - \$69,999	25%	99
4	≤ \$53,499	25%	155

Gillnet vessel crew (15% of gillnet sector allocation or ~\$1 million). Gillnet vessel crew must meet the following proposed criteria to be eligible for an **equal payment** of the gillnet crew pool. Direct payments to minors are not authorized by the terms of the Federal grant but may be authorized to guardians in the same household on behalf of an eligible minor.

1. Crew member must have held a 2020 commercial crew license or a 2020 CFEC permit for any fishery. This information will be verified using the ADF&G Licensing database and the CFEC permit database.
2. Crew member must provide information to show they participated as fishing crew in the 2020 commercial Southeast salmon fishery for a qualified S03A permit holder, based on an affidavit from the permit holder or vessel owner.
3. Gillnet crew member may not be eligible for fishery disaster funds as a gillnet permit holder but may be eligible as crew and/or a permit holder in the seine and/or troll sectors.

Southeast troll sector:

Troll (S05B/S15B) permit holders (90% of troll sector allocation or ~\$1.9 million): On average over 99% of the salmon species included in this fishery disaster and harvested in the Southeast troll fishery are chum and coho salmon. Therefore, ADF&G is proposing to use chum and coho salmon landings for the troll permit holder eligibility criteria.

Proposed eligibility criteria for troll (S05B or S15B) permit holders.

1. S05B or S15B permit holder must have made landings of chum and/or coho salmon in 2020 with a CFEC gross revenue value of at least \$2,500. In 2020, a total of 521 troll permit holders made chum and/or coho salmon landings with an estimated value greater than \$2,500.
2. Troll permit holder must have a demonstrated loss in 2020 estimated CFEC gross revenue value for chum and/or coho salmon as compared to their 2017-2019 average CFEC gross revenue value for chum and/or coho salmon **based on their unique CFEC identification number**. The annual average value of chum and coho salmon landings will be used for permit holders that do not have a fishery value in 2017, 2018, and/or 2019. A total of 416 permit holders may qualify for fishery disaster funds based on this second eligibility criterion.

ADF&G is proposing that troll permit holders who meet the criteria are eligible to receive an **equal payment** from the troll permit holder funds.

Troll vessel crew (10% of troll allocation or ~\$207,433). Troll vessel crew must meet the following proposed criteria to be eligible for an **equal payment** of the troll crew pool. Direct payments to minors are not authorized by the terms of the Federal grant but may be authorized to guardians in the same household on behalf of an eligible minor.

1. Crew member must have held a 2020 commercial crew license or a 2020 CFEC permit for any fishery. This information will be verified using the ADF&G Licensing database and the CFEC permit database.

2. Crew member must provide information to show they participated as fishing crew in the 2020 commercial Southeast salmon fishery for a qualified S05B or S15B permit holder, based on an affidavit from the permit holder or vessel owner.
3. Troll crew member may not be eligible for fishery disaster funds as a troll permit holder but may be eligible as crew and/or a permit holder in the seine and/or gillnet sectors.

Southeast Processors – 20%: Southeast salmon processing companies that meet all criteria are eligible for payment based on the average wholesale value of southeast sockeye, chum, coho, and pink salmon processed by the company from 2017-2019 using COAR production data. Processor eligibility criteria:

1. Processing company must have processed southeast sockeye, chum, coho, and/or pink salmon in 2020 with a wholesale value of at least \$10,000.
2. Processing company must have a demonstrated loss in wholesale value of southeast sockeye, chum, coho, and/or pink salmon in 2020 as compared to their 2017-2019 average wholesale value of southeast sockeye, chum, coho, and/or pink salmon.

Disaster payments to processing companies are **pro rata** to their demonstrated loss.

General direction: Unclaimed funds in any of the categories and/or subcategories are proposed to be reallocated amongst all qualified individuals within the same category/subcategory the funds were allocated to. Individuals may be eligible for more than one category e.g., permit holder or crew and head of household for subsistence, S01A and S04A permit holder, but may not be eligible as both a permit holder and crew in the same fishery sector e.g., a S01A permit holder and Southeast seine vessel crew.

February 12, 2023

Karla Busch
Federal Fisheries Coordinator
Department of Fish and Game
Phone: (907) 465-4394
Via email: dfg.com.fisheriesdisasters@alaska.gov

Dear Ms. Busch,

Thank you for your work on the ADF&G spend plan for funds appropriated to mitigate the 2020 and 2021 Alaska salmon disaster declarations and both opportunities to comment.

Petersburg Vessel Owner's Association (PVOA) is composed of 85 members participating in a wide variety of species and gear type fisheries in state and federally managed waters and businesses supportive to the industry. PVOA members fish throughout Alaska from Southeast to the Bering Sea. Targeted species include salmon, herring, halibut, sablefish, crab, shrimp, sea cucumbers, and geoducks.

The majority of our membership participates in salmon fisheries in Southeast Alaska and will be eligible for financial assistance under the draft spend plan. In our second draft of comments, we broke our comments into two categories; ADF&G recommendations for revisions and proposed research projects in Appendix 1.

ADF&G recommendations for revision

- To simplify the information used for determining eligibility, the criteria for the SE commercial fisheries are proposed to be based on the salmon species included in the disaster that are the primary targets of each gear sector. Eligibility for the seine sector is proposed to be based on the value of pink and chum salmon; for the gillnet sector on the value of chum, sockeye and coho salmon; and for the troll sector on the value of chum and coho salmon landings.
- References to ex-vessel value were replaced throughout the spend plan and clarified as the CFEC gross revenue estimates. Gross revenue estimates are calculated post-season and informed by the Commercial Fishery Operator Report (COAR) data.

PVOA members support both these changes to simplify the process and limit further delay in payment to fishermen.

- Allocations for SE vessel crew are proposed to be sector-specific rather than one pool of funds for all SE crew based on public comment.

PVOA members support crew shares coming of the top of sector-specific allocations, with one change. For the seine fleet, there should be a limit of five affidavits for crewmen per permit holder or vessel owner. Most seine operations are four-man including the permit

holder and crewmen. The limit of five accounts for crew changes within the season. It is common for High school aged teenagers in Southeast to crew for the summer and start school before the end of the seine season.

We believe this limit will account for these situations without leaving an open-end for the process to be abused. Finally, in cases where the permit holder is not the vessel owner, only five affidavits would be permissible for the operation.

- SE seine permit holder distribution is proposed to be equal shares for all eligible permit holders based on public comment. An estimated 204 permit holders meet the criterion.

PVOA supported the initial spend plan as written in our previous comments. We had some suggested changes, but none pertained to the division of funds within the commercial southeast seine allocation. The original tier system was equitable for all permit holders largely because the ranking was based off of performance from 2017-2019 and not solely 2020. In reviewing the latest draft, PVOA members were divided and saw merit in both approaches.

- Direct payments to commercial fishery permit holders and their vessel crew who are 18 years old or older and who meet all eligibility criteria in the relevant area. Commercial Fisheries Entry Commission (CFEC) permit data, fish ticket data from commercial salmon landings, and CFEC gross revenue value information will be used to determine eligibility and payment for permit holders.

As stated above, in Southeast, high school aged teenagers frequently work in crew and processing jobs during the summer months. This allows them to earn money towards many avenues including college, vocational school, and investing in fisheries businesses of their own. These are important jobs to the salmon industry and PVOA members feel it is unfair to exclude this sector of the workforce from the spend plan. If payment to a guardian is the only permissible way to include crewmen under 18, PVOA supports this means.

Appendix 1 proposed research projects, estimated costs, and which research theme is addressed

Thank you for providing Appendix 1, in past spend plans we haven't seen such a detailed wishlist to identify priorities within. Further, the estimated costs help achieve our previous recommendations that funds do not start research programs that cannot be completed in totality under these funds. We recognize additional projects not listed in the appendix may be funded through this spend plan in a competitive bid process.

PVOA supports the proposals listed below. We believe the proposals on tagging A-Y-K Chinook and researching Ichthyophonous disease could help the North Pacific Council find answers to reduce Chinook and chum bycatch. The SECM survey is one of the most important projects for PVOA's fleet as it guides vessel owner's and processors in preparing

capacity to move and process fish season to season. Finally, wild chum runs have been weak in the last several years and McDoland Lake sockeye are a *stock of concern*, we support improved surveys to obtain better understanding of these stocks.

Salmon Ocean Ecology Program Proposal 4, UAF satellite tagging project to assess western Alaska Chinook salmon migration and habitat use in the Bering Sea. By understanding the habitats used by Norton Sound, Yukon, and Kuskokwim Chinook salmon, it will improve our understanding of how ocean conditions impact survival and future runs. This project will also attempt to provide management tools that would allow marine fisheries to better avoid Chinook salmon as bycatch.

Arctic, Yukon, Kuskokwim Area Proposal 5, Study to evaluate Ichthyophonus disease infection timing and pathways of Yukon River Chinook salmon in the marine environment. Ichthyophonus disease associated mortality is a leading hypothesis to explain unprecedented poor abundance of adult Yukon River Chinook salmon entering U.S. spawning tributaries and passing the U.S./Canada border. Chinook salmon are known to become infected via their marine diets, but the specific pathway and timing of infection is not known. This project would allow for 1) systematic evaluation of Ichthyophonus infection in Chinook salmon prey species to better understand likely sources of infection, and 2) determine the prevalence and severity of Ichthyophonus disease in juvenile, immature, and sub-adult Chinook salmon to determine when infection occurs. Additional samples would be taken from Kuskokwim and Norton Sound inriver test fisheries to determine if recent increases in Ichthyophonus infections are unique to the Yukon River Chinook salmon stock. Funds would pay for sample processing and analysis by the ADF&G Pathology Laboratory, and results would improve ongoing and future research and assessment of the biological impacts of Ichthyophonus disease on adult run abundance and inriver mortality.

Southeast Area Proposal 1, Southeast Coastal Monitoring Survey (SECM) work in Stephens Passage, Upper Chatham Strait, and Icy Strait. The primary objective of SECM is to evaluate the status of the pelagic ecosystem, including juvenile salmon and other pelagic fish species, in the northern region of Southeast Alaska (SEAK). SECM surveys support research on the marine ecology of salmon, provide data for harvest forecast models for SEAK pink salmon, and support ecosystem research in the Gulf of Alaska

Southeast Area Proposal 2, Chum salmon helicopter surveys throughout Southeast Alaska. ADF&G maintains a standardized survey program to index spawning chum salmon abundance at 87 summer-run and seven fall-run streams. Chum salmon may be masked by high densities of pink salmon on the spawning grounds, particularly in years of low chum salmon abundance, which makes monitoring wild chum salmon populations challenging. Helicopter surveys provide surveyors improved views of these streams, validate observations of chum and pink salmon abundance, identify primary chum salmon spawning areas, and improve managers' ability to identify chum salmon during routine aerial surveys of other index streams in the area.

Southeast Area Proposal 3, McDonald Lake sockeye mark-recapture study. McDonald Lake sockeye salmon are a current Stock of Concern in Southeast Alaska, and an Action Plan is in place to reduce the commercial fisheries harvest on this stock. Escapements are estimated from standardized foot survey counts at Hatchery Creek, the primary spawning tributary. The expansion factor was based on comparison of peak foot survey counts to six years of population estimates from weir counts and mark-recapture studies. This project would fund additional years of mark-recapture population estimates to improve the current foot survey expansion and allow for improved age composition data and other relevant data to be collected at the lake.

Again, thank you for your work and both opportunities for the fleets to provide feedback.

Sincerely,



Megan O'Neil
Executive Director

Appendix 1. Public comments on the second draft of the spend plan.

Good Day,

Thank you for taking our comments into consideration and for sending us the 2nd draft.

Living on the Yukon River for 30 years, our comments are more on point for the Yukon River area.

There are so many things to consider and it was a good move to separate the Kuskokwim area from the Yukon area. It is also very important to point out that in the Yukon area dogs consumed 33% of the fish caught in the 2018 Annual Report that was used for this letter (see data table below).

As stated in the previous letter...losing the fish for personal use is not nearly as catastrophic as losing the fish that fed our dogs. For some, not attached to the road system the cost of freighting in dog food is beyond belief and for us having to add several more 1000 mile freight runs to get the additional dog food we need for our dogs has created a major financial hardship. For us the numbers of chum salmon we tried to target to feed our dogs averaged from 3500 to 4500 each year. This fed the dogs for a whole year. Many households have been put in the position of whether to cull their teams which is a horrible consideration and hopefully will not have to happen but as the hardship for kennels is so much greater that it should be considered as a separate money allocation for dog teams based on the number of dogs in the kennels.

Having looked over and read with interest the 2nd draft we will be making comments below.

1. ADF& G is asking for comment on whether subsistence households could qualify for subsistence payments in more than one area if they participated in more than one area included in the fishery disaster.

NO! They should not. Fishing in different places does not change the amount of loss. Also, anyone applying for relief should be able to prove that they have fished in that disaster area by Subsistence and or Personal Use Permits. They should also be able to prove that they have fished for at least 2 of the previous 4 years.

This program needs to go to the households that really depend on the resource and not just a few fish each year. Subsistence permits will show the amounts utilized by each household. This program is to help those in need and not those that can capitalize on a free handout, if they indeed did not suffer financial loss due to the fishery disaster.

Another factor that could and should be looked at would be separating commercial from subsistence and not allowing what could be called double dipping by applying for commercial and then also applying for subsistence.

2. ADF&G is asking for comment on whether dogs should be considered.

YES! Below is a chart that shows the 2018 Subsistence Annual Report. The dogs in the Yukon River utilized 33% of the subsistence salmon caught in the Yukon River while the dogs in the Kuskokwim utilized 6% of the subsistence catch.

Of all financial loses in the Yukon River, the financial lose to subsistence households with dog kennels is a much more severe blow than personal use fish. Not only the cost of the dog food but the cost and expense of getting the dog food to the remote communities is tremendous.

Having a separate category for dog kennels, split up based on the number of dogs, would be a fair way of working with the subsistence households. Again, subsistence permits show the number of dogs that a kennel had during 2020 and 2021 seasons. As before, we ask that shares be allocated for dogs based on kennel size. One suggestion is that a subsistence household with 16 or fewer dogs receive one additional share and subsistence households with more than 16 dogs receive two additional shares.

The amount for Yukon Area kennels should reflect the 33% usage based on the 2018 Annual Report. The Kuskokwim Area kennels should reflect 6% based on the same report.

Area	Total HHs	Total Salmon Harvest	Dog HHs	Salmon Consumed by Dogs	% of Total	Salmon Consumed by People	% of Total	Per HH Consumption by People	Per HH Consumption by Dogs
Yukon	3,320	182,471	280	59,580	33%	122,891	67%	37	213

Source: Alaska Subsistence and Personal Use Salmon Fisheries 2018 Annual Report. 2021 Technical Paper No. 484. Alaska Dept of Fish and Game. [Document Link](#)

Comments on the Proposed subsistence household eligibility requirement:

We are in total agreement with points 1 through 3 and 6.

On #4. Eligibility will be determined by Alaskan households should have a continuation on its 3rd point to read... All Alaskan households participating in subsistence fisheries may apply

regardless of physical household address in the fishery disaster area only if their Subsistence or Personal Use Permit states that area and they can prove the use of that fishery during 2 of the previous 4 years (2016 – 2019). Eligibility criteria for Commercial Harvesters and Processors requires claimants to hold fishery permits and to present landing, production value, and/or revenue data to prove eligibility. Why would you not require proof of eligibility through a similar process and require subsistence claimants to hold a Subsistence or Personal Use Permit? This is necessary to ensure fairness in distributing the funds.

As to #5...Subsistence and Personal Use Permits should be the main way to self-certify.

Final comments...

It is so easy for people to take advantage of a wonderful support program and then the people who have been really hurt do not get the full benefit that they should. This is going to be one of those times and it will be very important for those making the decisions to find a fair way to weed out those that only had a small financial loss and help those who had major losses and over the years have totally relied on the subsistence fisheries. People that were given only a few fish should not be taking from those who actually fed their families or dog kennels, who worked the nets and fish wheels for years and depended on the fish for food.

There might be a way to look at past records and see the amount of fish that households utilized in the years previous to 2020 and 2021.

Thank You for your time in reading this and your considerations!

Sincerely,

Scarlett and Wayne Hall

Bush, Karla L (DFG)

From: Cim Tawv' <[REDACTED]>
Sent: Wednesday, February 8, 2023 4:46 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Statewide salmon fishery disaster spending plan.

You don't often get email from [REDACTED]. [Learn why this is important](#)

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Funding for distressed subsistence families will be welcomed, but the relief will be short lived. These same families will not be able to fish this coming summer or, most likely for summers in the immediate future. The same questions of what has happened to the stocks and what is being done outside of the river habitat to allow for the resurgence of the species will be unanswerable. It was interesting, as far as the relief for commercial fishery on the Yukon, that the number of commercial permits that will be eligible for disaster funding is about half of the number of permits that actively fished in the early 2000's. The processor, that also will be eligible for disaster relief, is a "not for profit" subsidiary of a CDQ group that has contributed to the decline of salmon stocks through incidental bycatch. This same processor is also responsible for the elimination of the upriver "for profit" processor which contributed to the number of fishermen that participated in the salmon fishery on the Yukon.

I don't think that the government will continue to declare annual disasters, but with the salmon species on the Yukon on the verge of collapse more funding and more research must be done to prevent the complete loss of Yukon river salmon.

I wish the best for all and thank Alaska department of fish and game for their work.

February 15, 2023

ADF&G

Attn: Karla Bush

PO Box 115526

Juneau, AK 99811-5526

Dear Karla Bush,

My name is Axel Kopun. I am a fourth generation commercial fisherman from Chignik. I would like to offer some comments on the Chignik portion of the proposed 2020 salmon disaster spend plan.

The most significantly impacted group of the 2020 Chignik salmon disaster are the Chignik Harvesters and their families. No other group has suffered the level of loss, both financially and emotionally, that Chignik Harvesters, their crews, and their families have. Therefore I would like to see the harvesters allocation established at 95% of the total commercial funds. Like the 2018 disaster spend plan, I would like to see the harvester allocation be divided into two pools, one for **vessel permit holders (75%)** and one for **vessel crew members (25%)**. This proposed split between permit holders and crew members makes sense because it is based on average crew size and crew shares and considers the higher level of capital investment and initial costs borne by the vessel operators.

Chignik Permit holders (75% of harvester pool). Proposed eligibility criteria for Chignik permit holders:

1. Permit holder must have had a valid S01L permit card in 2020.
2. Permit holder did not make landings in another 2020 salmon seine fishery.

Funds should be paid to the person listed as the 2020 'Permit holder' and temporary emergency transfer permit holders (transferees) in the CFEC database. Permit holders who certified they were unable to participate in 2020 in order to qualify for an emergency transfer or permit holders who permanently transferred a permit away in 2020 should not receive payments.

Each permit holder who meets both eligibility criteria above will receive a minimum payment of \$30,000, except those eligible permit holders who made landings on the same vessel in 2019. If more than one eligible permit holder made landings on the same vessel in 2019, the total payment will be calculated at the vessel level and divided between eligible permit holders pro rata to the value of their 2019 salmon landings.

Additional tier payments for permit holders who made Chignik salmon landings in 2019 will be distributed using estimated gross revenue value for all salmon species to establish tiers because all salmon species were included in the fishery disaster for the Chignik area. Just like in the 2018 Disaster Distribution Plan, four tiers can be used and based on the estimated gross revenue for salmon landed in 2019 on each permit, or vessel if more than one permit holder landed salmon on the same vessel. Again, just like in the 2018 Plan, 25% of the remaining funds after

accounting for the minimum payments of \$30,000 per eligible permit holder should be allocated to each tier and each eligible permit holder in the same tier would receive an equal payment.

Chignik Vessel Crew (25% of harvester pool). Vessel crew that meet all criteria are eligible to receive an equal payment from the crew member pool. Payments to crew members under 18 years of age will be paid to the crew member's parent/legal guardian and that parent/legal guardian is required to act as a custodian over those funds consistent with custodial requirements in Alaska's uniform transfers to minors act (AS 13.45 et seq). Eligibility criteria for vessel crew:

1. **Crew members must have held a 2020 commercial crew license or 2020 CFEC permit for any fishery.** This shows true intent to fish. This information will be verified using the ADF&G Licensing database and the CFEC permit database.
2. Crew members must provide information to show they served as fishing crew in 2020 for a qualified permit holder, based on an affidavit from the permit or vessel holder.
3. Crew members must not be eligible for fishery disaster funds under the Chignik permit holder category of this distribution plan.

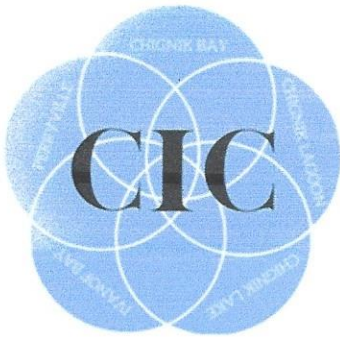
Regarding crew members under 18 years of age: Like much of coastal Alaska has done for generations and still does today, children younger than 18 are actively engaged in our fisheries in Chignik. A longstanding and historical part of our livelihood is passed along through local and traditional knowledge of our fisheries to our youth. In addition, the salmon fishery in Chignik is basically the only source of fishing income for local residents, so naturally the salmon fishery is an important source of income for crew members of all ages. My sons have fished with me as regular crew members since 2017, when they were aged 14 and 12. As such, they qualified for the 2018 disaster. I became a regular crew member for my dad when I was 12. My Dad started when he was 7. My Grandfather started when he was 14. To exclude crew under the age of 18 would be contrary to common fishing practices throughout the State of Alaska, and Chignik in particular.

Chignik Processors – (5%): There has not been a shore-based processing plant in Chignik since 2008. Trident and Ocean Beauty simply tender the salmon they purchase in Chignik to Sand Point or Kodiak Island. The bottom line is that neither processor has the large, fixed costs normally associated with operating a shore-based plant in Chignik. When Chignik has a poor, or non-existent season, both buyers just simply send their tenders elsewhere. The proposed 15% total in the 2nd draft is excessive when these factors are considered.

In closing, I respectfully offer these recommendations on the proposed draft spend plan for the 2020 Chignik salmon disaster funds. I appreciate the opportunity to comment in this process and my family and I appreciate your work throughout this process.

Sincerely,

Axel S Kopun



CHIGNIK INTERTRIBAL COALITION
427 AIRPORT ROAD
CHIGNIK LAGOON, ALASKA 99565

February 14, 2023

ADF&G
Attn: Karla Bush
PO Box 115526
Juneau, AK 99811-5526

RE: *Chignik portion of the DRAFT Spend Plan for funds appropriated to address the 2020 Norton Sound, Yukon River, Kuskokwim River, Chignik, Southeast Alaska; and 2021 Yukon River salmon disaster determination.*

Dear Karla Bush,

This letter is written on behalf of the five Federally recognized Tribes represented by the Chignik Intertribal Coalition (CIC). Our tribes are members of the communities of Chignik Bay, Chignik Lagoon, Chignik Lake, Ivanof Bay and Perryville. The Coalition has represented these tribes since 2018. Please find below the following suggestions on how the funds appropriated by Congress to address the 2020 Chignik Area salmon fishery disaster should be allocated.

2020 Chignik commercial estimated funds (\$3,203,211):

Chignik Harvesters – 95% (\$3,043,050): The harvester allocation will be divided into two pools, one for vessel permit holders (80%) and one for vessel crew members (20%). The split between permit holders and crew members is based on average crew size and crew shares and considers the higher initial costs borne by the vessel operators that are typically reimbursed through standard deductions to crew pay when the fishery is open.

Chignik Permit holders (80% of harvester pool = \$2,434,440). Proposed eligibility criteria for Chignik permit holders:

1. Permit holder must have had a valid S01L permit card in 2020.
2. Permit holder did not make landings in another 2020 salmon seine fishery.

Funds should be paid to the person listed as the 2020 'Permit holder' and temporary emergency transfer permit holders (transferees) in the CFEC database. Permit holders who certified they were unable to participate in 2020 in order to qualify for an emergency transfer or permit holders who permanently transferred a permit away in 2020 should not receive payments.

Each permit holder who meets both eligibility criteria above will receive a minimum payment of \$30,000, except those eligible permit holders who made landings on the same vessel in 2019. If more than one eligible permit holder made landings on the same vessel in 2019, the total payment will be calculated at the vessel level and divided between eligible permit holders pro rata to the value of their 2019 salmon landings.

Additional tier payments for permit holders who made Chignik salmon landings in 2019 will be distributed using estimated gross revenue value for all salmon species to establish tiers because all salmon species were included in the fishery disaster for the Chignik area. Just like in the 2018 Disaster Distribution Plan, four tiers can be used and based on the estimated gross revenue for salmon landed in 2019 on each permit, or vessel if more than one permit holder landed salmon on the same vessel. Again, just like in the 2018 Plan, 25% of the remaining funds after accounting for the minimum payments of \$30,000 per eligible permit holder should be allocated to each tier and each eligible permit holder in the same tier would receive an equal payment.

Chignik Vessel Crew (20% of harvester pool = \$608,610). Vessel crew that meet all criteria are eligible to receive an equal payment from the crew member pool. Payments to crew members under 18 years of age will be paid to the crew member's parent/legal guardian and that parent/legal guardian is required to act as a custodian over those funds consistent with custodial requirements in Alaska's uniform transfers to minors act (AS 13.45 et seq). Eligibility criteria for vessel crew:

1. Crew members must have held a 2020 commercial crew license or 2020 CFEC permit for any fishery. This information will be verified using the ADF&G Licensing database and the CFEC permit database.
2. Crew members must provide information to show they served as fishing crew in 2020 for a qualified permit holder, based on an affidavit from the permit or vessel holder.
3. Crew members must not be eligible for fishery disaster funds under the Chignik permit holder category of this distribution plan.

Regarding crew members under 18 years of age: Like much of coastal Alaska has done for generations and still does today, children younger than 18 are actively engaged in our fisheries in Chignik. A longstanding and historical part of our livelihood is passed along through local and traditional knowledge of our fisheries to our youth. In addition, the salmon fishery in Chignik is basically the only source of fishing income for the vast majority of our Tribal Members, so naturally the salmon fishery is an important source of income for crew members of all ages.

Chignik Processors – 5% (\$160,161): There has not been a shore-based processing plant in Chignik since 2008. Trident and Ocean Beauty simply tender the salmon they purchase in Chignik to Sand Point or Kodiak Island. The bottom line is that neither processor has the large fixed costs normally associated with operating a shore-based plant in Chignik. When Chignik has a poor, or non-existent season, both buyers just simply send their tenders elsewhere. The proposed 15% total in the 2nd draft is excessive when these factors are considered.

It was mentioned by one processor that they carry some outstanding balances on funds they advanced to certain Chignik fishermen during the disaster. They have not relinquished their rights to be repaid any outstanding debts and the Chignik Stakeholders who fished for that processor do not believe that if that processor is given a larger share of the commercial pool, that those past debts will be forgiven. Therefore requesting additional funds from the harvester sector to cover those debts doesn't make any sense. Additionally, not all Chignik harvesters fished for that particular processor, and thus don't owe them any money, nor do all of the fishermen that actually fished for that processor owe them money, so taking funds from *all* Chignik harvesters is not appropriate.

The Chignik Intertribal Coalition would like to express our support for Management Strategy Evaluation (MSE) analysis examining risks and tradeoffs of different management approaches or mixed stock fisheries to refine stock - specific management and understand impacts of various management actions. The Coalition supports this theme as a priority for research funding because we recognize that the cause of these fish disasters span more than one fishery area and/or salmon species.

In closing, we offer these recommendations on the proposed draft spend plan for the 2020 Chignik salmon disaster funds. We appreciate the opportunity to comment in this process and our Coalition membership appreciates your work.

Sincerely,



George Anderson

President, Chignik Intertribal Coalition

February 4, 2023

To: Alaska Department of Fish and Game

My name is Jason Alexander. I'm a long term Chignik salmon permit holder. I agree with the 2nd draft spend plan for the 2020 Chignik salmon disaster.

The 1st draft plan excluded me because I had no participation in Chignik in 2019.

The 2nd draft plan includes me and my crew as I read the qualifying criteria. I had a full crew waiting in Chignik for the salmon run that never materialized. I had a valid SO1L permit card and did not make a landing in 2020 in another salmon seine fishery.

Thank you,

A handwritten signature in blue ink that reads "Jason D. Alexander". The signature is written in a cursive style with a large, stylized "J" and "A".

Jason D. Alexander

ADF&G, Attn: Karla Bush

PO Box 115526

Juneau, AK 99811-5526

Dear Karla Bush,

Chignik Vessel Crew (25% of harvester pool)

Page 12. This Paragraph in the Second Spend Plan I disagree with, being a deckhand since I was 5 years old. During the Summer months many Highschool Students take up Commercial Fishing. Some of them are under the age of 18, The age limit Should stricken from the plan and only stick by the Eligibility Criteria of holding a Commercial Fishing License and verified by the captain as intended to Commercial fish. The state of Alaska has no Age limit on holding a license for Commercial fishing in fact anyone under the age of 10 still pays a price to obtain a Commercial fishing license. This is Discouraging any future generation from starting at an early age. Equality should be Considered. For those who have worked over the years built the trust of one another the pay-out should have been done the percentage they worked for.

In regard to Research and Communities, the communities should have a larger percentage rather than research taking such a large percentage. the loss of revenue within the communities is far greater.

Marty Takak

ADF&G, Attn: Karla Bush
PO Box 115526
Juneau, AK 99811-5526
dfg.com.fisheriesdisasters@alaska.gov

Date: Feb 2nd, 2023

RE: ***DRAFT Spend Plan for funds appropriated to address the 2020 Norton Sound, Yukon River, Kuskokwim River, Chignik, Southeast Alaska; and 2021 Yukon River salmon disaster determination.***

Dear Karla Bush,

My name is Russell Shangin, I am a lifelong Chignik salmon seine fisherman starting my career in 1976. Chignik is the **only** salmon fishery in the State of Alaska of which I have participated in my entire life.

I have participated each and every year prior to and after the 2018 sockeye disaster. To further demonstrate my commitment to the Chignik fishery, I participated in 2019 while others ran to other areas or decided to take a year off.

I agree with the qualifying criteria for the 2020 Chignik sockeye salmon disaster distribution plan.

As every year, good or bad, I choose to run by boat to Homer for maintenance and winter storage. Additionally, I use my vessel to transport my summer supplies and necessary hardware to maintain my home in Chignik Lagoon. My vessel also acts as transport for my family and my crew because the price to fly in/out of Chignik is very costly. Beyond that, Homer is where I choose to do much needed maintenance on my vessel.

It is a common and long standing practice for many Chignik fishers, to prepare my vessel to participate and stand by while I monitor the escapements in Chignik, with high hopes that we will have a fishery. I had full intention to fish in Chignik in 2020. I had a full crew (3) plus myself and my seine boat waiting in the harbor in Homer for the run to develop. I sent my crew home in August when it was obvious there was no fishery.

I have been accused of not being eligible because I choose to leave my vessel in Homer for the winter. If we have learned anything from the past few disasters, it is that delaying the cost of insurance and other expenses until necessary is a *prudent* business decision and only mine to make.

In all my 47 years of participating in Chignik I have never been told by the state where I must leave my vessel prior *to* or *after* participating in a fishery.

I, like everyone else, had all the expenses of vessel insurance, crew insurance, fuel, groceries, all the normal expenses for a salmon seine season.

I should not be penalized for acting in the best interest of my family and my business.

Sincerely, Russell Shangin
 owner/operator,
 F/v Cassie Joelle

ADF&G, Attn: Karla Bush
PO Box 115526
Juneau, AK 99811-5526
dfg.com.fisheriesdisasters@alaska.gov

Date: Feb 2nd, 2023

RE: ***DRAFT Spend Plan for funds appropriated to address the 2020 Norton Sound, Yukon River, Kuskokwim River, Chignik, Southeast Alaska; and 2021 Yukon River salmon disaster determination.***

Dear Karla Bush,

My name is Edgar Shangin, I am a lifelong Chignik salmon seine fisherman starting my career in 1967. I was born and raised in the Native Village of Perryville, one village to the west of Chignik. Chignik is the **only** salmon fishery in the State of Alaska of which I have participated in my entire life.

I have participated each and every year prior to and after the 2018 sockeye disaster. To further demonstrate my commitment to the Chignik fishery, I participated in 2019 while others ran to other areas or decided to take a year off.

I agree with the qualifying criteria for the 2020 Chignik sockeye salmon disaster distribution plan.

As every year, good or bad, I choose to run by boat to Homer for maintenance and winter storage. Additionally, I use my vessel to transport my summer supplies and necessary hardware to maintain my home in Chignik Lagoon. My vessel also acts as transport for my family and my crew because the price to fly in/out of Chignik is very costly. Beyond that, Homer is where I choose to do much needed maintenance on my vessel.

It is a common and long-standing practice for many Chignik fishers, to prepare my vessel to participate and stand by while I monitor the escapements in Chignik, with high hopes that we will have a fishery. I had full intention to fish in Chignik in 2020. I had a full crew (3) plus myself and my seine boat waiting in the harbor in Homer for the run to develop. I sent my crew home in August when it was obvious there was no fishery.


I have been accused of not being eligible because I choose to leave my vessel in Homer for the winter. If we have learned anything from the past few disasters, it is that delaying the cost of insurance and other expenses until necessary is a *prudent* business decision and only mine to make.

In all my 56 years of participating in Chignik I have never been told by the state where I must leave my vessel prior *to* or *after* participating in a fishery.

I, like everyone else, had all the expenses of vessel insurance, crew insurance, fuel, groceries, all the normal expenses for a salmon seine season.

I should not be penalized for acting in the best interest of my family and my business.

Sincerely,

A handwritten signature in blue ink that reads "Edgar Shangin". The signature is written in a cursive style with a blue dot above the final 'n'.

Edgar Shangin
Owner/Operator, Miss Angelina

From: Timothy Murphy <[REDACTED]>
Sent: Friday, February 3, 2023 3:43 PM
To: Bush, Karla L (DFG) <karla.bush@alaska.gov>
Subject: Re: Second draft of the 2020/21 Statewide salmon fishery disaster spend plan available for public comment

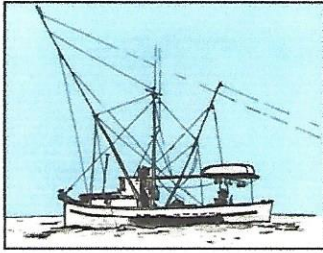
You don't often get email from [REDACTED]. [Learn why this is important](#)

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Karla,

My comment pertains to the Chignik Salmon disaster of 2020. Is it the department's intent to disqualify as many permit holders/crew from being eligible for the 2020 disaster relief by basing eligibility on 2019's salmon season in Chignik? There was virtually NO salmon season in Chignik in 2018, and it appears punitive to disqualify Chignik stakeholders that did not want to bank on there being a salmon season in 2019 following 2018. The disaster was in 2020, not 2019, please base eligibility requirements on 2020, not 2019.

Sincerely,
Timothy Murphy



Alaska Trollers Association

130 Seward #205
Juneau, AK 99801
(907) 586-9400
alaskatrollers@gmail.com
www.aktrollers.org

February 8, 2023

ADF&G attn: Karla Bush
PO Box 115526
Juneau, AK 99811-5526

Ms. Bush:

Thank you for requesting and considering our input in the previous and current round of comments on the Draft Spending Plan for the 2020-21 salmon disaster funds. As you are aware, the Alaska Trollers Association represents the Power Troll and Hand Troll fleet which comprise the second-largest commercial fleet in the state. We offer the following comments on this second draft plan:

- 1) We appreciate your recognition that including odd-year catch history of pink salmon in the allocation formula is inappropriate due to the odd-year pink runs being stronger than even year runs. However, it is even more inappropriate to create a fictional base period that hybridizes the even-year seine pink catch with the most recent 5-year catch of the other species. The same base period (preferably 2010-2018 even years) must be applied to all species and all gear groups (at least in SE). Fishermen chose what species to target based on the anticipated value of their catch. So, in a year when targeting pinks is less lucrative than chum, more fishermen will target chum and vice-versa. The proposed seine base period that adds the 2010-2018 even-year pink catch to the 2015-2019 chum catch is a Frankenstein creation that is in no way a realistic estimate of what the 2020 seine catch would have been had typical runs and markets prevailed.
- 2) We oppose increasing the proportion of SE funds directed at processors (rather than to fishermen) from 15% to 25%. Processors have deeper pockets than fishermen and have the ability to set dock prices to protect themselves. Fishermen have no such defense. It should further be noted that multiple commenters, including USAG & PVOA stated that they were happy with the previously proposed 85%; only a single letter from OBI, one of the largest and most dominant fish buyers in the state claimed dissatisfaction with the 15%.
- 3) We oppose the proposed changes to the SE crew allocation. Deckhands are an important part of salmon fishing in SE and deserve a fair portion of the mitigation funds. Some crew members work on multiple boats/fisheries in a given year-particularly when fishing is slow (and thus compensation is minimal). A compensation scheme that is tied to a specific gear type would be more complicated for these deckhands that participated in multiple fisheries. Your original plan for the crew compensation money to come out of a common pot of 20% of the SE total regardless of gear type is preferable.
- 4) Specific to the troll sector, we appreciate that you have agreed that the \$8,000 minimum landing requirement of chum/coho was excessive. We support a chum/coho landing threshold of \$2,500. Even at this minimal level, one share of the money proposed to be allocated to the troll sector would still not be sufficient to make up for the severely depressed dock prices of 2020.

We do not see a need for any additional troll eligibility criteria beyond those listed. Thank you for incorporating our views.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Amy Daugherty'. The signature is fluid and cursive.

Amy Daugherty
Executive Director



Post Office Box 1229 / Sitka, Alaska 99835 907.747.3400 / alfafish.org

February 15, 2023

Alaska Department of Fish and Game

Attn: Ms. Karla Bush

PO Box 115526

Juneau, AK 99811-5526

Submitted via e-mail to: dfg.com.fisheriesdisasters@alaska.gov

Dear Ms. Bush,

I submit the following comments on the second draft spend plan for funds appropriated to address 2020 and 2021 federal salmon fishery disasters on behalf of the Alaska Longline Fishermen's Association (ALFA). ALFA represents commercial fishermen and businesses from nearly every community in Southeast Alaska who participate in, or otherwise support and benefit from the commercial fishing economy.¹ Many of ALFA's members participate in the three Southeast Alaska commercial salmon fisheries impacted the 2020 salmon fishery disaster - seine, gillnet and troll.

Congress appropriated \$47.4 million to partially mitigate estimated losses of \$107.3 million that accrued to Southeast Alaska, Western Alaska and Chignik salmon fisheries because of the 2020 and 2021 fishery disasters. This second draft spend plan allocates 57.6 percent of the funds (\$27.3 million) to Southeast Alaska fishery participants based on an estimated loss of \$61.8 million. ADF&G also proposes to allocate 15 percent of the relief funds for research (12%/6.7 million) and community grants (3%/\$1.7 million).

ADF&G's initial plan allocated \$25.9 million in funds to Southeast Alaska salmon fishery participants in five categories as follows: (1) Seine permit holders: \$10.8 million (42%); (2) Processors \$3.9 million (15%); (3) Gillnet permit holders \$4.9 million (19%); (4) Crew \$4.4 million (17%) (5) troll permit holders \$1.9 million (7%).

The second plan allocates \$27.3 million in relief funds to fishery participants in four categories: (1) Seine permit holders and crew: \$13 million (48%); (2) Processors \$6.8 million (25%); (3) Gillnet permit holders and crew \$5.9 million (21%) and (4) troll permit holders and crew \$1.6 million (6%). The \$1.6 million troll allocation is lower than the \$2.6 million set aside for seine vessel crew members.

ADF&G estimates that 204 seine permit holders are eligible for an equal payment distribution. They would each receive roughly \$51,000 of the \$10.4 million allocated to seine permit holders. ADF&G proposes to allocate \$5 million in relief funds to 371 eligible gillnet permit holders in four tiers. Individual payments would range from roughly \$8,100 to the

¹ ALFA's office is in Sitka, Alaska but ALFA is a statewide and national fishery organization in scope, with members throughout Alaska and in the lower 48 United States.

155 permit holders in the bottom tier to \$28,400 to the 44 top tier permit holders.² ADF&G estimates that there are 648 troll permit holders eligible to receive equal shares from a \$1.4 million allocation, or \$2,160 apiece. These shares are lower than proposed payments to individual gillnet and seine crew members.

ALFA recognizes the severity of the ongoing, even year pink salmon crisis for our members and others that participate in the seine fleet. ALFA is also aware of the unique importance of sockeye returns to gillnet fleet revenues and the exceptionally poor 2020 sockeye harvests in several of the most important gillnet fishing districts.

But the low amounts of relief available to troll permit holders is a concern. The 2020 power troll catch of 79,101 chum is less than twenty percent of the typical 453,000 fish harvest.³ The 2020 power troll catch of 720,000 coho is just over half of the typical 1.4 million fish harvest.⁴ The proposal to provide significantly lower payments to salmon troll permit holders relative to other Southeast Alaska permit holders and crew in this context means something in the allocation formula went awry. ALFA requests that ADF&G consider ways to improve this situation, whether through changes to the method of crew payments, processor allocation percentage, reduced research allocations, or re-evaluation of the baseline period for troll and gillnet sectors.

(1) Re-evaluate the baseline period for Southeast Alaska salmon fisheries

For Southeast Alaska, this spend plan allocates relief funds for harvesters by comparing 2020 gross revenues for three species (chum, coho and sockeye) to average revenues from 2015-2019. It uses a different baseline period for seine pink salmon - 2010-2018 even years. ALFA recognizes the significant disparity between even and odd-year pink salmon run sizes. ADF&G's analytical approach appropriately evaluated revenue impacts to seine fleet pink salmon fisheries using two baseline periods: 2015-2019 in the initial spend plan and even-years from 2010-2018 used in this spend plan.

This second draft plan includes multiple changes that reduced the allocation to the troll sector. The choice of different baseline periods may have influenced the lower allocation. ALFA requests that you consider revenue impacts to other Southeast Alaska salmon fisheries using the same 2010-2018 even-year baseline period and/or develop a more reasonable baseline period specific to the troll sector as was done for the seine fleet. Using 2015-2019 baseline period to assess revenue losses for trollers likely reduced the allocation. 2016, 2018 and 2019 were the lowest troll harvests in terms of total salmon numbers over the last decade (2010-2019).⁵ Coho harvests of less than a million fish from 2018-2020 were the lowest this century.⁶

(2) Restore the separate, pooled crew allocation

ALFA supports a significant allocation of relief funds for vessel crews but requests that you implement the crew allocation formula from the first draft spend plan. This second draft spend plan allocates funds for vessel crew within each gear sector allocation. The initial draft plan established a crew pool using 20 percent of the funds (\$4.4 million)

² 73 Tier 2 gillnetters would receive \$17,123 each and 99 Tier 3 gillnetters would receive \$12,626 each.

³ Hagerman, G., M. Vaughn & J. Priest. 2021. Annual management report for the 2020 Southeast Alaska/Yakutat salmon troll fisheries. Alaska Department of Fish and Game Management Report No. 21-17, Anchorage.

⁴ *Id.*

⁵ *Id.*

⁶ *Id.*

allocated to harvesters. Crew members who worked on a Southeast Alaska salmon fishing vessel would receive equal payments from this pool. Seine boats typically employ three crew members, and most troll and gillnet permit holders employ one crew member. There would be potentially 1,600 active crew based on the number of eligible permit holders who would have received roughly \$2,748.00 each under the formula proposed in the initial spend plan.

This second draft spend plan, however, proposed to make crew relief payments specific to gear type and varies the percentages of each gear type's allocation. It allocates ten percent of the troll harvest share - \$159,000 - to crew, so that the potentially eligible 650 crew members would receive equal payments of less than \$250. The 340 potentially eligible gillnet crew members would share fifteen percent (\$885,000) of the gillnet sector's allocation, or \$2,600 each. The 600 potentially eligible seine crew members would receive twenty percent of the seine sector allocation, or over \$4,000 each.

ALFA requests that you use the pooled formula from the initial spend plan in the final spend plan. Further, while ALFA supports including meaningful relief to crew, it is odd that crew shares would exceed relief payments to troll permit holders. ALFA suggests, as explained in the following discussion, that you shift other relief payment categories such as processor payments and funds set aside for research back into the harvest pool. This approach may enable you to maintain similar payment amounts for crew at a lower percentage, perhaps fifteen percent and increase individual payments to eligible troll permit holders.

(3) Restore the 85/15 percent allocation between Southeast Alaska harvesters and processors

ALFA requests that you shift the harvester/processor allocation for Southeast Alaska back to 85/15 percent as proposed in the initial spend plan. Only one processor, OBI Seafoods, requested the 25 percent allocation and that request was very specific to Chignik. The Pacific Seafood Processors Association (PSPA), which represents all major salmon processors in Southeast Alaska, supported the general approach of the initial draft spend plan and stated the importance of including processors in the spend plan. PSPA did request an analysis of their sector's wholesale value revenue losses but did not ask ADF&G to shift funds from Southeast Alaska harvesters. While Southeast Alaska processors did incur considerable costs and diminished revenues supporting our fleets, many harvesters depend solely or primarily on salmon fisheries. Southeast Alaska processors were able to mitigate these losses to a greater extent than fishermen because of the availability of other species, including high value halibut and sablefish harvests, record harvests of Dungeness crab, and strong production from the dive fisheries.⁷

(4) Shift research funds to harvesters

ALFA also requests that you consider shifting funds allocated to research to harvesters. The spend plan allocates over twelve percent of the disaster funds (\$6.7 million) to research projects. There is a significant amount of ongoing and recent research already completed that addresses many of the topics and management needs listed in the second draft spend plan - particularly how climate driven mechanisms affect salmon abundance, habitat, prey and health.¹ Further, there are parallel research efforts that can address ADF&G's interests with funding sources other than disaster relief funds, such as efforts implemented under the federal Alaska Salmon Research Task Force Act.⁸ The high

⁷ <https://drive.google.com/file/d/1fbRDnqBNWbNt8uX1KCu9EnCu9WdfqD8o/view>

⁸ [Senate Passes Sullivan-Murkowski Alaska Salmon Research Task Force Act](#)

proportion of funding dedicated to research has a significant influence on the low payments to fishermen in Western Alaska and Southeast Alaska troll fishermen. Because there are other ongoing research efforts and alternative sources of federal research funding, ALFA requests that you allocate a significant proportion of the research funds to harvesters.⁹

(5) Comments on troll permit holder eligibility criteria

The second draft spend plan requests comment from troll permit holders regarding eligibility criteria. ADF&G replaced a criterion from the initial draft spend plan which required a minimum landing value of \$8,000 and now implements a landing requirement. The troll fleet is probably the most diverse fleet in the state. It ranges from part-time or semi-retired fishermen to catcher-processors that are among the highest earning vessels in any state salmon fishery. The spend plan identifies a wide range of losses and landings values, including some very low landings and revenue loss values.

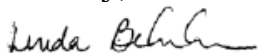
ALFA recommends that the final spend plan does include a minimum landing threshold to ensure the distribution of funds to fishermen who depend on the fishery as a primary income source. ALFA agrees that the \$8000 threshold was too high and recommends a lower landing threshold of \$3,000. This lower threshold ensures that fishery participants who made minimal landings due to other work opportunities or income sources do not receive payments that exceed their landings value.¹⁰ ALFA does support the spend plan's proposal to distribute funds through equal payments to ensure as broad a distribution as possible. Entry-level fishermen have the greatest need for these relief funds but would receive less under a tiered system because their relative long-term revenue losses are likely less than more established operators.

ALFA agrees with ADF&G's decision to use landing requirements as eligibility criteria for all sectors. Our review of public comments did identify some permit holders who intended to fish and may have experienced some hardship that prevented them from operating. ALFA does not oppose a hardship exception in exceptional circumstances but submits that in those cases the permit holder should submit an affidavit or similar document (1) describing the hardship; (2) detailing steps taken to begin fishing operations prior to the onset of the hardship; (3) verifying that the hardship also prevented the permit holder from pursuing non-fishing work during the 2020 salmon season and (4) detailing the amount of relief received under various COVID-19 relief packages and the extent to which that relief was insufficient to otherwise mitigate additional losses accruing from the 2020 salmon disaster.

Conclusion

Thank you for the opportunity to comment on this second draft spend plan. For the above reasons, ALFA requests that you re-evaluate and lower allocations to non-fishery participants and make other adjustments specific to Southeast Alaska fishery participants to better balance allocations between gear sectors.

Sincerely,



Linda Behnken, Director

⁹ [Alaska Bycatch Review Task Force \(ABRT\) Final Report, November 2022](#)

¹⁰ The range of estimated losses was between ~\$36 and ~\$77,000 and landings ranged between ~\$6 and ~\$100,000 per person.

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- ⁱ Barneche, D.R., Robertson, D.R., White, C.R. and Marshall, D.J., 2018. Fish reproductive-energy output increases disproportionately with body size. *Science*, 360(6389), pp.642-645;
- Bednaršek, N., Harvey, C.J., Kaplan, I.C., Feely, R.A. and Možina, J., 2016. Pteropods on the edge: Cumulative effects of ocean acidification, warming, and deoxygenation. *Progress in Oceanography*, 145, pp.1-24.
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Bush, Karla L (DFG)

From: Andy Kittams <[REDACTED]>
Sent: Thursday, February 9, 2023 12:01 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: 2022 salmon disaster spend plan

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Thank you for the opportunity to provide comments on the second draft spend plan for the 2022 salmon disaster.

My comments are focused on page 14 regarding S01A permit holders where it is written "ADFG is proposing an equal payment distribution based on public comments received in the initial spend plan."

Public Comments.

One S01A permit holder (myself) wrote in support of the initial spend plan distribution. PVOA wrote in support of it as well. Not one individual S01A permit holder wrote in opposing a tiered distribution. Not one individual S01A permit holder wrote in support of an equal payment distribution for S01A permit holders. If there was a burning desire in the fleet to change the initial spend plan, surely you would have seen at least one S01A permit holder voice his/her/them own concerns. But none did. Why??? Because the fleet expected the initial plan to pass as written.

Only one letter was written in support of this equal distribution and it was from the SEAS board. The SEAS board simply states 'We believe the simplicity of this approach will ensure a more **timely and fair process**'. SEAS does not disclose that this was a last minute board generated idea that had not been put before their 125 members or the other 154 S01A permit holders (who are the majority of the fleet) before being offered to the State of Alaska.

Most importantly, SEAS provides no justification as to why they believe equal distribution system is more timely or fair. In an open and transparent process there must be some justification to back up a change. To request the State of Alaska to completely change the States disaster distribution policy SEAS should have provided some reasoning, some supporting documentation to assert why the initial spend plan was unfair. SEAS provided none of this yet ADFG has now agreed. Why? Why does ADFG now believe a equal distribution is more timely and fair for just the S01A fishery? No one will answer that. Why? Without this analysis, the State of Alaska itself is not performing its due diligence in justifying the change. Furthermore if ADFG does believe a equal distribution system is indeed more timely and fair why isn't it being applied to all fisheries??

Here is my justification for supporting ADFG'S initial tiered distribution plan for the S01A fishery.

Timely Process.

Timeliness is not a justification for spend plan change. ADFG has the duty to get the process done right not fast. There are five other gear groups getting a tiered distribution in this spend plan alone. Are they untimely? No. Are they holding up the process? No. Would S01A permit holders having a tiered distribution hold up the process? No. We've waited nearly three years already for these funds. Please just get it right.

Fair Process.

A fair process is where everyone plays by the same rules. The State of Alaska has exclusively used a tiered system for fishery disaster funding in net fisheries. Why? Because the State recognizes that fishermen are not equal. Some of us fish harder and longer in a season. Some of us burn more fuel. Some of us spend more on crew and equipment. Some of us have more experience. Others have no other fishery to fall back to. Whatever the individuals situation, the State has consistently recognized we fishermen are impacted differently in a disaster. That is precisely why a tiered system was developed and implemented by ADFG. It is FAIR.

So why should the S01A fishery be singled out for a equal distribution system? That in itself is unfair. The S01A fishery has the same demographics as every other net fishery in Alaska. We Southeast Alaska seiners should be treated like every other seiner in the state. If its been deemed 'fair' in Chignik and PWS- its 'fair' for Southeast. Furthermore, if its 'fair' for southeast gillnetters in the same spend plan, surely its 'fair' for southeast seiners.

If ADFG goes ahead with this equal distribution because they agree it is more timely and fair, is the State of Alaska opening themselves up to lawsuits from those who have had a tiered distribution system? Have all the hundreds of other fishermen in the state that have gotten a tiered system been treated less fairly in disaster relief?

Please keep this process open and transparent. Treat all Alaskan net fishermen the same. Distribute disaster funds to S01A fishermen with the tiered system offered in the initial spend plan.

Andy Kittams

F/V SaraDawn

Petersburg, AK

Sent from [Mail](#) for Windows

Bush, Karla L (DFG)

From: Benjamin Phillips <[REDACTED]>
Sent: Tuesday, February 7, 2023 12:57 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Public comment

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To: Disaster spend Spend Plan Team,

After reading the latest spend plan relating to the SE troll sector I noticed the ADFG requests for more input on criteria for eligibility of SE trollers. I think it is important to remember that this run disaster and the legislative intent of the grant money is only meant for the portion of the fleet that actually fished in 2020, to proportionally offset the impacts of investment risk of time and money that was not realized as a result of the disaster. I fished the entire season and remember clearly the drop in actual boats participating on a weekly basis. Many fishermen just stayed tied up and lived off cares grant income. The criteria for eligibility, in my opinion, should favor the trollers that gutted out a bad season on starvation wages. I suggest the following:

1. Minimum qualifications for Salmon troll participants in the 2020 fishing season be set at 1 landing per month (1 landing in July, 1 landing in August, 1 landing in September for a total of 3 landings) of the summer troll season to ensure a reward for participation to trollers that tuffed out the 2020 season.
2. To simplify(unless necessary for compliance), abandon reference of past seasons for individual harvesters (it's already built into the fleet wide division formula of allocated funds for all of SE salmon gear types).
3. Separate hand troll from power troll when calculating the initial fleet wide division between gear types in order to address true loss to overall investment ratio of hand troll vs power troll.

Thank you for your consideration.

Bush, Karla L (DFG)

From: Bob Martin
Sent: Wednesday, February 15, 2023 9:53 AM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Southeast Gillnet Crew Allocation

15% off the top (gross sales) is near the top of the scale for a southeast gillnet crewmember. Many boats in this fishery have no crew at all, or just one for the peak of the season. Therefore, I think the 15% allocated to southeast gillnet crew is too high overall. 10% after expenses would be my suggestion for a fleet average. Furthermore, many, perhaps most crew members in this fishery are young people. The 18 year age requirement could be a real problem in this allocation category. My two crew in 2020 were 13 and 14 years old. Even three years later they would still be ineligible to apply. If the 18 year-old requirement can not be relaxed, there will be a lot of ineligible claims on the already juicy 15% crew allocation, possibly leading to some pretty inflated compensation for those who make the cut. Since I would like to share the relief money with my young crew, please consider capping the amount of an eligible gillnet crew claim at a generous but reasonable amount, perhaps \$3000, and let any leftover funds go to the permit holder group where they can be put toward younger crew members.

-Bob Martin
Petersburg Gillnetter

Bush, Karla L (DFG)

From: brad haynes
Sent: Wednesday, February 15, 2023 10:59 AM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Comments of disaster relief spend plan

ADF&G

Attn: Karla Bush
PO Box 115526
Juneau, AK 99811-5526

Re: Comments on disaster relief spend plan

Dear Ana,

My name is Bradley Haynes, owner of the F/V Sovereign Grace home port of Ketchikan AK. I am a purse seiner in SE Alaska.

I support the spend plan before SEAS changed last minute.

S01A permit holders are fishermen by lifestyle choice, but at the end of the day fishermen are business owners. If our fishing business doesn't pay for itself, we fail individually. Our businesses are successful on different financial levels relative to the risk we incurred. That financial risk includes debt and

expenses. Which make fishing businesses successful. All with the end goal of making it to the next fishing season or Lord willing retirement.

A main factor that separates success of fisherman in our fleet is the equipment we invest in. Equipment includes gear, permits, quality and size of our boat, and the maintenance. All of these factors come at varying debts to purchase and maintain. For those of us that have the larger operations we also operate with a larger annual expense and take on greater risk.

As a business owner in this industry we don't all have the same operating expenses therefore our relief amounts should be reflective of our historical catch records. I strongly oppose this "woke" movement to have an equal distribution of funds and I feel the "tiered relief payment proposal" is the only option for disbursing relief funds.

Sincerely,
Bradley Haynes
Owner/operator F/v Sovereign Grace
Ketchikan, Alaska

Bush, Karla L (DFG)

From: Brian Warmuth <[REDACTED]>
Sent: Saturday, February 4, 2023 1:47 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: 2020 disaster fund spend plan

I have a few comments that I would like to make on the proposed plan to distribute the federal funds for the 2020 salmon disaster.

After looking at the plan it looks like a totally unfair split in the funds for Southeast Alaska. With this plan Sein and Gilnet crewmen will probably receive a larger share of the Distribution than troll skippers.

Being a skipper of a troller I realize how much I have invested. My troll permit, my vessel and gear - I need all of that just to participate in the salmon season. On the other hand a crewmen needs a crewmen license, boots and rain gear and they are ready to go.

The 2020 coho season for me personally was the worst season I had since 1988. That season I was saved buy a very high dock price for salmon, which was not the case in 2020.

Sincerely
Brian Warmuth
F/V Shannon Hope

Sent from my iPhone

Bush, Karla L (DFG)

From: [REDACTED]
Sent: Thursday, February 2, 2023 6:59 AM
To: DFG, ComFisheriesDisasters (DFG sponsored)

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I believe any southeast permit holder in their category should be eligible for any disaster funds.

Covid made crew hard to impossible to higher and all the lockdowns and requirements were to much for soe to overcome and participate. So this was a double disaster to all especially to the permit holders.

Bush, Karla L (DFG)

From: Dave Brown <[REDACTED]>
Sent: Thursday, February 2, 2023 9:15 AM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: SO3A disaster relief spending plan

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To whom it may concern,

I feel that the proposed spending plan is extremely unfair and does not represent the 2020 fishing season whatsoever. Why would the 2017-2019 seasons have any bearing on disaster relief for the 2020 season?

I began gillnetting in 2020. At that time, all of the COVID relief money was distributed in this same manner, meaning anyone who hadn't been fishing prior, received very little to no financial support through any of those programs. Isn't this money supposed to be money directly designated to offset the 2020 season? Instead, yet again, it's giving more money to fishermen that already had three very successful seasons prior to 2020. This current spending plan is lining the pockets of older, rich fishermen, and leaving new, younger fishermen hung out to dry.

I believe the money should be given out as equal payments to all SO3A permit holders who fished in the 2020 season. If they want to use the tier system, it should be based strictly off of the 2020 fishing season, seeing that the disaster relief money is for the 2020 season not the 2017-2019 seasons.

Thank you for your consideration,
Dave Brown

UNITED SOUTHEAST ALASKA GILLNETTERS

Box 2196, Petersburg AK 99833 * (253) 279-0707 * usag.alaska@gmail.com * akgillnet.org

USAG'S MAIN PURPOSE IS TO PROTECT, SERVE AND ENHANCE SOUTHEAST ALASKA'S COMMERCIAL GILLNET FISHERY

USAG Comments regarding 2020 SE Salmon Disaster Draft 2 Spend Plan

United Southeast Alaska Gillnetters are supportive of the latest draft of the 2020 Salmon Disaster Spend plan as written in general. The tier system offered is in our opinion a good metric to assess effort and reliance in recent history. We also feel that 2020 season participants with no or limited history prior to that season are given a fair share.

The crew portion of the SEAK gillnet sector, ~\$885,000 would amount to ~\$2400 if one deckhand for each vessel that fished 2020 applied. We feel it is unlikely that will be the case. Many gillnetters don't use deckhands; for some it is a family business, and children, who are paid with fishing boat proceeds, will not be eligible for application. This disaster occurred nearly three years ago, and it is very likely that some that participated will not apply or be eligible. Because of this, we would ask that there be a cap instituted on the individual crew share of \$3,200. Without a cap, if funds were distributed evenly, and only 100 eligible people applied, crew disaster shares would exceed the amount paid to qualified permit holders in the fourth tier of the quartile. Any unclaimed crew funds should be distributed back to the permit holders. We are supportive of the concept of paying our crew, but we also recognize that the payout should have an upper limit, as a crew members investment in the fishery is usually little more than some raingear and time. It is notable that crew could be eligible for shares in as many as three different fisheries in the region.

We are supportive of the research projects proposed by the department for the SEAK region. We would rank them by importance to our fleet as follows:

1. MacDonald Lake mark-recapture study. As noted, this system is the subject of an Action Plan that has had a deleterious effect on fishing time for both net fleets. This project will allow the department to more accurately assess escapement.
2. Chum salmon helicopter surveys. Better assessments of index streams are apparently needed. Some these streams are subject to glacial silt, making fixed wing surveys difficult.

3. Environmental effects on coho salmon. Coho salmon are important to both the troll fleet and gillnet. Any research involving this species we would deem important. Since there is an active mining project in Berners Bay drainages, studying environmental data would be prudent.
4. Freshwater influences on disease and condition factor. This study could lead better understanding of ocean survival of coho, which could allow the department to better forecast coho in the region.
5. Southeast coastal Monitoring Survey. Since the department and the board of fish have decided that the pink salmon index is exempt from Stock of Concern criteria, due to their ability to bounce back quickly, and the department has indicated through this spend plan that pink salmon have no relevant value to the gillnet or troll fishery, we would make this our lowest priority.

We respectfully decline commenting on any other aspects of the spend plan, as more opinions make for more considerations, taking up time. It has been nearly three years since this disaster occurred, and we are looking to do all we can to expediate the process.

Sincerely,

A handwritten signature in black ink, appearing to read 'Max Worhatch', written in a cursive style.

Max Worhatch, Executive Director, USAG

Bush, Karla L (DFG)

From: joseph baxter
Sent: Wednesday, February 15, 2023 12:33 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Draft spend plan

To whom it may concern,

As a new entrant to the SEAK drift gillnet fishery in 2020, I appreciate ADFG's support for new entrants who do not have prior seasons landing history. Your decision to "use the annual fleet average for permit holders that do not have a fishery value in 2017, 2018, and/or 2019" ensures that new entrants are not left out of disaster funding simply because 2020 was their first year fishing. This approach also covers permit holders who for whatever reason were unable to fish in previous years as well. The tier system seems fair, although I support an equal distribution as well.

I support all the eligibility criteria for crew members, as they are an essential component of the fishery and they experienced an equivalent loss of income due to the disaster.

Thank you for considering my input.

Sent from my iPhone

Bush, Karla L (DFG)

From: Matt Kinney
Sent: Tuesday, February 14, 2023 7:03 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: ATTN: Karla Bush Written public comment for second draft disaster relief

To whom it may concern,

Attached are my comments to the revised spending plan for Southeast Seiners.

The original spending plan compensated those involved in the fishery in a fair and reasonable manor, and distributed funds based on effort, and production over a multi-year average. There should be no changes to the original tiered structure as it was best left as is.

I want to express support for production based tiered distribution for the disaster funds for Southeast seiners-based compensation on annual averages. It's a successful use of fund distribution based on efforts and productions that correlate to individual fisherman's businesses. Typically, those who achieve higher status in the tiered program have incurred higher operation cost, whether it be fuel cost to fish more aggressively, extra crew to ensure safe travel, upgraded equipment, all of which can be equated to more fish, and better rank in the tiered structure. However these "upgrades" to ones operation come at a cost, and its unfair to treat our operations as if they are all the same. Its not fair to reward the same dollar figure to a boat that has low overhead, low insurance cost, and low motivation for success to one that is willing to invest in their operation, hire more crew, and work harder to strive for success, ultimately putting more money back into our communities.

The original tiered structure should stand as originally written.

Also, I believe crew members under the age of 18 years of age should be considered for compensation. Coming from a small fishing community, our youth is the next generation to take over and without them our seasons won't be possible. Those that were under the age of 18 could use these funds as much as anyone during these uncertain times.

Regards, Matt Kinney

F/V Hukilau

103 Kramer Ave

Sitka, AK 99835

Bush, Karla L (DFG)

From: sam prysunka
Sent: Tuesday, February 14, 2023 8:12 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: 2020 Disaster Relief Comments

Alaska Department of Fish and Game

Hello, my name is Sam Prysunka, I am a S03A gillnet permit holder since 2019. I am writing to submit my comments regarding the draft spend plan for 2020 salmon disaster relief for S03A permits.

It is my belief that the current tiered system is flawed and is overly lopsided to benefit the members of our fleet who make the most amount of money due to years of experience. Young fisherman such as myself, who were just getting their start before the disaster, are slipping through the cracks under this current system. 2020 was catastrophic for those of us who did not have hundreds of thousands of dollars built up from years and years of lucrative fishing.

I believe the best way to divide this money would be equal payments across the board, just as every other southeast gear group has done. I understand that many permit holders are part time, but that is not unique to southeast gillnetters. I believe that many of the loudest activists for Southeast gillnetters greatly benefit from the current system, but that certainly doesn't mean it is in the best interest of those who need it most.

The bottom line is equal payments would result in almost 70% of eligible permit holders seeing an increase in their payment. I just ask that you consider making sure this money is dispersed fairly to benefit the majority of Southeast gillnetters.

Thank you,
Sam Prysunka
F/V Miss Kaitlyn



February 15, 2023

Commissioner Doug Vincent-Lang
Alaska Department of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Commissioner Vincent-Lang,

On behalf of the members of the Southeast Alaska Seiners Association (SEAS), thank you for the opportunity to provide additional comments as the Alaska Department of Fish and Game (ADF&G) finalizes the 2020 statewide salmon disaster Spend Plan for submission to the Pacific States Marine Fisheries Commission (PSMFC). SEAS represents 125 members of the seine fleet in Southeast Alaska who harvest all five species of Pacific salmon, primarily targeting pink and chum salmon.

SEAS applauds ADF&G for its efforts to put together a plan that considers the diverse and complex interests of Alaska's salmon fisheries. It is apparent through the evolution of the Spend Plan that significant care and attention to detail was taken. We would like to highlight and reiterate strong support for some specific provisions that were included in our June and October 2022 letters.

- First, the allocation for the Southeast (SE) commercial pink salmon fishery is based on comparing the 2020 disaster year to the 2010-2018 even-year average for pink salmon (2010, 2012, 2014, 2016, and 2018). SEAS appreciates ADF&G making this change and believes it is the most equitable way to execute a spend plan for SE pink salmon.
- SE seine permit holder distribution is equal shares for all eligible permit holders. This provision continues to have the unanimous support of the SEAS Board.
- SE is excluded from the Management Strategy Evaluation (MSE) scheme, with acknowledgement of the Pacific Salmon Treaty. This was specifically supported in our October 2022 letter.

- Allocations for SE vessel crew are proposed to be sector-specific, and eligible seine crew will receive equal shares. SEAS supports both updates.

SEAS would like to reiterate our strong support for this spend plan and appreciation for ADF&G leadership and staff efforts to expeditiously and effectively put together this spend plan. We believe that the Spend Plan, as currently drafted, accomplishes the State's statutory obligation, addresses public comments, and will go a long way to relieving the economic hardships that continue to be felt throughout Alaska from the 2020 salmon disasters.

Sincerely,

A handwritten signature in black ink, appearing to read "Phil Doherty". The signature is written in a cursive style with a long horizontal stroke at the end.

Phil Doherty
Executive Director – SEAS
PO Box 6238
Ketchikan, AK 99901

Bush, Karla L (DFG)

From: Stacy Kittams <[REDACTED]>
Sent: Friday, February 3, 2023 8:36 AM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: 2020 SE AK Disaster Second Round Draft Plan

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ADFG, Attn Karla Bush
PO Box 115526
Juneau, AK 99811-5526

I would like to voice my support for a 4 Tiered System for the SE AK Seine Fleet based on historical production ranking. This is the only fair plan presented and consistent with the historical distribution relief aid and disbursements in other Alaska regions and gear groups. To differentiate now with a equal split would be disparate treatment for the SE AK Seine Fleet.

Furthermore, I would like to voice my alarming concern and disapproval for the Spend Plan requirement that says crewmen must be over 18 years old to qualify for the aid. These crew members worked just as hard as the other members of the fishing fleet and deserve to be compensated at the same rate as their peers. To treat anyone differently based on their age is age discrimination. As a parent of several high school kids working summer seine jobs, I would be one of the first to sign on to a class action law suit if this were to go forward excluding them! The age limit is wrong and very disturbing this recommendation would even make it into the draft spend plan.

Stacy Kittams,
SE AK Resident, Business Owner, Permit Holder, Parent

ADF&G atten: Karla Bush
PO Box 115526
Juneau, AK 99811-5526

February 7, 2023

Ms Bush:

I want to thank ADF&G for considering my input on the first draft of the Spend Plan for 2020/2021 Salmon Disaster funds. As an affected stakeholder, I appreciate the opportunity to comment on this process. Specifically, I most appreciate the acknowledgement of the point made by myself and many others regarding the inappropriateness of basing the compensation for losses in 2020 on odd-year catches due to the known and full-anticipated even-odd year differences in the strength of the pink salmon return. However, the alternative presented in the second draft is even worse. It is even less appropriate to create a hybrid base period that combines 2010-2018 even-year pink salmon values with 2015-2019 chum salmon values for the seine gear group while using a different base period for other gear groups. Fishermen choose their target species from opening-to-opening based on the opportunities that the different species offer. So, the value of the pink salmon catch in a given year is the result of the many decisions made that year. In a different year with different opportunities, different decisions will be made resulting in different allocation of effort, and hence different catches. Thus, rather than representing a realistic model of what the 2020 seine season might have been, **the proposed hybridized base period is like AquAdvantage's "salmon" that has been genetically modified to include ocean pout genes**- neither is in any way a plausible outcome of natural circumstances. While it is strongly preferable that the base period include only even years, it is even more **important that the base period be the same for all species and all gear groups.**

Also, I oppose the change in the second draft plan to decrease the proportion of the SE funds going to fishermen from 85% to 75%. The processors don't need more than the 15% previously allocated. Not only did they prove to be much better organized when it came time to jump to the head of the line for CARES Act money, but as they always do when markets get weak, they simply reduced the price that they offered to fishermen like myself. Processors pass their costs down to the fleet, but we are not able to push our costs on to anyone else. Even after markets had firmed up in 2021, dock prices started low as processors made up any losses that might have remained on their books following the 2020 season. This disaster money that ADF&G is in charge of distributing is the fleet's chance to make up our losses.

I appreciate that this 2nd draft drops the \$8,000 minimum catch value on chum/coho required for trollers to receive compensation. That was an excessively high barrier in a disaster year for those species. I would support a lower threshold in the \$2,000- \$3,000 range. That should be high enough to ensure that a troller's losses were greater than their share of the compensation money.

Lastly, I oppose the changes proposed for crew compensation. The original 20% of the total SE funds is more generous than the new gear-group specific proposal. Crew are always on the bottom of the ladder, but an economic disaster is no time to push them further down, as the 2nd draft proposes to do. Furthermore, relating the crew compensation to the gear group is much more complicated than it would first appear because some crewmen participate in multiple fisheries. **Please restore the original crew compensation plan based on equal shares of 20% of the overall SE funds.**

Thank you for incorporating my opinions,

Tad Fujioka FV Sakura

Bush, Karla L (DFG)

From: Tom Lovrovich <[REDACTED]>
Sent: Monday, February 6, 2023 11:35 AM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: southeast AK seine license eligibility

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Any license holder who renewed his permit with the CFEC checking the required box (Intend To Fish) should be included in this disaster. I traveled to Alaska from Washington. My crew contracted covid not allowing me to participate to obtain a delivery. After weeks of the virus going through all the crew. I returned home due to my elderly parents who contracted the virus who needed my care., Please ask the CFEC how many renewals there was with the Box checked (Intend to fish) in 2020. That shows the individual was going fishing. This season was a disaster. Please ask the Entry commission for that data and make the right choice. Thanks Tom Lovrovich

Bush, Karla L (DFG)

From: Tracy Rivera <[REDACTED]>
Sent: Friday, February 3, 2023 8:51 AM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Troll/ disaster money

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Ms Bush:

Thank you for requesting further information on the draft spending plan for 2020-21 salmon disaster funds. I'm a power troller from Tenakee Springs.

1. I oppose increasing the proportion of SE funds directed at processors rather than fisherman 15% to 25%. Processors are able to qualify for more assistance money than fisherman. Individual fisherman were hit harder in 2020 by low fish price and a low fish run.
2. Trollers should have a \$2500 minimum landing for chum/coho to qualify. There should not be any additional troll eligibility criteria.

Thank you for your consideration,

Tracy Rivera

F/V Good News

Sent from my iPad

Bush, Karla L (DFG)

From: Troy Thomassen
Sent: Wednesday, February 15, 2023 9:59 AM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Spend plan S01A

Commissioner Vincent-Lang

This is Troy Thomassen, I am a SO1A permit holder. I own and operate the F/V Empress ported in Petersburg. I was on the S.E.A.S board from 2006 till 2017.

I would like to say that I support the tiered spend plan for disaster relief funds for the Southeast seine fleet. ADFG did an excellent job drafting plan. Please treat all Alaska net fisherman the same. Distribute SO1A fisherman using the tiered system as originally drafted.

Troy Thomassen
F/V Empress
Petersburg, Ak

Sent from my iPhone