



February 5, 2024

Final Spend Plan for funds appropriated to address the 2020 Prince William Sound (PWS) pink and coho salmon fishery disaster determination. NOAA Fisheries allocated \$15,730,357 for this salmon fishery disaster. 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. The scope of this fishery disaster includes fisheries for pink and coho salmon. A separate spend plan was developed for the 2018 Copper River and 2020 PWS Chinook, sockeye and chum salmon fisheries disaster and forwarded to PSMFC in August 2023.

Process to develop the spend plan: ADF&G posted an initial draft spend plan for public comment in December 2023 and received eighteen written comments. ADF&G revised the spend plan based on those comments and posted a second draft spend plan in January 2024, which received sixteen public comments (Appendix 1).

In response to public comments, ADF&G recommends the following revisions:

Harvester

- The base payment for seine harvesters was increased from \$10,000 to \$20,000 to allocate 75% of funds equally to all eligible permit holders. Allocating a majority of the funds towards base payments recognizes that all permit holders incur similar operational and startup costs and all fishery participants in the disaster year were impacted by low returns. The remaining 25% of the seine harvester funds will be allocated using the tier-based system. This approach is intended to balance public comments that supported equal payments across the fleet or a method to base payments to individual vessel performance.
- ADF&G slightly reduced the proportion of seine funds for crew members from 30% to 25% to recognize and balance differing public comments expressing support for either 20% or 30% for seine crew.

Processors

- Based on public comments, ADF&G removed the minimum loss value of \$10,000 as an eligibility criterion. Removing the minimum requirement for demonstrated exvessel value loss did not affect the number of eligible processors.

ADF&G did not reallocate funding between the harvester and processor sectors further. The previous PWS spend plan for Chinook, sockeye, and chum mitigated harvester losses by bringing the sector up to 38.7% of its historical value and the processor sector to 20% of its historical value. The revision made to this spend plan in the second draft brings the harvesting sector to 47% and the processing sector to 17% of historical value.

Guiding principles for disaster fund distribution: Disbursement of funds is intended to 1) assist fishery participants harmed by the 2020 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.

The impact of the fishery disaster created significant loss of income to those involved in the harvesting and processing sectors and to the communities in which the cultural and basic economic structure is the marine economy. Some of these funds will be allocated to research activities that restore the fishery or prevent a similar failure in the future, but they will also be used to help assist the fishing communities that were affected by this fishery resource disaster by recognizing the loss of incomes. These direct payments will compensate participants consistent with fishery investments and/or historical fishery performance. 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.

Categories and allocations reflect comments received from initial stakeholder input:

Category	Allocation	Estimated funds ^a
Research	10%	\$1,540,000
Communities	3%	\$463,000
Harvesters	60%	\$9,270,000
Processors	27%	\$4,170,000
Program Support	<0.1%	\$10,000
Total	100%	\$15,453,000

^a Additional funds will be allocated to Pacific States Marine Fisheries Commission (PSMFC) to administer the federal grant.

Research – 10% (\$1,540,000): Research funds will be available through an open and competitive bid process administered by PSMFC. Entities that are authorized to receive federal grant funds would be eligible to submit proposals. Funds would be allocated to support projects intended to improve available fishery information and help prevent and/or mitigate future fishery disasters. The scope of this fishery disaster includes PWS pink and coho salmon.

These research themes were suggested as priorities for funding:

- Research projects designed to investigate the potential effect of hatchery pink salmon releases on the size and number of returning salmon.
- Investigate the potential causes of sporadic coho salmon returns.
- Research the impact of salmon release timing.
- Radio-telemetry project to improve upriver timing and distribution forecasting for coho salmon to determine distribution and spawning locations in the Copper River.

Communities – 3% (~\$463,000): Direct payments should be made to municipalities and boroughs based on the port of landing where pink and coho salmon deliveries occurred. Municipalities and boroughs rely on revenue generated from salmon landings and other economic activities related to the salmon fisheries. The state’s Fishery Business tax rate is 3% for shore-based landings and is shared 50/50 with the state and municipalities/boroughs where the landings occur. If landings occur in the bounds of a municipality and borough, they are shared 50/50 between each entity. Some municipalities

and boroughs levy an additional local raw fish tax at a rate of 2% to 3.5% depending on the location and species.

Eligibility criteria for community funds:

1. Pink and/or coho salmon from PWS must have been landed in the community in 2020 based on the port of landing from ADF&G Fish Ticket data.
2. Estimated gross revenue value for those salmon species landed in the community in 2020 must be less than the previous five-year average (2015-2019).

Funds will be distributed pro rata to eligible communities based on each community’s demonstrated loss relative to the total loss of all eligible communities. If landings occurred in a community represented by both a municipality and borough, the funds will be split 50/50 between the municipality and borough, consistent with the methodology for state Fishery Business taxes. Based on the eligibility criteria, the following six communities and two boroughs may be eligible for community-designated funds: Cordova, Valdez, Whittier, Seward & Homer and the Kenai Peninsula Borough, and Kodiak and the Kodiak Island Borough.

Harvesters – 60% (\$9,270,000): This category includes permit holders and vessel crew. The estimated loss in Commercial Entry Fishery Commission (CFEC) exvessel value for the drift gillnet and seine gear sectors due to the 2020 PWS pink and coho salmon disaster is approximately \$20 million dollars. Funds allocated to the harvester sector are intended to mitigate this loss by providing funds to bring the harvester sector up to 47% of recent historical value.

Direct payments should be made to commercial seine and gillnet fishery permit holders and their vessel crew who meet all eligibility criteria. CFEC permit information and fish ticket data from commercial salmon landings will be used to determine eligibility and payment for permit holders. Eligibility for vessel crew will be verified using ADF&G commercial crew license or CFEC permit data and an affidavit from the permit holder or vessel owner.

Harvester funds are allocated to the drift gillnet and seine gear sectors proportional to the estimated loss in gross revenue for the 2020 PWS pink and coho salmon fisheries. The estimated loss in gross revenue for coho salmon is calculated by subtracting the value of the fishery in the disaster year from the 2015 through 2019 average. The estimated loss in gross revenue for pink salmon is calculated by subtracting the value of the fishery in the disaster year from the five even-year average from 2010 through 2018 because pink salmon run on an even or odd year cycle.

Gear Type	5-yr avg. Value	2020 Value	Estimated loss	Percent of total loss	Estimated funds
Seine					
Coho	\$837,103	\$233,496	-\$603,607	3%	\$282,158
Pink	\$41,341,133	\$24,082,472	-\$17,258,661	87%	\$8,067,608
Drift Gillnet					
Coho	\$4,381,448	\$3,257,995	-\$1,123,453	6%	\$525,161
Pink	\$1,731,000	\$885,838	-\$845,162	4%	\$395,073
Total			-\$19,830,883		\$9,270,000

2020 Prince William Sound seine ~\$8.35 million

Allocations to the seine sector are divided into two pools, one for S01E permit holders, 75%, and one for vessel crew members, 25%. Public comments state that most seine operations employ three or more crew members, each earning around a 10% share.

2020 S01E Permit Holders – 75% of seine harvester funds.

Eligibility criteria for 2020 seine permit holders:

1. S01E permit must have been used to make pink or coho salmon landings in 2020.
2. Permit holder must have experienced a loss in 2020 CFEC estimated exvessel value. The estimated loss is calculated by subtracting the exvessel value in the disaster year from the previous five-year average from 2015 through 2019. ADF&G used the annual fleet average to calculate a five-year average for permit holders who were new entrants in 2020.

Funds are 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 in 2020 and certified they were unable to participate to qualify for an emergency transfer and permit holders who permanently transferred a permit away in 2020 will not receive payments.

Each permit holder who meets all eligibility criteria will receive a minimum ‘base’ payment of \$20,000. Base payments are intended to help offset operational and startup costs incurred by all permit holders and the amount is determined by the number of eligible participants and funds allocated to each sector. If multiple eligible permit holders made landings in 2020 on the same limited entry permit, the base payment is split pro rata to the value of each eligible permit holders’ pink and coho salmon landings in 2020. A total of 223 permit holders made landings on 218 S01E permits in 2020. An estimated 219 permit holders are eligible for payment based on the eligibility criteria

After accounting for minimum base payments, the remaining funds are allocated to four tiers as shown in the table below. The tiers are established based on the 2015 to 2019 average estimated CFEC gross revenue value for pink and coho salmon landed by each individual based on their unique CFEC identification number. Individuals who were new entrants in 2020 will receive the annual average gross revenue of all permit holders to determine their tier. Twenty-five percent of the remaining funds are apportioned to each tier and each individual in the same tier will receive an equal payment. This is the same method used for the 2020 PWS Chinook, sockeye and chum salmon final spend plan.

Tier Level	2015-2019 average CFEC gross revenue value of PWS pink and coho	Tier Allocation	Est. number of eligible permit holders
1	≥ \$275,000	25%	34
2	\$228,000 - \$274,999	25%	46
3	\$186,000 - \$227,999	25%	56
4	≤ \$185,999	25%	83

2020 Seine vessel crew – 25% of seine harvester funds.

Seine crew must meet the following criteria to be eligible for an **equal payment** of the 2020 seine vessel crew funds. 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.

PWS 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 or the CFEC permit database.
2. Crew member must provide information to show they participated as fishing crew in the 2020 commercial seine salmon fishery for a qualified S01E permit holder, based on an affidavit from the permit holder or vessel owner.
3. Crew member may not be eligible for fishery disaster funds as an S01E permit holder in 2020.

2020 Prince William Sound drift gillnet ~ \$920,000

The allocation for the drift gillnet sector is divided into two pools, one for S03E permit holders, 95%, and one for vessel crew members, 5%. The split between permit holders and crew members is based on a typical crew size of zero to one person earning a 10% crew share.

2020 S03E Permit Holders – 95% of drift harvester funds.

Eligibility criteria for 2020 drift gillnet permit holders:

1. S03E permit must have been used to make pink or coho salmon landings in 2020.
2. Permit holder must have experienced a loss in 2020 CFEC estimated exvessel value. The estimated loss is calculated by subtracting the exvessel value in the disaster year from the previous five-year average from 2015 through 2019. ADF&G used the annual fleet average to calculate a five-year average for permit holders who were new entrants in 2020.

Funds are 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 in 2020 and certified they were unable to participate to qualify for an emergency transfer and permit holders who permanently transferred a permit away in 2020 will not receive payments.

Each permit holder who meets all eligibility criteria receive a minimum ‘base’ payment of \$1,000. Base payments are intended to help offset operational and startup costs incurred by all permit holders and the amount is determined by the number of eligible participants and funds allocated to each sector. If multiple eligible permit holders made landings in 2020 on the same limited entry permit, the base payment is split pro rata to the value of each eligible permit holders’ pink and coho salmon landings in 2020. A total of 446 permit holders made landings on 443 S03E permits in 2020. An estimated 327 permit holders are eligible for payment based on the eligibility criteria.

After accounting for minimum base payments, the remaining funds are allocated to four tiers as shown in the table below. The tiers are established based on the 2015 to 2019 average estimated CFEC gross revenue value for pink and coho salmon landed by each individual based on their unique CFEC identification number. Individuals who were new entrants in 2020 will receive the annual average gross revenue of all permit holders to determine their tier. Twenty-five percent of the remaining funds are apportioned to each tier and each individual in the same tier will receive an equal payment. This is the same method used for the 2020 PWS Chinook, sockeye and chum salmon final spend plan.

Tier Level	2015-2019 average CFEC gross revenue value of PWS pink and coho	Tier Allocation	Est. number of eligible permit holders
1	≥ \$21,000	25%	35

2	\$15,500 - \$20,999	25%	56
3	\$11,000 - \$15,499	25%	93
4	≤ \$10,999	25%	143

2020 drift gillnet vessel crew – 5% of drift harvester funds

Drift gillnet vessel crew must meet the following criteria to be eligible for an **equal payment** of the 2020 drift gillnet crew funds. 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.

PWS drift gillnet 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 or the CFEC permit database.
2. Crew member must provide information to show they participated as fishing crew in the 2020 commercial drift gillnet salmon fishery for a qualified S03E permit holder, based on an affidavit from the permit holder or vessel owner.
3. Crew member may not be eligible for fishery disaster funds as an S03E permit holder in 2020.

Processors – 27% (~\$4,170,000): The total estimated loss in exvessel value for the 2020 PWS pink and coho salmon disaster is \$25 million dollars. Funds allocated to the processor sector are intended to mitigate this loss by providing funds to bring the processing sector up to 17% of recent historical value. ADF&G suggests direct payments to processing companies that meet all eligibility criteria. Commercial Operators Annual Report (COAR) fisheries buying data will be used to determine eligibility and payment. Processing companies will be identified based on the nine-digit federal tax identification number. Companies with more than one identification number will be consolidated based on company name and address.

Salmon processing companies that meet all criteria would be eligible for payment based on the estimated loss in exvessel value using COAR buying data for 2020 PWS pink and coho salmon. The estimated loss is calculated by subtracting the final exvessel value in the disaster year from the previous five-year average from 2015 through 2019.

Processor eligibility criteria:

1. Processing company must have processed PWS pink or coho salmon in 2020.
2. Processing company must have a demonstrated loss in exvessel value for 2020 PWS pink and coho salmon as compared to the previous five-year average.

Disaster payments to processing companies are **pro rata** to each company’s demonstrated loss relative to the total loss of all eligible processing companies.

Program Support - <0.1% (\$10,000): ADF&G designates funds for staff working on fishery disaster plan development and implementation in coordination with PSMFC.

Appendix 1. Public comments on second draft spend plan.

From: Ben Vandyck
Sent: Tuesday, January 23, 2024 4:36 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Second Draft Spend plan

My name is Ben Van Dyck and I approve the second draft spend plan. I participated in the qualifying years and the second draft spend plan looks fair to everyone.

From: Brian Allen
Sent: Tuesday, January 23, 2024 7:47 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Send plan

Hello my name is Brian Allen and I approve the second draft send plan

From: Ms Sarah
Sent: Tuesday, January 23, 2024 7:37 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Comment on Second Draft Spend Plan 2020 PWS Coho + Pink

Regarding: Proposed processor eligibility criteria item #2 "Processing company must have a demonstrated minimum loss of \$10,000 in exvessel value for 2020 PWS pink and coho salmon."

Comment/Response: Like the permit holder user group, there should be a 'base' payment of \$10,000 for processors. With the base payment intended to help offset operational and startup costs incurred by all licensees in this sector.

There should not be a \$10,000 minimum loss requirement in place, this is exclusionary to smaller businesses that also suffered losses in the disaster year.

Thank u

From: Thomas Lopez
Sent: Sunday, January 21, 2024 11:49 AM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: 2020 Final Spend Plan Comment

Hello,

I am writing in regards to allocation of disaster relief specifically for seine fleet in the PWS.

I am in favor of equal distribution for all boats.

Costs related to younger fisherman are higher, and using a 5 year average gives a fisherman that started within 3-4 years ago a much lower value.

Additionally, when considering the recent market issues and costs of operating this would be incredibly damaging to a significant portion of the fleet. A portion of the fleet of which it has become even harder to survive.

Thank you,
Thomas

From: Dustin Cline
Sent: Tuesday, January 16, 2024 1:19 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: 2020 PWS Final Spend Plan Comment

Hello,
Dustin Cline here,

I am in favor of equal shares distribution for fisherman. This is the best, and fastest way to get the money to fisherman and communities. The longer the disaster funding sits, the less and less value/purchasing power it has.

Thank you
Dustin Cline

From: Kari Gilman
Sent: Wednesday, January 17, 2024 2:15 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: 2020 Prince William Sound Pink and Coho Salmon Fisheries

I have read the second draft spend plan and feel as if it reflects a fair distribution of funds. I approve of this plan as a 2020 crew member and current CFEC S03E permit holder.

Thank you,
Kari Gilman

From: Darin Gilman
Sent: Tuesday, January 16, 2024 2:41 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Second Draft Spend Plan

I approve of the revised second draft spend plan for the 2020 Pink and Coho Disaster.

Darin M Gilman

From: Jonathan Thomassen
Sent: Tuesday, January 16, 2024 3:18 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: 2020 Pink salmon and Coho Disaster relief

To whom it may concern,

I have read through what others have suggested as far as a split between processors and seine crew for the 2020 spending plan. I agree that the processors did incur more costs as a result of Covid 19 but the disaster relief spending does not have anything to do with Covid 19. They were all compensated just as we were through PPP loans and other funds by the government, this is a relief for the lack of Salmon and I support the initial split of 20 percent to processors.

For the split between crew and permit holder, we do indeed take on a great risk when we incur initial cost/wear and tear on our boats, when we fish. I believe a 70/30 split would be fair if you were to count the captain as a crewman and they get paid out of that pool too. If the captain is not being paid as a crewman but only out of the 70 percent split to the permit holder, then I think 80/20 or even 75/25 is more fair.

I stick with my initial assessment of the research allocation. What does an up-river sonar on the Copper River do to benefit us seiners? I propose more research into timing of salmon release or research into what cost recovery does to over escapement of our wild salmon in the sound.

Lastly, I also stick by my initial assessment of the way the money should be split amongst seiners. We should split it based off of numbers of days fished in 2020 (landings) or the total poundage caught in the year 2020. I am a young fisherman, owning and fishing my permit since 2017. I believe prior years or later years should not be judged but the year in-which we actually had the disaster. The people that made less landings in 2020 as a result of the run, shouldn't be rewarded because they made more of an effort in another years!

Thank you,

Jonathan

From: Lukeria
Sent: Saturday, January 20, 2024 4:08 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Loss Markets

The impact of Covid 19 on driftnet fishermen in Cordova was so severe and still continues to be.

Our reds and kings did not come in 2020, 2021, 2023. The returns were down very low. We went almost a month without a fishing period this yr.

Bottom line, we lost pretty much all markets. The price of food , fuel and supplies went up 10 to 40%. The fishermen that were out fishing missed the deadline to apply for other Federal assistance relief money. My appeal is to fund all fishermen that were out fishing that missed the first deadline.

We lost the market recognition for our fish locally and globally. This took years to develop. There should be serious consideration how to compensate for that loss also.

Sincerely

Vasily Efimoff

From: Justin Ryan
Sent: Tuesday, January 16, 2024 3:26 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: 2020 Seine disaster relief

Why did you switch the plan from equal distribution to a base plan with the rest tiered for seiners when not one seine permit holder emailed suggesting that? Every seiner that sent an email supported equal distribution. If the drift gillnet fleet wants a tiered system let them have it, but the seiners that emailed were unanimously in support of an equal distribution plan. Also, if you are going to do it based off a tiered system, then anyone who upgraded boats in 2020 like I did should either use their new catch record or the average. My prior catch record doesn't accurately reflect how the disaster affected me. I have been average or above every year since upgrading so my old catch record would hurt me. I also like the idea of using number of landings as a baseline because then anyone who left for other areas or only made a couple deliveries to get disaster money won't get rewarded for it. Also the gillnet fleet used 75% of the allocated funds for the base pay and then 25% for tiered. If you're going to do base pay then it should be like that.

Thank-You,
Justin Ryan.

January 19, 2024

Attn: Darion Jones
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
dfg.com.fisheriesdisasters@alaska.gov

Re: Second Draft Spend Plan for 2020 PWS pink and coho salmon

Dear Darion Jones:

Thank you for the opportunity to comment on the second spend plan for 2020 Pink and Coho Salmon.

While I am in favor of an equal payment plan for this disaster relief money, I feel that the current spend plan is disparate for many Prince William Sound seiners. I feel that the reallocation to 70% of funds to permit holders and 30% to crew is just, however I feel that the proposed "minimum base payment" is not, and should be higher.

Looking at the final spending plan for 2020 Copper River and Prince William Sound drift gillnetting that was recently approved, the amount of the base payment of \$15,000 represents about 72% of the value given for permit holders. This means that each permit holder will get a relatively equitable share of the money with only about 28% being divided up among the four tiers.

The 2020 proposed base payment of \$10,000 for Prince William sound seining permit holders in the current spend plan represents only about 38% of the value given for permit holders with about 62% to be divided up among the four tiers. This would create a very large discrepancy between a permit holder that was in Tier 1 and one that was in Tier 4. If a tiered system is used, I support a breakdown much closer to the 2020 Drift Gillnetting one above. In order to get similar numbers, I believe the base payment should be somewhere between \$19,000 and \$20,000.

In conclusion, I think that the current spend plan is good, but that the base payment for a PWS seine permit holder should be increased to around \$20,000 in order to equalize the payments some and bring it more in line with what was previously approved for other 2020 Prince William Sound Disasters.

Thank you,

Douglas S. Carroll

PWS Seine Permit Holder

From: Kenneth Jones
Sent: Wednesday, January 17, 2024 9:37 AM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Final spend plan

To whom it may concern,

I am gravely concerned that ADFG has decided to strip fisheries participants of 7% of the disbursement in favor of the processing sector. All because one individual who is salaried and probably got a nice bonus for that year complained. Meanwhile fisherman have struggled to make ends meet, as proven by his argument that guys didn't make their payments. A processor such as his holds all the cards when it comes to repayment, they likely just took the payments from fish caught the following year. It is ill sighted to punish the entire fleet by taking 7% of their disbursement to reward a mismanaged processing company. This change has to be rolled back to the original spend plan.

As an above average producer of course I generally do support the concept of a hybrid approach for tiered payments however I am confused why the switch when the majority of comments was in favor of the equal split initial draft.

I do not agree with using pink salmon disaster funding for a copper river sonar project, there are many other ways these funds could be applied like bolstering ariel surveys or bringing back the otolith sampling in the southwest district. Please consider these changes when drafting the final Spend plan.

I also do not agree with the change for crew pool from 20 to 30%. Many crew will not have the proper record keeping to meet the requirements to apply successfully. I could see a situation where this factor allows successful crew Applicants to receive funding greater than the amount they were actually paid from fishing proceeds in 2020, and greater than the average deckhand wages, which goes against the spirit of the disaster relief program. Also many crew are not paid 10%. 10% is generally for returning experienced competent crew. There are frequently crew positions paid at 5, 6, 7 or 8%. Also some boats only run two deckhands and not three, and some boats run 4. Crewmembers make money as soon as the first fish comes on board, their risk is 2-3 months of time and maybe \$1000 worth of gear and licenses. An average vessel owners risk is a \$200,000 permit, \$30,000 net, \$80,000 skiff, and \$600,000 seine vessel. When a boat has a bad season the crew member grabs their bag and moves on to the next fishery, the vessel owner is still left holding the bag on repairs/maintenance, and covering all the bills from the failed season. Frequently vessel owners won't make a dime of profit until mid August when operating expenses have been covered. With this in consideration I think it is proper to set the crew pool at 20%.

One further change I would lobby for and suggest, is a requirement that all qualified participants to prove up on continued fisheries participation. They must have made landings and not only participated in 2020, but also include participation requirement in 2021, 2022, and 2023. A processor, deckhand, or fisherman should not be included if they have retired, sold out, switched fisheries, or gone a different direction. This program is designed to support seafood producers and bolster our countries food supply chain in time of need, if they are no longer seafood producers then why do they get a slice of the pie? In the 2018 gulf of Alaska jig disaster this requirement was implemented, so there is precedent for a requirement such as this.

Please consider these and thank you, I appreciate the opportunity to comment.

Kenneth B Jones

From: James Burton
Sent: Wednesday, January 17, 2024 10:29 AM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Spend plan comments

Hi Karla and Darion,

First, thank you for confirming the figures I submitted so I have an understanding of what I'm commenting on.

I'm not a big fan of these tiered payments - I liked how we arrived at numbers for payouts in the 2016 disaster. That being said, I'm sure it was a more laborious process. What I didn't like about 2016 was that it left a lot of people out who should have gotten disaster relief. I am really not in favor of equal payments in any fishery disaster - ever; this isn't socialism. Every operation is different and some people work harder and invest more into their operations to be competitive. That needs to be recognized, so while not perfect, the tiers at least try to acknowledge that. If we can't have individual calculations, then tiered payments are a compromise that we could probably all live with.

Next, I would like to see the Harvester / Processor percentages reverted to 67 and 20 percent respectively, as they were in the initial draft spend plan. I wouldn't take one letter from a processor and remove 1.2 million dollars from the harvester pool. That money should revert back to the men and women who are producing the fish, both crew and permit holders. It is used for indebtedness payments, it gets spent in communities, and will help local economies. In other words, put the money back in the hands of a thousand people instead of a dozen companies.

Thank you

James

From: Norm Campbell
Sent: Thursday, January 18, 2024 3:36 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject:

I am against reducing the harvester allocation. Thank you Norman Campbell SO3E fisherman

From: Alexander Lopez
Sent: Sunday, January 21, 2024 3:48 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Disaster Relief Fund Second Draft Spend Plan: Comment Submission

To Whom It May Concern,

Equal shares for all is the most simple, fair, and inflation-cognizant distribution plan.

Uneven shares favor older fisherman:

The most highly correlated factor to high 5 year average production is an arbitrary factor — age.

I'll illustrate with a personal anecdote— Within the span of the 5 prior years to 2020, I upgraded my boat 2 times and fished for 4 different processors. That early time in my career was tumultuous and included losing a market mid season, being on small limits compared to the rest of the fleet, a processor going bankrupt, and upgrading boats twice. The point of this is that despite putting a great amount of resources into my fishing operation by 2020, I am still being harmed financially by the tumult of early career issues and poor market dynamics.

The fisherman that benefit the most from the 5 year average are established, older fisherman. They didn't do anything more right than the young fisherman, they've just been able to establish their current performance for a longer number of years. The younger fisherman are just getting to their peak but have not been there for as long. No one would say a young fisherman that caught 1 million lbs is worse than an older fisherman that caught 1 million lbs... But by the 5 year average calculation, if that young fisherman was working his way up the ranks for the past 5 years, he would be distributed far less. This is unfair.

The older fisherman not only entered the fishery at a more affordable price point for both permits and boats, they also had time to establish themselves. That time was used to pay off loans, solidify their market relationships and establish their production. These all items that younger fisherman have not been afforded. The bottom line is that an uneven distribution favors the most established fisherman who benefited from the lottery of being born at an earlier date. Winning a genetic lottery does not mean they're more deserving of disaster relief. In fact, young fisherman are more in need of that relief than anyone.

The greying of the fleet is a widely acknowledged problem throughout Alaskan fisheries. If we once again harm young fisherman by funneling resources towards older fisherman with less need, we will continue to exacerbate this problem.

Inflation & Delay:

Since 2020 we have lost 17% of our purchasing power to inflation.

The faster the execution of any plan, the less purchasing power we cede to time. In an era of historical inflation, we MUST focus on what gets money in the hands of fisherman fastest. 1) Further deliberation time + 2) A complicated distribution plan = further delays to any payout.

Given the dire current state of the fishing industry, these disaster funds can truly be a lifeline. We should prioritize helping all fisherman stay afloat rather than trying to be targeted. The reality is that increases to some fisherman mean decreases to other fisherman, and in the meantime all of our money is worth less and less. I argue that much of the gains to the beneficiary fisherman are actually mitigated by the losses to inflation by time delay. We are 4 years out from the disaster season — it's time to simplify the process and pay equal shares to get money in the hands of fisherman the fastest way possible.

I urge the ADF&G to do the most simple, fair, equitable, and inflation-cognizant approach — equal shares for all seiners.

Best,
Alex Lopez

From: Morgan Williams
Sent: Monday, January 22, 2024 11:15 AM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Relief Funds

Hello, I would like to make a comment on the relief funds advocating for an equal distribution. A few main reasons for this.

1. This will get the funds out faster and into the pockets of fisherman that are dealing with very low prices and record high inflation!

2. 5 year averages only benefit older fishermen who have had a lot more time to establish themselves and usually out perform younger fishermen who are trying to keep their vessels running and paying off larger loans. Most of the older generations have everything paid off, including possessions in their everyday life (house and vehicles).

3. Lastly, 5 year averages will severely hurt young fishermen that have recently got into the industry. They have many years of sacrifice and hard work in order to save enough for a loan to purchase an operation. I believe they deserve an equal share.

Thank you for the opportunity to add my input!

Morgan Williams