



March 20, 2024

Initial Draft Spend Plan for funds appropriated to address the 2022 Yukon River salmon disaster determination. NOAA Fisheries has allocated \$1,594,841 million 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.

Written comments are requested on all elements of the proposed spend plan and should be as specific as possible. Comments will be posted as received online and therefore, ADF&G requests that no business proprietary information, copyrighted information, or personally identifiable information be included in written comments. Comments can be submitted by email to:

dfg.com.fisheriesdisasters@alaska.gov or by mail to: ADF&G, Attn: Darion Jones
PO Box 115526
Juneau, AK 99811-5526

Comments must be sent by April 3, 2024, for consideration in the next iteration of the spend plan. A second draft of the spend plan will be available for public comment before the spend plan is finalized.

Guiding principles for disaster fund distribution: Disbursement of funds is intended to 1) assist fishery participants harmed by the 2022 Yukon River salmon fishery disaster 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 proposed categories and allocations for this draft spend plan were informed by the 2020 and 2021 Yukon River salmon elements of the 2020 and 2021 “Statewide” salmon spend plan and initial public comments (Appendix 1).

Public comment recommended including the sport fishing sector as a separate category for funding in this spend plan. ADF&G is proposing to include sport fishing businesses in the spend plan and is seeking suggestions for how to calculate loss, allocation percentage, and eligibility criteria.

Category	Allocation	Estimated funds ^a
Research	10%	\$151,500
Communities	3%	\$45,500
Commercial and subsistence participants	87%	\$1,316,599
Program Support	0.1%	\$1,500
Total		\$1,515,099

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

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. A portion of these funds will be allocated to research activities that promote

restoration of the fishery or prevent a similar failure in the future, but they will also be used to help assist fishing communities that were affected by this fishery resource disaster by recognizing the loss of incomes. 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 fishery participants as fast as possible. Direct payments provide that method.

Research – 10%: 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 includes Yukon River Chinook, chum, and coho salmon. The following research themes were suggested in public comment:

1. Feasibility studies for hatchery or other rehabilitation efforts.
2. Develop stock-specific distribution models to aid in Western Alaska chum avoidance and run reconstruction derived abundance estimates for chum salmon.
3. Exploring spatial and temporal changes in documented Yukon River salmon spawning tributaries.
4. Advance the understanding of environmental impacts from anthropogenic activities on the Yukon River.
5. Creating and hosting Culture Camps attended by youth and elders to incorporate salmon distributions, fish processing, sharing traditional knowledge and traditional practices, etc.
6. Focused research efforts on Yukon River juvenile salmon life histories, out-migrations, and survival.
7. Enforcement, public outreach, or signage to protect salmon spawning grounds from anthropogenic activities.

Recent Alaska disaster spend plans have used competitive and non-competitive bid processes to award research funds. ADF&G is requesting input on the appropriate award process for this fishery disaster spend plan.

ADF&G did not include all research suggestions from public comments, such as managing interceptions of Yukon salmon in other fisheries, because the proposed funding allocation for research is limited compared to previous disasters and some suggested research themes were not directly related to the marine heatwaves in the Bering Sea that caused the fishery disaster. Therefore ADF&G proposes to allocate limited research funds to projects that improve fishery information used to assess and forecast future fishery performance and can mitigate the impacts of future fishery disasters that cannot be prevented.

Communities – 3%: ADF&G proposes to allocate a portion of the disaster funds to municipalities and boroughs that 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 where the landings occur. These local government entities were negatively impacted by the fishery disaster because fishery revenues comprise a significant portion of local operating budgets and are used to support education, public works, and other services.

ADF&G proposes direct payments to affected municipalities and boroughs with a demonstrated loss of salmon landings due to the fishery disaster. ADF&G proposes a 3% allocation to affected communities to help mitigate losses in fish tax and other economic losses due to the fishery disaster.

Proposed eligibility criterion for communities:

- Yukon River salmon must have been landed in the community in 2020 based on the port of landing from ADF&G fish ticket data.

Based on this criterion the only eligible community is Emmonak, which had a demonstrated loss of salmon landings due to the fishery disaster.

Commercial and subsistence participants - 87%: ADF&G is proposing to allocate commercial and subsistence harvester funds proportional to the estimated loss in each of the following fisheries:

Fishery	Estimated loss due to fishery disaster	Proportion of total loss	Proposed allocation
2022 Yukon River commercial	-\$3,948,798	13.3%	\$174,775
2022 Yukon River subsistence	-\$25,849,239	86.7%	\$1,141,824
Total	-\$29,746,653		\$1,316,599

Subsistence Fisheries

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

2022 Yukon River: \$1,141,824

Eligibility criteria for subsistence households are based on criteria that were developed for Section 12005 CARES Act Fisheries Assistance. One household member will submit an application for the household. Eligible applicants will be placed into tiers based on household size in 2022. Smaller households with 1-3 members will be eligible for one share and households with 4-6 members will be eligible for two shares. Based on public comment, ADF&G proposes two additional tiers for larger households. Households with 7-9 members would be eligible for three shares and households with ten or more members would be eligible for four shares.

Household size	Number of Shares
1-3	1
4-6	2
7-9	3
10+	4

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.

Subsistence household eligibility requirements:

1. All eligible household members **MUST** be Alaskan residents meeting at least one of the following criteria:
 - a) Eligible to receive an Alaska Permanent Fund Dividend for calendar year 2022.
 - b) Possessed or eligible to receive a 2022 Alaska resident sport fishing license from the Department of Fish and Game.
 - c) Registered as a resident during 2022 with the Commercial Fisheries Entry Commission (CFEC).

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.
 - A household is defined as a person or persons having the same permanent residence.
 - All Alaskan households participating in subsistence fisheries may apply regardless of physical household address.
 - Only one application may be submitted per household.
5. MUST self-certify that one or more members of the household participated in the Yukon River salmon subsistence fishery in at least two of the previous four years when the fishery was open (2017-2020).
 - Participation includes harvesting, sharing, and/or using salmon subsistence fishery resources. Subsistence harvest does NOT require the use of a sport fishing license.
 - 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 2022 that was directly or indirectly related to the fishery disaster.

Commercial Fisheries

2022 Yukon River commercial: \$174,775

2022 Yukon River Commercial	Allocation	Estimated funds
Harvesters	90%	\$157,298
Processors	10%	\$17,477
Total		\$174,775

Yukon River Permit holders – 90%

Proposed eligibility criteria for Yukon River permit holders:

- Permit holder must have had a valid S04Y or S04P permit in 2022. A permit is considered valid if fees were paid to renew the permit in 2022.

Funds are proposed to be paid to the person listed as the 2022 ‘Permit holder’ and temporary emergency transfer permit holders (transferees) in the CFEC database. Permit holders who certified they were unable to participate in 2022 in order to qualify for an emergency transfer and permit holders who permanently transferred a permit away before the 2022 salmon season will not receive payments. ADF&G proposes that each permit holder receive equal payment. An estimated 332 permit holders would be eligible for equal payment.

Yukon River Processors – 10%: Yukon River salmon processing companies that meet the eligibility criterion are eligible for payment based on the average wholesale value of Yukon River

salmon processed by the company from 2017-2019 using Commercial Operator's Annual Report (COAR) data.

Proposed processor eligibility criterion:

- Processing company must have processed Yukon River salmon in 2019 or 2020.

ADF&G proposes disaster payments to processing companies be **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 salmon.

Program Support – 0.1%: ADF&G is proposing to designate funds for staff working on fishery disaster plan implementation in coordination with Pacific States Marine Fisheries Commission.

Appendix 1. Initial public comments and virtual listening session notes.

2022 Yukon River Salmon Fishery Disaster Spend Plan Virtual Listening Session

When: March 11th 12:30 – 1:30 PM Alaska Daylight Time

Anvik River Lodge:

- Would like to see the sportfishing industry included in the spend plan.
- Noted that having these processes occur in the summertime is difficult because most people are working and fishing.
- Suggested research funds go towards hatchery or other rehabilitation efforts and feasibility studies.

Tiffany Agayar Andrew:

- Tiffany estimated that more groups would apply if internet access or reaching the tribal office in time wasn't so difficult. Advertisements in May would be best for outreach, many individuals have Starlink, and it is unsafe to travel on the river in early May. The end of October and November would also be good for later applications.
- Suggested research or efforts into protecting salmon spawning grounds so the eggs are not interrupted by riding through the streams and rivers. Either enforcement, public outreach, or signage to protect the spawning grounds and eggs.
- Suggested using the previous outline for commercial participants and only requiring permit renewal, not landings.



Thank you for the opportunity to provide suggestions to the spend plan for the 2022 Yukon River Salmon fishery disaster funds.

We have a couple of suggestions that we'd like to have considered. First and foremost, the Sportfishing sector must be included in the spend plan. Secondly, under the research allocation – funds need to be made available for a feasibility study to rehabilitate our wild salmon fishery with possibly a streamside hatchery program or something similar.

Sportfishing Sector Inclusion –

In 1996, we took over ownership and management of Alaska's Anvik River Lodge. Since then it has been our livelihood. We've raised our children here. Spending almost three decades on the Anvik River has given us the unique perspective on the decline of the Chum, Chinook, and Coho populations. Year after year, our team and guests have stood witness to the withering returns of these critical species. In the early days, the salmon were so thick our son would be able to literally reach in the river and grab them as a child. In the 1970s, the state of Alaska designated the Anvik River as having one of the most prolific runs of Chum in the state, as well as being the largest chum spawning river in Alaska. We've had recorded Chum salmon runs reaching levels of 1.3M fish. As of 2023 our runs have plummeted to 60,000 with runs reaching as low as 19,000 in 2021. The decline is such that we cannot target Chum salmon, nor Chinook and often times Cohos.

In the past few years, our bookings have declined substantially, and we all fear that this trend will continue which will devastate our small rural business to the point of closure. This drop in bookings is directly related to the inability of our guests to be able to fly or spin fish for salmon. We are receiving direct feedback from past guests/potential guests, that they are passing on our experience due to the restrictions put in place by the State of Alaska. Any trip to remote Alaska is expensive, and guests not being able to experience the thrill of catching even one of these magnificent fish let alone take a couple home with them has pushed many would be tourists away from Western Alaska.

When you consider that the price per pound these individuals pay for a salmon, once you've taken all their costs into account, it makes a strong case that the low impact, conservation minded, sustainable sport fisheries should be considered in this spend plan. The majority if not all of the dollars spent by these guests stay within the state of Alaska and help our local and state economy. We have felt it in our business and others have too. Sport fishers spend A LOT of money right here in Alaska to be able to experience what we have been able to offer except in recent years. And please know that we have always been extremely conservative with the number of fish we have allowed our guests to keep, a fraction of what the state regulations allowed. This is not a meat hunting destination, but it is (or was) a sportfishing paradise where guests were able to enjoy and participate in one of Alaska's finest and unique outdoor recreational activities.

The sportfishing industry contributes a vast amount of income to state and local economies and cannot be ignored. As soon as our guests land at Ted Stevens International Airport; they are contributing to the local economy by spending money on -

- rental cars, hotels, AirBnB's
- restaurants,
- and other fishing or sightseeing experiences and tours.
- charter flights
- purchasing gas
- shopping at local stores and souvenir outlets

With that being said, our small business and surely other sportfishing entities and guides support the tribal, local and state economies by spending our income on -

- charter flight services (there are no commercial flights directly to Anvik)
- purchasing gas, fuel, & propane,
- freight services,
- grocery stores, food outlets,
- insurance providers,
- local crafts persons
- hiring Alaskans as most of our staff
- Donations of all kinds to the area villages

After spending hundreds of thousands in advertising alone to tout the phenomenal salmon fishing opportunities over the years we are now forced to start from scratch again with a whole new game plan. With this drop, we have doubled down on efforts to pivot our business by marketing and providing other wilderness and outdoor activities in hopes of being able to attract more guests. Even with our investment into these new areas, at the end of the day, we are a **SPORTFISHING** lodge on a tributary to the **YUKON RIVER**. Both words are synonymous with **SALMON**. Salmon that are no longer available in the numbers that have sustained our business for almost 30 years.

Research Funds Suggestion -

As a Sportfishing lodge on the Anvik River, operating for 29 years; we have undoubtedly been affected by the Yukon River salmon fishery disaster. While we do not fully understand the driving forces behind the disaster, we know that this is a multifaceted emergency.

That is why we advocate that additional resources be put towards research and study at the spawning ground level. We suggest researching the feasibility of a streamside hatchery or something comparable to revive the unique genetics held within the Anvik River itself. As research has revealed, Chum salmon are from a very old genetic line and these particular genetic strains developed in the particular river system under the conditions it uniquely provides.

We are also aware that for many years ADF&G collected scale samples during their Chinook carcass projects. We would also like to see the feasibility of a program that would use both the information gathered in the rivers and the events taking place in our oceans to verify how many of the salmon destined for the Yukon and Anvik Rivers are being bycaught in the Bering Sea. Although it would be labor intensive, a database sharing the unique scale profiles collected at the tributaries could be cross referenced with the scales coming off the bycaught salmon on the ships to also study how many of the Yukon and Anvik River's fish are being intercepted.

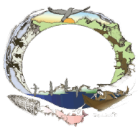
Alaska's Anvik River Lodge is uniquely positioned as a case study due to its former designation as the most prolific Chum salmon fishery in the state. The current level of returns to the spawning ground are many orders of magnitude less than what has been seen in the past. With ADFG operating a sonar station just south of our location, data on these returns date back to 1972.

In closing, we have a strong commitment to the Anvik River salmon runs and through that, the Yukon River Salmon runs. For almost 30 years we have made the Anvik River our home and livelihood from the bountiful returns that we have seen diminish to a shadow of themselves. With the decline, we stand ready to work with the state in a meaningful way. Whatever avenue that is to be pursued, Anvik River lodge can assist as a, "boots on the ground," level.

Thank you for your time and consideration of the inclusion of the Sportfishing industry due to this disaster.

Most Sincerely,

*Cliff, Cheryl, Blair & Alyson Hickson
Alaska's Anvik River Lodge
PO Box 109
Anvik, AK 99558*



March 13, 2024

Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811-5525

Re: 2022 Yukon River Salmon Fishery Disaster Spend Plan

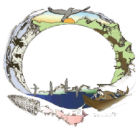
To whom it may be concerned,

Tanana Chiefs Conference (TCC) appreciates to provide comments on the 2022 Yukon River Salmon Fishery Disaster plan. TCC is a non-profit intertribal consortium of 42 communities, including 37 federally recognized Indian Tribes, located across Alaska's interior. TCC serves approximately 18,000 Alaska Natives in Fairbanks, where our headquarters is located, and in the rural villages located along the 1,400 miles of the Yukon River and its tributaries, and the upper Kuskokwim River drainage, in Alaska's interior.

TCC Tribes and our members have not been able to fish for three years on the Yukon River. This is not a new problem as concerns with the health of the salmon population goes back over 10 years. Our health and the health of the salmon are linked, and when the salmon suffer, our people suffer. It is estimated that salmon comprised 53 percent of our tribal community member's diets in the TCC region. When there is no salmon, our people face food insecurity. Additionally, between 2019 to 2023, there was a 70% increase in pre-diabetic patients. The lack of salmon is already affecting our health and will continue to harm the health of our tribal members.

Disaster funds may be used to assess the economic and social effects of the fishery failure and for activities that restore the fishery or prevent a similar failure in the future. The closure of subsistence fishing on the Yukon river from 2021-2023 has had both economic and social effects on the ability for Alaska Natives to meet their subsistence needs; a priority set by the State of Alaska in Alaska Statute 16.05.258. For economic effects, when TCC region subsistence users are unable to harvest, they face extremely high prices at the grocery store. TCC spent \$573,174 to send over 90,000 pounds of salmon to our communities to support food security and to continue teaching our children how to process fish.

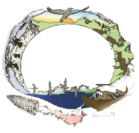
The 2022 Yukon River salmon disaster has also a major social effect on subsistence users. The indigenous people of the TCC region have been living in a relationship with salmon since time immemorial. Our people are salmon people, and have a deep cultural and spiritual connection with salmon that is fundamental to our way of life. Harvesting salmon is ceremonial. What is eaten and what is left untouched are life lessons retold from the elders to the youth through storytelling. Each family member at camp is responsible for a job and fish camp activities result in a shared sense of community and responsibility. Fish camp is hard work and builds life skills and serves to pass essential customs and traditions to the next generation. Traditional hunting,



fishing, and gathering embodies who our Tribes are as people, and is a foundation to our way of life.

Due to the major economic and social effects of the salmon disaster on our people and the potential to undermine our culture and way of life in gathering this important resource, the 2022 Yukon River salmon disaster spend plan should include the following:

1. Direct payments should be made to subsistence households without reducing the value of the numbers of fish historically taken to 75% as in previous spend plans. Fish heads are a delicacy among our people and we fully utilize each fish harvested.
2. There is no price we can put on the loss of salmon. Regardless, the allocation plan provided for subsistence households should fairly weigh the social loss of culture, ceremony and way of life our tribal members face. They not only face this during the summer, they face it at each celebration and honoring of guests when salmon cannot be shared throughout the year.
3. There should be an additional tier added to households. Due to housing shortages in our communities, many homes are multigenerational. We expect many households larger than 4. Looking at our BIA HIP applications, we have a number of large households that go up to 10. Two shares will not be large enough to accommodate for such a large household. We recommend the following:
 - a. 1-3 – 1 share
 - b. 4-6 - 2 share
 - c. 6-9 – 3 share
 - d. 10+ - 4 share
4. We urge the following research funding priorities:
 - a. To develop the three river tier index that can be used to address salmon intercept and bycatch in Area M and the North Pacific Fisheries Management Council.
 - b. Prioritize researching scientific alternatives to reduce chum and chinook intercept with the ultimate goal of zero salmon intercept in the Area M management area.
 - c. Develop stock-specific distribution models to aid in Western Alaska chum avoidance and run reconstructions derived abundance estimates for chum salmon.
 - d. Work collaboratively with Tribal governments to use traditional and indigenous knowledge to implement intercept measures.
 - e. Advance the State of Alaska's Catalog of Waters Important for the Spawning.
 - f. Rearing or Migration of Anadromous Fishes with a focus on Yukon River salmon using Traditional and Local Knowledge.
 - g. Exploring spatial and temporal changes in documented Yukon River salmon spawning tributaries.
 - h. Advance the understanding of environmental impacts from anthropogenic activities on Yukon River salmon.
 - i. Creating and hosting Culture Camps, youth and elders, incorporate TCC salmon distributions and have youth/elders process the bycaught fish, sharing traditional knowledge traditional practices, etc.
 - j. Focus research efforts on Yukon River juvenile salmon life histories, out-migrations, and survival.



In closing, TCC wants to share with you that our Tribes are willing to give up fishing if it means that our grandkids can fish. We understand that sacrifices are necessary even though we cannot teach our children the traditional ways of catching and putting away fish. Our tribal members can no longer provide for their families and process, preserve and store food they hunted and gathered themselves. Our families must now depend upon purchased foods with low nutritional value compared to our healthy wild foods. Though Tribes appreciate disaster funds to address the loss of salmon, Tribes urges the State of Alaska to take immediate action of prioritizing escapement and subsistence in compliance with the Alaska constitution, state statutes, and regulations. The state must restore precautionary and sustainable management where commercial fisheries share the burden of the sustainability of salmon to future generations. Thank you for the opportunity to provide comments.

Mahsi Choo,
Tanana Chiefs Conference

A handwritten signature in blue ink, appearing to read "BR".

Brian Ridley, Chief/Chairman
