



September 6, 2023

Updated May 10, 2024 –

**Research and program support allocations updated based on administrative fee assessment.**

**Final Spend Plan for funds appropriated to address the 2018 Upper Cook Inlet (UCI) East Side Set Gillnet (ESSN) and 2020 UCI salmon disaster determination.** NOAA Fisheries allocated \$9,404,672 for these salmon fishery disasters on May 6, 2022. The scope of this fishery disaster includes all salmon species, although most of the revenue loss was related to sockeye salmon. The final 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 June 2023 and received 7 written comments. ADF&G revised the spend plan based on those comments and posted a second draft spend plan for public comment in August 2023. Twenty-five additional comments were received (Appendix 1). In response to public comments received on the second draft spend plan, ADF&G is recommending the following revisions:

Research

- ADF&G is maintaining the 10% allocation to research and supports an open and competitive bid process for research funds. Research projects responsive to this fishery disaster include those focused on Chinook salmon conservation and management of sockeye salmon.

Communities

- Direct payments to communities are allowable under the new Fishery Resource Disasters Improvement Act. Therefore, ADF&G is recommending that community funds be disbursed as direct payments to municipalities and boroughs meeting all eligibility criteria. Communities rely on revenues derived from resource levies and incur economic losses as a direct result of the fishery disaster.

Harvesters

- Most comments on the second draft of the proposed spend plan did not support allocating more funds to permit holders who registered to fish in the Kenai section in 2018. ADF&G appreciates public comment on this issue and agrees that the proposed approach to base payments for the 2018 ESSN fishery disaster on different fishing opportunities in both fishing sections does not fully reflect the impacts and losses from the disaster for each permit holder. The estimated gross revenue loss in the Kasilof and Kenai sections are comparable at \$3.43 million and \$3.63 million, respectively. Additionally, permit holders may register for either section or both sections. For these reasons and to simplify the distribution process, ADF&G recommends an equal distribution of all 2018 ESSN funds.

- ADF&G did not accept the suggestion from public comment to remove the 2018 disaster year from the 5-year average calculation to determine fishery losses for the ESSN fishery in 2020. Both the set gillnet and drift gillnet fisheries experienced substantial revenue losses in 2018.
- ADF&G did not include payment of a shore fishery lease as a criterion to meet eligibility requirements. A shore fishery lease is not required for set net fishing and on its own does not exclude others from set net fishing in a leased site. Additionally, a shore fishery lease in the ESSN area does not preclude a permit holder from registering to fish in the Northern District or the Greater Cook Inlet areas, which were not included in the 2018 ESSN fishery disaster.
- ADF&G did not include an exception for ESSN permit holders who qualified for an emergency transfer because they were actively deployed in the military. The eligibility criteria developed in this spend plan requires CFEC permit registration and purchase of a buoy sticker, so permit holders who did not register their CFEC permit and purchase a buoy sticker for the Upper Subdistrict are not eligible in this spend plan.
- ADF&G updated the total number of eligible permits for the 2018 ESSN fishery from 439 to 435 based on further examination of the 2018 ESSN permit registration and buoy sticker purchase data which revealed that replacement stickers were previously included in the total count.

#### Processors

- ADF&G is maintaining the 25% allocation to processing companies. ADF&G did not find data to support assertions that eligible processing companies operating in 2018 and 2020 were able to mitigate their revenue losses due to reduced ESSN landings with additional drift gillnet landings. All eligible processing companies experienced revenue losses due to reductions in landings from both gear sectors in each disaster year. Several commenters noted that UCI salmon processing companies were less impacted by the disaster than harvesters due to participation in and revenue from other fisheries. While ADF&G does not have data available to determine these impacts, the spend plan recognizes that harvesters may have fewer options than processors to mitigate losses from a fishery disaster and provides funds to bring the harvesting sector up to 29% of its recent historical value and funds to bring the processing sector up to 8.6% of its recent historical value.

**Guiding principles for disaster fund distribution:** Disbursement of funds is intended to 1) assist fishery participants harmed by the 2018 and 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.

**Project category allocations:** The categories and allocations reflect comments received from stakeholder input.

Category	Allocation	Estimated funds <sup>a</sup>
Research	~10%	\$881,568
Communities	3%	\$281,000
Harvesters	62%	\$5,819,000
Processors	25%	\$2,346,000
Program support	<0.2%	\$16,997
<b>Total</b>		<b>\$9,344,565</b>

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<sup>a</sup> Additional funds will be allocated to Pacific States Marine Fisheries Commission (PSMFC) to administer the federal grant

**Research – ~10% (\$881,568):** Research funds will be available through an open and competitive bid process administered by PSMFC. Entities that are authorized to receive federal grant funds are eligible to submit proposals for research projects based on the themes outlined below. Allowable expenses for selected research projects are qualified for reimbursement by PSMFC up to the amount awarded through the competitive bid process. This fishery disaster includes research related to Chinook salmon conservation and management of sockeye salmon.

Projects that are responsive to the following research themes are prioritized for funding:

- Research that improves understanding of the relative importance of specific mechanisms that drive productivity of Kenai late-run Chinook salmon, which could include:
  - how ocean/climate conditions impact future runs;
  - freshwater and early marine survival bottlenecks, habitat use, and movement patterns; and
  - the role of diet, health, and disease on the survival and spawning success of Kenai late-run Chinook salmon.
- Research to inform non-adult abundance estimates of Kenai Chinook salmon that can be used in developing or improving forecasting tools.
- Improved methods for estimating adult salmon harvest and abundance including genetic analysis for stock composition and further assessment and review of the Kenai late-run Chinook salmon estimates for all age classes.
- Management Strategy Evaluation (MSE) analyses examining risks and tradeoffs of different management approaches for Upper Cook Inlet District mixed-stock fisheries to refine stock-specific management and understand impacts of various management actions.

**Communities – 3% (~\$281,000):** ADF&G is recommending direct payments to municipalities and boroughs rely on revenue generated from UCI salmon landings and other economic activities related to the salmon fisheries. 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, ports and harbors, and other services. 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, landing tax revenues are shared 50/50 between each entity.

Eligibility criteria for communities:

1. Fish ticket port of landing data must show that salmon from the 2018 ESSN fishery and/or salmon from the 2020 UCI salmon fisheries were landed in the community.
2. Estimated loss in gross revenue value for salmon landed in the community from the 2018 ESSN fishery and 2020 UCI fisheries combined must be at least \$400,000. The estimated loss in gross revenue is calculated by subtracting the value of the fishery in the disaster year from the previous five-year average, 2013-2017 and 2015-2019.

Disaster funds will be distributed pro rata to eligible communities based on each community’s proportion of 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. Landings of 2018 ESSN and/or 2020

UCI salmon occurred in two communities represented by two municipalities and one borough: 1) City of Homer and 2) City of Kenai and the Kenai Peninsula Borough.

**Harvesters – 62% (~\$5,819,000):** This category includes permit holders and crew. The total estimated loss in gross revenue for the 2018 ESSN and 2020 UCI fishery disaster is \$20.2 million dollars. Funds allocated to the harvesting sector are intended to mitigate this loss by providing funds to bring the harvesting sector up to 29% of the sector’s recent historical value.

Direct payments will be made to commercial fishery permit holders and crew who meet all eligibility criteria. Commercial Fisheries Entry Commission (CFEC) permit information, fish ticket data from commercial salmon landings, buoy sticker registration, and CFEC gross earnings data will be used to determine eligibility and payment for permit holders. Permit holders can apply for each fishery in which they meet eligibility criteria but cannot apply as both a permit holder and crew member in the same fishery. Eligibility for crew will be verified using ADF&G commercial crew license or CFEC permit data and an affidavit from the permit holder or vessel owner. An affidavit form will be provided by PSMFC in the application information.

Harvester funds are allocated proportional to the estimated loss in gross revenue for the 2018 ESSN, 2020 UCI set gillnet, and 2020 UCI drift gillnet fisheries because the fishery disaster funding allocation provided by NOAA Fisheries was informed by similar calculations. The estimated loss in gross revenue for the 2018 and 2020 fisheries is calculated by subtracting the value of each fishery in the disaster year from the respective previous five-year average, 2013-2017 and 2015-2019.

Fishery	Preceding 5-year average gross revenue value	Disaster year gross revenue value	Gross revenue loss <sup>a</sup>	Percent loss <sup>b</sup>	Estimated funds <sup>c</sup>
2018 East Side Setnet	\$10,202,227	\$3,116,154	-\$7,086,073	35%	\$2,040,632
2020 UCI Setnet	\$9,379,051	\$3,059,586	-\$6,319,465	31%	\$1,819,866
2020 UCI Driftnet	\$9,692,260	\$2,891,387	-\$6,800,873	34%	\$1,958,501
<b>Total</b>	<b>\$29,273,538</b>	<b>\$9,067,127</b>	<b>\$20,206,411</b>	<b>100%</b>	<b>\$5,819,000</b>

<sup>a</sup> Gross revenue loss is the value in the disaster year subtracted from the five-year average

<sup>b</sup> Percent loss is the gross revenue loss for each fishery and year divided by the total gross revenue loss of \$20,206,410.6

<sup>c</sup> Estimated funds are based on the percent loss multiplied by the \$5.8 million in disaster funds allocation to harvesters.

### 2018 East Side Set gillnet ~\$2,040,632

The East Side set gillnet allocation is divided into two pools, one for S04H permit holders (90%) and one for crew members (10%). 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.

#### 2018 ESSN Permit Holders – 90% of the ESSN funds.

Eligibility criterion for ESSN permit holders:

- Individual must have registered a valid S04H CFEC permit and purchased a buoy sticker for the Upper Subdistrict as demonstrated by ADF&G Division of Commercial Fisheries records.

Funds are to be paid to the person listed as the 2018 ‘Permit holder’ and temporary emergency transfer permit holders (transferees) in the CFEC database. Permit holders who certified they were unable to

participate to qualify for an emergency transfer and permit holders who permanently transferred a permit away before registering and purchasing a buoy sticker in 2018 will not receive payments.

**Each permit holder who meets the eligibility criterion receives an equal payment for each eligible permit for which they purchased an Upper Subdistrict buoy sticker.** A total of 435 permits were registered to fish with an Upper Subdistrict buoy sticker in 2018.

2018 ESSN crew – 10% of ESSN funds. East Side set gillnet crew must meet the following criteria to be eligible for an **equal payment** of the 2018 ESSN crew funds.

ESSN crew eligibility criteria:

1. Crew member must have held a 2018 commercial crew license or a 2018 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 2018 ESSN salmon fishery for a qualified S04H permit holder, based on an affidavit from the permit holder.
3. Anyone qualified for disaster funds as a 2018 ESSN permit holder or transferee cannot qualify as crew in the same fishery.

## 2020 UCI Setnet ~\$1,819,866

The allocation is divided into two pools, one for S04H permit holders (90%) and one for crew members (10%). 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.

2020 UCI Set gillnet Permit Holders – 90% of the UCI set gillnet funds.

Eligibility criterion for UCI set gillnet permit holders:

- Individual must have registered a valid S04H CFEC permit and purchased a buoy sticker for the Upper Subdistrict as demonstrated by ADF&G Division of Commercial Fisheries records.

Funds are 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 to qualify for an emergency transfer and permit holders who permanently transferred a permit away before registering and purchasing a buoy sticker in 2020 will not receive payments.

**Each permit holder who meets the eligibility criterion receives an equal payment for each eligible permit for which they purchased an Upper Subdistrict buoy sticker.** A total of 408 permits were registered to fish with an Upper Subdistrict buoy sticker in 2020.

2020 UCI set gillnet crew – 10% of UCI set gillnet funds. Upper Cook Inlet set gillnet crew must meet the following criteria to be eligible for an **equal payment** of the 2020 UCI set gillnet crew funds.

UCI set 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 and the CFEC permit database.

2. Crew member must provide information to show they participated as fishing crew in the 2020 UCI set gillnet salmon fishery for a qualified S04H permit holder, based on an affidavit from the permit holder.
3. Anyone qualified for disaster funds as a 2020 UCI set gillnet permit holder or transferee cannot qualify as crew in the same fishery.

### 2020 UCI Drift gillnet ~\$1,958,501

The allocation is divided into two pools, one for S03H permit holders (90%) and one for crew members (10%). 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.

#### 2020 UCI Drift gillnet Permit Holders – 90% of UCI drift gillnet funds.

Eligibility criteria for UCI drift gillnet permit holders:

1. S03H permit holder must have made a salmon landing in 2020 in Upper Cook Inlet.
2. Based on individual CFEC identification number, must have a demonstrated loss in exvessel value for UCI salmon in 2020 as compared to the previous five-year average, 2015 to 2019. This criterion does not apply to permit holders whose first year of participation was in 2020.

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

**Each permit holder who meets all eligibility criteria receives an equal payment.** If multiple eligible permit holders made landings in 2020 on the same limited entry permit, the payment will be split pro rata to the value of each eligible permit holders’ salmon landings in 2020. A total of 319 permit holders made landings in UCI in 2020 and two of those permit holders did not have a loss in gross revenue value in 2020 as compared to their previous five-year average. Based on the criteria, a total of 317 permit holders may be eligible for an equal payment.

2020 UCI drift gillnet crew – 10% of the UCI drift gillnet funds. Upper Cook Inlet drift gillnet crew must meet the following criteria to be eligible for an **equal payment** of the 2020 UCI drift gillnet crew funds.

UCI 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 and the CFEC permit database.
2. Crew member must provide information to show they participated as vessel crew in the 2020 UCI drift gillnet salmon fishery for a qualified S03H permit holder, based on an affidavit from the permit holder.
3. Anyone qualified for disaster funds as a 2020 UCI driftnet permit holder or transferee cannot qualify as crew in the same fishery.

**Processors – 25% (~\$2,346,000):** Direct payments to processing companies. The total estimated loss in final exvessel value for the ESSN and UCI fishery disaster is \$27.23 million dollars. Funds allocated to

the processing sector are intended to mitigate this loss by providing funds to bring the processing sector up to 8.6% of the sector's recent historical value.

COAR buying data are used to determine eligibility and payment for processors because those data are linked to where the salmon were harvested, and the scope of this fishery disaster includes the 2018 ESSN salmon fishery and the 2020 UCI salmon fisheries. COAR production data are linked to the location where the salmon processing occurred. Final exvessel price from the COAR buying data are used to determine processor losses.

Processing companies are identified based on their nine-digit federal tax identification number. Disaster payments to processing companies are proportional to each company's demonstrated loss relative to the total loss of all eligible processing companies.

Eligibility for processors:

1. Processing company must have purchased ESSN salmon in 2018 and/or UCI salmon in 2020.
2. Estimated loss in exvessel value for salmon purchased by the company from the 2018 ESSN fishery and 2020 UCI fisheries combined must be at least \$1,000. The estimated loss in exvessel value is calculated by subtracting the value of the fishery in the disaster year from the previous five-year average, 2013-2017 and 2015-2019.

Disaster payments to processing companies are **pro rata** to each company's demonstrated loss relative to the total loss of all eligible processing companies. Based on the criteria, a total of nine processing companies may be eligible for processor funds.

**Program Support – <0.02% (\$16,997):** ADF&G is allocating funds for staff working on fishery disaster plan development and implementation in coordination with Pacific States Marine Fisheries Commission.

## Appendix 1. Public comments received on the second draft spend plan

**From:** Richard Person  
**Sent:** Tuesday, August 22, 2023 4:54 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Second draft disaster relief

I am a second generation essn permit holder for 48 years

The 60/40 split between the kasilof section and the kasilof section is ridiculous. The kasilof section has 3times the number of permits.

Dividing 60% of the relief between 1/4 of the permits Would be giving those permit holders 5 to 6 times more than the other 75% in the kasilof section!

The fact that North K-beach starts by regulation a week or so into July had nothing to do with the fishing success in the years considered, its regulation produced by the BOF.

While an even split between permit holders is not necessarily ideal, it is simple and not controversial. If a more "fair" or accurate estimation of losses incurred those seasons is desired then a catch history based allocation similar to the 2012 dispersal and the dispersals for other fisheries should be used.

Than you for your consideration on these matters, Richard Person

**From:** Merry Doner  
**Sent:** Monday, August 21, 2023 11:36 AM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** 2018 and 2020 UCI Disaster Relief Spend Plan

In regard to the second draft of the 2018 and 2020 UCI Disaster Relief Spend Plan, it is ridiculous that the payments are broken down by setnet sections. The permit renewal fee for these permits are equal. The buoy sticker prices per permit are equal. Startup costs at the beginning of the season are mostly consistent per permit regardless of section location. It is reasonable that all disaster relief be split evenly among eligible permit holders. I strongly disagree with unequal payments between permit holders.

Respectfully,

Merry Doner

East Side permit holder



**From:** Matthew Person  
**Sent:** Tuesday, August 22, 2023 4:52 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Disaster Relief Public Comment

ADF&G, Attn: Darion Jones

PO Box 11626

Juneau, AK 99811-5526

Commissioners Office: 907.465.6136

To whom it may concern.

I am an Upper Cook Inlet East Side Setnetter writing in opposition to the Second Draft Spending Plan for 2018 and 2020 disaster relief disbursement. The lack of comment received on the first draft should be taken as evidence of widespread support within the fishery, not an opposition or lack of thought.

The portion of the second draft involving a 60/40 split between the kenai and Kasilof sections is completely unreasonable and unsupported. The Kasilof section has approximately *three times* as many permit holders and in the relevant years preceding the disaster years has had a significantly higher harvest. This 60/40 split has been being pushed for years by specific individuals and is based on "historical numbers" by which they mean prior to 1995 which is, of course, extremely irrelevant to the year and case in question. Nothing about disaster relief funds takes into account 30 years ago and the modern fishery is completely different. Furthermore the justification given in the draft plan regarding opening dates is even more ludicrous. June 20th and July 9th are the scheduled opening dates in the management plan for the respective sections and are absolutely normal. They have no impact or bearing on the disaster relief situation.

While an even split between permit holders is not necessarily ideal, it is simple and not controversial. If a more "fair" or accurate estimation of losses incurred those seasons is desired then a catch history based allocation similar to the 2012 dispersal and the dispersals for other fisheries should be used.

Thank You

Matthew Person

**From:** Joseph Person  
**Sent:** Tuesday, August 22, 2023 4:29 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Second Draft UCI Disaster Relief Comment

ADF&G, Attn: Darion Jones

To whom it may concern.

I am an Upper Cook Inlet East Side Setnetter writing in opposition to the Second Draft Spending Plan for 2018 and 2020 disaster relief disbursement. The lack of comment received on the first draft should be taken as evidence of widespread support within the fishery.

The portion of the second draft involving a 60/40 split between the kenai and Kasilof sections is completely unreasonable and unsupported. The Kasilof section has approximately three times as many permit holders and in the relevant years preceding the disaster years has had a significantly higher harvest. This 60/40 split has been being pushed for years by specific individuals and is based on "historical numbers" by which they mean prior to 1995. Nothing about disaster relief funds takes into account 30 years ago and the modern fishery is completely different. Furthermore the justification given in the draft plan regarding opening dates is even more ludicrous. June 20th and July 9th are the scheduled opening dates in the management plan for the respective sections and are absolutely normal. They have no impact or bearing on the disaster relief situation.

The comments from KPFA proposing the 60/40 splits are in no way representative of the fishery as a whole. KPFA membership is a minuscule portion of the fishery participants and the board is heavily dominated by members of a single small statistical area. I served on the KPFA board for many years, but find most of its actions in recent years to be self serving and not to the benefit of the fishery as a whole.

While an even split between permit holders is not necessarily ideal, it is simple and not controversial. If a more "fair" or accurate estimation of losses incurred during those seasons is desired then a catch history based allocation similar to the 2012 dispersal and the dispersals for other fisheries should be used. While the Kenai Section does contain some of the higher producing operations in the fishery, it also contains a high percentage of very low producing operations. Allocating disaster relief funds based on section is completely ridiculous, unfair, and detrimental to the majority of fisheries participants. If individuals feel they suffered disproportionate losses in those seasons relative to the five preceding ones, then a catch history based approach is the only fair way to address that.

Thank You

Joseph Person

**From:** Lillian Person  
**Sent:** Tuesday, August 22, 2023 4:55 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Disaster Relief Comment

ADF&G, Attn: Darion Jones

PO Box 11626

Juneau, AK 99811-5526

Commissioners Office: 907.465.6136

To whom it may concern.

I am an Upper Cook Inlet East Side Setnetter writing in opposition to the Second Draft Spending Plan for 2018 and 2020 disaster relief disbursement. The lack of comment received on the first draft should be taken as evidence of widespread support within the fishery.

The portion of the second draft involving a 60/40 split between the kenai and Kasilof sections is completely unreasonable and unsupported. The Kasilof section has approximately three times as many permit holders and in the relevant years preceding the disaster years has had a significantly higher harvest. This 60/40 split has been being pushed for years by specific individuals and is based on "historical numbers" by which they mean prior to 1995. Nothing about disaster relief funds takes into account 30 years ago and the modern fishery is completely different. Furthermore the justification given in the draft plan regarding opening dates is even more ludicrous. June 20th and July 9th are the scheduled opening dates in the management plan for the respective sections and are absolutely normal. They have no impact or bearing on the disaster relief situation.

While an even split between permit holders is not necessarily ideal, it is simple and not controversial. If a more "fair" or accurate estimation of losses incurred those seasons is desired then a catch history based allocation similar to the 2012 dispersal and the dispersals for other fisheries should be used.

Thank You

Lillian Person

August 21, 2023

ADF&G, Attn: Darion Jones

PO Box 115526

Juneau, AK. 99811-5526

**RE: Second DRAFT Spend Plan for funds appropriated to address the 2018 Upper Cook Inlet (UCI) East Side Set Gillnet (ESSN) and 2020 UCI salmon disaster determination.**

The South K-Beach Independent Fishermen's Association (SOKI) is a community-based group consisting of those individual commercial setnet fishermen who seek to harvest salmon primarily migrating to the Kasilof River in Cook Inlet. The statistical area has been designated as 244-31 and is in the Kasilof Section on the East Side Set Net (ESSN). Its proximity is within the Kalifornsky Beach area which is the 12-mile section between the mouths of the Kasilof & Kenai Rivers. Our net locations are allowed in the area defined from one mile north of the Kasilof River to approximately four and one-quarter mile north of the river.

We are concerned that the comments from some organizations or individuals would lead the reader to believe that they fairly represent the Kasilof Section area in membership or board representation. By the table (2018) the Department has offered; the Kenai Section has 34% of the permit holders (151), the Kasilof Section has 66% of the ESSN permit holders. This would follow the historic participation of 2/3 of the participants operate within the Kasilof Section and 1/3 within the Kenai Section. Board members of that organization represent six Kenai Section fishing operations and one in the Kasilof Section. Clearly, the proposed 'unequal distribution' would benefit the minority user group to a much higher degree than the Kasilof section user group.

Since the costs of doing business are very different from on portion of the sixty plus miles of ESSN beach no clear value can be 'averaged' nor can 'damages' to the fishery be clearly singled apart. The areas of the beach also target different runs of sockeye. The majority of the Kasilof Section starts sooner than the Kenai Section as they are targeting Kasilof River bound sockeye as their peak is around the 16<sup>th</sup> of July. The Kenai Section starts around July 8<sup>th</sup>. Some portions of the Kalifornsky Beach in the Kenai Section maybe opened By Emergency Order (EO) to target Kasilof River sockeye. The Kenai River sockeye run usually peaks about the 21<sup>st</sup> of July. Both Sections target both stocks at different intervals and by specific locations within the one and one-half nautical mile area in the Kasilof Section and North Kalifornsky Beach area of the Kenai Section. The remaining Kenai Section (Salamatof and Forelands) work within the one nautical mile area.

We are submitting this description of the two areas and the sections blended in between to give an example of the difficulties in establishing a right to prioritize one Section over the other to compensate for damages. To complicate further, the 'buoy registration' requires the 'group' to register for a section. Many on the division line of the two sections register in both areas

depending on where they will set their nets for a particular time of the year to best target stocks of sockeyes moving through their particular fishing area.

In 2012, a weighted matrix was developed that allowed a standard evenly distributed payment for all ESSN permit holders. The remaining amount was disbursed using past production as a way to qualify for certain levels of compensation. In that way, groups of ESSN permit holders who operated in different sections were compensated accordingly. The assumption was that higher historical production may have higher costs associated with these operations. We strongly urge the Department to review the 2012 ESSN disaster 'spend plan' as a guide for distribution if the Department continues with an un-even distribution plan.

It is our contention that the reasonable and most expedient distribution plan should be given the highest consideration since the ESSN fishery did not operate in 2023 because of Kenai River King salmon restrictions. The necessity to allow some relief to these fishing families is paramount, over-compensating one group over another after a fishing season where no one is allowed to harvest would seem immaterial since all were negatively affected equally.

Distribution proposed by the Department after the first comment period would give the Kenai Section 63% of the per compensation over 37% in the Kasilof Section overall when you combine the per permit value in both Sections. The fact that 1/3 less of the permit holders already compensates the Kenai section more per permit, which greatly skews the proposed 60% compensation. If not divided equally the Department should consider dividing the Kasilof Section into the 60% remaining after compensation the first 50% equally. The justification is that there are 2/3 more participants in the Kasilof Section and the per permit compensation would be more reasonably close to the Kenai Section. The remaining 40% divided within the Kenai Section, because of less permit holders would still compensate the Kenai Section a reasonable amount to compensate for possible time constrictions.

To be clear that the fishery in 2018 was restricted for slow sockeye escapements into the Kenai River, the result of a late return.

Final Comments:

**Research-**

We would accept the 10%

**Communities-**

We understand the qualifications for compensation and agree with the 3%

**Processors-**

We continue to disagree with the compensation for the Processor compensation and would argue that in 2012 the percentage was much less. We are concerned that the is not reflective of the actual loss from the restrictions on the ESSN in 2018. No comments specifically from Cook

Inlet processors were submitted so no clear justifications can be commented on. If it is necessary to fairly compensate this segment, we would suggest that a maximum of 20% be considered if not a lesser amount based on justifications.

**Harvesters-**

By amending the processor portion from 25% to 20%, this would increase the harvester amount to 67% which is much closer to the 75% that we originally supported.

We remain committed to an expedient process. We strongly suggest using the 2012 ESSN Disaster Plan as the guide that worked instead of re-inventing the entire process.

Thank you for your attention,

Paul A. Shadura II

Spokesperson for SOKI

**From:** Ken Coleman  
**Sent:** Tuesday, August 22, 2023 1:20 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Draft 2 Eastside Setnet Disasters 2018/2020

Ms. Bush,

My comments as to draft 2 and the distribution of funds are as follows. As you know the Eastside Setnet fishery is bifurcated in area(Kasilof section and Kenai section) and managed separately for most of each season which often creates disparities in how much each section may fish. In most years the Kasilof section may fish twice as much as the Kenai section resulting in catch differences and monetary differences. As it applies to the 2018 disaster the Kasilof section was able to fish and earned an income as opposed to the Kenai section which only fished a couple of days and suffered a near complete loss.

As I mentioned the Kasilof section was able to earn but as compared to previous seasons it was sub-standard (59% loss)a poor season though not rising to disaster level. The Kenai section suffered a 95% loss. When averaged the combined average loss by both sections rose to the level of disaster which covered the entire fishery.

Within that average was a large level of disparity of financial loss, thus the difference in how the loss was calculated for disbursement in each particular section, a basic fairness issue relative to an equitable split of one half of the funds allocated to 2018.

The other one half of funds allocated to 2018 is proposed to be split on an even basis.

2020 funds are proposed to be disbursed on an even basis..... future disasters, 2021,2022 and 2023, will likely be, if granted, split on an equal basis as well.

As a 53 year setnetter I find it distasteful to be appealing for disaster funds especially on a chronic basis. This however, is the process we're left with. I am in support of Draft 2.

Respectfully Submitted,  
Ken Coleman

**From:** Sterling Doner  
**Sent:** Tuesday, August 22, 2023 8:33 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** UCI Disaster Relief Plan

In regards to the second draft of the 2018 and 2020 UCI Disaster Relief Spend Plan, it is ridiculous that the payments are broken down by setnet sections. The permit renewal fee for these permits are equal. The buoy sticker prices per permit are equal. Startup costs at the beginning of the season are mostly consistent per permit irregardless of section. It is reasonable that all disaster relief be split evenly among eligible permit holders. I strongly disagree with unequal payments between permit holders.

Thanks for your time,  
Sterling Doner

**From:** Judy Johnson  
**Sent:** Monday, August 21, 2023 9:56 AM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** East side set net disaster relief

It seems right that the money's be equally distributed among all the permit holders in the east side set net fisheries.  
Thank you,  
Judith A Johnson

**From:** Joel Doner  
**Sent:** Monday, August 21, 2023 10:59 AM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Upper Cook Inlet Disaster Relief spend plan

In regards to the second draft of the 2018 and 2020 UCI Disaster Relief Spend Plan, it is ridiculous that the payments are broken down by setnet sections. The permit renewal fee for these permits are equal. The buoy sticker prices per permit are equal. Startup costs at the beginning of the season are mostly consistent per permit irregardless of section. It is reasonable that all disaster relief be split evenly among eligible permit holders. I strongly disagree with unequal payments between permit holders.

Joel Doner

**From:** johanna doner  
**Sent:** Monday, August 21, 2023 11:20 AM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Disaster Relief Funds

ADF&G, Attn: Darion Jones  
PO Box 115526  
Juneau, AK 99811-5526

In regards to the second draft of the 2018 and 2020 UCI Disaster Relief Spend Plan, it is ridiculous that the payments are broken down by setnet sections. The permit renewal fee for these permits are equal. The buoy sticker prices per permit are equal. Startup costs at the beginning of the season are mostly consistent per permit irregardless of section. It is reasonable that all disaster relief be split evenly among eligible permit holders. I strongly disagree with unequal payments between permit holders.

Johanna Doner



To: ADF&G, ATTN: Darion Jones  
P.O. Box 115526  
Juneau, AK 99811-5526  
Email dfg.com.fisheriesdisasters@alaska.gov

Re: 2018 and 2020 Set net disaster funds: Comment on Second Draft Spend Plan for Upper Cook Inlet  
Date August 16, 2023  
Letter transmitted via email

To Whom It May Concern,

After Review of August 11, 2023 Spend Plan – I offer the following comments over how the funds will be distributed:

1/ ADF&G wants \$938,000 for Research or 10% of the total Disaster Funds. Again, the fisherman were harmed not ADF&G. Your response indicated additional further comment on Research funds amounts.

- ADF&G wants 16% of the total Harvesters amount. This is unacceptable.
- ADF&G wants 25% of the total Set Net disaster funds amount - by comparison. Not acceptable.
- ADF&G should consider a reasonable percentage of research funds and compared to harvesters in which qualified federal disaster funds occurred in the first place.
- ADF&G should consider 10% of total Harvester amount for Research which represents a total amount of \$581,900 dollars. Also, 2021, 2022, and 2023 were Set Net disaster years – if and when those disaster declaration years are brought forth by the Department/Governor - additional Research dollars will be made available and would exceed 2 million dollars. In the meantime the Set Net fleet experienced and realized further economic disasters.

2/ Under Research ADF&G makes the statement “This fishery disaster includes research related to sockeye salmon and weak stock management of Chinook salmon.” What is the definition of weak stock management of Chinook salmon?

**Weak stock management is not described** within Article 2 Salmon Fishery, Policy for the management of mixed stock salmon fisheries or Policy for the management of sustainable salmon fisheries or definitions within.

**Instead stock or stocks are described**, including the definition of a salmon stock. Defined “salmon stock” means a locally interbreeding group of salmon that is distinguished by a distinct combination of genetic, phenotypic, life history, and habitat characteristics or an aggregation of two or more interbreeding groups which occur within the same geographic area **and is managed as a unit.**

The point being, Research funds approved by ADF&G should adhere to the definition of salmon stocks and management of mixed stock salmon fisheries and federal disaster funds approved by N.O.A.A. This should be requirement on Research funding / projects by N.O.A.A. At present and from 2017 ADF&G has not been in compliance with the definitional standards and management of salmon stock(s); i.e. a large fish king goal on Kenai late-run chinook salmon was established by ADF&G. This change removed the all size fish king goal established in regulation for decades which adhered to salmon stock definitional standards (managed as a unit – all age classes). The federal definition of a salmon is managed as a unit. The current large fish (over 75cm in length) is 15,000 – 30,000 fish the same goal as the all-fish goal established in prior regulation. Now a non-definitional term weak stock is used for Research funding by ADF&G.

3/ I strongly object to the 2018 Set gillnet spend Plan as outlined on August 11,2023 on page 6 – proposed allocation 30% to Kenai ESSN group vs. 20% to Kasilof ESSN group portion by KPFA public comment.

First of all there are 288 permit holders in the Kasilof Section and 151 in the Kenai Section. In 2018 the harvest per permit holder averaged 732 sockeye salmon in the Kasilof Section and the Kenai Section was 449 sockeye salmon or a difference of 283 sockeye. This 30/20 split has the Kasilof Section permit holder receiving \$1,275 dollars while the Kenai Section permit holder receives \$3,649 dollars per permit - a 300% difference on allocation dollars in favor of the Kenai Section permit holder. This is totally unacceptable. KPFA and all Kenai Section permit holders have always realized there are two different management Plans in regulation regarding time and area based on Kasilof sockeye salmon run timing. The Kasilof Section is coupled into the Kenai late-run sockeye plan on or after July 8<sup>th</sup>. The 2018 disaster was over Kenai salmon stocks; therefore sockeye management on or after July 8<sup>th</sup> is germane. The Kasilof River sockeye BEG goal was exceeded.

**KPFA has a conflict of interest in this allocation scheme.** KPFA board of directors has 5 board members in the Kenai Section and only 2 in the Kasilof Section. The vote was 6-1 to allocate more funds to the Kenai Section with its president voting with the majority. KPFA membership is comprised of only 32-36 members of which are mainly within the Kenai Section. KPFA membership within the Kasilof Section is near zero. KPFA no longer fairly represents set gillnet permit holders in the Kasilof Section or under the use of the term “fairly represents” espoused by KPFA.

Finally, and remarkably KPFA board members espoused in a pre-season Easter meeting to Commissioner Lang - that the Kasilof Section should be managed with reduced time and gear, including initiating the “may restrict” the use 45 mesh depth nets with 29 mesh gear restrictions. This was for more sockeye to be distributed into the Kenai Section. This action caused the Kasilof Section further economic harm during 2018 on Kasilof River sockeye salmon stocks. KPFA nor the Kenai Section should be rewarded by such action which re-allocates dollars taken away from all Kasilof Section permit holders – period.

Please notify that you received this letter. Thank you.

Sincerely,

Jeff Beaudoin  
SO4H permit holder / operator  
Kasilof, Alaska 99610

**From:** warren Brown  
**Sent:** Monday, August 14, 2023 2:11 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Re: East side set net

I think if you paid your shore leases it shows you intend to fish and stay in the fishery but if the season looks like you are only going to get a couple openings like 2018 and you're probably going to lose money, then that should qualify as a disaster and should be eligible so I can pay my fishing expenses. I still had to pay for my permit, skiff and outboard maintenance, shore lease, nets etc.

On Mon, Aug 14, 2023 at 9:02 AM DFG, ComFisheriesDisasters (DFG sponsored)  
<[dfg.com.fisheriesdisasters@alaska.gov](mailto:dfg.com.fisheriesdisasters@alaska.gov)> wrote:

Good morning,

If you were a set netter that applied for a CFEC and made a buoy sticker registration, regardless of catch, you are proposed to be eligible for an equal payment in the current draft spend plan. Please let us know if you have other suggestions for eligibility criteria.

From the spend plan at this link:

[https://www.adfg.alaska.gov/static/fishing/pdfs/2018\\_2020\\_uci\\_setnet\\_second\\_draft\\_spend\\_plan.pdf](https://www.adfg.alaska.gov/static/fishing/pdfs/2018_2020_uci_setnet_second_draft_spend_plan.pdf)

“Proposed eligibility criterion for ESSN permit holders:

- Individual must have registered their CFEC permit and purchased a buoy sticker for the Upper Subdistrict as demonstrated by ADF&G Division of Commercial Fisheries records.”

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**From:** warren Brown  
**Sent:** Saturday, August 12, 2023 8:09 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored) <[dfg.com.fisheriesdisasters@alaska.gov](mailto:dfg.com.fisheriesdisasters@alaska.gov)>  
**Subject:** East side set net

It looks like there is no funds for the fishers who couldn't afford to fish in 2018, doesn't a fishery that you can't participate in because it won't be open equal a disaster? I have all the investments in the fishery including shore leases, outboards, skiffs, nets, trailers but don't qualify because I couldn't afford to fish. I have 45 years invested in the fishery, I should get something!

**From:**  
**Sent:** Wednesday, August 16, 2023 8:50 AM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Disbursements of funds Cook Inlet

8/16/2023

Hello Darion and Carla,

I have looked at the second distribution plan for UCI 2018 and 2020. It is a good improvement over the initial plan.

There are a couple items I would like to address:

I feel the processors share should be reduced to 15%. Processors still were economically viable in most areas of the State. It was the fishermen in Cook Inlet that were economically devastated in 2018 and 2020.

I believe that the disaster in 2018 should not count as one of the past five years for tabulation in figuring losses in 2020. Any prior disaster years should be thrown out of the calculations.

Thank you for making the qualifications for setnet permit holders, one to have renewed their permits for the 2018 and 2020 seasons, respectively, and two to have registered buoy stickers.

For permit holders or fishing groups of permit holders that registered in both the Kenai and Kasilof sections. using data from CFEC landings, to show which section was fished the majority of the season, should be the section those individual or fishing groups are to receive funds from the disaster.

I believe that any CI permit holder that held a permit prior to 2018 or 2020, who was actively deployed with the United States military, and emergency transferred their permit(s) to a crew member for those respective seasons, should receive permit payment.

With an emergency transfer the permit automatically goes back to the permit holder after the season, The crew member that was emergency transferred the permit, would qualify for a crew members share.

Any permit holders or crew members, that were minors in 2018 and 2020, should be compensated accordingly. I understand that they can't receive direct payments, yet forms should be made readily available, so their guardians can apply for their disbursements of funds.

With the total closure in 2023, for the Setnet fleet in Upper Cook Inlet, I am hoping these distributions of funds can happen ASAP.

Thank you for your time and help on this matter,

Gary L Hollier  
Kenai, AK

**From:** Robert & Krystina Williams  
**Sent:** Friday, August 18, 2023 7:15 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Disbursement of ESSN Funds

We are writing to express our position on the proposed spending plan for the UCI 2018 & 2020 Disaster Relief Fund. After reviewing the suggested revisions we believe the following:

(1) We would be in support of 10% for research studies on the Kenai late run king salmon estimates for all age classes. As well as fishermen having input on the direction of the funding & research.

(2) Regarding the processing sector, we understand they accrued losses however they had other opportunities for diversification at their level, the percentage should be directed towards the fishermen.

In conclusion, this was a devastating disaster and the funds should be dispersed in a timely manner considering the first disaster was five years ago. The fishermen should be the main priority. The ESSN fishermen were the gear group who were the most affected.

Thank you for your time and consideration,

Robert & Krystina Williams

**From:** blossom  
**Sent:** Sunday, August 20, 2023 9:53 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** 2018 ESSN & 2020 UCI Comments

Hello,

I am a lifelong 3rd generation ESSN fisher, my four kids making the 4th generation to fish the same site as my dad and grandfather started in 1950 (Ninilchik Beach). Our family site fishes 7 permits, all in my immediate family.

After review of the latest spending plan, I must take exception to the Kenai section receiving 60% of 2018. Especially when you take into account the fact that the upper beach (Kenai section) has a far lower percentage of the permits in comparison to the Kasilof section. Now, if this spending plan is approved, it will mean 35% of the fishermen will receive 60% of the disaster relief. That hardly seems equitable just because they start at a later date, which is based on the management plan, not the disaster.

I still hold that in times of disaster and relief money, each permit holder should receive the same amount across the board. I read the KPFA's distribution comments and noted it was signed by 3 Kenai beach fishers. I agree with many points of their letter, but the allocation percentage is where I differ.

Thank you for your consideration, please contact me if you would like to have any further discussion.

Sincerely,  
Doug M Blossom

**From:** Tanya Donner  
**Sent:** Monday, August 21, 2023 3:02 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Attn: Daroin Jones

I have a few comments in regards to the second draft of UCI Disaster Relief Spend Plan.

- 1) ADF&G should receive no funding for research. They have not used those funds in the past to benefit our fishery. I have no confidence they would do any different.
- 2) Processors did not apply for any disaster relief. In fact they were still able to operate in 2018 with the drift fleet once setnetters were closed.
- 3) Communities did not apply for any disaster relief and should not receive funds.
- 4) I strongly disagree with the setnet payouts differing by location. We all have start up expenses and have to hire crew. Buoy tags and yearly renewal fees are the same. In fact cfec valuation makes no distinction where the permit is fished in UCI, the value is the same for all SO4H permits. The payout should be split evenly between all permit holders who bought buoy tags. Those are the people who intended to fish. The one who were impacted by the closure of the fishery.

Thank you for your consideration,  
Tanya Doner

Sent from [Mail](#) for Windows

**From:** "Mark Doner"

**To:** "dfg com fisheriesdisasters" <dfg.com.fisheriesdisasters@alaska.gov>

**Sent:** Monday, August 21, 2023 5:35:47 PM

**Subject:** Public comment on " Second DRAFT Spend Plan for 2018 Upper Cook Inlet (UCI) East Side Set Gillnet (ESSN) and 2020 UCI salmon disaster determination"

## **Comments on Second Draft Spend Plan for 2018/2020 UCI Setnet Disaster Relief**

I disagree with the proposed allocation of relief funds to harvesters in the eastside setnet fishery as given in the second draft spend plan.

The allocation to Eastside setnet permit holders in the initial draft spend plan for Disaster Relief funds was: "Based on initial public input, ADF&G is proposing that each permit holder who meets all eligibility criteria receive an equal payment."

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While it is probably obvious that different permit holders throughout the eastside setnet fishery suffered from this disaster to different degrees, quantifying this individual difference in an accurate way is not practical and likely not possible. Thus, allocating the relief equally split among all participants in the impacted fishery is the most fair method. I did not comment on the first draft spend plan.

ADF&G received 7 public comments on the initial draft, only one of which proposed changing the allocation formula. ADF&G changed the allocation based on the comment submitted by KPFA which suggested that the allocation amount to eastside setnet permits should be based upon section registration. The justification given in KPFA's comment was "we believe this is fair based on how the 2018 and 2020 disasters impacted the fishing sections." Without any supporting evidence, the belief of fairness is arbitrary and arguable. Where do the numbers 60/40 split on 50% come from? Presumably, KPFA figures the Kenai section suffered more than the Kasilof section. With the allocation as proposed in the second draft, permit holders in the Kasilof section would each receive \$3367.16 and permit holders in the Kenai section would each receive \$5740.58. Did the Kenai section suffer 1.7 times ( $\$5740.58/\$3367.16$ ) more than the Kasilof section? How is that degree of suffering quantified? I don't believe that it can be.

The most fair allocation is to divide the relief funds equally among all affected permit holders.

Respectfully submitted,

Mark Doner

Active Eastside Setnet Permit Holder

**From:** Linda Ruttum  
**Sent:** Monday, August 21, 2023 6:06 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)

Atten: Darion Jones

I am commenting in regard to the second draft of the 2018 and 2020 UCI Disaster Relief Spend Plan. It is ridiculous that the payments are broken down by setnet sections. The permit renewal fee for these permits are equal. The buoy sticker prices per permit are equal. Startup costs at the beginning of the season are mostly consistent per permit regardless of section. It is reasonable that all disaster relief be split evenly among eligible permit holders. I strongly disagree with unequal payments between permit locations.

My husband and I both are crew members and bear the cost of setting up each season. Neither of us has taken a crew share in the past few years.

Respectfully,

Linda Ruttum  
Scott Ruttum

**From:** Tim  
**Sent:** Monday, August 21, 2023 3:49 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** 2018/2020 Disaster Spend Plan Comments

Greetings, I would like to make know my objection for the allocation classes laid out in the proposed disaster spend plan. I strongly oppose the classes that allocates different percentages based on fishing area. The formula is not fair, it is discriminatory, is not defensible and its basis has no merit. I wholeheartedly disagree with the formula which would be divisive in an already disenfranchised fishery.

Tim Doner  
East Side Setnet permit holder



**From:** Dean Osmar  
**Sent:** Monday, August 21, 2023 9:38 PM  
**To:** Dean Osmar; My Dzung Osmar; DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Re:

On Mon, Aug 21, 2023 at 8:21 PM Dean Osmar wrote:  
To Whom it may concern,

My name is Dean Osmar. Age 76. I started set net salmon fishing on my fathers Cook Inlet east side set net sites at the age of 8. My older brother and myself ran our fathers Clam Gulch set net sites at the age of 16 and 14. Over the years I've crewed on (and owned) various sites in Corea Bend, Clam Gulch, Humpy Point, and Salamatof.

I pioneered my own off shore set net sites on Humpy Point in 1966...at the age of 17. I've fished those sites for over 56 seasons. I pioneered my own off shore salmon set net sites on lower Salamatof in 1988. Fished those sites for over 25 seasons. Ive had children and grand children involved in the E.S.S.N. fishery for decades.

I disagree with the proposed allocation of relief funds to harvesters in the eastside setnet fishery

...as given in the second draft spend plan. The allocation to E.S.S.N. permit holders in the initial draft spend plan for Disaster Relief funds was: "Based on initial public input, ADF&G is proposing that each permit holder who meets all eligibility criteria receive an equal payment." While it is likely obvious that different permit holders throughout the eastside setnet fishery suffered from this disaster to different degrees, figuring out this individual difference in an accurate way is not practical ...and likely not possible. So allocating the relief funds equally split among all participants in the impacted fishery is the most fair method.

The ADF&G received 7 public comments on the initial draft, one of which proposed changing the allocation formula. ADF&G changed the allocation based on the comment submitted by KPFA which suggested that the allocation amount to E.S.S.N. permits should be based upon section registration. The justification given in KPFA's comment was "we believe this is fair based on how the 2018 and 2020 disasters impacted the fishing sections." Without any supporting evidence, the belief of fairness is arbitrary and arguable. Where do the numbers 60/40 split on 50% come from? Presumably, KPFA figures the Kenai section suffered more than the other sections. With the allocation as proposed in the second draft, permit holders in the Kasilof section would each receive \$3367, and permit holders in the Kenai section would each receive \$5741. Did the Kenai section suffer nearly double (\$5,740 compared to \$3,367 ) more than the Kasilof , Clam Gulch , Ninilchik sections? The most fair allocation is to divide the relief funds equally among all affected permit holders.

Dean Osmar

**From:** Ryan Stassel  
**Sent:** Tuesday, August 22, 2023 12:16 AM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** 2018 and 2020 Disaster Relief Comments

Hello there,

Regarding the second draft of the 2018 and 2020 UCI Disaster Relief Spend Plan, I find it unfair that half of the 2018 payments are divided based on set-net sections. Your explanation that the Kasilof section had more fishing time compared to the Kenai section doesn't make sense in the context of Disaster Relief. The reason the Kasilof section began fishing earlier is due to the fishing regulations set by ADF&G. The Kenai section, following the normal rules, couldn't start fishing until July 9th. It's important to note that this wasn't an Emergency Order granting the Kasilof section extra time.

Both the Kasilof and Kenai areas were equally impacted by the disaster. All Emergency Orders issued by ADF&G in relation to this disaster affected both set-net areas in terms of gear usage and time spent in the water. Therefore, the funds from this Disaster Plan should be evenly distributed between the Kasilof and Kenai areas since both of their regular fishing seasons were affected in the same way.

And as for the "timely" distribution of these funds... its absolutely unacceptable that disaster relief funds intended to aid those affected by an incident are being disbursed a staggering five years after the incident took place.

The purpose of disaster relief funds is to provide immediate assistance and support to individuals and communities facing the devastating consequences of a disaster - in this case it was UCI Commercial Fishing Community. By waiting years to release these funds, ADF&G, and the State of Alaska has failing in its duty to fulfill the very purpose for which these funds were allocated. The delays not only undermine the effectiveness of the relief efforts but also hinder the recovery process for those who have already suffered losses, many being local Alaskans who are proud to call this state home.

Thank you,

Ryan Stassel

**From:** Brent Johnson  
**Sent:** Tuesday, August 22, 2023 5:19 AM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** disaster relief distribution plan for Cook Inlet stetnetters

Alaska Department of Fish and Game,

I've been setnetting on the east side of Cook Inlet since 1962.

If I recall right, the 2012 disaster relief funds were distributed unequally. I think 60 percent went to fishers north of Blanchard Line and 40% to fishers south of that line. I don't think that was fair.

The fairest plan is to distribute the money for the 2018 disaster and the 2020 disaster equally. And crew members should be included in the plan.

Thank you,

Brent Johnson

**From:** Audra Doner  
**Sent:** Tuesday, August 22, 2023 6:53 AM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Cook Inlet set Net Disaster Relief

ADF&G, Attn: Darion Jones  
PO Box 115526  
Juneau, AK 99811-5526

In regards to the second draft of the 2018 and 2020 UCI Disaster Relief Spend Plan, it is ridiculous that the payments are broken down by setnet sections. The permit renewal fee for these permits are equal. The buoy sticker prices per permit are equal. Startup costs at the beginning of the season are mostly consistent per permit irregardless of section. It is reasonable that all disaster relief be split evenly among eligible permit holders. I strongly disagree with unequal payments between permit holders.

Thank you for listening

Audra Doner

From: Roni Carmon  
To: DFG, ComFisheriesDisasters (DFG sponsored)  
Subject: The second draft, final comments.  
Date: Friday, August 11, 2023 8:29:47 PM

I only know what ive been told.  
I was told guides, lodges, and charter boat captain  
Recieved,110,000 dollars.

Im told, funds for commerical drift fleet will get funds based on what we earned.

Prior seasons:

My thoughts are, our season are compromised, by continous, king regulations, or dipnet , and  
city of kenai, borough regulation  
Saying drifters, and setnet, oppertunities need to be met , before the comercial fisher get all  
there fish. ( this thought put comercial fisherman in the whole, before we can earn a living

I believe adfg, hold us to a income of about 20 thousand a year.

And guide , charter boats, lodges, toursim enjoy a right to earn a living. Worth over a 100  
grand a year.

While licensed, comercial fishers are restricted, regulated

Adfg only can control licensed honest working people .  
Because we own a real license.

And you can not control unlicensed citizens.

So i think phase two , needs to be equal , treated the same as anyone else.

So we need to be paid, what everone else got paid, or more.

110 thousand. And i heard, some are on a nother payout.  
If your going to take, fish!, that i paid to fish, and give it to some one, un licensed , and un  
eregulated.

Then you need to pay us, and feed us fisher men.