



December 2, 2022

DRAFT Spend Plan for funds appropriated to address the 2019/2020 Bering Sea Tanner crab fishery disaster determination. NOAA Fisheries allocated \$12,935,199 for the 2019/2020 Bering Sea Tanner crab fishery disaster.

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

Comments must be submitted by December 16, 2022, 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 2019/2020 Bering Sea Tanner crab 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.

Proposed allocations to project categories: The proposed categories and allocations reflect comments received from initial stakeholder input with the exception of the research fund allocation. Public comments supported a 2% allocation to research and ADF&G is proposing a 10% allocation to promote the second guiding principle for use of disaster funds.

Proposed categories	Allocation	Estimated funds ^a
Research	10%	\$1,293,000
Communities	4.75%	\$614,000
Community Development Quota (CDQ) Program	8.53%	\$1,102,000
Harvesters	57.79%	\$7,475,000
Processors	18.93%	\$2,448,000
Program Support	<0.1%	\$14,000
Total	100%	

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

- **Research:** The 2019/2020 Bering Sea Tanner crab fishery disaster resulted from undetermined and natural causes which led to low estimated mature male biomass in the eastern and western management areas. These estimates were below thresholds required for a fishery opening during the 2019/2020 season. The relationship between Tanner crab productivity, biomass, and the environment

is not well understood but environmental changes and new extremes in sea temperature and ice extent likely play a role in the distribution, growth rate, and natural mortality of Tanner crab.

- **Communities:** Municipalities and boroughs rely on revenue generated from Bering Sea Tanner crab fishery landings and other economic activities related to the Bering Sea Tanner crab fishery. Funds designated for communities can be used for managing, repairing, or maintaining infrastructure, services, or habitat that support the Tanner crab fishery in the region.
- **Western Alaska Community Development Quota (CDQ) Program:** Direct payments to CDQ groups meeting all eligibility criteria. CDQ groups share a 10% allocation of the Bering Sea Tanner crab Total Allowable Catch (TAC) and are mandated by statute to provide economic and social benefits to their respective communities from revenues generated by their allocations. Distribution of funds to CDQ groups is proposed to be proportionate to the share of the Bering Sea Tanner crab fishery allocated to each group by federal regulations¹.

After research and community allocations are taken off the top and 10% of the remainder is allocated to CDQ groups, the remaining funds are proposed to be shared between harvesters and processors based on the historical distribution of revenue from the Non-Binding Price Formula² for Tanner crab as reported in the 2018/19 Non-Binding Price Formula Report.

2018/19 Tanner crab - Harvester/Processor sharing based on the Non-Binding Price Formula	
Non-Binding Price Formula	Wholesale price x 0.49767 - 0.1043
Total Allowable Catch	2,439,000
First Wholesale Price (SAFE Report)	\$7.83
Expected Ex-vessel value from Formula	\$3.79
Recovery	64.3%
Fishery Gross Revenue	\$12,279,609
Ex-Vessel Gross Revenue	\$9,249,800
Harvester % of Gross	75.33%
Processor % of Gross	24.67%

- **Harvesters:** Direct payments are proposed to Bering Sea Tanner crab quota share (QS) holders, vessel owners, captains and crew who meet all eligibility criteria. Quota share holders are proposed to be identified using the National Marine Fisheries Service (NMFS) Restricted Access Management (RAM) database for the 2019/20 Western Bering Sea Tanner crab (WBT) season. Vessel owners are proposed to be identified using the Commercial Fisheries Entry Commission (CFEC) vessel license database for 2019. Captain and crew eligibility are proposed to be verified based on crew contract or settlement from the 2017/18 and/or 2018/19 season, or an affidavit from the vessel owner or CFEC permit holder. Captains may also be verified based on CFEC permit holder data from fish ticket landings during the 2017/18 and/or 2018/19 season.

¹ <https://www.federalregister.gov/documents/2006/08/31/06-7326/fisheries-of-the-exclusive-economic-zone-off-alaska-western-alaska-community-development-quota>

² § 680.20(g)(2)(ii) The Non-Binding Price Formula Report is prepared annually for the Bering Sea Arbitration Organization (harvesters) and the Alaska Crab Processors Arbitration Organization (processors).

- **Processors:** Direct payments are proposed to processor quota share (PQS) holders meeting all eligibility criteria. Processor quota share holders are proposed to be identified using the NMFS RAM database for the 2019/20 WBT season.
- **Program Support:** The Alaska Department of Fish and Game proposes to designate funds for staff working on fishery disaster plan development and implementation in coordination with Pacific States Marine Fisheries Commission (PSMFC).

Proposed allocations and eligibility for disaster relief funds:

Research – 10% of total funds (~\$1.3 million): Research funds are proposed to be allocated to improve available fishery information in order to help prevent and/or mitigate future fishery disasters. Research themes include:

1. Further evaluation of mature male biomass (MMB), exploitation rates, and potential management strategy evaluation work to examine the relationships between MMB, legal size, and industry preferred size on stock dynamics.
2. Refined understanding of terminal molt and growth for stock components east and west of 166° W long., with an emphasis on growth increments at terminal molt.
3. Further evaluation of spatial and temporal dynamics of the eastern/western stock components.
4. The relationship between snow and Tanner crab stock status, including the dynamic of hybridization, with emphasis on Tanner crab status in response to the snow crab collapse.
5. Gear modifications to reduce incidental catch of female/small male crab.
6. Understanding the importance of groundfish (e.g., Pacific cod) predation and cannibalism as a function of crab abundance and environmental conditions.
7. Movement/distribution shifts as a function of environmental factors (e.g., temperature).

ADF&G is requesting input on these or other suggested research themes. ADF&G is not proposing to include recommendations from public comment for research themes related to transitioning the current Tanner crab stock assessment model to the Generalized Modeling for Alaskan Crab Stocks (GMACS) framework and considering survey selectivity in the stock assessment mode. These projects are currently underway, and the research themes proposed above have been initially identified as the highest priorities for fishery disaster research funds.

ADF&G is requesting input on the appropriate award process for research funds. Recent Alaska fishery disaster spend plans have used competitive and non-competitive bid processes to award research funds. A complete process would be administered by PSMFC and would include a call for proposals, review process, and award of selected projects. A non-competitive process would include identifying the specific research project(s), funding amounts, and research entities receiving the funds in the spend plan as determined by ADF&G after considering public comment.

Communities – 4.75% of total funds (~\$614,000): Municipalities and boroughs rely on revenue generated from Tanner crab landings and other economic activities related to the Tanner crab fisheries. ADF&G is proposing to distribute funds to affected communities to mitigate the impacts of the disaster. Currently, communities cannot receive direct payments and fishery disaster funds can only be used for

managing, repairing, or maintaining approved infrastructure, services, or habitat that support Tanner crab fisheries in the Bering Sea.

The following criterion is proposed for a community to receive a distribution of funds:

1. Bering Sea Tanner crab must have been landed in the community during the 2018/19 season based on the port of landing from ADF&G Fish Ticket data.

Disaster funds are proposed to be distributed pro rata to eligible communities based on the 2017/18 and 2018/19 average pounds of Bering Sea Tanner crab processed in the community.

CDQ Groups – 8.53% of total funds (~\$1.1 million): CDQ groups depend on revenue generated from Bering Sea Tanner crab landings to provide economic and social benefits in their respective communities consistent with statutory mandates. Based on initial stakeholder input, ADF&G is proposing direct payments to each CDQ group based on each group’s allocated share of the Bering Sea Tanner crab fishery in federal regulation and shown in the table below.

ADF&G is requesting comments on whether vessel owners, captains, and crew participating in the Bering Sea Tanner crab CDQ fishery should be eligible for direct payments in the CDQ category.

CDQ group	Allocation	Estimated amount
Aleutian Pribilof Island Community Development Association	10%	\$110,000
Bristol Bay Economic Development Corporation	19%	\$209,000
Central Bering Sea Fisherman’s Association	19%	\$209,000
Coastal Villages Region Fund	17%	\$187,000
Norton Sound Economic Development Corporation	18%	\$198,000
Yukon Delta Fisheries Development Association	17%	\$187,000
Total	100%	\$1,100,000

Harvesters – 57.79% of total funds (~\$ 7.5 million)

Based on public comments, ADF&G proposes to allocate harvester funds into three pools: QS holders, vessel owners, and a combined pool for captains and crew. The proposed allocation to QS holders is 31%, which is based on the 2018 median exvessel lease rate (proportion of exvessel value paid by a harvester to a QS holder for use of individual fishing quota) as reported in Table 3 of the January 2022 economic status report³ for all Bering Sea Tanner quota types. The remaining 69% is proposed to be allocated to vessel owners and captain/crew. The 2017/18 and 2018/19 WBT seasons are proposed to be used as eligibility criteria for vessel owners and captains and crew because the WBT fishery was open in the two years immediately preceding the disaster and the 2016/17 season was closed.

- QS Holders – 31% of harvester funds (~\$2.3 million). The following criterion is proposed for a QS holder to qualify for a direct payment:
- Must be listed as a QS holder of Catcher Vessel Owner (CVO), Catcher/Processor Owner (CPO), Catcher Vessel Crew (CVC), and/or Catcher/Processor Crew (CPC) quota for WBT in 2019/20.

³ <https://meetings.npfmc.org/CommentReview/DownloadFile?p=9e166e8f-4e58-4522-973a-ca074306e42e.pdf&fileName=D7%20Crab%20Economic%20SAFE.pdf>

Direct payments to QS holders are proposed to be distributed pro rata based on each QS holder’s proportion of the total QS units of all QS holders who apply and are eligible for QS holder funds. There were 326 individual QS holders of WBT quota for the 2019/20 season.

Based on this pro rata distribution and the proposed allocation of funds to this category, payments to QS holders with less than 25,000 QS units are estimated to be <\$300. ADF&G is requesting comments on whether to establish a minimum holding of QS units to qualify for a direct payment. This could reduce administrative costs and burden and promote greater efficiency in the process to distribute funds.

The remaining 69% of funds allocated to harvesters are proposed to be shared between vessel owners and captains and crew based on a calculated “Vessel Payment”. Vessel Payment funds are proposed to be split 70/30 between vessel owners and captains/crew based on the proportion of fishery revenues paid to captains and crew for the 2018 Tanner crab fishery as reported in the January 2022 economic status report, after deducting lease fees:

2018 Tanner crab Vessel owner and Captain/Crew split	\$Million	Revenue split
Bering Sea Tanner (BST) Gross Revenue (Table 1)	\$9.79	
BST All Quota Lease Fees (31%, Table 3)	\$3.03	
subtotal	\$6.76	
Payments to Captains and Crew (\$0.61 +\$1.44, Table 2)	\$2.05	30%
Net Revenue to Vessels	\$4.71	70%

The following criteria are proposed for calculating Vessel Payments:

1. The vessel must have been used to harvest WBT in the Individual Fishing Quota (IFQ) fishery during either the 2017/18 or 2018/19 season.
2. Total vessel landings of WBT in the IFQ fishery for the 2017/18 and 2018/19 seasons must be greater than 100 pounds.

ADF&G estimates that 35 vessels are eligible for Vessel Payments based on these criteria.

The amount of available funds for each Vessel Payment are proposed to be pro rata based on the total amount of live pounds of Bering Sea Tanner crab landed by each vessel during the combined 2017/18 and 2018/19 seasons.

70% of each Vessel Payment is proposed to go to the individual listed as the 2019 vessel owner in the CFEC vessel database.

30% of each Vessel Payment is proposed to be shared by the captains and crew who worked on the vessel during the 2017/18 and 2018/19 seasons and who meet all eligibility criteria.

Each eligible captain is proposed to receive 2 shares for each season they worked on the vessel and each eligible crew member is proposed to receive 1 share for each season they worked on the vessel.

	Season		Shares	Percent of total Captain/Crew funds
	2017/18	2018/19		
Captain A	X		2	16.7%
Captain B		X	2	16.7%
Crew 1	X		1	8.3%
Crew 2	X	X	2	16.7%
Crew 3	X	X	2	16.7%
Crew 4		X	1	8.3%
Crew 5		X	1	8.3%
Crew 6	X		1	8.3%
		Total	12	100%

The following criteria are proposed for captains and crew to qualify for a direct payment:

1. Captains and crew must have participated in the WBT IFQ fishery on an eligible vessel as defined above for Vessel Payments. Eligibility will be verified based on crew contract, crew settlement, or an affidavit from the vessel owner or CFEC permit holder. Eligibility for captains may also be verified from the CFEC permit information on the Fish Tickets.
2. Captains and crew must have held a commercial crew license in either 2018 or 2019 or a CFEC permit for any fishery in 2018 or 2019.

If no eligible captains or crew apply for the 30% portion of a Vessel Payment, those funds will be shared proportionally among all other eligible captains and crew.

Processors – 18.93% of total funds (~\$2.4 million)

The following criterion is proposed for PQS holders to qualify for a direct payment:

- Must be listed as a PQS holder for WBT in 2019/20. Payment distribution for PQS holders is proposed to be pro rata based on the total PQS units of all PQS holders who apply and are eligible for QS holder funds. There were 14 individual PQS holders for the 2019/20 WBT season.

ADF&G is requesting comments on whether processing facilities should be included in the processor category in addition to PQS holders.

Program Support - <1% of total funds (\$14,000): ADF&G is proposing to allocate funds to partially cover salary and benefits for a Program Coordinator who helps manage the fishery disaster program on behalf of the State of Alaska.

Stakeholder Input



Coastal Villages Region Fund

711 H Street, Suite 200 • Anchorage, Alaska 99501 • Phone 907.278.5151 • Fax 907.278.5150

June 17, 2022

Alaska Dept. of Fish and Game
Attn: Karla Bush, Extended Jurisdiction Program Manager
P.O. Box 115526
Juneau, Alaska 99811-5526

Re: Spend Plan Recommendations for the 2019/2020 Eastern Bering Sea Tanner Crab Fishery Disaster Declaration

Dear Ms. Bush,

We would like to take this opportunity to provide comment on the 2019/20 Eastern Bering Sea *Chionoecetes bairdi* Tanner Crab (“Tanner Crab”) fishery disaster funding spend plan.

Coastal Villages Crab, LLC (CVC) is a wholly owned and operated division of Coastal Villages Region Fund (CVRF), the largest of the six Western Alaska Community Development Quota Program (CDQ) groups. The CDQ program, which serves 28,000 residents in 65 Bering Sea communities, was started in 1992 to help address persistent poverty in Western Alaska and historic lack of access to the Bering Sea fisheries. 10% of each annual crab TAC is set aside for the CDQ sector, and each of the CDQ groups has made additional investments in Bering Sea crab fisheries. Our statutory mandates require us to help us provide economic and social benefits in our respective communities, and our crab revenue has contributed a great deal to this purpose.

The CVRF region has 9,900 residents in 20 rural communities that make up more than one-third of the entire CDQ population. CVRF has become the largest crab fishery owner-operator among the CDQ groups, and the 2019/20 closure of the Tanner Crab fishery had multi-level impacts to CVRF and our crab business that had direct effects on our ability to fund and implement the programs we provide.

For any fishery disaster spend plan, there are multiple ways to determine the proportion that should go to each affected party (apart from administrative fees). For the Tanner Crab spend plan, CVRF participated in discussions to come to agreement on those decisions, and we agree in concept with the recommendations put forth by the Alaska Crab Stakeholders, and we have signed onto their letter. In particular, CVRF would like to call attention to the following components:

- 2.0% for research. This agrees with the Stakeholder letter. Additional research into the complexities of volatility in the Bering Sea crab populations is paramount. There was some discussion on whether this should be higher but at this point, we support the BSFRF’s assertion in their letter that 2% is the right number.
- 4.75% for communities. This agrees with the Stakeholder letter.



Coastal Villages Region Fund

711 H Street, Suite 200 • Anchorage, Alaska 99501 • Phone 907.278.5151 • Fax 907.278.5150

- 9.325% for CDQ. This agrees with the Stakeholder letter in its rationale but not value. According to federal regulations, 10.0% of the harvestable amount (Total Allowable Catch) is allocated to CDQ before the remainder is distributed to other participants. After accounting for negotiated allocations for research (2.0%) and communities (4.75%), 93.25% remains, and 9.325% for CDQ represents 10% of that value prior to the distribution calculation for harvesters and processors. Due to the complexities of the negotiations and calculations, the Stakeholder letter has the CDQ value rounded up to 9.33%, with subsequent values rounded in different ways to compensate. However, CVRF supports an accurate accounting of 10% to CDQ after compensating for communities and research.
 - The Stakeholder letter is not specific on suballocations to individual CDQ entities, but we support a distribution to each based on its regulatorily allocated share of the fishery (i.e., 17.0% for CVRF).
- Remaining proportions for harvesters and processors – we agree with the Stakeholder letter on the ratio between these sectors, which is based on industry estimates of the value of the 2018/19 Bering Sea Tanner crab fishery as determined by the Sackton Formula, and we support that calculation.

In addition to the above, CVRF requests that the final 2019/20 Tanner Crab spend plan be used only as general guidance for potential future Bering Sea crab disaster funding, and not as a prescriptive formula. The level of impact for each fishery does not consistently affect all parties in the same way and consequently, we request the State similarly solicit comment and adequately review those comments prior to deciding on a plan for future crab disaster spending.

We at CVRF have a substantial interest in this matter given our significant investments in the Bering Sea crab fisheries and their importance to achieving our mission of alleviating poverty and improving economic development in some of the poorest and most isolated communities in the United States. We look forward to providing any further assistance as the department considers the direction of the spend plan for this fishery disaster.

Thank you for your consideration in this matter.

Sincerely,

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

Eric Deakin,
Chief Executive Officer, Coastal Villages Region Fund



June 17, 2022

Alaska Department of Fish and Game
Attn: Karla Bush, Extended Jurisdiction Program Manager
P.O. Box 115526
Juneau, Alaska 99811-5526

Re: Spend Plan Recommendations for the 2019/2020 Eastern Bering Sea Tanner Crab Fishery Disaster Declaration - HARVESTERS

Dear Ms. Bush:

The Alaska Bering Sea Crabbers (ABSC) is a trade association representing the majority of independent crab harvesters who commercially fish for king, snow (opilio), and Tanner (bairdi) crab with pot gear in the Bering Sea and Aleutian Islands Crab Rationalization Program. We appreciate the opportunity to comment on the spend plan for the 2019/2020 Eastern Bering Sea Tanner crab fishery disaster declaration.

ABSC supports all of the recommendations outlined in the joint crab stakeholder letter, including categories of affected fishery participants and the sharing of funds among them (see summary table below). In addition, ABSC supports the recommendations outlined in the Bering Sea Fisheries Research Foundation (BSFRF) letter, including bairdi research priorities.

BST Spend Plan	% Allocation	\$ Allocation
Harvesters	63.22%	\$8,185,531
Processors	20.71%	\$2,681,203
CDQ	9.33%	\$1,207,415
Communities	4.75%	\$615,037
Research	2.00%	\$258,963
Sum	100.00%	\$12,948,148

Further, ABSC offers the following recommendations for subcategories within the Harvester category, eligibility criteria, and how to allocate funds among the subcategories. These subcategories are based on existing sharing arrangements resulting from the Crab Rationalization Program.

Proposed HARVESTERS Sharing Arrangement

Below includes all of the subcategories of affected crab harvesters. A harvester may receive funds for any of the following subcategories for which they qualify. The percent share between quota share (QS) holders and vessel owners is based on average lease rate as reported for BST

(Bering Sea Tanner) in the [Economic SAFE \(NMFS, Jan 2022\)](#) in Table 3 for the calendar year 2018 median for all quota types.

- **QS Holders– 31%**

Payment distribution for eligible QS holders is based on their percent of Western Bairdi Tanner (WBT) issued by NMFS for the 2019/20 season. QS holders as defined here hold the following types of quota - CVO, CVC, CPO, and CPC.

Eligibility Criteria for QS holders

1. QS for WBT held by the QS holder of record in NMFS database for the 2019/2020 season.

- **Vessels – 69%**

Within the vessel category, the percent share between vessel owners and crew is based on crew shares and captain shares as reported for BST in the [Economic SAFE \(NMFS, Jan 2022\)](#) in Table 2 using calendar year 2018 as the basis. Payment distribution for qualified vessel owners is pro-rata based on the vessel's landings from the 2017/18 and 2018/19 bairdi seasons.

- **Vessel Owners (70% of the 69% or 49% of harvester pool)**

Eligibility Criteria for Vessel Owners

1. Vessel must have been used to harvest WBT in any year from 2017/18 or 2018/19. The vessel owner will be identified from the CFEC Commercial Vessel License database for 2019/20.

NOTE: These years chosen as showing recent participation. Only WBT was open these years. 2016 the fishery was closed. Earlier years involve both EBT/WBT and many more participating vessels (>60 compared to ~35). See Table 11 from [ADFG BSAI Crab Report 2019](#) (p.34)

- **Captains/Crew (30% of 69% or 20% of the harvester pool)** – Applicants that meet the criteria for the Captains/Crew pool are grouped into either captains or crew. Captains typically get paid twice what a full-share deckhand makes. Payment distribution for qualified Captains and Crew is a multi-step process. First, the total pounds of bairdi landed by vessel by season (2017/18 and 2018/19) is tallied. Then the proportion of those pounds by vessel by season are equated to the 20% of available disaster funds for this subcategory of Harvesters. Then the qualified Captain and Crew are matched to the vessel they worked on and its associated available disaster funds for each season and those funds are shared at a rate of 2 to 1 (Captain to Crewmember). If there are no qualified Captain nor Crew for a vessel, then the available funds would get shared proportionally among other vessels with qualified Captains or Crew. This approach will ensure that the entire 20% of funds for Captains/Crew gets shared equitably and spent.

Eligibility Criteria for Crew

1. Captains and crew must have participated in the WBT fishery on a vessel in any year from 2017/18 or 2018/19. This information will be verified based on crew contract or crew settlement from 2017/18 or 2018/19, or an affidavit from the vessel owner or CFEC permit holder. Captain may also be identified from the CFEC permit holder records.

This sharing arrangement between subcategories of harvesters would be expected to result in approximately the following fund allocations.

BST Spend Plan - Harvesters	% Allocation	\$ Allocation
QS Holders	31.00%	\$2,537,514
Vessel Owners	49.00%	\$4,010,910
Captains/Crew	20.00%	\$1,637,106
	100.00%	\$8,185,531

We are happy to answer any questions you may have on these recommendations and thank you for considering our comments.

Sincerely,



Jamie Goen
Executive Director
Alaska Bering Sea Crabbers



BSFRF

Bering Sea
Fisheries
Research
Foundation



BERING SEA FISHERIES RESEARCH FOUNDATION

23929 22ND DR SE BOTHELL, WA. 98021

FORGING COOPERATIVE RESEARCH PARTNERSHIPS IN THE BERING SEA

June 15, 2022

Ms. Karla Bush
Extended Jurisdiction Program Manager
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811

RE: Comments on Disaster Relief Funds – Spending Plan/Bairdi Research

Dear Karla,

We recognize with Eastern bairdi Tanner crab closed for the last several years, BBRKC closed last fall, and Bering Sea opilio collapsing and entering a rebuilding plan, that now is a more important time than ever to be capable and ready to help current science, research, and management. The reality of fishery disaster events for Bering Sea crab is evident and a well-defined and crafted relief response is critical. We support the efforts underway among crab industry stakeholders to come to agreement and an appropriate spending plan for relief funds that come from the 2019/2020 Eastern Bering Sea Tanner crab fishery. As part of the Foundation's ongoing efforts to seek additional support for crab research during tough economic times, we support the designation of at least 2% of the available money for bairdi specific research funds.


We support that disaster relief bairdi research would run through BSFRF and be conducted as part of our typical approach to work closely with ADFG, NOAA, and others in all aspects of our research. Since our inception our mission has guided our focus on science, transparency, and our capacity for strong cooperative research builds on our successes leveraging industry support, (vessels, gear, skippers/crews, and funds) with strong research capacity from federal, state, and academic partners (project design, methods, results, etc.). For our input on updated bairdi research priorities we generally defer to topics defined by the CPT, SSC, Council and others but we would note the following which represent a combination of review, field work, and modeling project areas that are not completely independent from each other:

- Further evaluation of MMB, exploitation rates, and potential MSE work to evaluate the relationships between MMB, legal size, and industry preferred size on stock dynamics
- Refined understanding of terminal molt and growth for EBT compared to WBT stock components, with an emphasis on growth increments at terminal molt
- Further evaluation of spatial and temporal dynamics of the EBT/WBT stock
- Further considerations of survey selectivity within the stock assessment
- The transition of the current bairdi assessment to GMACS in the near future
- The relationship between opilio stock status with bairdi stock status, including the dynamic of hybridization, with emphasis on bairdi status in response to opilio collapse

We look forward to further opportunities to help refine high priority topics for bairdi research. It is very apparent that the WBT/EBT resource will be critical to potentially balance during periods with BBRKC and BSS stressed or declining.

Thank you for your time and consideration of our input.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Goodman". The signature is fluid and cursive, with a long horizontal stroke at the end.

BERING SEA FISHERIES RESEARCH FOUNDATION
Scott Goodman
Executive Director

Cc:

C. Siddon/ADFG

R. Foy/NMFS-AFSC

M. Litzow/NMFS-AFSC



Central Bering Sea Fishermen's Association

P.O. Box 288 | Saint Paul Island, Alaska 99660 | Phone: 907.546.2597 | Fax: 907.546.2450 | cbsfa.com

June 17, 2022

Alaska Department of Fish and Game
Attention: Karla Bush
PO Box 115526
Juneau, AK 99811-5526

Ms. Bush:

The Central Bering Sea Fishermen's Association (CBSFA) is the CDQ group for St. Paul Island in the Pribilofs. CBSFA manages its CDQ allocations to promote social and economic development in St. Paul.

We are sharing our comments on the spend plan for the federal disaster funding for the bairdi crab fishery in the 2019-20 season. In the bairdi crab fisheries, CBSFA receives 19% of the EBT and WBT crab CDQ allocations. In addition, CBSFA has invested in crab quota shares and holds 2.5% of the harvesting quota shares and 14.9% of the processor quota shares in the bairdi crab fishery.

We recommend that the allocations determined in the spend plan are guided by how the participants derive value from the crab fishery. Since disaster funds are intended to offset the harm incurred from a fishery failure, this general approach would help ensure that the disaster funds are allocated proportionately to the harmed participants in a way that is fair and reasonable.

In the crab rationalization program allocation of the crab TAC, the CDQ Program (and Adak) is granted 10% off the top of the TAC before issuance of any IFQ or IPQ. (See the attached NMFS diagram and excerpts from the CR program 10-year review.) After that amount is granted, the remaining TAC is allocated to the various categories of harvesters as IFQ, and a percentage of the CVO IFQ is matched with processors in the form of IPQ.

CBSFA has utilized its crab CDQ allocations as both harvesting quota and processing quota, earning revenues on both sides. It is important that the unique value of the crab CDQ allocation is fully recognized. We believe it would be appropriate for CDQ to be in its own category, and receive an allocation in the spend plan prior to harvesting and processing allocations. We recommend that the allocation to CDQ be 10% of the remainder after the allocations to Communities and Research comes off the top.

We participated in the crab industry discussions that resulted in the joint letter you are receiving through ABSC, and support the allocation of funds recommended in that letter. The arrangement would provide 4.75% to communities and 2% to research through the Bering Sea Fisheries Research Foundation off the top, and then 10% of that net to the CDQ program, resulting in 9.3% to CDQ. The remainder would be divided appropriately between harvesters and processors.

We cannot emphasize enough how important CBSFA's crab CDQ allocations and investments are to our group's revenues and to the community of St. Paul. Due in part to St. Paul's proximity to the Bering Sea's crab resources, we have among the largest crab CDQ allocations of EBT, WBT, BSS, and EAG. In addition to our CDQ allocation, CBSFA has made considerable investments in crab assets, both processing and harvesting quota, as well as harvesting capacity in the form of crab boats. Much of the investment is in snow crab, and CBSFA is allocated 20% of the total Bering Sea snow crab that is set aside for the CDQ Program.

We currently have ownership interest in two crab harvesting vessels. Before the recent opilio crab crash we had ownership interest in three crab harvesting vessels.

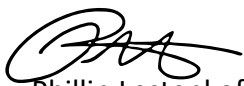
As a result of the 87% drop in the snow crab total allowable catch (TAC) from 45 million pounds to 5.6 million pounds announced in October 2021, CBSFA is expecting a 65% drop in its total revenues.

This dramatic drop in CBSFA's revenues, compounded by the bairdi decline and the closure of the Bristol Bay Red King crab (BBRKC) fishery, will impact its ability to fulfill CDQ program objectives for St. Paul Island, including funding many of the educational, research, and social programs it supports.

At such low overall levels, there may be insufficient crab poundage to keep existing crab harvesting and processing capacity engaged in various locations. This has a cascading effect on processing capacity for our local halibut fishery. Depending on the duration of the snow crab and red king crab downturn, this could be devastating to St. Paul Island and other crab-dependent communities.

We greatly appreciate the attention of the State of Alaska to the desperate situation in the major crab fisheries, and to this process of equitable allocation of disaster funding. Please contact us if you have any questions.

Best regards,

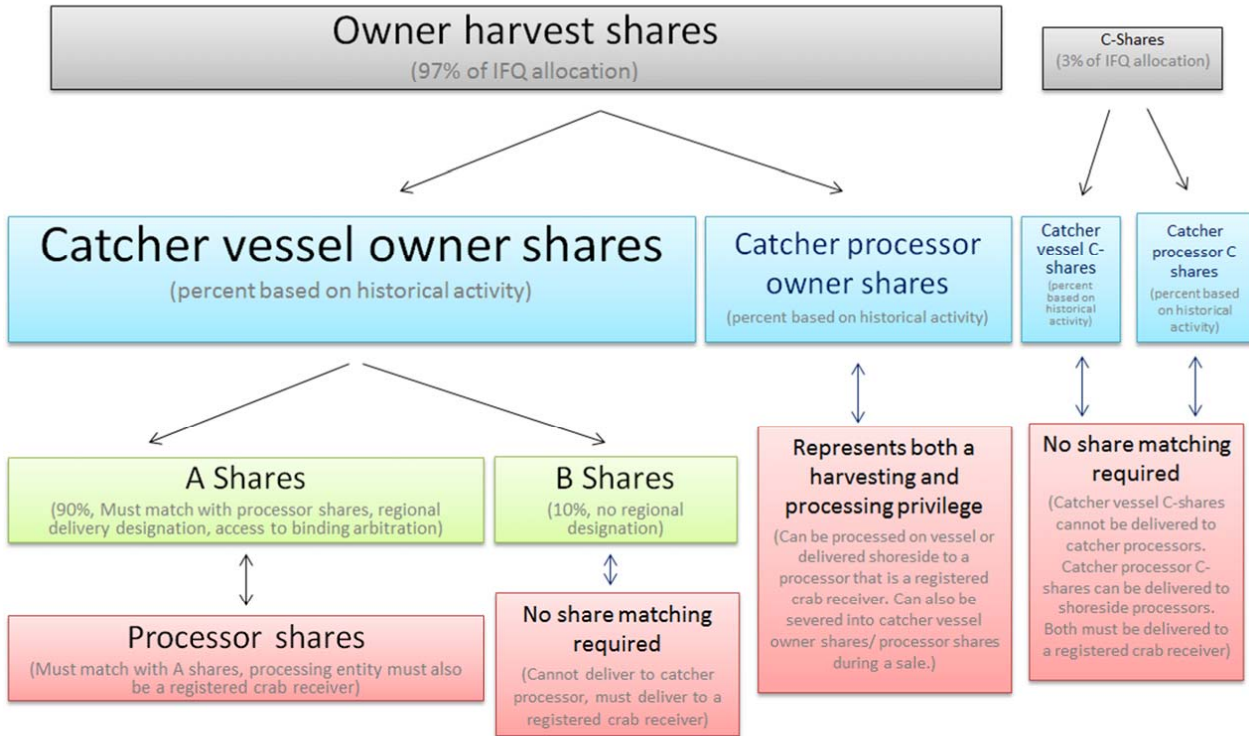


Phillip Lestenkof, President

Attachments

Figure 2-1 Diagram of quota shares in the CR Program

Crab Fishery TAC - 10% for CDQ & Adak = IFQ allocation



2.3.1 Total Allowable Catch

Each program fishery is managed with a total allowable catch (TAC), which sets a specific catch limit, instead of a GHL. Although the change to a TAC may be largely semantic, it signifies a change to more precise catch management. To discourage harvesters from exceeding the TAC in a program fishery, any overharvest of an allocation is a violation. Although penalties are at the discretion of NOAA Office of Law Enforcement and NOAA General Counsel, the Council has recommended that all overages be subject to forfeiture and that additional penalties be imposed only for overages in excess of 3% of a harvester's shares at the time of landing. **Once the TAC is set for the fishery, 10% of this amount is available for the Community Development Program (CDQ) Program or Adak Community Allocation (in the Western Aleutian Islands golden king crab fishery) and 90% of the TAC is converted into IFQ for harvest under the CR Program.**

A 2009 amendment to the program allows post-delivery transfers of QS. This amendment was intended to improve flexibility of the fleet, reduce the number of violations for overages, reduce enforcement costs, and allow more complete harvest of crab allocations.¹⁰

2.3.2 Harvesting Shares

Harvesting quota shares (QS) were created in each crab fishery of the program (see Figure 2-1). QS are a revocable privilege that allow the holder to harvest a specific percentage of the annual TAC in a program fishery. The corresponding annual allocations, which are expressed in pounds, are referred to as individual fishing quota (IFQ). The size of each annual IFQ allocation is based on the amount of QS held in relation to the QS pool in a program fishery — a person holding one percent of the QS pool receives IFQ to harvest one percent of the annual TAC in the fishery. **IFQ TACs do not include pounds that have been set aside for the CDQ program.** All crab that is sold or kept for personal use, and all deadloss is debited against the IFQ account of the allocation holder. Legal discards, however, are not counted against an IFQ holder's account.¹¹

QS are designated as either catcher vessel QS or catcher processor QS, depending on whether the vessel that created the privilege processed the qualifying landings on board. Approximately 97% of the QS (referred to as "owner QS") in each program fishery were initially allocated to LLP license holders based on their catch histories in the fishery. The remaining 3% of the QS (referred to as "C shares" or "crew QS") were initially allocated to captains based on their catch histories in the fishery.

Catcher vessel owner IFQ are issued in two classes, Class A IFQ and Class B IFQ. Crab harvested using Class A IFQ must be delivered to a processor holding unused individual processing quota (IPQ). In addition, Class A IFQ are subject to regional share designations, whereby harvests are required to be delivered within an identified region.¹² The delivery restrictions of Class A IFQ are intended to add stability to the processing

¹⁰ Amendment 28 to the BSAI king and Tanner crab FMP, Final rule published: 74 FR 41092.

¹¹ There is no prohibition against sorting crab at the rail, and it is common practice to discard females or sub-legal sized crab immediately after the pot is brought on board. While not debited from an individual account, discard mortality is estimated from observer data and factored into the total removals necessary for stock assessments.

¹² The EBT and WBT Tanner crab QS, and a portion of the WAG golden king crab QS, are considered undesignated because they do not carry a regional landing designation.



June 17, 2022

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

Dear Commissioner Vincent Lang,

On behalf of the City of Saint Paul, I would like to provide you with the following comments regarding a proposed Spend Plan for the \$12,935,199 made available in response to 2019-2020 tanner crab fishery disaster under Section 312 of the Magnuson-Stevens Act.

The City of Saint Paul's revenue is largely dependent on the revenues, businesses, services, and taxes associated with crab landings in the harbor and the processing of this resource at the Trident Seafoods plant, in particular of snow crab.

On average, snow crab landings and processing as a whole account for approximately 85% of the revenues entering the community. The City currently receives a 3.5% sales tax on crab delivered to, and processed by, floating processors within three nautical miles of Saint Paul Island, as well as deliveries inside the harbor for processing at the shore-side Trident plant. The City also generates revenues from a 2% sales tax on non-regionalized crab shares and receives sales taxes on fuel and supplies sold in the community. Finally, Saint Paul Island derives revenue and jobs from the crab fishery due to the activities of the Trident Plant and service support for the crab harvesting vessels calling at Saint Paul Island.

The community's success in developing a crab-dependent economy did not come without costs. After the phase-out of the commercial fur seal harvest in 1984, the City, with substantial federal and state support, embarked on the construction of a harbor, small boat harbor and other infrastructure necessary to become a platform for the Bering Sea crab fisheries. The City became highly indebted as a result and is still paying off obligations resulting from the construction of this infrastructure. In addition, despite the downturn in the crab TACs, the existing infrastructure must be maintained. These challenges to the community will be difficult to face, to say the least, without the revenues being generated by the crab fisheries.

For the above reasons, the City is supportive of an allocation to dependent communities of 4.75% in response to the tanner crab disaster determination and funding. Such a formula would cover for lost taxes revenues by the City. The attached spreadsheet provides some guidance on how such a split could take place. As far as the allocation between communities, the proportion of total landings to



each community would be an objective way of determining how much each community receives, even though it does not necessarily capture overall dependence on a particular resource by communities such as Saint Paul Island, vis-à-vis others with more diversified economies.

Saint Paul Island's dependence on tanner crab is limited, as compared to snow crab and Bristol Bay Red King crab. Should a disaster determination regarding the 2021-22 snow crab and BBRKC fisheries be made in the future, the City will likely be proposing a different formula that is reflective of this dependence.

Sincerely,



Phillip A. Zavadil, City Manager

Cc. Saint Paul City Council

2019/20 BST Fishery Disaster Spend PlanFunds from NOAA **\$12,948,148**

Off the Top Deductions

Communities	4.75%
Research	2.00%
Sum	6.75%
Net	93.25%

Then CDQ

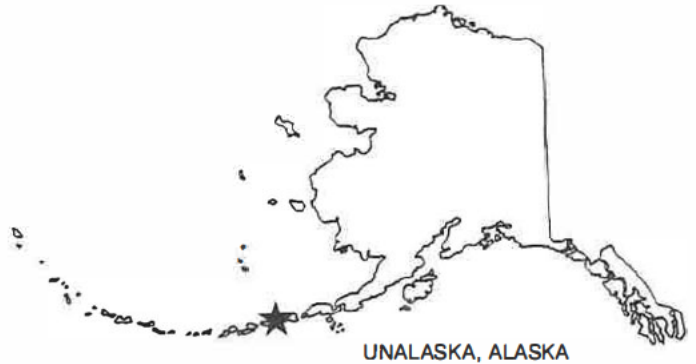
CDQ	10.00%
CDQ % of Net	9.33%
Net after CDQ	83.93%

From remainder, Harvester/Processor split

Harvester % of Gross	75.33%
Processor % of Gross	24.67%
Harvester % of Net	63.22%
Processor % of Net	20.71%

BST Spend Plan	% Allocation	\$ Allocation
Harvesters	63.22%	\$8,185,531
Processors	20.71%	\$2,681,203
CDQ	9.33%	\$1,207,415
Communities	4.75%	\$615,037
Research	2.00%	\$258,963
Sum	100.00%	\$12,948,148

Bairdi - Harvester/Processor split		2018
Formula	Wholesale Price X 0.49767-0.1043	
TAC		2,439,000
SAFE First Wholesale Price		\$7.83
Expected Ex-Vessel from formula		\$3.79
Recovery		64.3%
Fishery Gross Revenue	\$	12,279,609
Ex-Vessel Gross Revenue		\$9,249,800
Harvester % of Gross		75.33%
Processor % of Gross		24.67%



June 16, 2022

Karla Bush, Extended Jurisdiction Manager
Alaska Department of Fish and Game
PO Box 115526
Juneau, Alaska 99811-5526

RE: Federal Fishery Disaster Allocation for Bering Sea Tanner Crab \$12.9 Million

Karla:

The City of Unalaska has been the State of Alaska's largest crab processing community for over fifty years. Unalaska has been heavily impacted by the crash of many of our historic Bering Sea Crab stocks. We had a total closure of the Bristol Bay King Crab Fishery, a 90% decrease in the Bering Sea Snow Crab allocation from 45 million pounds down to 5.5 million pounds. The Western District Tanner Crab fishery was reduced by 60% from 2.2 million pounds down to 950,000 lbs. The Eastern District Bering Sea Tanner Crab fishery has been closed for five years.

The allocation reductions and off-season closures have had a terrible financial impact on the Crab Industry, harvesters, processors, CDQ, and crab-dependent communities of Southwest Alaska. The disaster allocation of \$12.9 million will not make any sector whole. Therefore, Unalaska recommends that the community's percentage be set at 4.75% off the top of the \$12.97 million, which would be \$615,037.03 allocated between the cities of Unalaska, Akutan, King Cove, and St. Paul. This small amount of funding would help offset losses incurred in fish, sales, and support sector tax revenues. I would also point out that Unalaska traditionally has processed over 50% of the Bering Sea Tanner crab allocation because Unalaska has three to four processors. We would further recommend and support that an additional 2% be allocated for crab research, \$258,963, as a passthrough to the Bering Sea Fisheries Research Foundation. For over 15 years, the foundation has done outstanding work on various crab species' life history,

Letter to Karla Bush
Alaska Department of Fish and Game
Page 2

tagging work, and stock survey assessments. That would leave 93.25% of the disaster funding, \$12,167,013.75, divided between harvesters, processors, and community development quota (CDQ) entities.

We would like to thank the Alaska Department of Fish and Game for considering the City of Unalaska's comments on the Bering Sea Tanner Crab disaster allocation percentages for communities and research allocations.

Sincerely,

A handwritten signature in black ink that reads "Vincent M. Tutiakoff Sr." The signature is written in a cursive style with a large initial 'V' and a prominent 'S' at the end.

Vincent Tutiakoff Sr.
Mayor
City of Unalaska

CC: City Manager Chris Hladick,
Unalaska City Council Members,

To: Commissioner ADFG Doug Vincent-Lang; Karla Bush; and Kari Winkler

From: North Pacific Crab Association (NPCA)

Re: Fishery Disaster Relief Fund-Comments

Date: 17 June 2022

Commissioner Vincent-Lang and staff;

Thank you for the opportunity to comment on the disbursement of federally allocated fishery disaster relief funding. The NPCA is a small trade association comprised of Alaskan fishery businesses that concentrate on processing crab resources in the Bering Sea. NPCA members hold individual processing quota shares (IPQ) under the federal crab rationalization program. Our members directly process IPQ shares in processing plants in the Bering Sea. Some of our members also custom process their IPQ shares and directly market their crab. All NPCA members hold shares of EBT crab that is the subject of the current fishery disaster funding. That funding has been designated to help with the financial loss suffered by participants in the 2019/2020 EBT (Eastern Bering sea Tanner) crab fishery.

As you know the Bering Sea crab fisheries are located in areas that are some of the most challenging in the country. All processing locations are remote and require labor and materials and people to travel into for the processing operation. Freight and fuel costs are extremely high and the plants depend on the resource to allow for their businesses to operate in a financially sound manner. The loss of the 2019/2020 EBT fishery was a very difficult event. Processing and custom processing suffered financial losses due to not being able to process EBT crab. Processor labor and products for market had to be cut short. Freight charges and market share are dependent upon volume of product and the loss of half the bairdi quota was substantial.

The bering sea crab fisheries are rationalized. Harvesters and processors have defined shares of fishing quota (IFQ) and IPQ. Community Development Quotas are also allocated. We believe that an equitable share of the fishery disaster relief funding can be reached for the participants in this particular fishery.

To assist the department in working on a spending plan the NPCA members have joined a crab stakeholder comment letter (sent separately) that proposes a division between CDQ groups; communities; harvesters and processors. Additionally there is a modest recommendation for research funding. We agreed to this joint proposal to expedite the disbursement of funds. Please understand that our agreement is limited to this fishery alone and should not be considered as a precedent for any other fishery disaster relief. Each fishery is unique and the processing sector has vastly different economic structures based on each fishery.

We believe each IPQ holder can submit its share of EBT quota to the ADFG for disbursement of the share of disaster funding allocated to the processing sector. This can be accomplished quite accurately as the EBT IPQ is managed by the restricted access management division of NOAA Fisheries.

We thank you for considering our comments and look forward to reviewing and further commenting on the ADFG proposed spending plan for the disbursements of the disaster relief funding.

Thank you,

John Iani

President NPCA

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Seattle, WA 98101

From: [Jamie Goen](#)
To: [DFG, ComFisheriesDisasters \(DFG sponsored\);](#) [REDACTED]
Subject: Re: comment on Tanner spend plan
Date: Friday, June 17, 2022 3:35:03 PM
Attachments: [Crab stakeholders' spend plan recommendation - 2019-20 Bairdi Fishery Disaster v2.pdf](#)
[BST spend plan formula v2.xlsx](#)

Hi Karla.

Follow-up to my email below. Please use the attached letter (v2) instead. I mistakenly left SWAMC's logo off the earlier version.

Apologies. -Jamie

From: Jamie Goen
Sent: Friday, June 17, 2022 1:28 PM
To: dfg.com.fisheriesdisasters@alaska.gov <dfg.com.fisheriesdisasters@alaska.gov>; [REDACTED]
Subject: comment on Tanner spend plan

Hi Karla.

Please see the attached letter signed by representatives of Bering Sea crab harvesters, processors, communities, and CDQ groups. We include several recommendations in the attached letter regarding the spend plan for the 2019/2020 Eastern Bering Sea Tanner crab fishery disaster declaration, including categories of affected fishery participants and how to allocate funds among those.

Also attached is an excel spreadsheet with formulas and resulting values for our recommended sharing arrangement.

We have worked hard as a group to come to agreement on what we view as a fair and equitable sharing of bairdi disaster funds among ourselves as affected fishery participants, building primarily from arrangements within our Crab Rationalization Program. Thank you for considering our recommendations and we are available to answer any questions you may have on this joint crab stakeholder recommendation.

Regards- Jamie

Jamie Goen
Executive Director

[REDACTED]
alaskaberingseacrabbers.org





June 17, 2022



Alaska Department of Fish and Game
Attn: Karla Bush, Extended Jurisdiction Program Manager
P.O. Box 115526
Juneau, Alaska 99811-5526

Re: Spend Plan Recommendations for the 2019/2020 Eastern Bering Sea Tanner Crab Fishery Disaster Declaration

Dear Ms. Bush:

The below signed parties of affected fishery participants representing various crab harvesters, processors, CDQ entities, and communities held three meetings and shared numerous emails over the past few weeks to come to general agreement on the below recommendations for the spend plan for the 2019/2020 Eastern Bering Sea Tanner crab fishery disaster declaration and resulting award of \$12,948,148.¹

Our recommendations are described in the bullets below with the categories and sharing arrangements also provided in Table 1. We have attached the corresponding Excel spreadsheet which includes formulas for your reference.

We recommend:

- Where possible, using the sharing arrangements established in the Bering Sea and Aleutian Islands Crab Rationalization Program as the basis for sharing fishery disaster funds among affected fishery participants.
- The categories of affected fishery participants should be harvesters, processors, Community Development Quota (CDQ) entities, communities, and research.
- Research funds flow through the Bering Sea Fisheries Research Foundation (BSFRF) to further mitigate impacts on harvesters and processors that fund that research

¹ The example in this recommendation uses the NOAA awarded amount of \$12,948,148 as noted on their [Fishery Disaster Determination website](#) for bairdi (number 108). We note [ADFG's public notice](#) states a slightly smaller amount of \$12,935,199.

organization. The expectation is that BSFRF would work collaboratively with ADFG and NMFS on bairdi research. We support the research priorities outlined in BSFRF’s comment letter.

- Research be awarded 2.00%. We recognize this is a lower percentage than other recent state spend plans. However, there are several other resources for crab research funding in the works through grants and Congress.
- Communities be awarded 4.75%. The Communities percentage is a negotiated amount based on the fishery landing tax from harvesters, a state tax, plus a tax paid from processors.
- Funds for research and communities comes off the top before allocating funds to CDQ, harvesters, and processors.
- CDQ be awarded 10% of the remaining amount consistent with Crab Rationalization Program allocation (see Figure 1) before allocating remaining funds between harvesters and processors. This results in 9.33% to CDQ.
- Harvesters and Processors should share according to the historical distribution of revenue from the Sackton formula for bairdi crab in 2018 (75.33% and 24.67%, respectively). Further description of this formula is provided below and in Table 2. After all other deductions, this results in 63.22% to Harvesters and 20.71% to Processors from the total funds available.
- We recognize that a small administration fee (<1%) will be added to the spend plan to account for handling the application process and awarding the money, etc.

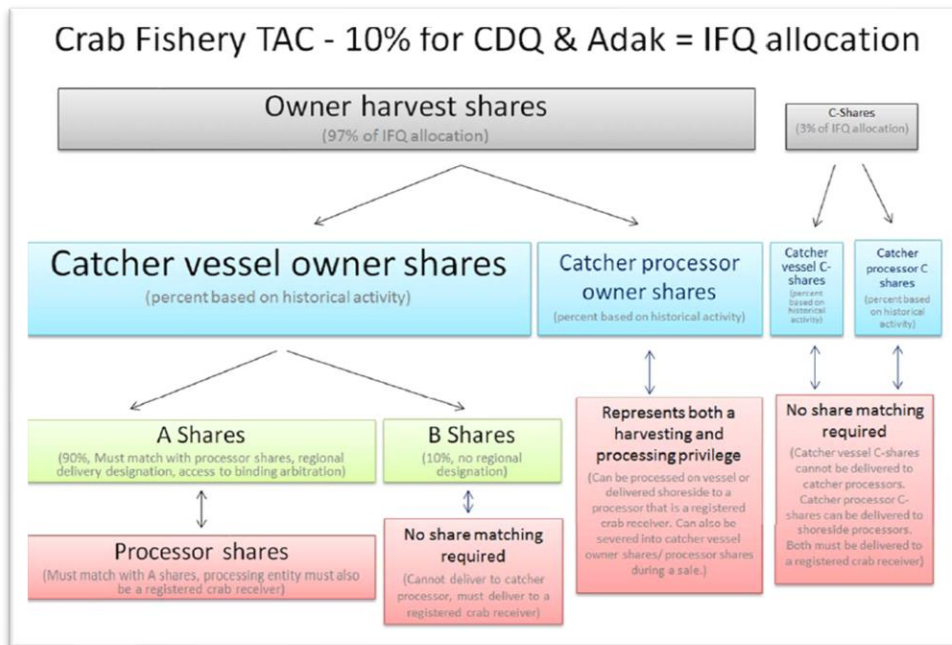


Figure 1. Diagram of quota shares from the [BSAI Crab Rationalization Program 10-year review](#) (p.29).

Table 1. 2019/20 Bairdi Fishery Disaster Spend Plan Categories and Sharing Arrangements

Off the Top Deductions		
Communities		4.75%
Research		2.00%
Sum		6.75%
Net		93.25%
Then CDQ		
CDQ		10.00%
CDQ % of Net		9.33%
Net after CDQ		83.93%
From remainder, Harvester/Processor split		
Harvester % of Gross		75.33%
Processor % of Gross		24.67%
Harvester % of Net		63.22%
Processor % of Net		20.71%
BST Spend Plan	% Allocation	\$ Allocation
Harvesters	63.22%	\$8,185,531
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CDQ	9.33%	\$1,207,415
Communities	4.75%	\$615,037
Research	2.00%	\$258,963
Sum	100.00%	\$12,948,148

Harvester/Processor Split

We recommend sharing between the Harvester and Processor categories be based on the historical distribution of revenue from the Sackton formula for bairdi crab in 2018 (75.33% and 24.67%, respectively). Table 2 shows the Sackton formula along with key values to calculate the sharing arrangement. While recovery rates for crab are variable among processors, the recovery rate of 64.3% is recommended for bairdi as the value used in the original Sackton formula and within the range of current recovery rates. To compare apples to apples, in this case revenue based on whole crab, Table 2 provides values to convert the fishery gross revenue (TAC x recovery rate x first wholesale value) and ex-vessel gross revenue (TAC x expected ex-vessel value from the Sackton formula) to a percent split between Harvesters of 75.33% (ex-vessel gross revenue / fishery gross revenue) and Processors of 24.67% (the remainder).

Applying this split after deductions for all other categories of affected fishery participants results in 63.22% to Harvesters and 20.71% to Processors from the total funds available.

Table 2. Values to determine Harvester/Processor sharing based on Sackton formula.

Bairdi - Harvester/Processor split		2018
Formula	Wholesale Price X 0.49767-0.1043	
TAC		2,439,000
SAFE First Wholesale Price		\$7.83
Expected Ex-Vessel from formula		\$3.79
Recovery		64.3%
Fishery Gross Revenue		\$12,279,609
Ex-Vessel Gross Revenue		\$9,249,800
Harvester % of Gross		75.33%
Processor % of Gross		24.67%

We would like to highlight that these recommendations are for the 2019/2020 Eastern Bering Sea Tanner crab fishery disaster. As you know, the Secretary of Commerce is currently reviewing the more recent 2021/2022 Alaska Bering Sea Crab Fisheries disaster request that includes Bristol Bay red king crab, Bering Sea snow crab, and Bering Sea Tanner crab and is estimated at over \$200 million in losses. While we expect this bairdi spend plan will set some precedent for the larger 2021/2022 disaster, if awarded, we want to make sure there is an opportunity to review and revise the sharing arrangements between affected fishery participants as appropriate for those crab fisheries. For example, the split between harvesters and processors may be different based on the Sackton formula for other crab species. Similarly, the amount to communities may differ based on other factors for those crab fisheries. Finally, we expect there may be some lessons learned as we move through the bairdi spend plan process that could be improved for the larger 2021/2022 disaster.

In closing, the below signed parties have worked hard to come to general agreement on these recommendations for the bairdi spend plan with the hope that it will speed up the fishery disaster process and get much needed relief to crab stakeholders more quickly. Thank you for considering our comments.

Sincerely,

Jamie Goen, Alaska Bering Sea Crabbers²

L. John Iani, North Pacific Crab Association³

Shirley Marquardt, Southwest Alaska Municipal Conference⁴

Phillip Zavadil, City of St. Paul

Vincent M. Tutiakoff, City of Unalaska

Robin Samuelsen, Bristol Bay Economic Development Corporation

Phillip Lestenkof, Central Bering Sea Fishermen's Association

Ray Melovidov, 57 Degrees North

Ragnar Alstrom, Yukon Delta Fisheries Development Association

Eric Deakin, Coastal Villages Region Fund

Luke Fanning, Aleutian Pribilof Island Community Development Association

Janis Ivanoff, Norton Sound Economic Development Corporation

ATTACHMENT: Excel spreadsheet with formulas and values "BST spend plan formula v2.xl"

² Alaska Bering Sea Crabbers (ABSC) is a non-profit industry trade association representing the majority of independent crab harvesters who commercially fish for king, snow (opilio), and Tanner (bairdi) crab with pot gear in the Bering Sea and Aleutian Islands Crab Rationalization Program.

³ The North Pacific Crab Association (NPCA) is a small trade association comprised of the majority of individual processing quota (IPQ) in the Bering Sea Crab Rationalization. NPCA members hold IPQ in the EBT bairdi fishery and process or have custom processed bairdi crab for the consumer markets. All such IPQ holders suffered losses due to the cancellation of the 2019/2020 EBT fishery and qualify for receipt of disaster relief funding.

⁴ Southwest Alaska Municipal Conference (SWAMC) is a regional economic development and regional membership organization that serves subregions of Southwest, Alaska, including Bristol Bay, Kodiak, and Aleutian/Pribilof.