



September 21, 2022

DRAFT Spend Plan for funds appropriated to address the 2019 Norton Sound red king crab disaster determination. NOAA Fisheries allocated \$1,433,137 for the 2019 Norton Sound red king 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: Ana Enge
PO Box 115526
Juneau, AK 99811-5526

Comments must be submitted by October 5, 2022, for consideration in the final spend plan.

Process to develop the spend plan: ADF&G posted an initial spend plan for public comment on August 12, 2022 and received one written comment (Appendix 1). ADF&G revised the plan to include two additional research themes based on public comment and input from the department's Subsistence Section. ADF&G is requesting comments on this second draft spend plan before the plan is finalized and submitted to the Pacific States Marine Fisheries Commission (PSMFC) who will be administering the federal grant for the fishery disaster funds.

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

1) assist fishery participants harmed by the 2019 Norton Sound red king 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 categories for disaster relief funds:

- **Harvesters:** Direct payments to 2019 licensed Commercial Fisheries Entry Commission (CFEC) Norton Sound red king crab permit holders and their vessel crew who meet all eligibility criteria. Fish ticket data from commercial Norton Sound red king crab landings will be used to determine eligibility for permit holders.
- **Processors:** Direct payments to processing facilities. Fisheries production and value data from the Commercial Operators Annual Report (COAR) will be used to determine eligibility and payment for processors.
- **Research:** The 2019 Norton Sound red king crab fishery disaster resulted from natural and undetermined causes which resulted in extremely challenging and unexpected conditions on the fishing grounds during both the winter and summer fishing seasons.

- **Program Support:** The Alaska Department of Fish and Game (ADF&G) is proposing to designate funds for staff working on fishery disaster plan development and implementation in coordination with PSMFC.

Proposed allocations to project categories and eligibility criteria: The proposed categories and allocations reflect comments received from initial stakeholder input. Recent Alaska disaster spend plans have included payments to communities to address the impacts of fishery disasters on shared fisheries taxes and fisheries-related economic activity in affected communities. Although ADF&G supports the allocation of disaster funds to communities to address these losses, initial input to ADF&G suggested a community allocation may not be applicable for the 2019 Norton Sound king crab fishery disaster. ADF&G requests public comment on the proposed categories for disaster relief funds and whether a community allocation should be considered for the 2019 Norton Sound red king crab fishery disaster.

Proposed allocations and eligibility for disaster relief funds:

Harvesters – 70% of total funds (~\$ 1.0 million): The 2014-2018 average value for the Norton Sound red king crab fishery is \$2.65 million dollars and the value of the 2019 fishery was \$534 thousand dollars, for a total estimated loss due to the disaster of \$2.1 million dollars. The funds proposed for allocation to the harvesting sector are intended to mitigate this loss by providing funds to bring the harvesting sector up to approximately half of their recent historical value, which is similar to funding amounts provided for harvesters in other recent disaster spend plans. In addition, the proposed allocation reflects initial stakeholder input suggesting that harvesters should receive the bulk of disaster funds.

Based on public comments, ADF&G is proposing to divide the harvester funds into two pools, 8% for winter fishery participants and 92% for summer fishery participants based on the guideline harvest level proportion allocated to each season. The summer fishery allocation is proposed to be further subdivided into two pools: 85% for permit holders and 15% for vessel crew. Most fishery permit holders operate with one to three additional crew members who earn an average crew share of 10% each. We are proposing to use the most recent seasons of 2017 through 2019 to establish eligibility criteria. This period covers years when the most recent management measures were in place including the guideline harvest level (GHL) split between the winter and summer fishery that was established in 2016 and the winter season pot limit implemented in 2017.

Winter fishery participants - 8% of harvester funds (~\$80,000)

Permit holders who meet both criteria below are eligible for a payment amount based on their average landings in 2017 and 2018. Participation during the 2019 winter season is not proposed as an eligibility requirement because most permit holders who registered did not make landings due to poor ice conditions.

1. K09Z or K09ZE permit holder must have made a Norton Sound red king crab commercial landing during the winter fishing season in any two of three years from 2017 to 2019.
2. ADF&G proposes to allocate available funds among four tiers. The tiers are based on the average annual pounds of Norton Sound red king crab harvested during the winter season by all eligible permit holders in 2017 and 2018. The proposed allocation to each tier approximates the proportion of the total average landings by harvesters in that tier. Each permit holder's payment will be determined by the tier level corresponding to their average landings in 2017 and 2018. All permit holders in the same tier level will receive the same payment amount.

Tier level	Average landings 2017-2018	Allocation	Est. number of eligible permit holders
1	< 800 pounds	10%	7
2	800 - 1,299 pounds	20%	6
3	1,300 - 1,999 pounds	30%	7
4	> 2,000 pounds	40%	5

Summer fishery participants - 92% of harvester funds (~\$923,000)

Permit holders - 85% of summer fishery funds or ~\$784,000.

Permit holders who meet both criteria below are eligible for a tiered payment based on their average landings from 2017 through 2019, not including the lowest year. Participation in the 2019 summer season is proposed as an eligibility requirement because weather conditions did not limit participation and nearly all permit holders who registered for the fishery made landings.

1. K09Z or K09ZE permit holder must have made a Norton Sound red king crab landing during the 2019 summer fishing season.
2. ADF&G proposes to allocate available funds among four tiers. The tiers are based on the average annual pounds of Norton Sound red king crab harvested during the summer season by all eligible permit holders from 2017 to 2019, not including the lowest year. For most permit holders, the lowest year was the 2019 disaster year. The proposed allocation to each tier approximates the proportion of the total average landings by harvesters in that tier. Each permit holder's payment will be determined by the tier level corresponding to their average landings from 2017 through 2019, not including the lowest year. All permit holders in the same tier level will receive the same payment amount.

Tier level	Average landings 2017-2019, drop one	Allocation	Est. number of eligible permit holders
1	> 6,000 pounds	10%	8
2	6,000 - 9,999 pounds	20%	7
3	10,000 - 17,999 pounds	30%	6
4	> 18,000 pounds	40%	5

Vessel crew - 15% of summer fishery funds or ~\$138,000.

Vessel crew members who meet both criteria below are eligible for an equal share payment. All eligible crew members will receive the same payment.

1. Vessel crew member must have held a 2019 commercial crew license or 2019 CFEC permit for any fishery. This information will be verified using the ADF&G Licensing database or the CFEC permit database.

2. Vessel crew member must have worked for a permit holder that made a landing during the 2019 summer season. This information will be verified based on crew contract, crew settlement, 1099-MISC tax form, or a signed affidavit from the permit holder.

Processors – 15% of total funds (~\$215,000): The 2014-2018 average wholesale value of the Norton Sound red king crab fishery for shorebased processors was \$3.04 million dollars and the wholesale value of the 2019 fishery was \$625 thousand dollars, for a total estimated loss due to the disaster of \$2.42 million dollars. The proposed allocation of funds to the processing sector is intended to mitigate this loss by providing funds to bring the processing sector up to approximately 10% of their recent wholesale value. In addition, the proposed allocation reflects initial stakeholder input suggesting that harvesters should receive the bulk of disaster funds.

Processors who meet both criteria below are eligible for disaster funds. If more than one processing facility is eligible, payment will be pro-rata to the facility's loss in 2019.

1. Processing facility must have processed Norton Sound red king crab in 2019.
2. The COAR data must show that the processing facility had a demonstrated first wholesale loss for Norton Sound red king crab in 2019 compared to the average annual first wholesale value for Norton Sound red king crab processed at the facility from 2014 to 2018.

Research – 15% of total funds (~\$215,000): Research funds will be allocated to improve available fishery information and help prevent and/or mitigate future fishery disasters. Research themes include:

1) Spatial distribution and movement of Norton Sound red king crab, including how environmental factors affect the distribution and movement of mature male crabs.

2) Evaluating the potential for electronic monitoring on small vessels to help estimate total catch.

3) Documentation of Traditional Ecological Knowledge of Norton Sound red king crab, including distribution, size distribution of subsistence harvest, developing community fishing profiles, and an evaluation of the impacts of changes in the fishery to Norton Sound communities.

4) Management strategy evaluation (MSE) analysis to look at the risks and tradeoffs of different management approaches that may allow for more consistent annual harvest and minimize fishery closures. Stakeholder goals for the fishery should be incorporated early in the MSE process.

ADF&G is requesting input on these or other suggested research themes. In addition, recent Alaska disaster spend plans have used competitive and non-competitive bid processes to award research funds. ADF&G is requesting input on the appropriate award process for the 2019 Norton Sound red king crab fishery disaster spend plan.

Program Support - <1% of total funds (\$1,500): 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.

Appendix 1. Public comments on the initial draft spend plan.



August 25, 2022

Alaska Department of Fish and Game
Attn: Ana Enge
PO Box 115526
Juneau, AK 99811-5526

Re: Draft Spend Plan for 2019 Norton Sound Red King Crab Disaster Determination

Dear Ms. Enge,

Norton Sound Economic Development Corporation (NSED) welcomes the opportunity to comment on the draft spend plan issued August 12, 2022 regarding the fishery disaster determination for the 2019 Norton Sound red king crab fishery.

NSED is the Community Development Quota (CDQ) organization representing 15-member communities and more than 8,700 people in the Norton Sound/Bering Strait region of Alaska. NSED provides economic development through education, employment, training and financial assistance to our member communities, with our biggest economic driver tied to our investments in regional commercial crab, halibut, salmon, and cod fisheries. NSED owns and operates three regionally based processing plants, four buying stations and a fleet of tender vessels that support more than 150 Norton Sound resident commercial fishers.

NSED also aims to promote scientific research within the Norton Sound region with an emphasis on supporting both local commercial and subsistence fisheries through our Norton Sound Fisheries Research and Development (NSFR&D) Department.

NSED is a stakeholder on several fronts in regard to the Norton Sound red king crab fishery. We operate as the sole buyer and processor for the commercial fishery, and support the fishing fleet with gear and loan programs. Our NSFR&D Department monitors the fishery and crab population while also conducting and supporting research on several fronts to better understand the dynamics of the resource. NSED also acts as an advocate for the fishery and its participants by actively engaging with related regulatory and management processes to push for decisions and policies that protect the long-term health of the crab resource while delivering as much benefit to resident stakeholders as possible.

NSED supports the draft spend plan's focus on the commercial fishery participants, as their loss is the most acute due to the 2019 failure and subsequent years of no commercial activity. NSED is also supportive of the tiered approach both between and within the summer and winter commercial fisheries.

In regard to the proposed research funding, NSED is supportive of the first proposed research item which would address the understanding of spatial distribution and movement of the crab population. NSED would also support funding being directed toward a management strategy evaluation (MSE) for the fishery, as has

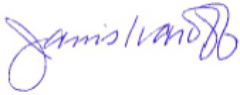
"NSED will participate in the Bering Sea fisheries to provide economic development through education, employment, training and financial assistance to our member communities."

2701 Gambell Street, Suite 400 Anchorage, AK 99503 (907) 274-2248 Fax: (907) 274-2249

been conducted for other Bering Sea crab fisheries, to determine possible outcomes of potential harvest strategy changes. NSEDC favorably views projects that would better inform and improve the accuracy of the current population modeling for the stock.

We are appreciative of the work done by ADF&G to prepare the draft spend plan, as well as the opportunity to provide comment. While we know disaster funds cannot replace what was lost by the fishery failure, we are hopeful that the spend plan, once finalized, will assist with mitigating the hardships that the loss of the fishery placed upon our resident fishers. Please do not hesitate to contact me if you have any questions.

Sincerely,



Janis Ivanoff
President & CEO

cc: Frank Katchatag, NSEDC Chairman
Simon Kinneen, NSEDC Vice-President
Tyler Rhodes, NSEDC COO

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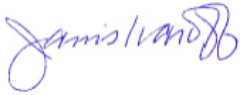
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Sincerely,



Janis Ivanoff
President & CEO

cc: Frank Katchatag, NSEDC Chairman
Simon Kinneen, NSEDC Vice-President
Tyler Rhodes, NSEDC COO

From: [REDACTED]
To: [DFG, ComFisheriesDisasters \(DFG sponsored\)](#)
Subject: NOAA 2019 Norton Sound Red King Crab Fisheries Disaster Relief
Date: Wednesday, May 11, 2022 5:04:33 PM

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>.]

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5/11/22

Hello,

My name is Randall Takak a longtime Crab and Salmon fisherman from Shaktoolik, Alaska located in the Norton Sound. First of all I'd like to thank you for reaching out and gathering info on how the disaster relief money should be distributed. I strongly know and seen firsthand that the active commercial summer crab fleet were deeply affected and impacted the hardest and it should be allocated to each fisherman that participated in the 2019 RKC summer fishery and five years prior based on each individuals catch history. Here is a few reasons why.

1. In 2019 there was a crab opener but only a fraction of the quota was harvested because of low crab numbers and it wasn't worth the crabbers time, risk, and money in which most or all of the fleet have gone further in debt with higher operating expenses.
2. In 2020 and 2021 there wasn't a crab season because of the concern of the crab population to rebound and recover. So we sat idle and slowly watching our livelihoods go into uncertainty with huge economic losses.
3. The winter commercial crab fishery should be excluded because it is unstable due to a high number of high pot loss, dead loss, and unstable sea ice conditions. And I believe it hinders with the crab breeding stock that move nearshore annually each winter to reproduce then move back out offshore in the spring.
4. The summer crab fishery was considered somewhat a feasible fishery of Norton Sound until the disaster started occurring.
5. I know the for a fact that some of the returning summer crabbers are hardest working people with high safety risks, debt, increasingly higher operating costs, and shorter seasons due to the growing number of vessels actively participating.

Thank You

Randall Takak
[REDACTED]
Shaktoolik, Ak
99771
[REDACTED]

Sent from my iPhone

From: [Merle Towarak](#)
To: [DFG, ComFisheriesDisasters \(DFG sponsored\)](#)
Subject: Distasteful relief
Date: Wednesday, May 11, 2022 10:35:47 AM

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Hi,

My name is Merle Towarak. I fish commercially for the 2019 Norton sound red king crab fishery and the 2020 Norton sound salmon fishery. If you have any questions please email me at [REDACTED]. Thank you and have a good day.

Sent from my iPhone

From: [Tyler Rhodes](#)
To: [DFG, ComFisheriesDisasters \(DFG sponsored\)](#)
Cc: [Simon Kinneen](#); [Janis Ivanoff](#)
Subject: May 11 meeting
Date: Tuesday, May 10, 2022 10:48:32 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

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

Hello Karla,

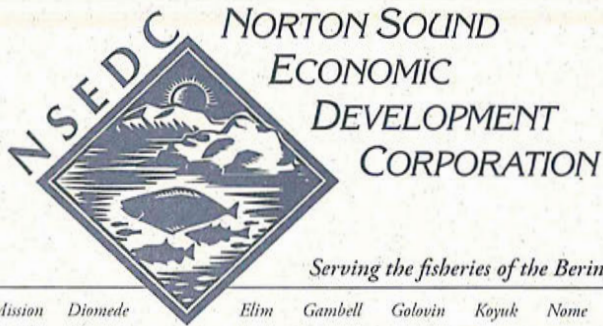
NSEDC plans to offer comments during tomorrow's 10 am session regarding spend plans for Norton Sound 2019 red king crab and 2020 salmon. Is there a sign-up sheet to provide comments or will it somehow be addressed during the meeting? We will plan on submitting written comments as well. Is there a deadline to get those to the department?

Thanks!

Tyler

Tyler Rhodes | [Norton Sound Economic Development Corporation](#)
Chief Operating Officer

██████████
Nome, Alaska 99762
██████████



Brevig Mission Diomedes Erim Gambell Golovin Koyuk Nome Saint Michael Savoonga Shaktolik Stebbins Teller Unalakleet Wales White Mountain

October 7, 2019

The Honorable Neal Foster
Alaska House of Representatives
State Capitol Room 505
Juneau, Alaska 99801

Dear Representative Foster,

I am writing on behalf of the Norton Sound Economic Development Corporation (NSEDCC), the regional Community Development Quota (CDQ) organization, to request your assistance in the pursuit of a determination on whether the 2019 Norton Sound red king crab (NSRKC) fishery qualifies for a fisheries disaster declaration.

As you are aware, the 2019 winter and summer commercial NSRKC fisheries were both extremely challenging. The winter fishery was next to impossible to prosecute due to the lack of sea ice required to legally set gear. Although there were limited deliveries, the overall harvest was drastically reduced and far less than the catch limits specified by the Alaska Department of Fish and Game. There was hope, however, that the forgone harvest in the winter fishery would be made up in the summer commercial season (any crab allocated to the winter fishery but not harvested during the winter season 'rolls into' the summer fishery).

While the summer fishery was more successful in that fishermen at least had the opportunity to try to prosecute the fishery, the results were arguably much worse. The fishery catch rates were nothing short of abysmal, with Norton Sound fishermen falling well short of the quota. This wasn't for lack of effort, however. Fishermen and their crews spent weeks and months searching for viably harvestable concentrations of crab to no avail. In addition to the lack of income for their time and efforts, vessel owners spent substantial amounts of money to pay for the fruitless operations. The cost of equipment and fuel to utilize it is substantial during a productive fishing season, and crippling in a season like 2019.

The NSRKC fishery is historically a high-value fishery and extremely important to the fishermen who rely on it for the bulk of their annual income. Fishermen from across our regional communities participate in this fishery, so the results are widespread in Norton Sound.

In light of the 2019 NSRKC fishery results, I'd appreciate your coordination with the State of Alaska to investigate if a potential commercial fishery failure has occurred and to determine if it is appropriate to petition the Secretary of Commerce for a fishery disaster determination for this fishery.

Please do not hesitate to contact me with any questions or if there is any information we can provide to assist in this process.

Sincerely,



Janis Ivanoff
President & CEO

cc: Dan Harrelson, NSEDC Chairman

MAY 11, 2022 - FISHERY DISASTERS' PUBLIC COMMENT SESSION

96 - NORTON SOUND RED KING CRAB – 1:06

MAY 11, 2022 - 1:06

On May 11th, 2022, The Alaska Department of Fish and Game (DF&G) held a public comment listening session for all six approved fishery disasters. The comments in this document pertain to the Norton Sound Region: Federal Disaster #96: Alaska Norton Sound Red King Crab

Eric Osborne, Nome, RKC & Salmon:

- Fund allocation: Money needs to go to the people. Commercial fishermen have taken huge hits.

Don Stiles, Nome, RKC:

- Fund allocation: Winter season – 8% of total relief funds. Summer season - 92%
- Eligibility criteria: Recommend participation (held permit card and delivered) in 2019 fishery.

Ken Anderson, Unalakleet, RKC & Salmon:

- Eligibility criteria: We fished two years (2021 and 2020) hoping that new entrants will also be included (less than five years). Hope relief extends to non-resident permit holders.
- Fund allocation: Support a tiered approach, think it's a fair way to distributed.

Phil Pryzmont, Nome, RKC:

- Fund allocation: Not satisfied with equal share payouts for the 2018 P-cod disaster (jig fishery). There's a discrepancy between those who fish summer and those who do a little in the winter. Would like to see a sliding scale for individual history. Sliding scale based on individual history.

Tyler Rhodes, Chief Operating Officer, Norton Sound Economic Development Corporation (NSEDC), RKC & Salmon:

- Fund allocation: Processors have incurred losses; however, resident fishers (commercial and subsistence) losses were comparatively greater and should receive the bulk of fund allocation. For salmon, the fishery has grown over the last decade and become a more important income for the community. Our commercial fleet is also a subsistence fleet and that needs to be taken into consideration. Processor employees should be considered – many were hired to work and didn't receive hours. Hoping the NS 2021 season (salmon and RKC) will be included down the line.
- Research recommendations:
 - ❖ Salmon: Looking at ocean conditions that are leading to widespread failure.
 - ❖ RKC: Would support research evaluating NSRKC management strategy and objectives, improvements of the population modeling, and ensuring an annual trawl survey is conducted to improve data collection.

Jacob Ivanoff, Unalakleet, RKC & Salmon:

- Fund allocation: More for the salmon fishery - should consider commercial fishing effort/time spent fishing. Some permit holders make only one or two deliveries - support a tiered approach to harvester allocations based on the number of deliveries made.

Randy Takak, Shaktoolik, RKC & Salmon:

- Eligibility criteria: Funds should be distributed to crab permit holders who participated in 2019 and be based on their catch history. Don't support subsistence for crabs.

From: [Tyler Rhodes](#)
To: [DFG, ComFisheriesDisasters \(DFG sponsored\)](#)
Cc: [Janis Ivanoff](#); [Simon Kinneen](#); [Frank Wayne. Katchatag](#); [Enge, Ana C \(DFG\)](#)
Subject: RE: NSEDC Comment on Draft Spend Plan for 2019 NSRKC Fishery Disaster
Date: Friday, September 9, 2022 11:29:14 AM
Attachments: [image001.png](#)
[image003.png](#)
[image005.png](#)
[image006.png](#)
[image008.png](#)

Hello Karla,

Thanks for reaching out with the additional questions. We have had a few discussions internally on a possible MSE for the Norton Sound red king crab fishery, but have not firmly landed on any final, prioritized objectives yet. However, the following points are items that we have identified as possibilities should an MSE move forward:

- Are there management strategies that will allow more consistent harvest each year and minimize the years that are closed? (i.e. examine the effects of more conservative GHGs in certain scenarios)
- Currently the GHG is based on legal size of 4 ¾" while the market only purchases 5" or larger crab. Are there management changes that would likely lead to a more stable fishery considering that only 5" crab are retained in the summer fishery?
- When a pulse of crab comes into the fishery are there management strategies that would extend the number of years that could be fished on the pulse? How does reduced harvest on the front end of a pulse affect the number of years that crab from the pulse are available for harvest?

Additionally, if an MSE is to be considered, a process should be included in getting feedback from Norton Sound resident stakeholders on what goals they may want to see addressed. This is another aspect that could benefit from available funding.

Regards,

Tyler

Tyler Rhodes | [Norton Sound Economic Development Corporation](#)
Chief Operating Officer

Nome, Alaska 99762

Phone: [REDACTED]

Fax: [REDACTED]

From: DFG, ComFisheriesDisasters (DFG sponsored) <dfg.com.fisheriesdisasters@alaska.gov>

Sent: Wednesday, September 7, 2022 3:36 PM

To: Tyler Rhodes [REDACTED]

Cc: Janis Ivanoff [REDACTED]; Simon Kinneen [REDACTED]; Frank Wayne. Katchatag [REDACTED]; Enge, Ana C (DFG) [REDACTED]
Subject: RE: NSEDC Comment on Draft Spend Plan for 2019 NSRKC Fishery Disaster

EXTERNAL EMAIL: Do not open unexpected attachments or links.

Tyler,

Thank you for your comments on the initial draft spend plan for the 2019 Norton Sound red king crab fishery disaster.

Regarding your recommendation for “funding being directed toward a management strategy evaluation (MSE) for the fishery, as has been conducted for other Bering Sea crab fisheries, to determine possible outcomes of potential harvest strategy change”, it would be helpful to understand what your goals and/or objectives for that study would be. For example, the recent MSE for the [Bering Sea Tanner crab harvest strategy](#) were to explicitly incorporate particular conservation and economic goals (incorporate consideration of the female stock component and minimize the years when the fishery is closed).

I appreciate any clarity that you can provide.

Karla

~~~~~

Alaska Department of Fish & Game  
Extended Jurisdiction Program Manager

[REDACTED]  
Office: [REDACTED]  
Mobile: [REDACTED]

---

**From:** Tyler Rhodes <[tyler@nsedc.com](mailto:tyler@nsedc.com)>  
**Sent:** Thursday, August 25, 2022 11:53 AM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored) <[dfg.com.fisheriesdisasters@alaska.gov](mailto:dfg.com.fisheriesdisasters@alaska.gov)>  
**Cc:** Janis Ivanoff [REDACTED]; Simon Kinneen [REDACTED]; Frank Wayne. Katchatag [REDACTED]  
**Subject:** NSEDC Comment on Draft Spend Plan for 2019 NSRKC Fishery Disaster

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

To whom it may concern,

Please find the attached comment letter from Norton Sound Economic Development Corporation on the Draft Spend Plan for the 2019 Norton Sound Red King Crab Fishery Disaster Determination.

Please let us know if there are any questions on our submission.

Thank you,

Tyler

**Tyler Rhodes** | [Norton Sound Economic Development Corporation](#)  
Chief Operating Officer

[REDACTED]

Nome, Alaska 99762

Phone: [REDACTED]

Fax: (9 [REDACTED]



Brevig Mission Diomed

Elim

Gambell

Golovin

Koyuk

Nome

Saint Michael

Savoonga

Shaktoolik

Stebbins

Teller

Unalakleet

Wales

White Mountain

August 25, 2022

Alaska Department of Fish and Game

Attn: Ana Enge

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NSED is the Community Development Quota (CDQ) organization representing 15-member communities and more than 8,700 people in the Norton Sound/Bering Strait region of Alaska. NSED provides economic development through education, employment, training and financial assistance to our member communities, with our biggest economic driver tied to our investments in regional commercial crab, halibut, salmon, and cod fisheries. NSED owns and operates three regionally based processing plants, four buying stations and a fleet of tender vessels that support more than 150 Norton Sound resident commercial fishers.

NSED also aims to promote scientific research within the Norton Sound region with an emphasis on supporting both local commercial and subsistence fisheries through our Norton Sound Fisheries Research and Development (NSFR&D) Department.

NSED is a stakeholder on several fronts in regard to the Norton Sound red king crab fishery. We operate as the sole buyer and processor for the commercial fishery, and support the fishing fleet with gear and loan programs. Our NSFR&D Department monitors the fishery and crab population while also conducting and supporting research on several fronts to better understand the dynamics of the resource. NSED also acts as an advocate for the fishery and its participants by actively engaging with related regulatory and management processes to push for decisions and policies that protect the long-term health of the crab resource while delivering as much benefit to resident stakeholders as possible.

NSED supports the draft spend plan's focus on the commercial fishery participants, as their loss is the most acute due to the 2019 failure and subsequent years of no commercial activity. NSED is also supportive of the tiered approach both between and within the summer and winter commercial fisheries.

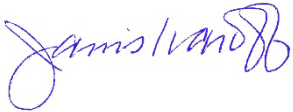
In regard to the proposed research funding, NSED is supportive of the first proposed research item which would address the understanding of spatial distribution and movement of the crab population. NSED would also support funding being directed toward a management strategy evaluation (MSE) for the fishery, as has

*"NSED will participate in the Bering Sea fisheries to provide economic development through education, employment, training and financial assistance to our member communities."*

been conducted for other Bering Sea crab fisheries, to determine possible outcomes of potential harvest strategy changes. NSEDC favorably views projects that would better inform and improve the accuracy of the current population modeling for the stock.

We are appreciative of the work done by ADF&G to prepare the draft spend plan, as well as the opportunity to provide comment. While we know disaster funds cannot replace what was lost by the fishery failure, we are hopeful that the spend plan, once finalized, will assist with mitigating the hardships that the loss of the fishery placed upon our resident fishers. Please do not hesitate to contact me if you have any questions.

Sincerely,



Janis Ivanoff  
President & CEO

cc: Frank Katchatag, NSEDC Chairman  
Simon Kinneen, NSEDC Vice-President  
Tyler Rhodes, NSEDC COO