



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

## Department of Fish and Game

OFFICE OF THE COMMISSIONER  
Headquarters Office

1255 West 8<sup>th</sup> Street  
P.O. Box 115526  
Juneau, Alaska 99811-5526  
Main: 907.465.6136  
Fax: 907.465.2332

**DRAFT Distribution Plan for funds appropriated to address the 2018 Chignik sockeye salmon disaster declaration.** NOAA fisheries has allocated \$10,327,039 for the Chignik sockeye salmon fishery disaster.

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

[DFG.2018ChignikSockeye@alaska.gov](mailto:DFG.2018ChignikSockeye@alaska.gov) or by mail to: ADF&G, Attn: Kari Winkel  
PO Box 115526  
Juneau, AK 99811-5526

Comments must be sent by Friday, August 14, 2020, for consideration in the next iteration of the distribution plan.

**Proposed guiding principles for disaster funds distribution:** Disbursement of funds are intended to: 1) assist fishery participants harmed by the 2018 sockeye salmon fishery disaster and; 2) improve fishery information used to assess and forecast future fishery performance and to develop management approaches that avoid and/or mitigate the impacts of future fishery disasters that cannot be prevented.

**Proposed categories for disaster relief funds:**

- **Harvesters:** Direct payments to 2018 licensed CFEC Chignik salmon seine permit holders and their vessel crew who meet all eligibility criteria. Fish ticket data from commercial Chignik sockeye salmon landings will be used to determine eligibility and payment for permit holders.
- **Processors:** Direct payments to processing companies. Fisheries production and value data from the Commercial Operators Annual Report (COAR) will be used to determine eligibility and payment for processors. An option to include Tender vessels is included in this category and more input from participants is needed to further develop eligibility criteria and the distribution process.
- **Communities:** Municipalities and boroughs rely on revenue generated from salmon landings and other economic activities related to the Chignik salmon fishery. Funds designated for communities can be used for managing, repairing, or maintaining infrastructure, services, or habitat that support sockeye salmon fisheries in the region.
- **Subsistence:** The fishery failure placed an additional burden on many households in the five Chignik area communities who rely on sockeye salmon to meet their subsistence needs. The impact of the failed 2018 sockeye salmon fishery is beyond the capacity of local governments to manage or mitigate, so in 2018 the Chignik Intertribal Coalition (CIC) was formed to provide winter food security for those in need. The CIC has requested fishery disaster funds to explore the development of alternatives to support subsistence activities in the region.
- **Research:** The 2018 Chignik sockeye salmon fishery disaster resulted from a failure in both the early and late run components of the stock. Key data gaps exist as to the potential cause of the collapse and the extent to which freshwater or marine processes contributed to the failure of both runs is unknown. Disaster funds will be used for scientific and socioeconomic research activities to better understand

sockeye salmon ecology and abundance, improve sockeye salmon forecasts in the future, and improve understanding of the effects of the Chignik sockeye salmon disaster on subsistence users in the region.

- **Program Support:** The Alaska Department of Fish and Game (ADF&G) is proposing to designate funds for staff time dedicated to fishery disaster plan development and implementation in coordination with Pacific States Marine Fisheries Commission (PSMFC).

**Proposed allocations to project categories and eligibility criteria:** The proposed categories and allocations reflect comments received from initial stakeholder input and the Governor’s office.

**Harvesters – 55%:** Funds allocated to harvesters are calculated to achieve ~75% of the 2015 to 2017 average exvessel value of the commercial Chignik sockeye salmon fishery.

ADF&G is proposing to subdivide the harvester allocation into two pools, one for vessel permit holders (65%) and one for vessel crew members (35%). The 65/35 proposed split between permit holders and crew members is based on an average crew share of 10% and 3-4 crew members per vessel.

ADF&G proposes a permit holder-based distribution where funds would be paid to the individual named on the CFEC commercial fishing permit used to make sockeye salmon landings.

**Permit holders (65% of harvester pool):**

Proposed eligibility criteria for permit holders:

1. 2018 CFEC S01L permit holders.
2. Permit holder must have made Chignik sockeye salmon landings in at least two out of three years from 2015 to 2017.
3. CFEC permit holder must not have made landings in another 2018 salmon seine fishery.

Option 1: remove eligibility criteria #3.

Option 2: remove eligibility criteria #3 and modify the fund distribution for CFEC permit holders that made landings in another 2018 salmon seine fishery.

Proposed distribution for permit holders:

Option 1: Equal share – all eligible CFEC permit holders would receive an equal payment of the permit holder allocation pool.

Option 2: Tiers – establish four tiers based on the average annual pounds of commercial sockeye salmon landed by each permit holder in their best two of three years (2015 to 2017). Twenty-five percent of the permit holder pool would be allocated to each tier and those funds would be equally shared by the eligible permit holders in each tier.

Tier level	Average landings (best 2 of 3 years)	Allocation (from the permit holder pool)	Est. number of eligible permit holders
1	≥ 184,000 pounds	25%	10
2	140,000 – 183,999 pounds	25%	13
3	98,000 – 139,999 pounds	25%	18
4	≤ 97,999 pounds	25%	27

Suboption: Eligible permit holders who made salmon landings in another 2018 salmon seine fishery would receive 50% of the tier payment.

Vessel Crew (35% of harvester pool): Vessel crew that meet the eligibility criteria are proposed to receive an **equal payment** from the crew member pool. The intent is to identify those crew who intended to participate during the 2018 season and who were dependent on the fishery as evidenced by prior participation as crew in the Chignik fishery.

Proposed eligibility criteria for vessel crew:

1. Crew member must have held a 2018 commercial crew license or 2018 CFEC permit for any fishery. This information will be verified using the ADF&G Licensing database and the CFEC permit database.
2. Crew member must provide information to show intent to participate as vessel crew in the 2018 commercial Chignik salmon fishery, based on crew contract or skipper affidavit.
3. Crew member must provide information to show prior participation as vessel crew in the commercial Chignik salmon fishery in any year 2015 to 2017, based on crew contract, crew settlement, 1099 tax form, or skipper affidavit. Crew member must have had a valid commercial crew license or CFEC permit for the corresponding year with prior participation.

Processors – 11%: Based on initial comments from stakeholders, ADF&G proposes to calculate the allocation to eligible commercial Chignik salmon processing companies based on the average wholesale value of Chignik sockeye salmon processed by the company from 2015 to 2017 using Commercial Operator’s Annual Report (COAR) data.

Proposed processor eligibility criteria:

1. Processing company must have processed Chignik sockeye salmon in at least two of three years, 2015 to 2017.
2. Processing company must have an average 2015 to 2017 first wholesale value of \$10,000 or greater for Chignik sockeye salmon.

Disaster payments to processing companies are proposed to be **pro rata** to their demonstrated loss.

Option for Tender vessels: Include Tender vessels by subdividing the processor allocation into two pools: one for processing companies (X%) and one for tender vessels (X%).

Proposed eligibility criteria for tender vessels:

1. Tender vessel must have been listed on a signed a contract with a processing company in 2018 to tender salmon from the Chignik area.
2. Tender vessel must have been used to tender Chignik sockeye salmon in two out of three years (2015 to 2017) based on signed contracts with a processing company to tender salmon from the Chignik area.
3. Tender vessel must not be owned by a processing company eligible to receive funds from the processing company pool.

Tender vessel owners that meet the eligibility criteria will receive an **equal payment** of the tender vessel pool.

Communities – 3%: Based on initial comments from stakeholders, ADF&G proposes to allocate a portion of the funds to fishing communities in the Chignik region that depend on revenue generated from fish landings and other economic activity related to the fishery. These revenues comprise a significant portion of local operating budgets and are used to support education, public works, ports and harbors, and other services.

ADF&G proposes that community entities eligible to receive funds would identify specific expenditures for managing, repairing, or maintaining infrastructure, services, or habitat that support sockeye salmon fisheries in the region prior to receiving funds from Pacific States Marine Fisheries Commission (PSMFC).

**Subsistence – 1%:** These funds are proposed to go to the Chignik Intertribal Coalition (CIC) to explore the development of alternatives to provide sustained future support of subsistence activities in the region. Residents of the region are heavily dependent on the sockeye salmon runs to sustain their subsistence lifestyle.

The CIC may need to identify specific projects or infrastructure that support subsistence activities in the region prior to receiving funds from PSMFC. The funds could also be considered for direct payments to regional households to mitigate food security concerns.

**Research - 30%:** There are two genetically distinct sockeye salmon runs that contribute to the Chignik sockeye salmon fishery. The early-run, predominantly Black Lake watershed, sockeye salmon and the late-run, primarily Chignik Lake watershed sockeye salmon. Information from ADF&G shows that the total Chignik sockeye salmon run has both a long-term (1998 to 2017) and short-term (2013 to 2017) average size of approximately 2.4 million fish. In 2018, both the early and late runs failed, and total run size was approximately 540,000 sockeye salmon. Key data gaps exist as to the potential cause of the collapse and the extent to which freshwater or marine processes contributed to the failure of both runs is unknown.

Research funds will be available by competitive bid through PSMFC. Funds will be available for scientific research projects that provide information to help fishery scientists and managers assess the freshwater and marine conditions that influence the productivity of the Chignik sockeye salmon stock. The primary goals of research funds are to further our understanding of the cause of the 2018 Chignik sockeye salmon fishery failure, better understand the abundance and ecology of Chignik sockeye salmon, improve the ability of resource managers to identify future poor runs, and to help managers avoid and mitigate the impacts of future Chignik sockeye salmon fishery disasters that cannot be prevented.

Funds will also be available for socioeconomic research to examine the effects of the Chignik sockeye salmon disaster on subsistence users in the region. This research will help scientists and managers better understand the relationships between subsistence and commercial fishing, factors that affect harvest effort and harvest success, and will help to effectively manage future fish related disasters.

Based on initial comments received from stakeholders and resource managers, ADF&G recommends funding research projects that are focused around the following themes:

- 1) Better understanding of the environmental factors and freshwater and marine processes that drive downstream movement of early and late run sockeye salmon.
  - 2) Investigate juvenile sockeye salmon movement, growth, and habitat use in freshwater and estuarine environments.
  - 3) Improvements to sockeye salmon escapement enumeration with a focus on late-season assessment.
  - 4) Better understanding of the socioeconomic effects of fishery disasters on subsistence users in the region related to food security concerns.
- 5) **Administrative – <1%:** ADF&G is proposing to allocate funds to cover salary and benefits for a Program Coordinator position to oversee the fishery disaster program on behalf of the State of Alaska. Fishery disaster coordination is not expected to require full-time year-round work. Funding for this position is expected to cover an average workload of 37.5 hours per month plus indirect costs.

**From:**  
**To:** [DFG, 2018ChignikSockeye \(DFG sponsored\)](#)  
**Subject:** 2018 sockeye distribution  
**Date:** Tuesday, July 21, 2020 3:26:54 PM

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To whom it may concern;

I am writing to give my view on the considerations for the 2018 Chignik Sockeye disaster distribution and the requirements of eligibility.

If the intent is to HELP the participants and communities, I am in favor of an equal distribution per PERMIT HOLDER- similar to the distribution a crew member will receive per this plan. Some fishermen always produce more than others, but we were all affected by the lack of a fishery and if the intent is to actually help all affected this is the best way in my opinion, perhaps take into consideration there may not be a commercial fishery once more in Chignik in 2020.

Eligibility requirements for permit holder item 3- not having made deliveries in other salmon fisheries should remain a requirement to be eligible. If those fishermen were able to participate in other salmon fisheries they should not request disaster assistance. Leave it for those that did not have the option to have a fishing season.

I would like to add my take on one of the requirements for crew, that they must show proof that they participated 3 years prior to 2018, I would like for the crew I had to be able to receive some kind of income from this lost season but none of them had ever fished Chignik prior to 2018, so this requirement makes my crew ineligible.

There was no 3 year requirement regarding the 2016 pink salmon disaster eligibility.

I planned on 3 manning it in 2018, one of my crew has licenses for those years but didn't fish in 2016, and the other crew fished in

2015 and 2018, but not in 2016 or 2017. I dont think this requirement is fair for the crew.

Sincerely,

Timothy Murphy

Chignik Seine Permit Holder and summer resident of Chignik Lagoon

**From:**

DFG\_2018ChinnikSockeye (DFG sponsored)

**Date:**

Wednesday, July 22, 2020 2:50:54 AM

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You need to address what's causing the acute collapse of the Chinook salmon before you can help. Why is there no talk on Fukushima and its 3 nuclear meltdowns yet.? It's getting worse.

CJ Schenck

**From:**  
**To:** DFG, 2018ChignikSockeye (DFG sponsored)  
**Date:** Wednesday, July 22, 2020 12:34:06 PM

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I do not support other fishers who made landings in other fisheries in 2018. I believe there is a law tht states you cannot participate in 2 fisheries, so its unlawful as well.

Patrick Kosbruk

**From:** DFG, 2018ChignikSockeye (DFG sponsored)  
**Subject:** Chignik Salmon Disaster Relief Distribution  
**Date:** Thursday, July 23, 2020 9:55:51 AM

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Why isn't a portion of the Chignik disaster relief being distributed to Kodiak salmon fishermen? Chignik recently argued that Kodiak fishermen have been catching Chignik's salmon in order to successfully advocate for a fishery management change. If in fact Kodiak salmon fisherman had relied on Chignik salmon in the past it wouldn't make sense that Kodiak fishermen were affected by the disaster under the old management structure. Therefore Kodiak fishermen should receive a portion of the relief.

<https://www.alaskajournal.com/2020-01-22/board-shifts-salmon-kodiak-chignik-cook-inlet#:~:text=Board%20shifts%20salmon%20from%20Kodiak%20to%20Chignik%2C%20Cook%20Inlet,-By%3A&text=Commercial%20fishermen%20in%20Kodiak%20will,proposals%20at%20its%20meeting%20Jan.>

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Ian Ivanoff

Thank you for the opportunity to comment on the distribution plan for 2018 Chignik Fishery disaster funds. These funds are critical to the survival of Chignik businesses, families and the communities as a whole and we will appreciate the opportunity to begin stabilizing our area. As the fishery is presently suffering yet another year of falling below escapement levels needed to sustain a fishery, and everyone faces the burdens of covid-19, the prompt distributions of funds are ever more critical. That said, I hope this perspective only helps to expedite a fair distribution.

When considering permits to crew allocations, consideration should be given that the burden of startup to the permit holder is so much greater during low or disaster scenarios. Boat owners/permitholders incur direct financial loss of around \$50k or more with payments included to ready a seiner annually. Crew did not experience loss in most cases as the permittee in most cases bore the burden of crew travel, crew licenses, groceries and the accompanying freight. In other words, a permit holder begins a year with a loss while crew begin the year at zero. The ability to fish gradually mitigates this loss but with no fishery in 2018 the permit holder went financially backwards. The typical ratio of permit share/crew share should be tipped more to the permit holder if this is truly relief. A 75/25 split would be more equitable.

When identifying permit holders, only those that were ready and able to prosecute the Chignik fishery and that did not get to mitigate their losses in another Alaska salmon seine fishery should qualify for disaster relief funds. If CFEC recorded income was generated to the permit holder in another salmon seine fishery, then damage/loss was mitigated certainly to the degree that if the permit holder generated the same or more as the disaster payment share equates then they and their crew do not carry a burden needing this disaster relief.

Regarding the percentage to processors, the local processors buying in Chignik do not have shore based processing facilities but have very diversified business models with many other facilities around the state and they spread seasonal fluctuations from area to area. They were able to move most tenders and floating processors to other salmon fishing areas as needed, thus mitigating losses as well. Only a handful of local tenders who were not moved to other areas would need relief. As with permits and crew that moved to other areas, processors should be seeking relief for losses not mitigated elsewhere. Less than 11% is likely reasonable.

I am very concerned with the percentage directed to research. For studies to be optimally relevant, it would be necessary to know the number of fish escaping into the river system. Recent budget deficits are not allowing the weir to remain into September and so valuable information, that other studies would benefit from, is being lost. Until the state funds comprehensive escapement counts with a mindset of maintaining a sustainable fishery, 15%-20% of the funds would be appropriate.

To expedite the initial distribution of funds to the permit holder, 50% of the funds should be dispersed in equal portions immediately or as soon as practical. The second portion can be scrutinized and calculated for any catch history that may be decided on. This would keep the range of payments more narrowed, adjusting the lowest recipient permit holder's payment higher and the highest lower. Highlighting the levels of catch doesn't necessarily reflect the same level of disaster incurred. Narrowing the spread of payment levels would be fair.

In summary, the category percentages should be 70% harvesters, 16% research, 9% processors, 3% communities, 1% subsistence/CIC, less than 1% for administrative.

It should be noted that however this disaster was declared, the department or persons with authority to handle the declaration process, overlooked the fact that not harvesting sockeye in 2018 also precluded the ability to prosecute pinks, chum, coho, and chinook which are an important part of the fishery. These catch histories should have been included in submitting a request for disaster relief. It would be right to submit an amended request on behalf of the Chignik fisherman to include these species when determining the magnitude of the disaster and subsequent relief amount.

Thank you again for the opportunity to share perspective.

Raechel Allen

LAW OFFICE OF  
**BRUCE B. WEYHRAUCH, LLC**

whyrock@gci.net

114 S. FRANKLIN ST.  
SUITE 200

JUNEAU, ALASKA 99801

TELEPHONE: (907) 463-5566      FAX: (907) 463-5858

August 4, 2020

Ms Kari Winkel  
PO Box 115526  
Juneau, AK 99811-5526  
DFG.2018ChignikSockeye@alaska.gov

Ms. Winkel:

We represent Mr. Dean Anderson and his crew on the F/V Menry Anne. Mr. Anderson is a Chignik sockeye salmon purse seine CFEC permit holder. Mr. Anderson has operated in that fishery since 1970. We submit these comments to you on the draft July 21, 2020 Distribution Plan for funds appropriated to address NOAA's 2018 Chignik sockeye salmon disaster declaration. .

As the department requested, we submit these comments with an eye towards distributing disaster funds to best assist Chignik sockeye fishery permit holders who were harmed by the 2018 sockeye salmon fishery disaster. We also comment on the proposed distribution of 31% of the disaster funds to research and administration. We understand that this plan will be amended and then circulated again to the public for additional comments.

The department indicates in its draft plan that the plan would direct payments to 2018 licensed CFEC Chignik salmon seine permit holders who meet all eligibility criteria. We believe that is appropriate. However, we have not seen any detail in any draft department plan indicating what the "eligibility criteria" are. The department must provide a draft plan to us and the public that actually sets forth and defines the eligibility criteria for applying for, and receiving, disaster funds. Without that detail, we are deprived of a meaningful opportunity to have actual notice of a plan that may affect Mr. Anderson, and to offer comments on what the eligibility criteria will be. The Alaska Administrative Procedures Act requires the department to provide us with a reasonable opportunity to comment on the details of the distribution plan. We incorporate by reference our analysis of the APA that we submitted to the department on July 17, 2020.

Ms Kari Winkel  
August 4, 2020  
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It appears the department will require fish ticket data from commercial Chignik sockeye salmon landings will be used to determine eligibility and payment for permit holders. We believe that is appropriate too. Each permit holder's landing history must be considered as part of a final plan. Again, however, the details of what data would be used to compensation a permit holder, are missing from the draft plan.

On page 2 of the draft plan we reviewed the following relates to harvesters like Mr. Anderson:

**Harvesters – 55%:** Funds allocated to harvesters are calculated to achieve ~75% of the 2015 to 2017 average exvessel value of the commercial Chignik sockeye salmon fishery. ADF&G is proposing to subdivide the harvester allocation into two pools, one for vessel permit holders (65%) and one for vessel crew members (35%). The 65/35 proposed split between permit holders and crew members is based on an average crew share of 10% and 3-4 crew members per vessel. ADF&G proposes a permit holder-based distribution where funds would be paid to the individual named on the CFEC commercial fishing permit used to make sockeye salmon landings.

It is not clear what the department based its determination to only distribute 55% of the disaster funds to harvesters. Because Harvesters were the individuals who were the most affected by the failed sockeye fishery, they should receive at least 75% of the disaster funds, not 55%. In addition, we do not know how the department decided that harvesters would receive 75% of the 2015 to 2017 average exvessel value of the commercial Chignik sockeye salmon fishery. Why not 80%? This too is reasonable because permit holders were negatively affected by the disaster more than any other group that the department is considering as possible recipients of disaster funds.

In addition, a permit holder on a boat who was not working as a captain or crew should not be compensated at the same amount as a permit holder who was the captain. If a permit holder did not fish and did not crew, then they should only receive the same amount as a crewmember.

Page 2 of the draft plan continues:

Permit holders (65% of harvester pool):

Proposed eligibility criteria for permit holders:

1. 2018 CFEC S01L permit holders.

We agree that a necessary element of the plan is that a potential claimant must have been a 2018 CFEC S01L permit holder. However, we believe that they should receive 75% of the funds, not 55%.

2. Permit holder must have made Chignik sockeye salmon landings in at least two out of three years from 2015 to 2017.

We agree that a necessary element of the plan should be that a potential claimant must have made Chignik sockeye salmon landings in at least two out of three years from 2015 to 2017.

3. CFEC permit holder must not have made landings in another 2018 salmon seine fishery.

We disagree with this element of the proposed plan. If the department disqualifies a 2018 CFEC S01L permit holder because they made a landing in another 2018 salmon seine fishery, then the department is penalizing a permit holder who mitigated the damages from the Chignik disaster. At the same time, the department penalizes those permit holders who saw the problem in 2018 and tried to earn something by fishing. The departments proposed compensation plan rewards permit holders who simply sat on the beach and did nothing.

Any permit holder who made landings in another 2018 salmon seine fishery should not have the value of the landings deducted from their compensation after the amount of compensation under the plan is calculated.

Option 1: remove eligibility criteria #3.

We agree with removing eligibility criteria #3.

Option 2: remove eligibility criteria #3 and modify the fund distribution for CFEC permit holders that made landings in another 2018 salmon seine fishery.

We agree with removing eligibility criteria #3 and modifying the distribution of funds for CFEC permit holders that made landings in another 2018 salmon seine fishery as discussed above. Alternatively, compensate each permit holder based on their landing history of all species.

Proposed distribution for permit holders:

Option 1: Equal share – all eligible CFEC permit holders would receive an equal payment of the permit holder allocation pool.

If our suggestions above are not adopted into the plan, then we agree with this option.

Option 2: Tiers – establish four tiers based on the average annual pounds of commercial sockeye salmon landed by each permit holder in their best two of three years (2015 to 2017). Twenty-five percent of the permit holder pool would be allocated to each tier and those funds would be equally shared by the eligible permit holders in each tier.

<b>Tier level</b>	<b>Average landings (best 2 of 3 years)</b>	<b>Allocation (from the permit holder pool)</b>	<b>Est. number of eligible permit holders</b>
1	≥ 184,000 pounds	25%	10
2	140,000–183,999 pounds	25%	13
3	98,000–139,999 pounds	25%	18
4	≤ 97,999 pounds	25%	27

We continue to assess this option.

Ms Kari Winkel  
August 4, 2020  
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Suboption: Eligible permit holders who made salmon landings in another 2018 salmon seine fishery would receive 50% of the tier payment.

We disagree with this Suboption. There is no reasonable basis for suggesting that if a permit holder made salmon landings in another fishery, that they would receive 50% of their tier payment. For example, if a permit holder who fished the Chignik fishery for decades determined that the 2018 season was a bust so they had to do something to earn a living, then they reasonably tried to fish somewhere else. Because they had never fished elsewhere, they would have to get a permit, or a permit holder, they would have to learn the fishery, and they would have to buy the necessary gear (net depths are different depending on the location). They may have only caught one fish. But now, under this proposed option, they would be penalized for that effort and loss by only getting 50% of a tier payment. That is both unfair and arbitrary.

Finally, we comment on the draft plan's suggestion that "subsistence" would receive 1% of \$10,327,039 (\$103 thousand), that 30% of \$10,327,039 (\$3.1 million) would be paid to the department for "research", and that the department would receive 1% of the \$10,327,039 (another \$103 thousand) for "administrative," which the plan defines as paying for a program coordinator.

Paying \$103 thousand to the Chignik Intertribal Coalition (CIC) "to explore development of alternatives to provide sustained future support of subsistence activities in the region" is completely vague. What does that mean? We understand that residents depend on sockeye as part of their subsistence lifestyle. However, the department proposes paying that money because CIC "may need to identify specific projects or infrastructure that support subsistence activities" is the most obtuse of reasons. The money would be better spent giving direct payments to regional households that actually use the sockeye resource for subsistence. The program coordinator should be part of the department's cut, the subsistence compensation should be eliminated, and the research component should be reduced to 15% from 30%

Thank you for the opportunity to submit these comments.

Very truly yours,  
  
Bruce B. Weyhrauch

To whom it may concern,

This opinion is for the 2018 monetary dissemination for disaster funds.

I have found some significant oversights in the proposed plan thus far. My thoughts are based on careful consideration of the stakeholders in the region. My heaviest concern in the distribution plan is that there is no mention of redistributing the unused directed amounts. I am also heavily concerned that there is no mention of monies given to the Chignik areas based on pinks, chums and coco that were not eligible to fish on based the management plan, the sockeye have priority in this management plan and without minimum escapement the fishery doesn't open in the CMA therefore giving no access to our other stocks. This was an oversight by the department or authorizing agency for fisheries disasters, not listing this loss to the federal government needs to be reevaluated.

Current distribution plan is not considering all the laws that are currently in place, nor is it directing the monies to where it will help the area recover from the disaster.

Allocation redistribution percentages should change to these;

1. Harvesters 73%
2. Processors 4%
3. Local small tenders 2%
4. Communities 3%
5. Subsistence users 1% (non-Commercial permit holders)
6. CIC subsistence research 1%
7. Research 15% (with caveat)
8. Administrative 1% or less

**Harvesters:** (Permit holder) Eligibility proposed criteria #1 and #2 look to be appropriate. In regards to #3; a permit holder that had a vessel register to the Chignik Area that did not participate in another area for salmon in the season of 2018, the current rules that are regulating Permit usage stops double dipping, in that super exclusivity is written in to regulation. By paying disaster money to a vessel that fished another salmon area would be contrary to current regulation so criteria #3 should be kept. I believe that option 2, tier distribution is fair, but as stated earlier the mixed fish are not accounted for and need to be paid on as well, using the tier method ensures appropriate distribution based on effort of participation in the fishery.

Vessels that were utilized for alternate sources of revenue during the salmon season should be paid at a reduced permit holder share, 50% or the percent of time that they were unavailable to harvest salmon in Chignik. In any regular season if a vessel chooses to utilize a alternate fishery it is unable to participate in the salmon fishery and the salmon a by de facto redistributed to the remaining fleet; which that in mind all reductions and all unclaimed amounts should be redistributed to the permit holders and be stated as that in the wright up.

(Crew member) A 70/30 permit holder/crew member split would be more appropriate as expenses were absorbed by the owners in 2018, in most cases this included personal store bills, gear, crew licenses, and travel. These expenses usually are recovered and reflected in the settlement at the end of the season. I am unsure why the first year crew are proposed ineligible, but if that is the case I think it is most appropriate to redistribute the ineligible funds back to the permit holders so that they can distribute or retain; the current common practice is to operate the vessel with two crew members if one is lost and the permit holder retains the

remainder and chooses to distribute based on extra effort of the remaining crew. If that is not an option then at least redistribution of the unused portion, to the entire harvester group with a 70/30 split again. By having the crew be able to claim all 30%, with enough disqualified people the crew will have a windfall and have no expenditure like the boat owners or permit holders.

Eligibility of crew member should be denied if the crew member left the area to seek out alternative employment, as the same point applies; you can't be in two different places at the same time. Many crew members stayed in the local area in order to fulfill agreements with their skippers and should be rewarded for their commitment.

**Processors:** I believe the processor and Tender section should be split into two separate pieces. On the processor pay out, it should be set at 3%, at this time and in many previous years there has not been a land based processor and this gives them the freedom to move assets to areas during the season in which they do not have to take a loss due to lower numbers of fish in the area. In recent years discussions with the processors have been shown that they are not willing to spend money in building a short base plan until a significant number of fish are guaranteed to be harvested in this area, showing that their liability has been greatly reduced. Tender contracts for the larger vessels in their fleet are mitigated by moving them to different areas where they would be of use and a skeleton crew for the minor amount of shore base operations was run in 2018; therefore there was not a large loss for the processors. Year after year the local processor explained that they were taking a loss in this area even when they were processing fish and as they process fish in other areas that are destined for the Chignik Fisheries eligibility should be reduced. A 3% pro rata based on the amount of percentage of fish that are processed by each company on average of the previous two years to 2018 should be significant enough compensation to mitigate their loss equal to the harvesters.

**Tenders:** A tender share of 2% should go to local tenders that are contacted with the processors. If the tender is from other areas and tender vessel was moved to a different area, that should disqualify them. Eligibility should only be provided with tenders that are unable to provide service elsewhere. Money should be split as agreed on the tender vessel.

**Communities:** I Believe that 3% is an appropriate amount of money to be distributed, as long as 2% goes to the City of Chignik and the rest is given to the 5 villages. Normally the city taxes at 2% and that money goes to providing wintertime jobs for local residence and keeping the harbor master employed in order to look after the vessels during downtime, Which seems to be becoming more frequent. The City of Chignik and villages can use the money to give out fuel for homes for the local communities.

**Subsistence:** I believe that 1% needs to be given to the subsistence users in the area that applied for subsistence permits in 2018 and are not commercial permit holders. These funds can be used to give relief to the local subsistence users that had to use money to offset the lack of fish available to them. Most subsistence users tried very hard not to take their normal amounts of subsistence that year, as to not endanger the run further. Because of the undo pressure on locals; I believe that is is important to offset some of the cost in order to fill the freezers. The qualifying factor is to have held a subsistence permit between Jan 1st of 2017 and end of 2018, and not to have had a commercial salmon permit for the Chignik area. Subsistence and personal use can be mitigated in the harvester payout for permit holders.

**CIC Subsistence research and development:** 1% is inappropriate amount. I agree the the CIC needs to explore and develop alternatives and to help maintain stainable Fisheries and subsistence in this area and should have an operational cost potential to do so. Things like

chartering commercial vessels to obtain subsistence when Chignik area has little availability of salmon as well as gillnets that can be borrowed for people that don't possess them. This group also gives adequate representation to the tribes in the local area and the board of fish meetings where most cannot attend based on cost. This group is also responsible for assisting and getting food to the Chignik region in 2018 that was donated by a faith based organization.

**Research:** 15% Should only be allocated to research. I believe research is an extremely important aspect of disasters, but appropriate gains in recovery need to be proven before money is given. A hard careful look needs to be given to the percentage of the research monies that are being allocated in this disaster relief. The department has only suffered the loss of collecting the money that is from the cost recovery and test Fisheries. As this is a disaster relief and not intended for operational cost of the department and fish and game which receives their money from the state of Alaska in an approved manner for research; no money has ever gone to the department from the areas gross revenue. I believe if any disaster money is used for research it must be matched by the ADF&G in order to ensure that the money is being used in a manner which has proof of concept through the department and they are equally responsible for operational cost of the studies. Studies must also have an accurate fish account in order to be scientifically valid and currently the weir system has gaps in counting date. The river system must first have accurate counts through the middle of September and updating of the weir so that installation and removal are effectively done at any time and tides are not a factor.

As far as studies listed, in my opinion is this;

Understanding the environmental factors and improving the juvenile sockeye salmon movement which are the first two studies listed seem to be very similar and probably be best suited to be one study. Improvements to the sockeye salmon escapement enumeration I believe is important as well as knowing the effects on Fisheries disasters but I do not believe that these studies that are currently proposed have the desired affect to reclaim the yield that is required to have a fishery and subsistence need filament, and needs to be re-focused on achieving escapement and that rearing habitat including feed supplies during smolt out migration and first year in the Gulf of Alaska must be studied more adequately. The socioeconomic effects of the fishery is a waste of money due to the fact that we already know the effect of, what not having subsistence does to a community by seeing what occurred in 2018 and now monies need to be directed into stopping degradation of the Chignik system. I must reiterate the weir need to have full counting time from the last week of May to the middle of September before any study is done because without proper counting the studies will not be as productive.

**Administrative:** I believe the amount proposed was appropriate at < 1%.

Thank You for your consideration of changes in this public comment period.

Ben Allen

Sean C. Alexander  
F/V Mary Jane

July 28, 2020

Department of Fish and Game  
Headquarters Office  
P.O. Box 115528  
Juneau, AK 99811-5526

Attention: Ms. Kari Winkel

Re: Chignik Disaster Funds Distribution Plan

Dear Ms. Winkel,

As a Chignik salmon permit owner and purse-seine vessel owner I have a distinctive perspective on several points in regards to the Department's public notice requesting comments on the Chignik Disaster Plan for 2018.

In 2018 I was in Chignik with my purse seiner the F/V Mary Jane and a 3-man crew through mid-July. When it was apparent that there was not going to be a Chignik fishery I was forced to leave. The reason is that I could no longer keep my crew together and I was at my last few dollars. Every one of my crew was broke and the only alternative was to leave Chignik and gamble on another fishery. I entered the Prince William Sound salmon purse seine fishery blind having no experience, a leased permit funded by my father, and darn determined. While we did everything we could my boat gross hardly met expenses especially considering the wear on the F/V Mary Jane and her gear.

Under the harvester eligibility criteria it states that a CFEC permit holder must not have made a landing in another 2018 fishery (Criteria #3, page 2). Per Option 1 this should be removed. I paid my dues to the Chignik 2018 salmon fishery having spent better than a month 'camped' in Chignik harbor waiting for the prospect of an opening. As stated earlier, I was forced to leave, not by choice by any means.

Some other Chignik boats were in my predicament. A few were fortunate to secure a tendering job in Bristol Bay and/or Norton Sound. No such luck came to my crew and me. I do believe it is wrong to selectively disqualify anybody that elected to pull out of the Chignik harbor in an attempt to not lose their boat, crew, and family by not having an income. I am not looking for welfare. My crew and I paid our Chignik 2018 dues and should quality as a Chignik harvester the same as those who chose to stay tied up in the Chignik harbor until the processor was able to yard-up their boat or went tendering.

Sean C. Alexander  
F/V Mary Jane

On another subject, it is beyond me that under Research the proposed allotment is 30% (page 2). This is exorbitant and far beyond what anyone in Chignik believes is right. 15% is realistic for research. I recognize that we need to find out what caused the 2018 disaster and that for 2020 which is looking like a complete disaster as well. Management advances in terms of using genetics inseason to separate Chignik' early and late runs when they overlap in timing and late season operation of the Chignik weir would be money well allocated and a 15% disaster fund distribution would leave enough for many other projects too.

As for vessel crew, 35% is too high. Most if not all skippers paid crew expenses that were not reimbursed. The crew share be reduced to about 25%, and there be no requirement for them to have served as a Chignik crew person in previous years. Every year we have 'green' crew members. They should not be excluded if they were with a 2018 Chignik boat and permit holder. Specifically drop criteria #3 due to unfairness.

It is my understanding that tenders were paid on contract whether a Chignik salmon fishery occurred. Therefore no disaster funds should be awarded to tender owners.

On the issue of subsistence, the late Chignik sockeye run provided adequate harvest opportunity for subsistence users. Residents were impacted by the lack of employment from salmon fishing commercially but not from a shortage of subsistence caught sockeye salmon. Residents that crewed or had Area L salmon permits are to be compensated as provided under those categories.

Harvesters (p. 2) are shown to receive 55%. This should be increased to 65% at least. We sustained well more than half the impact of a failed 2018 Chignik salmon fishery.

Most sincerely,

A handwritten signature in black ink that reads "Sean Alexander". The signature is written in a cursive, flowing style.

**From:**  
**To:** [DFG, 2018ChignikSockeye \(DFG sponsored\)](#)  
**Subject:** 2018 Relief Distribution  
**Date:** Wednesday, August 5, 2020 7:07:09 PM

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To whom it may concern; I am a commercial fisherman/permit holder in the Chignik Management Area. I have several problems with the way this relief is suggested to be distributed. Who were the people who missed paychecks during the 2018 Salmon Season, the people who struggled to make ends meet and are still in crisis from that summer? It is simply the fishermen {Permit holders, Crew and Communities} who waited for the fish all summer.

I agree that the Harvesters should get the majority of the funds. this money was released to the people who were hurt by the disaster. We did miss our paychecks!

As for the harvesters who went to fish other areas, you had made your choice and don't need to double dip. You did not miss any paychecks!

The communities also took a hit, no fish tax, difficulties with subsistence.

As far as the researchers go, I believe they need to find there funding elsewhere. petition the federal or state government for the funds, it is in their best interests to find out why they need to give out disaster funds on a sustainable fishery. The researchers did not miss any paychecks!

As for the processors, your tenders have contracts, your workers have salaries and I am sure that your Companies claimed losses for tax benefits! You did not miss any paychecks!

And finally, for Program Support, the good old ADF&G! There is a strong argument that this is your fault. You are supposed to sustain our fishery! I have seen the blank look on your faces at the meetings when all the village elders tell you there is insufficient escapement, intercept fishery is going to kill the system and that there is no way you can get that escapement with the fleet fishing the lagoon! I know you will say "We do what the board of fish tells us to do!" . I have been to the board of fish; they make their rules off of your recommendations! Not only do I think you don't deserve any funds but I feel your liable for the state of the fishery! And You didn't miss any PAYCHECKS!

Henry Erickson, F/V Sharon Lee

# Chignik Regional Aquaculture Association

2731 Meridian Street, Ste. B  
Bellingham, WA 98225



August 3, 2020

ADF&G, Attn: Kari Winkel  
PO Box 115526  
Juneau, AK 99811-5526  
DFG.2018ChignikSockeye@alaska.gov

Subject: 2018 Chignik Sockeye Disaster Fund

Dear Kari Winkle:

Pursuant to the State's recent request for comment on the draft 2018 Chignik Disaster Distribution Plan, Chignik Regional Aquaculture Association (CRAA) respectfully offers the following:

CRAA finds the proposed 30% allocation to research to be excessively high. Recommended is no more than 20% for research and administration combined. We submitted along with the L&P Borough, and the Chignik Intertribal Coalition a comprehensive list of research projects that would well meet all expected requirements and analyzes. Total cost was estimated at less than \$2 million. We take a strong position on this matter believing that the disaster funds should be overwhelming assigned to those entities impacted the most. A 20% research assignment is enough.

CRAA recommends that the harvesting sector be increased by 10%. Harvesters sustained the largest impact and by prudent adjustments in other categories a 65% distribution to this group is well within range.

Regarding vessel crew we recommend deletion of eligibility criteria #3. As written, requiring prior-year participation in the Chignik fishery as a crewman would cause the exclusion of crewmen that signed on to a Chignik boat in 2018 without any earlier Chignik experience. Those crewmen sustained the same impact (loss) from the absence of 2018 Chignik salmon fishery as crewman with a Chignik history. It is not uncommon for a boat to have an inexperienced crewmen or a new crewman from another fishery each season. The requirement for previous-year Chignik employment serves no purpose and is inequitable.

CRAA recommends a more detailed explanation of funding distribution to communities. In a normal fishery year, the Lake and Peninsula Borough, City of Chignik, and CRAA receives a tax distribution of 2%, 1%, 2% respectively. They should be accommodated. CRAA has consistently funded fisheries research projects annually to enhance area management, evaluate

and protect essential sockeye salmon habitat in the Chignik River watershed, and to promote Chignik fisheries interests and needs of Chignik commercial and subsistence fishermen (stakeholders).

We agree with the two proposed guiding principles on page 1. However, we do offer a comment on the last part of #2) which says "... avoid or mitigate the impacts of future fishery disasters that cannot be prevented." Relative to the Chignik commercial salmon fishery we do not understand how "management approaches" might mitigate "future disasters that cannot be prevented." If disasters 'cannot be prevented' how could it be said that the "impacts" could possibly be "avoided"?

The eligibility criteria for harvesters could be expanded to consider other information to establish eligibility other than strictly fish-ticket data in two out of the three previous years. The option for providing such seems reasonable at least in one instance. In 2016 there was a situation where a stricken seiner had its catch from earlier in the day recorded on a fish ticket that included the catch from a seiner that "rescued" the disabled vessel. The disabled vessel had its net wrapped in its wheel and had to be towed to Anchorage Bay. The seiner that towed combined its catch with the immobilized seiner's catch and delivered the mix to a Trident tender. A single fish ticket was issued to the seiner that did the towing. The permit holder of the disabled seiner did not fish after the incident for the rest of the 2016 season. No landings were made in 2017 but the permit holder and vessel were in Chignik in 2018 with an intent to fish. A well designed commercial fishery eligibility criteria would not exclude any permit holders who were in Chignik in 2018 and intended to commercially fish salmon.

Thank you for your consideration of our comments.

Sincerely,



Executive Director, CRAA

Cc: Senator Lyman Hoffman  
Representative Bryce Edgmon

**Don Bumpus**

**August 6, 2020**

**ADF&G, Attn: Karen Winkel  
P.O. Box 115526  
Juneau, AK 99811-5526**

**Subject: 2018 Chignik Sockeye Salmon Disaster Funds- Distribution**

**Dear Karen Winkel.**

**As a long-term resident of Chignik Lagoon and one involved in the Chignik salmon fishery for several decades I offer the following comments pertaining to the Department's draft plan:**

- 1. While the draft plan is a reasonable start, there are some shortfalls. One is the research component. It should not be 30%. That is excessive. The research allotment should be in the 10-15% range and Chignik stakeholders should have some say on which sockeye studies might be best.**
- 2. Research projects conducted by the Department they should include, as first priority, in-season genetic sampling of the early and late run sockeye escapements and late season sockeye counting at the weir. There is no need for a socioeconomic study or lake-limnology sampling. There are enough economic and subsistence studies existing that define Chignik's dependence on its sockeye runs. As for limnology or plankton sampling, the results can be quite broad and open to too much interpretation, so much so that for forecasting future runs and setting escapements goals the data have no practical usefulness. Brood tables offer a more a superior means for run-forecasting and determining escapement goals.**
- 3. The Harvester allocation should be increased from 55% to 75%. The individuals and communities that suffered actual losses should get the bulk of the disaster award. Furthermore for the split between permit holders and crew members, the permit holders should be increased to 75% and crew members reduced to 25%. This is justified because permit holders covered crew expenses including air travel to and from Chignik, food, gear purchases, and numerous other personal costs. And since there was no fishery in 2018 crew members were unable to pay the permit holders for those expenses.**
- 4. For the proposed distribution to permit holders I believe that a base or standard amount should be given to every permit holder to offset startup expenses common accroos the fleet. The costs include but are not limited to boat registration, electricity, insurance, permit renewal, vessel moorage or harbor fees, groceries, and other standard expenses. In fairness 40% of the total amount allocated to permit holders would seems reasonable as a standard base payment. This is justified given gear-up costs run of \$35k to 40k for every permit owner. For the remainder of the funding (60%) for permit holders, I support a distribution according to the tier grouping under Option 2 (page 2).**
- 5. Pertaining to the permit holders eligibly criteria, I support the Suboption at the bottom of page 2 which would assigned those who made a landing in another 2018 fishery 50% of the tier payment. If a baseline amount is awarded they should be eligible for a 50% payment.**

Don Bumpus

6. For a permit holder to be eligible to receive Chignik disaster funds, it should be mandatory that a permit holder have registered a purse-seine vessel for the 2018 Chignik fishery. Just having a Chignik salmon permit does not in itself indicate intent to fish the 2018 season. Some families own multiple Area L salmon permits but have only one vessel, and so the reason for the additional eligibility requirement.
7. The eligibility criteria for vessel crewmen are too stringent. The #3 requirement should be eliminated. Green or new crew members should have an equal share; they were financially impacted the same as other Chignik crew members in 2018. As for the distribution among crew members, it should be based on a tier ranking determined by the average annual pounds of sockeye salmon landed by the permit holder or the seine boat in the best two of three years (2015-17). Furthermore, a crew share should be based on the number of crew members a permit holder 'employed' for the 2018 season. This would be fair recognizing that some replace crewmen in-season and some have more crewmen than others.
8. There is no justification for funding subsistence. While there was no commercial sockeye fishery there was escapement with ample numbers of sockeye salmon available for the subsistence fishery in 2018. Aside from sockeye salmon, Chignik subsistence users had other resources available. The problem that Chignik faced due to the failure of the 2018 sockeye fishery was the lack of revenue. Local permit holders and crewmen were broke. The food-assistance program run by the Chignik Intertribal Coalition was funded entirely by a most generous grant and much appreciated. Based on the proposed harvester distribution, which as indicated earlier should be raised to 75%, local permit holders and crewmen will be receive grant funds for the economic impact caused by the 2018 fishery failure.
9. The processor component should be raised to about 15%. They were substantially impacted and 11% is simply not enough.
10. Lastly, instead of generalizing by assigning 3% under the category communities, be specific. The Lake and Peninsula Borough should get 2%, City of Chignik 1%, and CRAA 2% based on the amount awarded to the harvesters.

For the record, I (as a CRAA Board member) and others are tired of the Department undermining CRAA including not attending their annual meeting, or recognizing that CRAA has funded and continues to do so considerable Chignik sockeye habitat and other sockeye studies for the sole purpose of sustainability and management of the area's sockeye resources.

CRAA clearly represents Chignik salmon stakeholders. The Board has 6 commercial seats, 1 Native seat, 1 subsistence seat, 1 processor seat, and 1 local government seat. An improved relationship at the Department's headquarters and regional level with Chignik stakeholders and CRAA is needed.

Thank you.

Sincerely,



To Whom It May Concern,

I am writing regarding the Distribution Plan for the 2018 Chignik Sockeye Salmon Disaster Declaration. As part of the 30% allocated to research, I would like to see 50% of that to be offered to the communities to research alternative economic opportunities since our fish run is no longer able to support families. This will allow the communities within the Chignik Fishery to survive.

One opportunity for our region is mariculture. It is an up and rising prospect in Alaska. With the pristine clean waters, existing seafood industry, the skills and abilities of our people who have worked these waters for generations, the cultural knowledge of Alaska Natives and the remarkable brand that Alaska seafood has established worldwide, the sky is the limit. However, it takes about 2+ years to get permitted through ADF&G. It is a vigorous permitting process, but the rewards could be astounding. It is projected that mariculture will be 100-billion-dollar industry in 20 years per Julie Deckers, Chair of State Mariculture Task Force.

This disaster hit Chignik hard, mentally and economically. I would like to see something good come out of it. I would like to see hope in our communities again. By allowing communities to research alternative feasible economic opportunities like mariculture, we can and will survive. Thank you for your time.

Sincerely,

Jennie Grunert

**From:**  
**To:** [DFG, 2018ChignikSockeye \(DFG sponsored\)](#)  
**Subject:** Chignik Disaster Public Comment  
**Date:** Wednesday, August 12, 2020 8:35:27 AM

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Current proposed eligibility criteria for permit holders includes two conditions that will unfairly disqualify fisherman that are young and attempting to get established.

The first criteria require that permit holders made landings in at least two of the years between 2015 and 2017, the second is that they have not made landings in any other seine fishery in 2018. While these stipulations have good intent, of limiting the disaster funds to those dependent upon the Chignik fishery for their livelihood and survival, they neglect extraneous situations and will specifically hurt those that are younger and were striving to survive both 2018 and the tough couple years that preceded.

Modifications to the current proposed eligibility criteria should factor in individual circumstances and evaluate income reliance the Chignik fishery via other means (than the proposed criteria). The criteria should not penalize those that have sought other fishing opportunities to provide for themselves when extraneous situations (e.g. lost markets in Chignik, poor escapement) have forced them to fish their boat in other districts. This is especially important as the years preceding 2018 had abnormally warm water temps and the prices were low.

Based on the concerns presented here, it is recommended to omit the third proposed eligibility criteria for permit holders and to modify the second to consider individual circumstances that evaluate reliance on the Chignik fishery for survival.

**Corrie Black**

August 11, 2020

Alaska Dept. Fish and Game  
Attn: Karen Winkel  
P.O. Box 115526  
Juneau, AK 99811-5526

Subject: Chignik Sockeye Salmon Disaster Fund- 2018

Dear Karen Winkel,

After reviewing the draft distribution plan for the 2018 sockeye salmon disaster declaration my comments are as follows:

1. Page 1, Harvesters: There should be a provision to provide means, other than fish ticket data for eligibility. I personally know of one fisherman (permit holder) in 2016 who transferred his catch to another seiner because the vessel's seine was wrapped in the wheel to where there was no mobility and sea conditions were rough. The seiner that towed the disabled boat transferred the disabled boat's salmon catch into his boat's RSW tank. The catch from both boats were recorded on a single fish ticket reflecting only the permit number of the vessel making the delivery. The permit holder on the disabled vessel did not fish anymore in 2016. His participation in the 2016 fishery, although limited, should meet the eligibility criteria given the availability of multiple (notarized) affidavits supporting the claim.
2. Page 1, Research. While I support a well vetted sockeye salmon reach program for determining the cause and prevention of the 2018 sockeye disaster, I am opposed to socioeconomic studies. There is no need. The dependence on Chignik's sockeye runs economically and culturally is well documented.
3. Page 2, Harvesters. The Harvester allocation should be increased to 75%. The division between permit holders should also be adjusted with crew members receiving 25% and permit holders the remaining 75%. Permit holders had to 'carry' the full cost of their crews and were not reimbursed for travel, meals, and other personal expenses their crews racked-up.

Most of the disaster funds should go to the harvesters. They overwhelmingly sustained the greatest impact and 55% is insufficient. The allocation needs to be raised to 75%.

I recommend that eligibility criteria #3 be deleted subject to the Suboption that those that made deliveries in other fisheries, but originally registered their seine boat in Area L, be limited to 50% of the tier payment and 50% of any baseline payment (if that option is provided) .

As for the tier payment schedule, I am support the draft with the suggestion that there be a baseline payment of \$30,000 allotment to every qualified permit holder from the harvester funds assigned to permit holders. All of us had about the same level of initial expenses including insurance, airfares, shipping, food, electricity, and moorage costs.

4. Page 3, Vessel Crew. The crew allotment should be reduced to 25% for the reasons identified earlier. Further, eligibility criteria #3 should be eliminated. Every year we have new or green crewmen, and they should not be penalized for not having previous Chignik experience. As for individual crewman compensation it should be based on the tier ranking of the boat's permit holder.

5. Page 3, Processors. The Chignik processors should see their percentage increased to 13%. They were impacted substantially in 2018.

6. Page 3, Communities. This needs to be specifically defined. The City of Chignik should get 1%, L&P Borough 2%, and CRAA 2%. They are the ones who would have received tax revenue had there been a fishery. Those percentages should be calculated on the amount assigned to harvesters not the total \$10.3 million appropriation.

I do not want CRAA to be left out. The organization has and continues to support valuable research operations on Chignik's sockeye runs. CRAA represents Chignik (Chignik permit holders, sport fishermen, local government, subsistence fishermen all have seats on the CRAA Board). For disclosure I occupy one of the three commercial seats.

Page 4, Subsistence. There should be no funds assigned to the Chignik Intertribal Coalition. Sockeye salmon were adequately harvested in 2018 from the escapement and Department numbers verify it (2019 Chignik AMR *in prep.*). Additionally there were ample subsistence alternatives available for Chignik residents in 2018 and still are.

Relief to the Chignik villages was necessary in 2018-19 because local permit holders and crew did not make any money from the 2018 salmon fishery. As proposed they are to be compensated through the disaster fund. In accordance, I am against funding being sent to regional households that were not involved in the commercial fishery.

7. Page 4, Research. The proposed 30% should be reduced to 12%. At that level of funding more than \$1.2 million would be available for Chignik sockeye salmon studies. That should be adequate to determine what caused the 2018 sockeye run failure and how to prevent a reoccurrence through advances in management and habitat protection.

As previously stated, I do not support research funding for socioeconomic studies.

Lastly, I recommend that Chignik stakeholder input be solicited on all proposed research projects and that project proposals be peer-reviewed and ratified before funds are spent.

Best Regards,

*Paul Johnson*

Alfredo Abou-Eid

August 6, 2020

ADF&G, Attn: Kari Winkel  
PO Box 115526  
Juneau, AK 99811-5526  
DFG.2018ChignikSockeye@alaska.gov

Subject: 2018 Chignik Sockeye Disaster Plan Comments

Dear Kari Winkle:

I approve of option 2 for distribution of disaster funds to permit holders – The Tiers approach. This is a more equitable approach than just equal share for all.

Permit holders who did not make a landing in Chignik in 2018 and did make landings in another area should not receive disaster funds.

I approve of vessel crew getting 35% of the harvester pool. Crew members should get their fair share.

Research is way too high. 15% would be plenty.

Processor allocation is too high. There is no land-based processor in Chignik and services are poor. They should get 1% for the support they provide.

Harvester allocation should be increased to 80%.

Thank you for your attention to my comments.

Sincerely,

Alfredo Abou-Eid

Norine K Jones

Alaska Department of Fish and Game  
Attn: Kari Winkel  
P.O. Box 115526  
Juneau Alaska 99811-5526

August 13, 2020

**Subject: Chignik Sockeye Salmon Disaster Fund Distribution Plan-2018**

Dear Kari Winkel:

Thank you for the time and effort that the Department has put into a distribution funding plan for Chignik.

Offered are the following points for your consideration:

I think that any 2018 Chignik Harvester licensed to fish and also had a vessel registered to his license, with crew and ready to harvest, should be part of the allocated distribution, whether it was their first year fishing Chignik or a life-long fishery for them. Some Chignik harvesters may not have a long history or catch record because they have taken over the family fishing business due a death, health issue, or other. Harvester families should not be penalized for this reason. If you were ready to fish Chignik in 2018 then that is where the harvester intended to fish and should be eligible to receive disaster funding.

Any harvester who left to offset their income in another fishery should receive 50% of the allocated funding based on the tier system for their payment. If they left Chignik to offset their income, that was their choice. We all have bills and expenses, but those that left shouldn't receive the full percentage. That would not be fair to the harvesters who sat on the beach for the entire season.

The Harvester's percentage should be raised from 55% to 75%. The Chignik harvester has at least 25-30 thousand dollars invested in the fishery operation before the vessel even starts fishing. Costs of operation are going up yearly, and in order to get a crew, the harvester is footing the bill for all initial startup costs and then taking it out of the crews pay at the end of season.

A fair way to allocate funds would be to give every Chignik harvester a base price of 25-30 thousand dollars and then go to the formulated tier system for the rest of the allocation. This would mean that every harvester would recoup their initial startup outlay. The tier system does not take this into account. A base-level allocation would ensure a fairer distribution.

Further, I believe that vessel crews should be reduced from 35% to 25%. Many harvesters hire first-time crew members for 6%, seasoned crew members get 10%, one or two will get 12%. The vessel owner/skipper pays all startup costs plus the license fee. If a crew member had a valid license for crewing in 2018, and they have documentation what vessel they were on they should get paid, experienced or not. Currently, 'green' crewmen are the norm. Crewmen payments should be made on a tier system according to the skipper's average production in his best of two of three years (2015-17).

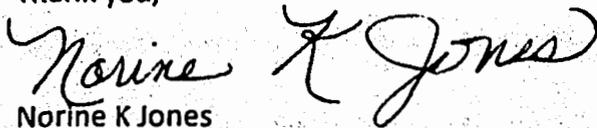
There is no reason for tenders in Chignik to receive an allocation. They get paid a flat fee and in addition a poundage price. They are paid whether they haul fish or not.

I feel that the Lake and Peninsula Borough should receive 2%, the City of Chignik 1%, and CRAA 2% against that assigned to the harvesters.

Subsistence users had enough sockeye in 2018, and therefore they do not need to be funded including the Coalition. Village members who own permits or were crewmen in 2018 will be compensated under the harvester-fund assignment.

Research should be limited to no more than 15%. 30% for research is excessive. Chignik does not need that amount of money for research. What Chignik needs is to make sure that Chignik-bound fish get harvested in Area L, which has not been happening. The Department needs to get a handle on Area M to where Chignik-bound sockeye salmon are not excessively exploited as is now occurring. They need to focus the Area M fishery on its local stocks and reduce the pirating of migrating sockeye headed to other areas especially those traveling to Chignik. No amount of research funding should be assigned for social-economic studies. Who does not know that Chignik, unlike Kodiak and other areas, only has its local salmon stocks to support our villages?

Thank you,

  
Norine K Jones

F/V Islander, owner



## United Cook Inlet Drift Association

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43961 K-Beach Road, Suite E • Soldotna, Alaska 99669 • (907) 260-9436 • fax (907) 260-9438  
• [info@ucida.org](mailto:info@ucida.org) •

Date: August 13, 2020

Addressee: ADF&G  
Attn: Kari Winkle  
PO Box 115526  
Juneau, AK 99811-5526

Re: Chignik Disaster

United Cook Inlet Drift Association (UCIDA) opposes any disaster relief funds distributed to anyone who fished another area, such as Kodiak or Area M, in that same year. It just does not seem ethical that a fisherman would receive similar relief funds as those fishermen that remained in Chignik and attempted to participate in the Chignik fishery.

In the funds that are proposed for research, UCIDA would strongly encourage these funds be made available to the local aquaculture association. The local aquaculture association is uniquely situated to understand the research and remediation activities that will assist in the recovery efforts.

Sincerely,

*Original Signed Document*

David Martin, President  
United Cook Inlet Drift Association

**From:**  
**To:** [DFG, 2018ChignikSockeye \(DFG sponsored\)](#)  
**Subject:** Disaster funds allocation  
**Date:** Thursday, August 13, 2020 11:39:27 AM

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As a fisher who may one day find himself in a disaster allocation. I find in your draft a few issues that greatly concern me. To keep in short I'll only speak to 2 of them, being allocation and research. Under the draft before me I see a suboption being mentioned. As I read it, I understand that if a fisher held a Chignik permit and fished elsewhere, the fisher would qualify for a share of the funding, just for holding a permit. In doing so it would reduce the funds available to the ones who actually endured the hardship. Whereas, if one held a permit, registered and licensed the vessel in the Chignik management area, and chose not to fish, is completely different. This to me is the only fair way to do it. Otherwise I think of our salmon permits as a futures market on the stock exchange. Secondly, research percentage, I find that a number of 30% to be excessive. Yes, research is important to try and avoid a repeat disaster. Research usually takes years to complete, and sometimes doesn't bear any fruit. The affected permit holders are financially stressed, then and now. To allocate away from the stressed, to the research sector, only to possibly see the funds evaporate into the ozone, with no possible benefit to the area, would add to the hardship. We all have witnessed how the government can massage things around. A somewhat more modest number would make me more comfortable, let's say 5-15% with sideboards of in to insure the funds don't just benefit one user group or section of fish and game.

Dan Anderson

8/13/20

Al Anderson

ADF&G  
Attn: Kari Winkel  
PO Box 115526  
Juneau, AK 99811-5526

To Whom It May Concern:

My name is Al Anderson and I am writing to address some concerns I have with the proposed 2018 Chignik Sockeye Draft Distribution Plan.

I have dedicated my entire life to the Chignik salmon industry. I have fished and sat on advisory boards, spending countless hours as a part of this fishing community.

I completely disagree with 30% of the 2018 disaster funds going to "research." It is my opinion that we are in the position we are currently in due to partial mismanagement on the part of the Department of Fish and Game. I have advocated for higher numbers of fish escapement, with a consideration to the quality of fish (size and females), to the Chignik Weir management for years. I believe that had the department listened to the local people with irreplaceable indigenous knowledge, we would not be in this position. I put in many years listening to the Department at CRAA meetings. Limnology studies and smolt studies indicated that the lakes needed a rest, so their answer was to cut escapement numbers. The zooplankton were small, and the smolts, on average, were smaller than normal indicating poor rearing conditions. While I believe they were on track with these studies and results, they drew the wrong conclusion. Instead of cutting escapement numbers, they should have

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increased the escapement; thus, putting more nutrients into the rearing system, helping the zoo plankton to grow, and in turn, feeding the young sockeye. I could go on with my beliefs in the mismanagement on the Department's part, but that is for another letter. In the end, my local and generational knowledge was disregarded, falling on deaf ears with the Department as they faced pressures from Kodiak to open up the Chignik salmon fishery. I will never advocate for the continued lining of pockets for the persistent mismanagement of the Chignik fishery. The Department was not injured by the 2018 Disaster as their funding was continued. They were paid. I (boatowner) was not. Widows were not. Elders were not. Captains were not. Crew were not. Processors were not. Communities were not. Subsistence users did NOT fill their freezers. The Department of Fish and Game should not receive one penny from the 2018 Chignik Sockeye Disaster funds.

I am now retired, but my income is still highly dependent on the success of each salmon season as a boat owner in Chignik Lagoon. Though I no longer own a permit or personally run my boats for the Chignik salmon fishing industry (my sons do), I am still financially obligated for their maintenance and insurance. In the salmon season of 2018, I spent well over \$100,000 maintaining and insuring my boats for a season that was declared a disaster. I was deeply financially affected by the 2018 disaster.

In a typical season, agreements between permit holders/captains, boat owners would receive 40% of the boat's seasonal gross. Out of that, the boat owner pays for a proportional share of fish tax and fuel, any boat payments (if there are), insurance, all fishing gear, licenses, and maintenance. Thus, 40% of the "Harvestor" allotment from the 2018 Chignik Sockeye Distribution Plan should go to boat owners.

This is just my story as a boat owner. There are multiple WIDOWS and ELDERS who own boats, but do not run them. They count on each season to be a success in order to pay for their boat payments, maintenance, and insurance, and still have enough to live off of for the year.

Your 2018 Chignik Sockeye Draft Distribution plan does not account for boat owners, for *widows*, for *elders*. These people suffered equally, if not more so, since they were unable to run out and get winter jobs like other younger captains and crew.

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**This population suffered greatly, relying on younger family members to get them through the winter. This vulnerable group of people should not be forgotten when allotting disaster relief funds.**

**I believe that, instead of giving the Chignik Intertribal Coalition money from the 2018 Disaster, it should be allotted directly to the subsistence user. Their indigenous and precious salmon fishery is depleted. The mismanagement of our fishery has caused years of pain as subsistence users (indigenous peoples) try unsuccessfully to fill their freezers with their annual fish supply. The outlook for resourceful and plentiful subsistence fisheries looks grim for future years to come.**

**Please accept my comments on the 2018 Chignik Sockeye Draft Distribution Plan and take them into consideration.**

**Sincerely,**

A handwritten signature in black ink that reads "Al J. Anderson" followed by a long horizontal flourish.

**Al Anderson, Boat Owner  
Chignik Lagoon**

**Ernie Carlson**  
***FV Desperado***

Alaska Department of Fish and Game  
Attn: Kari Winkel  
P.O. Box 115526  
Juneau Alaska 99811-5526

August 13, 2020

**Subject: 2018 Chignik Sockeye Salmon Disaster Fund Distribution Plan**

Dear Kari Winkel:

My comments on the subject plan are:

**1. Subsistence: 0%**

For the 2018 season the Chignik sockeye subsistence harvest was a reported 4,538 fish from 69 permits returned. A total of 92 permits were issued. Based on previous year data, the 2018 Chignik sockeye subsistence catch was 76% of the 2008-2017 average for returned permits. (source: ADF&G Division of Subsistence, Alaska Subsistence Fisheries database, Ross Renick 7/20/2020. The Chignik Tribal Coalition should not be funded.

**2. Communities 5% (based on the harvester amount):**

2% for Lake and Pen Borough

2% for CRAA

1% for the City of Chignik

CRAA was not mentioned and is a big supporter of research and funding of Chignik sockeye salmon studies.

**3. Research 14%**

The Departments proposal of 30% is excessive. The disaster funding should chiefly go to the fisherman, processors, and other entities directly impacted. The department did not sustain any impact from the absence of the 2018 Chignik fishery.

I recognize that a research element is necessary a 14% allocation is more than enough. Money should be used to support better management, determining the causes of why there was a collapse of Chignik's two sockeye runs collapsed, and how they can be prevented in future years.

**4. Processors 15%**

To my knowledge private tenders were under contract with the processors and duly compensated under their contracts. Therefore a tender allocation is unwarranted. A 15% allocation to the processors is well in order.

**5. Harvesters 66%**

**Ernie Carlson**  
***FV Desperado***

Harvesters were the most impacted and deserving. They should be assigned at least 66%. Of that 70% should be allotted to permit holders and 30% to crew members.

I support the harvester settlement for each permit holder being based on of their average sockeye harvest in their best two of three years (2015 – 2017). This would also be a fair method for crew members to receive their share by calculating the amount based on the permit holder's production record.

Pertaining to eligibility criteria 3 for vessel crews, eliminate it. New or 'green' crewmen should not be penalized for not having previous Chignik experience. Likewise permit holders who do not have a record of previously fishing Chignik should not be excluded from receiving disaster funds if they have a Chignik permit and vessel registered for the 2018. A person may well have bought into the Chignik fishery in late 2017 or early 2018 with the expectation of fishing Chignik in 2018 or missed a season or two prior to 2018. Alternatively a person could have just family inherited a Chignik permit. These permit holders should qualify for a share of the disaster fund according to the production record of the permit they own, calculated on the average sockeye harvest in the best two of three years (2015 – 2017) for that permit.

As for vessel and permit holders, at present there are no provisions in a disaster year to address the issue of permit holders leaving the area and fishing elsewhere. A statewide policy should be developed.

I support limiting Chignik permit holders that fished in another area in 2018 to 25% of that assigned to harvesters and similarly, limiting crew member that left to 25% of the amount assigned to crewmen that remained in Chignik.

Thank you for the opportunity for public input

Sincerely,

Ernest Carlson

**From:**  
**To:** [DFG, 2018ChignikSockeye \(DFG sponsored\)](#)  
**Subject:** Subsistence user former commercial fishermen father  
**Date:** Thursday, August 13, 2020 7:08:40 PM

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Clinton Boskofsky

ADF&G

Attn: Kari Winkel

PO Box 115526

Juneau, AK 99811-5526

Dear Kari Winkel:

I am writing this letter to address some concerns I have with the 2018 Chignik Sockeye Draft Distribution Plan.

Subsistence users should get a bigger cut of the money. I think the research has been done and failed the subsistence users and commercial fishermen. All local commercial fishermen are also subsistence fish users. This disaster has impacted local subsistence users more than any group involved. We don't only rely on sockeye for money but also for food to fill our freezers and shelves for the cold Alaskan winters. Sockeye is our culture, our heritage, and our way of life in Chignik Lake. Our community of Chignik Lake was put on a 100 fish limit for the whole community in our traditional fishing area within federal waters in 2018. With that said, I think the locals in the Chignik fishing area should also get a direct payment per community member with these monies on a bigger percentage coming from "Research" portion in the draft plan. I suggest (30% for subsistence users) and (1% for research.) Cost of living, traveling in, and shipping are very expensive. Our communities have been devastated with no sockeye and nothing happening to help us.

Sincerely,

**Clinton Boskofsky,**

**Chignik Lake Resident**

**From:**  
**To:** DFG, 2018ChianikSockeve (DFG sponsored)  
**Subject:** Disaster pay  
**Date:** Friday, August 14, 2020 9:20:00 AM

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All eligible participants should be paid equally, the highliners have already been rewarded and it's the people on the lower scale of pay that need the money the most.

We are all in this disaster together and we all need to be treated equally. There is no point in making the rich richer and the poor poorer!

Thank you

Sent from my iPad

Lori Pedersen

Enter Name and Address below

Margrette Kosbruk

Chignik Lake, Alaska 99548

ADF&G

Attn: Kari Winkel

PO Box 115526

Juneau, AK 99811-5526

To Whom It May Concern:

I am writing this letter to address some concerns I have with the 2018 Chignik Sockeye Draft Distribution Plan.

I am a resident of Chignik Lake and have counted on subsistence salmon fishing to feed my family my entire life, as my father did before me, and his father before him for generations. The Chignik salmon run means more to me than a paycheck. It means food on my table for my children and my elders. For generations, we have harvested from this stock of salmon as it has sustained our indigenous livelihoods.

I disagree with 30% of the 2018 Chignik Sockeye Distribution going to the Department of Fish and Game for "Research." The Department of Fish and Game is the reason for our diminishing "renewable" resource. Their mismanagement of escapement is now the reason we cannot fill our freezers and shelves with our precious food source.

I feel that the 30% allotted to "Research" in the draft plan should go directly to subsistence users. The Department stole my food and now they are trying to steal my relief. No more!

Sincerely,

Signature Margrette Kosbruk

PRINT NAME Margrette Kosbruk  
Chignik Lake Resident

Enter Name and Address below

Chignik Lake, Alaska 99548

ADF&G

Attn: Kari Winkel

PO Box 115526

Juneau, AK 99811-5526

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Sincerely,

Signature Nick P. Aleck

PRINT NAME Nick P. Aleck  
Chignik Lake Resident

Enter Name and Address below

Chignik Lake, Alaska 99548

ADF&G  
Attn: Kari Winkel  
PO Box 115526  
Juneau, AK 99811-5526

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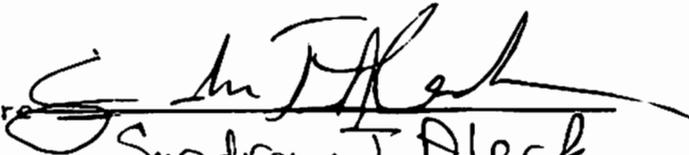
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Sincerely,

Signature



PRINT NAME Sandra J Aleck  
Chignik Lake Resident

Enter Name and Address below

Elliot Lind

Chignik Lake, Alaska 99548

ADF&G

Attn: Kari Winkel

PO Box 115526

Juneau, AK 99811-5526

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Sincerely,

Signature



PRINT NAME

Elliot R Lind

Chignik Lake Resident & Permit Holder

Take Notice, Fish & Game (State of AK) employees were all paid their salaries during 2018 during their time in Chignik & didn't lose their pay. They didn't lose a dime. Why should they profit from our loss? I consider that double dipping getting paid from the state of AK & from receiving from Chignik's disaster of 2018.

Elliot R Lind

Enter Name and Address below

Chignik Lake, Alaska 99548

ADF&G  
Attn: Kari Winkel  
PO Box 115526  
Juneau, AK 99811-5526

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Sincerely,

Signature Denise Beerskin

PRINT NAME Denise Beerskin  
Chignik Lake Resident

Enter Name and Address below

Chignik Lake, Alaska 99548

ADF&G

Attn: Kari Winkel

PO Box 115526

Juneau, AK 99811-5526

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Sincerely,

Signature Dylan Shagin

PRINT NAME Dylan Shagin  
Chignik Lake Resident

Enter Name and Address below

Chignik Lake, Alaska 99548

ADF&G  
Attn: Kari Winkel  
PO Box 115526  
Juneau, AK 99811-5526

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Sincerely,

Signature



PRINT NAME Fred Shagin  
Chignik Lake Resident

Chignik Lake, Alaska 99548

ADF&G

Attn: Kari Winkel

PO Box 115526

Juneau, AK 99811-5526

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Sincerely,

Signature Kevin O'Domin

PRINT NAME Kevin O'Domin  
Chignik Lake Resident

Chignik Lake, Alaska 99548

ADF&G  
Attn: Kari Winkel  
PO Box 115526  
Juneau, AK 99811-5526

To Whom It May Concern:

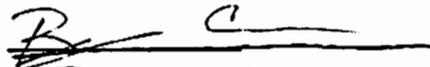
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Sincerely,

Signature 

PRINT NAME Briana Croom  
Chignik Lake Resident

—  
Chignik Lake, Alaska 99548

ADF&G  
Attn: Kari Winkel  
PO Box 115526  
Juneau, AK 99811-5526

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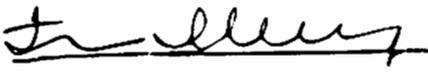
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Sincerely,

Signature 

PRINT NAME Francine Isenberg  
Chignik Lake Resident

Enter Name and Address below

Chignik Lake, Alaska 99548

ADF&G

Attn: Kari Winkel

PO Box 115526

Juneau, AK 99811-5526

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Sincerely,

Signature Rosa S. Lind

PRINT NAME Rosa S. Lind

Chignik Lake Resident

General Del  
Chignik Lake AK  
99548

Enter Name and Address below

Chignik Lake, Alaska 99548

ADF&G

Attn: Kari Winkel

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Juneau, AK 99811-5526

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Sincerely,

Signature

PRINT NAME

Chignik Lake Resident

  
Don O Lind  
Chignik Lake AK  
99548

Enter Name and Address below  
Tom O'Dom *in*

Chignik Lake, Alaska 99548

ADF&G

Attn: Kari Winkel

PO Box 115526

Juneau, AK 99811-5526

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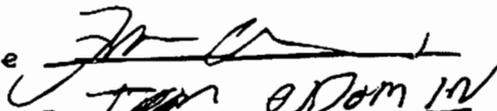
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Sincerely,

Signature



PRINT NAME

Chignik Lake Resident

*Tom O'Dom in*

Chignik Lake, Alaska 99548

ADF&G

Attn: Karl Winkel

PO Box 115526

Juneau, AK 99811-5526

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Sincerely,

Signature Katherine Lind

PRINT NAME KATHERINE LIND  
Chignik Lake Resident

Chignik Lake, Alaska 99548

ADF&G

Attn: Karl Winkel

PO Box 115526

Juneau, AK 99811-5526

To Whom It May Concern:

I am writing this letter to address some concerns I have with the 2018 Chignik Sockeye Draft Distribution Plan.

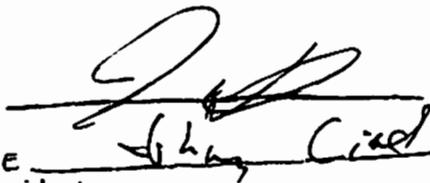
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I disagree with 30% of the 2018 Chignik Sockeye Distribution going to the Department of Fish and Game for "Research." The Department of Fish and Game is the reason for our diminishing "renewable" resource. Their mismanagement of escapement is now the reason we cannot fill our freezers and shelves with our precious food source.

I feel that the 30% allotted to "Research" in the draft plan should go directly to subsistence users. The Department stole my food and now they are trying to steal my relief. No more!

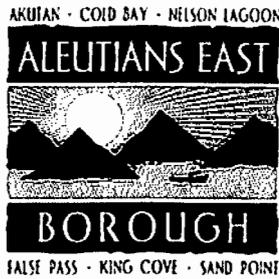
Sincerely,

Signature



PRINT NAME

Chignik Lake Resident



August 14, 2020

Alaska Department of Fish & Game  
Attn: Kari Winkel  
PO Box 115526  
Juneau, AK 99811-5526

Transmitted by email: [DFG.2018ChignikSockeye@alaska.gov](mailto:DFG.2018ChignikSockeye@alaska.gov)

Thank you for the opportunity to comment on the proposed distribution plan for funds related to the 2018 Chignik Sockeye salmon fishery disaster. The Aleutians East Borough Assembly discussed the proposed plan at their meeting August 13<sup>th</sup> and I submit these comments at the direction of the Assembly.

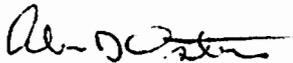
The Aleutians East Borough Assembly is concerned that the proposed distribution plan does not include consideration of Southeastern District Mainland (SEDM), a group of sections in the eastern end of Area M. Setnet fishermen in the SEDM are restricted by regulation from fishing when the Chignik run is reduced, based on the estimation that 80% of SEDM sockeye are Chignik bound. 7.6% of the total estimated Chignik sockeye salmon harvest is allocated to SEDM fishermen.

SEDM fishermen accept a share of the burden of conservation of Chignik sockeye, as do other Area M fishermen. In 2018, SEDM fishermen were severely impacted along with Chignik fishermen and had zero opportunities to fish that year. Over time SEDM setnet fishermen have lost a very large portion of their ability to harvest in traditional fishing grounds causing large revenue losses to those households.

The Borough regrets that we were not informed of the application for these disaster funds when the request was made by Chignik fishermen. If we were made aware, SEDM fishermen could have possibly joined the request at that time. In addition, we would note that Cape Igvak fishermen in the Kodiak area are similarly allocated a portion of the Chignik harvest.

Please reconsider the 2018 Chignik Sockeye salmon fishery disaster fund distribution plan to include all fishermen impacted by this fishery disaster, including Southeastern District Mainland setnet fishermen.

Sincerely,

  
Alvin D. Osterback, Mayor

**From:**  
**To:** [DFG, 2018ChignikSockeye \(DFG sponsored\)](#)  
**Subject:** Comments: Chignik Disaster Relief Fund  
**Date:** Friday, August 14, 2020 1:39:09 PM

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Attention to Kari Winkel or Whom it May Concern: August 14, 2020

Over the past four years, we have witnessed declining returns of Chignik River Sockeye and Chinook Salmon with great concern. While we recognize that there are undoubtedly multiple factors behind this decline, we are frustrated with **the role the Alaska Department of Fish and Game and the Board of Fish have played in this decline.**

We especially want to draw attention to recent decisions by ADFG/the Board to continue the **at-sea Interception (stealing)** of Chignik Drainage salmon. We saw a quote by a board member and/or ADFG personnel that the Sand Point fishery is justified because those fishermen "have already bought boats" or words to that effect. By this logic, gun owners ought to be permitted to rob banks, because they "already have purchased guns."

The Board's/ADFG's management approach, as illustrated in the above paragraph, is clear **not science-based**. But it *should be* science-based. This say one thing ("science") and do another ("not science") is a problem. In speaking out of two sides of its mouth, **ADFG has undermined trust.**

A second problem we see is that it appears ADFG has made **very limited efforts to educate users** as to what is going on in the Chignik Drainage... or perhaps no meaningful effort at all. For example, habitat degradation due to local practices is part of the problem. It is our observation that in some instances, residents and users of the Chignik Drainage are unaware of the harm their own practices may be contributing to declines. Education could help mitigate this. Again, this not only goes to living by the "science-based approach" ADFG touts but does not employ; it also goes to **sharing information in ways that would build trust.**

As an example of how impactful education can be, Barbra ran a Salmon in the Classroom program at the school. Residents were surprised to learn just how silt-free an environment redds require. How can it be that in all the years ADFG has been "researching" out here, **no one from ADFG has ever thought or bothered to come into the community and talk with and educate users?**

For these reasons and others, we feel strongly that a 30% allotment to "research" (or whatever ADFG calls "research") is way out of line. The system has already been thoroughly researched. A more helpful tact would be for ADFG to **use the moneys they already have to send real fisheries biologists, geologists and hydrologists out to Chignik Lake** and other Chignik communities and

A) educate users as to what they can do to **restore, enhance and protect the watershed,**

B) engage in ongoing, **meaningful dialog** with these communities **regarding the**

**changes that are occurring to the drainage and what mitigation efforts are and are not practicable,**  
C) **stop talking about science while practicing non-science, and**  
D) **ending, once and for all, intercept fisheries.**

Meanwhile, the **30% proposed for “research”** (or whatever ADFG calls “research”) **ought to instead be distributed to the Chignik’s subsistence users**, many of whom have relied on this fishery for generations and who are now suffering due to a variety of factors such as dropping water levels, changing ocean conditions and ADFG’s unscientific mismanagement of these salmon stocks.

Sincerely,  
Jack & Barbra Donachy

Enter Name and Address below

Chignik Lake, Alaska 99548

ADF&G

Attn: Kari Winkel

PO Box 115526

Juneau, AK 99811-5526

To Whom It May Concern:

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I am a resident of Chignik Lake and have counted on subsistence salmon fishing to feed my family my entire life, as my father did before me, and his father before him for generations. The Chignik salmon run means more to me than a paycheck. It means food on my table for my children and my elders. For generations, we have harvested from this stock of salmon as it has sustained our indigenous livelihoods.

I disagree with 30% of the 2018 Chignik Sockeye Distribution going to the Department of Fish and Game for "Research." The Department of Fish and Game is the reason for our diminishing "renewable" resource. Their mismanagement of escapement is now the reason we cannot fill our freezers and shelves with our precious food source.

I feel that the 30% allotted to "Research" in the draft plan should go directly to subsistence users. The Department stole my food and now they are trying to steal my relief. No more!

Sincerely,

Signature Virginia B Aleck

PRINT NAME Virginia B. Aleck  
Chignik Lake Resident

Comment on  
back of paper →

8-14-20

To Whom It Concerns

This letter I've watched & heard what's going on today since 1958, My Grandfather Fred Lindholm was married to My Grandmother Dora before she remarried. My Father Andrew F Lindholm was first born to Fred & Dora 1922. I'm from Chigik Lagoon I was born there 1944. I now live in Chigik Lake, 1958

I seen Chigik Lake 1958 with a high water it never did fluxate. we use to go up the river with our outboards no problem all the way to black Lake, no growth on the Lake like today rice was high then, ADF+G was looking at problems with with no explainable results watching rice & growth on late is everywhere areas where channels were are filled with growth, what kind of work is ADF+G doing? watching watching Lake go dry & filling up with sea growth. Some one explain to Elders who have seen this like me people getting money for a vacation.

Concerned

Elder

Virginia Aldek

Enter Name and Address below

Chignik Lake, Alaska 99548

ADF&G

Attn: Karl Winkel

PO Box 115526

Juneau, AK 99811-5526

To Whom It May Concern:

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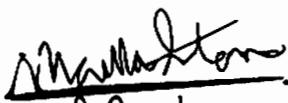
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Sincerely,

Signature



PRINT NAME

Chignik Lake Resident

Chignik Lake, AK 99548

Enter Name and Address below  
Christie N. Aleck

Chignik Lake, Alaska 99548

ADF&G

Attn: Karl Winkel

PO Box 115526

Juneau, AK 99811-5526

To Whom It May Concern:

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Sincerely,

Signature Christie N. Aleck

PRINT NAME Christie N. Aleck  
Chignik Lake Resident

Enter Name and Address below  
Jamie O'Domin

Chignik Lake, Alaska 99548

ADF&G  
Attn: Kari Winkel  
PO Box 115526  
Juneau, AK 99811-5526

To Whom It May Concern:

I am writing this letter to address some concerns I have with the 2018 Chignik Sockeye Draft Distribution Plan.

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Sincerely,

Signature Jamie O'Domin  
PRINT NAME Jamie O'Domin  
Chignik Lake Resident

H. Gary Anderson

August 14, 2020

ADF&G, Attn: Kari Winkel  
PO Box 115526  
Juneau, AK 99811-5526  
DFG.2018ChignikSockeye@alaska.gov

Subject: 2018 Chignik Sockeye Disaster Plan Comments

Dear Kari Winkle:

I approve of option 1 for distribution of disaster funds to permit holders – The equal shares approach. This is a simpler and quicker way to deal with the issue.

Permit holders who did not make a landing in Chignik in 2018 and did make landings in another area should not receive disaster funds. Why should some fishermen double dip?

Research is way too high and the department shouldn't get a penny of it. I recommend zero for research. I doubt that any money the department got would truly benefit Chignik.

The processor allocation is too high. There is no land-based processor and losses are lower as a result. No more than 5% for the processors. Also, the tenders shouldn't get a share because their contracts were paid so they didn't have a loss.

The subsistence allocation should go to the commercial sector. Subsistence is important but it is hard to use money to help subsistence needs. Giving these funds to the commercial sector means that local households with permits or crew that also depend on subsistence are getting the help that they need.

Chignik Regional Aquaculture Association (CRAA) deserves their fair share of 2%. Likewise, the Borough should get 2% and the City of Chignik should get 1%. Total for this sector should be 5%.

Harvester allocation should be increased to 90%. The bulk of the funds should go to where the bulk of the suffering and loss have occurred – the harvesting sector.

In summary, the allocation should be 90% to the harvesting sector excluding those who made landings in areas other than Chignik; 5% to Processors excluding the tenders; 5% to communities & CRAA; 0% to research; 0% to administrative; and 0% to subsistence.

Thank you for your consideration of my comments.

Sincerely,

H. Gary Anderson

August 14, 2020

ADF&G, Attn: Kari Winkel

PO Box 115526

Juneau, AK 99811-5526

[DFG.2018ChignikSockeye@alaska.gov](mailto:DFG.2018ChignikSockeye@alaska.gov)

Subject: 2018 Chignik Sockeye Disaster Plan Comments

In response to the Alaska Department of Fish & Game's (ADF&G) recent request for input on how the Magnuson-Stevens Act funds appropriated by Congress to address the 2018 Chignik Area sockeye salmon fishery disaster should be allocated, I would offer the following suggestions:

	RESEARCH	COMMERCIAL SECTOR	PROCESSORS	SUBSISTENCE	CHIGNIK REGIONAL FISH TAX ENTITIES
2018 SOCKEYE SALMON, CHIGNIK (\$10.3M)	19.5%	71%	5%	0%	4.5%

### Research: 19.5%

ADF&G's proposal to allocate 30% of the available disaster funds towards research is excessive, considering the economic losses experienced by fishers and community members from this run return disaster. Chignik will have to submit Disaster Relief request for 2020, so a full 30% for research doesn't have to come out of the 2018 disaster relief fund, the research funds can be spread between 2018 and 2020.

In response to the State's suggestion for input on potential research studies to address why the 2018 Chignik sockeye fishery failed I offer the following:

- The Alaska State Legislature has **already tasked** ADF&G to do this job. The directives of the constitution were included in statute by the legislature under Alaska Statute

16.05.020. The functions of the commissioner are to: **manage, protect, maintain, improve, and extend the fish, game, and aquatic plant resources of the state in the interest of the economy and general well-being of the state.**

- **ADF&G's Mission: To protect, maintain, and improve the fish, game, and aquatic plant resources of the state, and manage their use and development in the best interest of the economy and the well-being of the people of the state, consistent with the sustained yield principle.**

In my opinion the Chignik Management Area (CMA) has already surpassed yield concern, management concern and soon to be a conservation concern. The goal of any research should be to ensure resource sustainability and optimum production of Chignik's two sockeye salmon runs. The CMA is no longer biologically or economically viable.

### **Commercial Sector: 71%**

I recommend allocating the majority of available disaster relief funds to the individuals who bore the brunt of the economic devastation that resulted from the failed 2018 sockeye salmon season: the Chignik commercial fleet. This Commercial Sector has had a string of failed or depressed returns and this has made this sector weak and in need of real cash infusion. The annual fixed costs of owning and preparing for fishing that never occurred or only occurred at low levels has devastated our communities. Vessel maintenance, insurance, gear, etc goes on even when you can't fish. 65% should be the minimum for this Sector.

**Crew:** A typical purse seine operation in Chignik utilizes a minimum of two crew to a maximum of four or more. In an average year, a permit holder typically pays out 20-36% of their total net profit to their crew. Crew are an integral part of our communities and fleet and need to be compensated in any way possible. 25% of the Commercial sector is reasonable. Further, I believe that it is unfair to require that a crew member to have worked as a crewman in the Chignik salmon fishery in any year 2015-2017 to be eligible for a payment. Unfortunately, Chignik's short term history of not having fisheries makes it almost impossible to retain an experienced crew and have resorted to hiring "green" or inexperienced crew.

I recommend that eligibility to receive such funds be defined as **having not actively fished in another area in 2018, Period.** If a delivery was made from a vessel in one area, it should not receive remuneration from another area. If the CFEC allows this, a vessel owner should be able to operate in any area they obtain a permit for in any given one year period. Individuals who crewed or tendered in another fishery in Alaska in 2018 would remain eligible as this is a common practice. Once eligibility is established I recommend this method to distribute funds to eligible CFEC permit holders and crew:

- **Method 1: Equal split**

I recommend that eligible permit holders receive an equal split of the total percentage of disaster relief funds allocated to the commercial sector. This would simplify the allocation process and expedite getting the funds out to the affected sectors sooner than later. Chignik is on the verge of another economic disaster declaration for 2020 and communities are in dire need of help.

## Processors: 5%

There are no Brick & Mortar processing plants left in Chignik since the plants burned down and they haven't moved to rebuild them, but are rather using floating processors or tenders; the remaining buyers fixed costs are much lower. Generally speaking, summer activity with a shore plant is very high, with crew, building maintenance, electricity, and other power and water needs that are moved elsewhere (Kodiak & Area M). They also no longer have the high associated winter costs if their Chignik shore plants still operated. The processors have moved most of their costs to plants existing elsewhere where those fixed costs are already covered by Kodiak or Area M caught fish. By taking Chignik caught fish to those communities greatly increases their profits from Chignik caught fish because fixed costs are greatly reduced.

The private tender fleet for 2018 was paid in full for their contracts. So any additional funds would be a duplicate payment.

## Chignik Regional fish tax entities: 4.5%

Three entities within the Chignik region depend on the revenue generated from a fish-based tax.

The City of Chignik levies a 2% fish tax. Revenue from the fish tax comprises almost the entirety of the City's operating budget. The lack of any fish tax revenue in 2018 devastated the City.

The Lake & Peninsula Borough, of which the 5 Chignik communities are a part of, receives a severance tax of 2% of the value of the commercial harvest of the Chignik Management Area as well and the revenue generated from that tax comprises a significant portion of the Borough's operating budget.

The Chignik Regional Aquaculture Association (CRAA) also receives a tax of 2% of the value of the commercial salmon harvest of the Chignik Management Area. This tax revenue is the sole source of revenue for CRAA.

In order to help alleviate this loss of revenue, I support that each regional fish tax entity should receive their proportional share of the commercial sector's allotment, which calculates out to 1.5% each.

For Example, since the Borough receives a severance tax of 2% of the value of the commercial harvest of the Chignik management area, if the commercial sector were to receive 70% of the total value that would mean that the Borough's allotment would be 2% of the commercial sector's allotment (i.e. 2% of 70%), which approximates 1.5% of the *total* disaster payout. Likewise, the City of Chignik and CRAA would each receive 1.5% of the total disaster payout, for a total of 4.5% for this category.

## Protecting Subsistence: 0%

While the value of our commercial interests can be quantified, placing a dollar amount on the value of the continuation of our subsistence ways of life cannot. Recognizing that the failure threatened

subsistence and commercial users alike with potentially devastating food insecurity, I would suggest that this Subsistence portion be added to the commercial sector.

### Administrative: 0%

PSMFC already is tasked with covering the administration of this grant. ADF&G Research projects are generally allocated by a budget. I don't see the need to change from this approach just because funds are available and to create a position that uses 450 hours annually. Just put the projects out for competitive bid. No need to add a layer of administration to siphon off funds that should go to stakeholders who received nothing during the 2018 economic disaster.

Thank you for opportunity to comment on this sensitive issue.

Sincerely,

George Anderson

8/14/20

Vivian Brandal

ADF&G  
Attn: Kari Winkel  
PO Box 115526  
Juneau, AK 99811-5526

To Whom It May Concern:

I am writing this letter to address some concerns I have with the 2018 Chignik Sockeye Draft Distribution Plan.

My name is Vivian Brandal and I am an elder, widow, and boat owner residing in Chignik Lagoon. It is my understanding that the proposed allocation of funds for the 2018 Chignik fishery disaster does not include boat owners, many of whom are retired, elders, and widows, like myself. This is extremely disappointing! Annually, I put up money to have my boat insured, maintained, and laid up. The salmon season of 2018 was no exception. I, and all boat owners who paid limited entry to register our boats, paid out, but little was returned.

I, personally, fished with my husband beginning in 1955, since the year we were married. I have put in my time in the Chignik salmon fishery. I should definitely be included in the 2018 disaster allocation of funds.

I disagree with 30% of the 2018 Chignik Sockeye Distribution going to the Department of Fish and Game for "Research." The Department of Fish and Game is the reason for our diminishing "renewable" resource. They have made poor choices with escapement and overfishing of our sockeye run year after year. Their mismanagement of escapement is now the reason we cannot fill our freezers and shelves with our precious food source. My husband predicted this happening 30 years ago, but the Department chose to turn a deaf ear to his valuable local and indigenous knowledge of our viable resource. I continue to see the advice of the local knowledge ignored. If the Department is allocated anything, in total, it should be the very smallest amount in the allocation.

Furthermore, the allocation of the 2018 disaster relief funds does not address subsistence fishermen who rely on the returns to fill their freezers and their pantries. Instead, I watch as my children, grandchildren, great-grandchildren, and yes, great-great grandchildren are unable to access their cultural foods, their heritage lost to the destruction of Fish and Game's mismanagement. The proposed 30% of the Distribution plan should be paid directly to the subsistence users, not to Fish and Game's "Research." If they want to conduct research, I

encourage them to finally listen to the indigenous knowledge of the local people. I fear, however, that their damage is done, and our precious fishery has been destroyed.

Sincerely,

Vivian Brandal,  
Chignik Lagoon Resident

Enter Name and Address below  
Inez O'Domin

Chignik Lake, Alaska 99548

ADF&G

Attn: Karl Winkel

PO Box 115526

Juneau, AK 99811-5526

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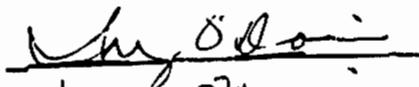
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Sincerely,

Signature



PRINT NAME

Inez O'Domin

Chignik Lake Resident

In response to the request for input on how the Magnuson-Stevens Act funds appropriated by Congress to address the 2018 Chignik Area sockeye salmon fishery disaster should be allocated, the City of Chignik offers the following suggestions:

	RESEARCH	COMMERCIAL SECTOR	PROCESSORS	SUBSISTENCE	CHIGNIK REGIONAL FISH TAX ENTITIES
2018 SOCKEYE SALMON, CHIGNIK (\$10.3M)	19.5%	71%	5%	0%	4.5%

### Research: 19.5%

The City of Chignik believes that ADF&G's proposal to allocate 30% of the available disaster funds towards research is excessive. Instead, the City of Chignik recommends that 19.5% of the total available funds be appropriated for research. The City of Chignik suggests the that the following seven projects be considered and funded:

- 1) ADF&G: GSI analysis of historical samples from smolt project to quantify stock-specific migration timing. Duration: 2yrs; Est. cost: \$200k for 10 years of samples; \$300k for 15 years of samples.
- 2) UW Fisheries Research Institute (FRI): Determine relative growth performance of Black Lake and Chignik Lake juveniles, while co-rearing in Chignik Lake. Duration: 3 yrs.; Est. cost: \$520k for project 2&3 together (5 years of fry genetic samples).
- 3) FRI: Determine watershed locations where Black Lake juvenile sockeye achieve their growth during freshwater residency. Duration: 3 yrs.; Est. cost: \$520k for project 2&3 together (6 years of otolith samples).
- 4) FRI: Historical and future assessment of risk to major sockeye stocks of changing habitat in the Black Lake watershed. This project may be taken up by the Army Corps of Engineers. Duration: 3 yrs.; Est. cost: \$350k.
- 5) FRI: Continued monitoring of hydrology and geomorphic evolution in the Black Lake watershed. Duration: 5 yrs.; Est. cost: \$150k.
- 6) ADF&G: Late-season sockeye escapement enumeration for management, brood table analysis, and forecasting future runs. Duration: 5yrs; Est. cost: \$400k.
- 7) ADF&G: In-season genetic sampling of the early July - August Chignik sockeye escapement. Duration: 5yrs; Est. cost: \$175k.

### Commercial Sector: 71%

The City of Chignik recommends allocating the majority of available disaster relief funds to the individuals who bore the brunt of the economic devastation that resulted from the failed 2018 sockeye salmon season: the Chignik commercial fleet. This includes active permit owners and operators as well as their respective crew. A typical purse seine operation in Chignik utilizes a minimum of two crew, with the norm being three. 30% allocation to crew is reasonable based on that fact. Whether a crew member fished in Chignik prior to 2018 should not matter as to eligibility to receive funds from the 2018 disaster payout. Crew are an integral part of our communities and fleet and need to be compensated.

The City of Chignik recommends that permit owner and operator eligibility to receive disaster relief funds be defined as having not actively fished in another area in 2018. Individuals who crewed or tendered in another fishery in Alaska in 2018 would remain eligible. Once permit owner eligibility is established the City of Chignik has no recommendation as to how the funds are split, other than the most expedient method should be used due to the current economic disaster we are currently suffering just 2 years after the 2018 disaster.

### Processors: 5%

Since 2008, no shore-based processing has occurred in Chignik. The two buyers in Chignik, Ocean Beauty and Trident, tender the vast majority, if not all, of the sockeye salmon they buy in Chignik to their shore-based plants in Alitak and Sand Point, significantly changing the cost matrix from traditional expectations. The City of Chignik believes 5% is reasonable to cover any losses experienced by these two processors in 2018.

### Chignik Regional Fish Tax Entities: 4.5%

The City of Chignik levies a 1% landing tax, and also receives revenue from a 1% processing tax for those fish processed in Chignik. Revenue from the fish tax comprises almost the entirety of the City's operating budget. The lack of any fish tax revenue in 2018 devastated the City, and the fact it is happening again in 2020 will not be survivable without the funds from 2018.

The Lake & Peninsula Borough, of which the 5 Chignik communities are a part of, receives a severance tax of 2% of the value of the commercial harvest of the Chignik Management Area as well and the revenue generated from that tax comprises a significant portion of the Borough's operating budget.

Further, the Chignik Regional Aquaculture Association (CRAA) also receives a tax of 2% of the value of the commercial harvest of the Chignik Management Area. This tax revenue is the sole source of revenue for CRAA.

In order to help alleviate this loss of revenue, the City of Chignik supports that each regional fish tax entity should receive their proportional share of the commercial sector's allotment, which calculates out to roughly 1.5% each if the commercial sector receives the recommended 71%.

**For clarification**, since the Borough receives a severance tax of 2% of the value of the commercial harvest of the Chignik management area, if the commercial sector were to receive 71% of the total value that would mean that the Borough's allotment would be 2% of the commercial sector's allotment (i.e. 2% of 71%), which approximates 1.5% of the *total* disaster payout. Likewise, the City of Chignik and CRAA would each receive 1.5% of the total disaster payout, for a total of 4.5% for this category.

### Protecting Subsistence:0%

Subsistence has played a pivotal role in our region's cultural heritage and nutritional stability for thousands of years but the 2018 sockeye salmon disaster threatened the viability of our region's subsistence ways of life. How do you quantify that economically? You can't. People need food. They need money to buy food, especially after we have endured a repeat of 2018 in 2020. Providing the majority of the funding to our region's fishing families is the best way to help people put food on the table and "keep the lights on" in our communities.

Thank you for considering our recommendations.

Sincerely,

  
\_\_\_\_\_  
Guy Ashby, Mayor, City of Chignik

8/14/20  
Date

**From:**  
**To:** [Dan Anderson](#)  
**Cc:** [DFG\\_2018ChignikSockeye \(DFG sponsored\)](#)  
**Subject:** Re: Disaster funds allocation  
**Date:** Friday, August 14, 2020 8:36:22 PM

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Bullseye Dan!                      John McCombs

On Thu, Aug 13, 2020, 11:39 AM Dan Anderson wrote:

As a fisher who may one day find himself in a disaster allocation. I find in your draft a few issues that greatly concern me. To keep in short I'll only speak to 2 of them, being allocation and research. Under the draft before me I see a suboption being mentioned. As I read it, I understand that if a fisher held a Chignik permit and fished elsewhere, the fisher would qualify for a share of the funding, just for holding a permit. In doing so it would reduce the funds available to the ones who actually endured the hardship. Whereas, if one held a permit, registered and licensed the vessel in the Chignik management area, and chose not to fish, is completely different. This to me is the only fair way to do it. Otherwise I think of our salmon permits as a futures market on the stock exchange. Secondly, research percentage, I find that a number of 30% to be excessive. Yes, research is important to try and avoid a repeat disaster. Research usually takes years to complete, and sometimes doesn't bear any fruit. The affected permit holders are financially stressed, then and now. To allocate away from the stressed, to the research sector, only to possibly see the funds evaporate into the ozone, with no possible benefit to the area, would add to the hardship. We all have witnessed how the government can massage things around. A somewhat more modest number would make me more comfortable, let's say 5-15% with sideboards of in to insure the funds don't just benefit one user group or section of fish and game.

August 14, 2020

To Whom It May Concern,

As a Life-long, native fisherman from Chignik, I would like to offer the following suggestions on how the Magnuson-Stevens Act funds appropriated by Congress to address the 2018 Chignik Area sockeye salmon fishery disaster should be allocated,:

	RESEARCH	COMMERCIAL SECTOR	PROCESSORS	SUBSISTENCE	CHIGNIK REGIONAL FISH TAX ENTITIES
2018 SOCKEYE SALMON, CHIGNIK (\$10.3M)	20%	71%	4.5%	0%	4.5%

Research: 20%

ADF&G's proposal to allocate 30% of the available disaster funds towards research is excessive. 20% will fully cover the sockeye studies needed, provided the research spending is used toward ensuring resource sustainability and optimum production of Chignik's historically robust sockeye salmon runs which are no longer biologically or economically viable. Several such projects were clearly outlined in the distribution plans submitted by CRAA, the Lake & Peninsula Borough, The City of Chignik, and the Chignik Intertribal Coalition back in April.

There are most likely several reasons for the 2018 disaster in Chignik. Some are more obvious than others: Past Board of Fisheries decisions that drastically increased interception of Chignik-bound sockeye, a management mind-set by ADF&G Westward Region staff that favors interception fisheries over terminal harvest fisheries, and the continued allowance of these large, extremely efficient interception fisheries to target and over-exploit already weakened Chignik sockeye runs despite the economic and social devastation that has resulted in the Chignik region. These issues are not going to be solved through research.

The research projects outlined by CRAA, the Lake & Peninsula Borough, The City of Chignik, and the Chignik Intertribal Coalition with input from FRI address issues that actually can help shed light on the less-obvious causes of the 2018 (and now 2020) Chignik sockeye run failures.

## Commercial Sector: 71%

1. **Permit holders:** The majority of available disaster relief funds should be allocated to active Chignik permit holders and their families who bore the brunt of the social and economic devastation that resulted from the failed 2018 sockeye salmon season (and now the disaster of this 2020 season). Our fleet is devastated. The annual costs of preparing for a fishing season are substantial. Boat/permit payments, vessel maintenance, insurance, gear repair, etc., occurs whether you fish or not. Taking on those costs in preparation for a season that doesn't happen is crippling. Add in trying to support a crew and your family as well and it should be obvious the kind of havoc such an occurrence wreaks on Chignik fishermen, their families, their crew, and their entire communities. That's what happened in 2018, and now it's happening again in 2020.
2. **Crew:** As far as the allocation to crew goes, I find it hard to accept 35% across the board. Some guys (very, very few) only hire 2 crew. The vast majority hire 3. Some hire 4. I had 4 crew in 2018, 3 of which were to be paid 10%, and one 5%, for a total of 35%. So for me personally the 35% for crew in 2018 works. However, that's unique to my operation in 2018 and doesn't represent the entire Chignik fleet. For example, prior to 2016 I always had a maximum of 3 crew. In 2017 & 2019 I had the same crew as in 2018. This "season" I had only 3 crew again. The fact that most Chignik fishermen hire at least 3 crew leads me to say 30% of the Commercial sector allocated to crew is more fair and reasonable than 35%. I will be paying all 4 of my 2018 crew regardless of what the final allocation is set at. It is very important that crew get paid.

One more point regarding crew - I believe that it is unfair to require that a crew member worked as a crewman in the Chignik salmon fishery in any year between 2015-2017 to be eligible for a payment from 2018 disaster funds. The crewmembers that were here in 2018 are the people who suffered the loss. Whether they were here prior to 2018 is irrelevant in my opinion. Just FYI, my crew fished with me prior to 2018 so this would not affect them anyway.

3. **Permit holder eligibility:** I agree wholeheartedly with the original recommendation provided by the Chignik Intertribal Coalition that permit holder eligibility to receive 2018 disaster funds be defined as **having not actively fished in another area in 2018, period.** If a salmon delivery was made by a permit holder outside the Chignik area in 2018, they should not receive remuneration from the Chignik sockeye salmon disaster funds. Those fishermen who were able to go and fish another area were able to fish and make income for themselves and their crew in 2018. Good for them. Most Chignik fishermen did not have this opportunity. It's not just as simple as just "going somewhere else" for the majority of Chignik fishermen. Most Chignik fishermen do not own permits for other areas and very few have the cash on hand to put up the up-front money necessary to lease a permit for another area. Most have small boats, built and rigged specifically for the Chignik fishery and are not viable boats for other areas (can't fish in bad weather while tanked down, small fishholds, underpowered, etc.). The gear (seine length, etc.) required for other areas is also different than that allowed in Chignik (longer seines in adjacent areas for example) requiring substantial costs to try to fish elsewhere for the majority in

Chignik who do not own such equipment. Obtaining a permit in another area is also costly for those who don't already own one. Additionally, for most of us, Chignik is home – our homes are here, our families are here, naturally our groceries and supplies are here, and it's not so easy to just pack our lives up mid-season and leave to go somewhere else - even if we had the boat, gear, and extra money to do so. In support of this, all but 2 permit holders that chose to go fish elsewhere in 2018 don't own land or a home in Chignik, none brought their families with them, and none are residents of the region. Further, allowing some permit holders to “double dip” and basically profit from the Chignik disaster even though they actually fished salmon and made money elsewhere in 2018 just seems unethical. Add to that the fact that every “double dipper” you allow to receive disaster funds from Chignik results in even less money for the Chignik permit holders that bore the brunt of the 2018 disaster and it just seems downright criminal.

One last concern on permit holder eligibility – what's to keep Chignik permit holders who had zero intention of fishing in Chignik in 2018 from claiming they were going to fish here? There are salmon permit holders who fish Bristol Bay, Area M, Kodiak, and Prince William Sound that also own Chignik permits. If you exclude fishing in another area as an eligibility factor how do you prevent false claims of intent to fish Chignik? Anyone can say they were going to fish here but “had to fish elsewhere” due to the disaster in Chignik.

Bottom line, if a permit holder fished salmon in another area in 2018 they should not be eligible for funds from the 2018 Chignik sockeye salmon disaster.

▫ Method 1: Equal split

Once eligibility is established, I recommend that eligible permit holders receive an equal split of the total percentage of disaster relief funds allocated to the commercial sector. The reasoning behind this is to expedite getting the funds out to the affected sectors. Chignik is in the midst of another economic disaster and our people and communities are in dire need of help. It is my understanding that the historical average method will delay distribution of the funds when compared to the equal split method. If neither offers a time advantage I do not care which method is used.

## Processors: 4.5%

There has not been a shore-based processing plant in Chignik since 2008. Trident bought both plants – one in 2002 and the other in 2004. They dismantled one and the other burned down in 2008. Trident has made no effort to rebuild, but rather primarily uses tenders to haul the salmon they buy in Chignik to either Sand Point or Kodiak. They also use a floating processor sporadically, when it isn't in Bristol Bay and when the Chignik salmon harvest is productive enough to warrant it. When using tenders Trident also transfers the salmon caught in Chignik outside of the City of Chignik's tax boundaries so as to avoid paying the 1% landing tax that provides much of the City's operating budget. Ocean Beauty is the other buyer in Chignik. Like Trident they do not have any shore-based processing capability in the Chignik area. They simply tender the salmon they purchase in Chignik to their plant at Alitak on Kodiak Island. Ocean Beauty does however, pay the 1% landing tax to the City of Chignik for all salmon they buy here. The bottom line is that neither processor has the large fixed costs associated with operating a shore-based plant. When Chignik has a poor, or non-existent season, both buyers just simply send their tenders elsewhere. There is minimal direct cost associated with Chignik due to the lack of a shore-based processor. Unlike Chignik fishermen, the vast majority of whom are economically tied solely to Chignik, the processors are operating plants in Washington, SE Alaska, Prince William Sound, Cook Inlet, Kodiak, Area M, and Bristol Bay. The economic impact on the two salmon buyers of a disaster salmon season in Chignik, already minimized by their lack of any Chignik shore-based processing facility, is further offset by all the millions of pounds of salmon they buy statewide.

As far as a special allowance for the tenders that I have seen referenced, there are only 4 tenders that are exclusive to the Chignik fishery and those 4 Chignik-only tenders were already paid in 2018. Since they were already compensated, any further compensation, if deemed appropriate, should be adjusted to reflect that.

## Chignik Regional fish tax entities: 4.5%

Three entities within the Chignik region depend on the revenue generated from a fish-based tax.

The City of Chignik levies a 2% fish tax. Revenue from the fish tax comprises almost the entirety of the City's operating budget. The lack of any fish tax revenue in 2018 was disastrous. The lack of any fish tax revenue in 2020 will be doubly so.

The Lake & Peninsula Borough, of which the 5 Chignik communities are a part of, receives a severance tax of 2% of the value of the commercial harvest of the Chignik Management Area as well and the revenue generated from that tax comprises a significant portion of the Borough's operating budget.

In order to help alleviate this loss of revenue, I support that each regional fish tax entity should receive their proportional share of the commercial sector's allotment, which calculates out to 1.5% each.

For example, since the Borough receives a severance tax of 2% of the value of the commercial harvest of the Chignik management area, if the commercial sector were to receive 70% of the total value that would mean that the Borough's allotment would be 2% of the commercial sector's allotment (i.e. 2% of 70%), which approximates 1.5% of the *total* disaster payout. Likewise, the City of Chignik and CRAA would each receive 1.5% of the total disaster payout, for a total of 4.5% for this category.

Administrative: 0%

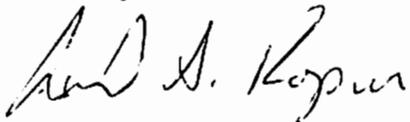
PSMFC already is tasked with covering the administration of this grant. ADF&G Research projects are generally allocated by a budget. I don't see the need to change from this approach just because funds are available and to create a position that uses 450 hours annually. Just put the projects out for competitive bid. No need to add a layer of administration to siphon off funds that should go to stakeholders who received nothing during the 2018 economic disaster.

Protecting Subsistence: 0%

Placing a dollar amount on the value of the continuation of our subsistence ways of life is not possible. The emptiness and loss felt by our entire community when we were unable to get subsistence is not something money can replace. In the end it comes down to needing money to replace the food we would have had were we able to get it via traditional means. We are dealing with the same thing again this summer. That being said, I believe the best way to do that is by getting the most money to the people most heavily impacted by the 2018 disaster, which can be accomplished by getting more funds to the Chignik permit holders and their families, their crews, and thereby into the local communities of the Chignik region.

Thank you for giving me the opportunity to make suggestions.

Sincerely,

A handwritten signature in black ink, appearing to read "Axel S. Kopun". The signature is fluid and cursive, with the first name "Axel" being the most prominent.

Axel S Kopun

July 31, 2020

I am a commercial fisherman in the Chignik Management Area. My comment for the distribution plan would be to first of all remember the cost of each Boat Owner/Permit Owner before the season even begins:

- Boat Insurance
- Many Owners have State Boat/Permit Loans
- Boat Moorage Fee
- Boat Preparation
- Crew Fares to flight into Chignik
- Groceries for Crew for a 3-3 ½ month season

The Boat Owners/Permit have the biggest investment and take the largest hit when a Disaster is declared, with this knowledge it would only be fair for the ACTIVE PERMIT HOLDERS that have not fished any other areas be allowed at least \$40,000 dollars off the top of the 10,327,039 awarded for the Disaster for startup expenses.

According to the Tier schedule there were 68 active permits (not sure if this count also included individuals that fished in other areas)

10,327,039

2,720,000 (68 active permits @40,000)

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7,607,039 Left to divide among the percentage formula

Processors 12% (They pay tenders from their share—but also with the knowledge that the small tenders are on a – you get paid for what you haul. No fish No hauling so it would be at the processors decide if they get a share.

Harvesters 55% (65% Permit holders and 35% crewmembers)

Research 30% (Research, subsistence and Administrative should all share from the same pool)

City/Borough 3%

Chignik Management Area did not have a 1<sup>st</sup> run in 2019. Covid-19 has put an extra burden and cost for Permit Holders along with a complete 1<sup>st</sup> run failure. As of July 31, 2020, the fleet is still not fishing and there is a good chance we won't fish this season. HELP IS NEEDED IMMEDIATELY FOR THE PERMIT HOLDERS. A first wave of 40,000 off the top would help with the burden of last 3 years of disasters to the fisherman that don't have other resources while you figure out the remaining shares.

## **Chignik Sockeye Distribution Plan comment**

**The fisherman invest the most and lose the most so they should get at least 70% instead of the 55%. Equal Share for all active permit holders. The city only gets 1% for landing tax and 1% processing tax as they usually get from the fisherman's portion. 10% for the processor since they run a bare bones operation in Chignik and generally ship fish to Kodiak or Sand point instead of building a processing plant. 20 % for the research portion that the coalition can get their 1% portion from.**

## **Alaska Department of Fish/Game**

### **Chignik Sockeye comments:**

**2018 was the beginning a 3 years of Disaster for the Chignik Sockeye Salmon fisheries. The loss of our 1<sup>st</sup> run of Sockeye in 2019 and the outlook is another complete disaster for 2020. If the fisherman is going to get 55% of the allocated funds just divide it equally among all active permit holders . We all have the same cost rather you are a small lagoon boat or an outside fisherman to start fishing with boat insurances, boat state loans, permit state loans, crew cost, grocery cost and boat maintenance cost. The advantage of the larger boats is that they have the ability to find other resources to make money like cod fishing, crab fishing or tendering. We are all hurting especially us permit holders that live in the village and there is limited employment.**

**All CFEC permit holder that left Chignik and were able to fish in other areas cannot be included in the disaster. That is double dipping.**

**Just divide the disaster money equally among all permit holders and get it to the permit holders asap for us to pay our bills.**

**William Jones**

**Department of Fish and Game  
Attention: Kari Winkel  
P.O. Box 115526  
Juneau, AK 99811-5526**

**August 10, 2020**

**Attention: 2018 Chignik Sockeye Salmon Disaster Funds Distribution- Kari Winkel**

**Dear Ms. Winkel,**

**I, William Jones, a 4th generation fisherman of Chignik Alaska, offer my comments concerning the proposed distribution plan:**

**1. The research portion should not be 30%. The department was not financially affected by Chignik's' 2018 sockeye salmon disaster. The allotment should be in the 10-15% range. Funds received must stay, be used to help the Area L Chignik sockeye salmon, and not siphoned-off to support Areas K and M fisheries or resources. Also the research projects funded by disaster money should be well vetted to ensure suitability and worthiness for management and sustainability of Chignik sockeye salmon runs.**

**I do not support research funding going to a social-economic investigation. It is entirely evident that Chignik is extremely dependent on its local salmon runs for subsistence, economic viability, and culture. Nothing has changed.**

**2. The Harvester allocation should be increased to 70-75% because they are the heart of the Area L Chignik fishery. Harvesters must have registered a purse seine vessel for the 2018 Chignik Sockeye Salmon season and also hold a current Area L salmon seine permit. The individuals that suffered losses should get the majority of the disaster award. It should be divided between permit holders at 75% and crew members at 25%. As there was no fishery, crews did not pay their expenses. In 2018, I personally spent thousands on my crew for flights, food, gear and other items.**

**I believe the harvester payout to should be divided into two categories:**

**A. \$35,000 to \$40,000 base pay to every eligible permit holder divided equally to help cover expenses, including airfare to Chignik, groceries, fuel, licenses, moorage, insurance, shipping and other expenses that normally would be covered by the vessel gross, had there been a 2018 sockeye salmon fishery.**

**B. The remaining would be used for the skipper/vessel and crew based on the tier**

schedule proposed, split with 75% to the permit holder and 25% to divide among crewmen.

3. Crew members must be required to show intent to participate as vessel crewman in the 2018 commercial Chignik salmon fishery, based on a crew contract or skipper affidavit, and also have held a 2018 commercial crew license or 2018 CFEC permit for any fishery. They should not have to prove that they crewed in a previous year in the Chignik fishery for eligibility.

4. Permit holders that made a landing in another fishery should get 50% of the baseline price. Skipper, vessel and crew should only get 50% of the vessel tier payment. They made a choice to fish elsewhere, and the rest of us who made the choice to stay in the Area L fishery should not carry the burden of them wanting to double dip.

5. To be eligible for the sockeye disaster fund, harvesters must hold a current Area L salmon seine permit and also have a register purse seine vessel for the 2018 Chignik sockeye salmon season and geared-up and ready to fish.

Previous year documentation of participation in the Chignik salmon should not exclusory be limited to a fish ticket receipt. In 2016 I salmon purse-seined on the first opener but because of a major mishap on the fishing grounds where I wrapped my seine on the wheel I was unable to make a delivery on the opener. I transferred my catch to another boat with salmon already onboard and that seiner delivered both of our catches. Since he did not have my permit card, his catch and mine were recorded on his permit. Given verification of this, via notarized affidavits, should be allowed to stand as proof of my participation in the 2016 fishery. Because of my father's death I did not fish Chignik after that first opening in 2016. In 2015, I fished Chignik the entire season. In 2017, I did not fish. To meet the required eligibly requirement of fishing in at least two out of three years from 2015 to 2017, verification of my participation in the 2016 Chignik fishery is essential.

6. All crew members were impacted the same as others in 2018. Their allotment should be based off of the tier system determined by the average annual pounds of sockeye salmon landed by the permit holder.

7. There should be no funding for subsistence. In 2018 the Chignik sockeye subsistence fishery was not a disaster according to the department's subsistence catch records. The impact to the Chignik villages was solely due to lost wages and income from the absence of a commercial fishery.

8. Processors should get 15% based on the intent to purchase and process Chignik sockeye salmon for the 2018 salmon season. They were the second most impacted.

9. Communities should get 5%, calculated against the amount assigned to harvesters as specified:

2% to the L&P Borough,

1% to the City of Chignik, and

2% to CRAA.

The opportunity to comment is appreciated.

Sincerely,

*William M. Jones*

**Rodney Anderson**

**August 8, 2020**

**ADF&G  
Karen Winkel  
P.O. Box 115526  
Juneau, Alaska 99811-5526**

**Dear Ms Winkel,**

**I am a lifelong resident of the Chignik, of 60 years, I testified before the Board of fisheries in Kodiak in 2014 and cautioned the board then that the run would fail if no action was taken. Chairman stated the Chignik was a through bred referring to a horse and didn't need any help, A board member asked the Department Biologists What the Timing of the run that past by Cape Igvak the response was "we don't have that information" clearly they do! The Chair said moving on, with no consideration for the Board members question.**

**The Department has been reducing the escapement goals over the years to the point that bad sea or lake conditions there is not enough stock to recover, we need carcass in the lake to fertilize it! Mother nature was doing just fine until The current department came along. The words over escapement, there is no such thing, a better phase is underutilized stocks.**

**Chignik Fishermen are taxed 5% the 5% is divided amongst the State, City, Borough and CRAA. CRAA has been funding studies for the Department since conception, what is the end result, no improvements to the problems at hand! The Borough helps the local governments, the city does whatever the city does and of course the State spends it wisely, furthermore the department has a permit that they use to generate revenue to run their operation, also the Department is getting funding from other outside agencies such as Area M.**

**The Disaster relief funds should be used for what is intended the fishermen not a cash cow for agencies that get funding elsewhere.**

**As you my know Chignik is coming off yet another failed season, I put the full responsibility on the Department and the Board of Fisheries, Their suppose to be the stewards of the resources yet are allowed to manage it recklessly.**

- 1. Any amount in addition to the 5% is excessive and It could be considered additional taxation to the relief funds.**
- 2. To study the problem is kicking the can down the road.**
- 3. The Department has a permit so the disaster funds would cover the department.**
- 4. All Permit holders who chose to fish other areas should not qulify, because they have income from other Salmon fishery.**

5. It's high time for action, the answer is in the past say 1964 the area biologist was faced with a failed Chignik run and his answer was simple and yet effective, He closed all interception fisheries to the run down and this included Kodiak waters, no study needed! Keep in mind the fishing gear is way more effective now then it was back then and fishing area has expanded. Terminal stocks are the first to feel the effects of a failed run and other fisheries that have relied on this failed run will be the next victim of poor management.

Respectfully yours,



Rodney Anderson

**From:**

DFG, 2018ChignikSockeye (DFG sponsored)

**Date:**

Tuesday, August 4, 2020 6:23:07 AM

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Ms. Winkel,

My name is Eugene Carlson and I am owner/operator of the Megkenzie, permit number . This is in response to plans for 2018 salmon disaster relief. The crew share versus harvester share seem inequitable. Harvestors/owners incurred the lion's share of expenses, particularly insurance and groceries. Crewmembers needed to be supported with meals, grocery accounts and gear which we never were able to recover. Personally our crew left approximately June 20th and only one stayed the summer. Paying crew who stayed less than one month is unfair to others who stuck it out.

There were also other permit holders who went and fished in other areas and should not be eligible for any payment. Alaska law states if you make a delivery in another area, you can no longer fish the Chignik Area as it is very exclusive. Many Native fishermen cannot afford to move to another area.

Other allocations seem fair.

I believe the percentage for research should be allocated for Fish and Game should be STRICTLY FOR CHIGNIK RESEARCH, not in Kodiak's fund. With all due respect, we are in a disastrous mess yet again which must fall on ADF&G!! As for the 1% for Administration, no.

The boat owners/operators, their families and those crew who stuck it out are those suffering the most. It is literally the food on our table and the ability to pay bills and keep a roof over our heads. Many others on the list have the luxury of a regular paycheck or chose to go to other fishing grounds.

Thank you for the opportunity for us to give input.

Sincerely,  
Eugene Carlson

Eugene Anderson  
F/V Raymar

July 28, 2020

Department of Fish and Game  
Attn: Kari Winkel  
P.O. Box 115526  
Juneau, AK 99811-5526

**Subject: Draft 2018 Chignik Disaster Funds Distribution Plan**

Dear Ms. Winkel,

My comments on the subject Chignik disaster fund plan are:

1. Page 1, Research: I support science-based studies that will identify what went wrong in 2018, what can be done to prevent a reoccurrence, late season escapement monitoring, inseason genetic sampling, and other studies that will improve sockeye salmon management to where production is sustainable and prosperous for Chignik stakeholders. As for socioeconomic studies I oppose. We know that Chignik is completely dependent on its local sockeye salmon fishery, economically and culturally. It is important to stay focused on what will help Chignik, and it is not a social economic study. There been more than one published (McDowell Group, Juneau), and they were conveniently ignored in the State's regulatory process owing to politics for maintaining sockeye-salmon interception fisheries in Area M and Kodiak.
2. Page 2, Harvesters: After careful examination of the proposed funding distribution the percentage for the harvesters should be increased to at least 65%. The proposed 55% does not account enough for the loss sustained in 2018 which I will address later. 30% for research is over-kill, the range of 15 to 20% for research is appropriate. I understand that a comprehensive list of science-based studies was provided earlier by several groups that tallied less than two million dollars. Harvesters sustained the greatest impact, and 35% for the other categories would be a fairer distribution.
3. Page 2, Permit holders, Eligibility criteria: My support goes for deleting eligibility criteria #3. Several Chignik-salmon permit holders were forced to enter other salmon fisheries when it was clear that there was not going to be a Chignik fishery. Personally, I waited until August 9, 2018 before leasing an Area K salmon permit. It was a gamble and required a huge learning curve. There was not a choice. I had to do something to make loan payments and money to carry me though winter. I should not be penalized for making the decision. The only salmon permit I own is a Chignik seine permit
4. Page 3, Vessel Crew: The #3 eligibility requirement should be removed. Commonly, new crewmen without a previous year of Chignik seining experience are hired and 2018 season is no exception. Newbies should be compensated equally.
5. Page 3. Processors, Eligibility Criteria, Tender Vessels: To my knowledge privately owned tenders are paid under their contract irrespective to how the fisheries develops. The point is that tenders have already been compensated.

6. Page 3, Communities: This should be amended to include our aquaculture association, CRAA. They are important to Chignik by funding sockeye salmon research and providing management tools for resource sustainability and assisting stakeholders on regulatory issues. A 2% CRAA assignment would be fair, being consist with the annual tax amount that the fleet approved in the 1980's.
7. Page 4, Subsistence: I am not aware that there was any subsistence shortage of sockeye salmon. The impact to our villages was entirely due no 2018 commercial salmon fishery. Crew members and permit holders are to be provided compensation in their respective category and that should be sufficient. A subsistence allocation is not recommended.
8. Page 4, Research: As previously stated 15-20% is appropriate but not 30%. Ample investigations pertaining to the 2018 disaster, along with sockeye habitat and management studies, can be accomplished with a 15-20% allocation. More of the disaster fund should go to those impacted and not on excessive science-based studies. As previously noted, a socioeconomic study would be a waste of funds.

Thank you and sincerely,

Eugene Anderson

**From:**  
**To:** DFG\_2018ChignikSockeye (DFG sponsored)  
**Cc:**  
**Subject:** Comments on proposed Chignik Salmon disaster relief plan  
**Date:** Thursday, July 30, 2020 6:52:06 PM

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Dear Alaska Dept of Fish and Game,

I would like to make comments on the relief plan for the 2018 sockeye disaster in Chignik.

My name is Malcolm "Jamie" Ross, 40 year veteran Alaskan Commercial Fisherman, and Chignik permit holder since 1996.

I was one of the founders of the 'Chignik Coop", and as many of you know, instrumental in most of the Board of Fish actions and issues around the Chignik Fishery for the past 20 + years. I have invested the majority of my personal fishing political life into the Chignik fishery, and devoted far more energy into this fishery than any of the other numerous fisheries on the West Coast that I participate in.

In 2012, I purchased another seiner, the 'Orcrist" (ADF&G formerly the "Stellor") with the intent of my son fishing the Chignik fishery with me in the future. In 2015 I transferred my permit into my son's name (Alden B. Ross, permit and he has held the permit in his name since then.

Alden has participated in the Chignik fishery every year since 2015- (on the F/V "Shadowfax" in 2015, and on the F/V "Orcrist" in 2016 and 2017)

In 2018, we waited the entire month of June, watching escapement and trying to decide if we should abandon hopes of a Chignik Fishery, and bring the "Orcrist" over to PWS with an "emergency transfer" permit?

Finally, after waiting the entire month of June (and missing out on a very productive PWS June Chum Fishery) we decided that the Chignik escapement looked so poor that it would in all likelihood never open.

So we found an "emergency transfer " permit for PWS at the last second, and brought the F/V "Orcrist" over there to fish. Given my financial situation, not fishing at all is NOT an option- so we had to do something!!

I have looked at the proposed distribution plan, and while I sympathize greatly with all my Chignik brethren, and want to see them recoup as much as possible for the disastrous 2018 season; I do believe that there are some of us.....who had EVERY intention of participating in the Chignik fishery in 2018; but only at the last possible second went to another fishery because we had no other financial option.

Realistically, this option was open to ALL viable and active Chignik permit holders like my son Alden- every one of the 60-70 active Chignik fishermen could have done the same thing that we, and several other Chignik fishermen did- and go participate in another fishery. I begged some of my Chignik friends to come to PWS- they just chose not to.

In any case, while I DON'T believe that those of us who went to another fishery deserve a

full share, I certainly don't believe that we should be excluded entirely from the disaster relief \$\$ either.

Is 50% of a share "fair"?? Perhaps. All I know is that we put out substantial costs to go to another fishery (in the case of PWS - a \$25,000 fee for an Emergency Transfer, extra fuel, conversion of seine to legal gear, lost insurance for June, lost income in June by not leaving sooner, etc)

So while I believe that the 10 -15 guys who went to other fisheries don't deserve a full share; I do believe that those boats who had every intention of going to Chignik, do deserve some part of the relief funds.

As for other issues, it's probably more fair in this case to distribute in an "equal" basis, rather than by catch history?? I would argue that the "lowliners" are probably the most adversely affected by no fishery, than the top boats??? Its more likely that top boats have everything paid for and maybe even some savings, whereas guys who don't do so well or just started in the fisheries are the ones most seriously hurt by this disaster!

Considering that Alaskan fishermen have never gotten help like this before (first time with 2016 PWS relief!) It seems far more "Fair" to everyone to just distribute equally- far less chance for appeals, etc that way too.

Also, I think crewmembers share should be dropped down too- maybe to 20 - 30% tops. Most of my crew are my kids, and I know this is the case for lots of Chignik folk. If the parents want to give their kids more they can. Bottom line, crewmembers only have some rain gear, a crew license, and maybe a plane ticket invested in a fishery.

If there's no fish, they're just out a couple of months potentially catching an unknown amount of fish.

We owners, no matter if there's fish or not, still have huge insurance payments; fuel and food expenses; all the pre-season boat and gear repairs. - let alone huge boat payments and permit payments....whether or not fish come back or not.

We owners stand to loose our entire life time of labor and investment in a fishery and way of life! Not just a couple months of adventure!!!

And finally, I think that in this circumstance, the Chignik fishermen are the most desperate individuals- not huge Seattle based processing corporations who have numerous other fisheries to tide them over- SO I say less \$\$ for processors and more to the fishermen.

This goes for research too! Why spend millions on something we all know is going on? Chignik meets escapement, the smolt "out-migrate" then they just don't come back!

Its pretty obvious that the same problems that are affecting all gulf fisheries are doing the same to Chignik sockeye!! There's not a Damm thing we can do about "the blob" or global warming. Can we tag smolt and track where they are dying out in the North Pacific??? I don't think so. As far as I know, it's not a freshwater problem- the entire Gulf is having problems and I'm sure the Federal Government is going to be spending millions trying to figure out what's going on. Why spend this precious amount when it should go to the

fishermen!

I figure a SMALL seine operation needs to gross at least \$150,000 in a season to just barely get by- and that's with little to no permit or boat payments!!! Just insurance, fuel, repairs, maintenance, etc cost so much now a days! This payout (as I understand it) is extremely minimal for not having any fishery at all in Chignik in 2018!

As far as doing a socioeconomic study- that's ridiculous! When people don't make any \$\$ they, have to leave their homes, go bankrupt or find another line of work! End of story! Why spend \$\$ on a study to find that out? Just give people more \$\$ so they don't have to loose their way of life!!! Or ask for welfare or more handouts??

You're far better off giving the MAXIMUM amount possible to the skippers and owners so they can make their State loan payments, boat payments, pay for fuel, boat maintenance, etc, etc. so they can keep on trying .... and continue to spend \$\$ in the community, hire crew, etc.

It looks like 2020 is another disaster, AND with this whole Covid nightmare, and uncertainty in the world, they're going to need EVERY last \$\$ they can possibly muster up, in order to stay "afloat" at all!

Ok folks, that's all for now! Thank you for your time and consideration.

Sincerely,

Malcolm Jamie Ross and  
Alden B. Ross

Father and son, 24 year, Chignik permit holders and owners of F/V Shadowfax and "Orcrist"

**From:** Winkel, Kari M (DFG)  
**To:** DFG, 2018ChignikSockeye (DFG sponsored)  
**Subject:** FW: 2018 Chignik Sockeye Disaster distribution plan Public Comments  
**Date:** Monday, August 3, 2020 3:24:38 PM

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Respectfully,

Kari Winkel  
Special Projects Assistant  
Office of the Commissioner  
Department of Fish and Game  
Ph: (907)-465-6136  
Kari.winkel@alaska.gov

**From:** John H Clutter  
**Sent:** Monday, August 3, 2020 3:21 PM  
**To:** Winkel, Kari M (DFG) <kari.winkel@alaska.gov>  
**Subject:** 2018 Chignik Sockeye Disaster distribution plan Public Comments

Dear Kari, ADF&G Commissioners and Managers,

As my email is personally identifiable, I will submit my comments in two parts (one for your review and a matter of record validating my claim, and the second part for public comment). I will also send a certified copy via USPS.

**2) My Public Comment is as follows:**

**Under the Category of Processors; Proposed percentage: Processors 70%, Tenders 30%.**

Proposed eligibility criteria for tender vessels:

One of two options: **1) REMOVE tender eligibility #2**: Tender vessel must have been used to tender Chignik sockeye salmon in two out of three years (2015 to 2017) based on signed contracts with a processing company to tender salmon from the Chignik area. \_

Proposed tender eligibility #2 is arbitrary as it relates to tenders, as tenders are not restricted to permit areas as catcher vessels are, and may roam freely from area to permit area operating wherever they are needed or wherever the work may take them. It is understandable that Processors and catcher vessel fit the criteria of 2015 through 2017 to calculate averages and percentages, but tenders should not be in this category, or bound to it (especially if salmon tendering is the vessel's primary income source).

**OR 2; REWORD tender eligibility #2** by replacing the wording to one of three options:

1. Tender vessel must have been used to tender Chignik sockeye salmon in two out of seven years (2011 to 2017) based on signed contracts with a processing company to tender salmon from the Chignik area.
2. Tender vessel must have been used to tender salmon in two out of three years (2015 to 2017) based on signed contracts with a processing company to tender salmon in the waters of the Alaska Peninsula.
3. Tender vessel must have been used to tender salmon in two out of three years (2015 to 2017) based on signed contracts with a processing company to tender salmon in the State of Alaska.

Thank you for your reviewing and help with this,  
John H Clutter

**KNUD H OLSEN**

**August 1, 2020**

**ADF&G, Attn: Kari Winkel  
PO Box 115526  
Juneau, AK 99811-5526**

**I would like to comment on the allotment of funds.**

**It seems to work fine the way Exxon and the last relief fund was set up.**

**The upper permit-holders have the most invested. Vessels, gear and upkeep.**

**I think the first-year-crewmen should be included to receive their share.**

**It is hard enough to get a crew to fish Chignik.**

**The crew percentage should be reduced because the permit-holder gets stuck with all the expenses: fuel, groceries, airfare, fishing gear and license.**

**We personally get stuck with all the draws because the crews are always broke before the season.**

**Permit Holders: Knud H Olsen,  
Shirley I Olsen  
Jeffrey H Olsen ... Medical Transfer**

**KNUD H OLSEN**

**August 1, 2020**

**ADF&G, Attn: Kari Winkel  
PO Box 115526  
Juneau, AK 99811-5526**

**On a personal note.**

**As the guideline states, no personal information.**

**Regarding Permit Number: Knud H Olsen and  
Permit Number: Shirley I Olsen  
Medical Transferred to our son, Jeffrey H Olsen, our son for those years**

**As you can see both permits were fished by one boat F/V Heidi Linea**

**All landings of salmon on the two permits should be combined for the allocation plan.**

**There is no problem with the crew because the crew was the same for both permits.**

**Any questions:**

**Knud H Olsen**

July 28, 2020

Department of Fish and Game  
Headquarters Office  
P.O. Box 115528  
Juneau, AK 99811-5526

Attention: Ms. Winkel

Re: 2018 Chignik Disaster Funds Distribution Plan

Dear Ms. Winkel,

I am responding to the Department's call for comments on the disaster plan for 2018.

As a long time Chignik commercial fisherman and owner of the purse-seiner F/V Defiant and a Chignik limited entry permit owner, I am strongly opposed to the Department's proposed assignment of 30% for research. 15% is sensible to determine the cause of the 2018 sockeye run failure, and what I see as another total run failure coming this year. Further disaster funds under research should be set aside for extending the Chignik weir operation annually through August and accurate apportionment of Chignik's two runs during the overlap period by inseason genetic sampling. A 15% level of funding is reasonable and would avoid taking away from the fishermen and others most impacted by the 2018 sockeye disaster.

I think that the Chignik fishermen that left Chignik inseason to fish elsewhere in 2018 should be entitled to a full share of the allocation proposed for harvesters for the reason that by mid-season it was clear that there was not going to be a Chignik sockeye fishery and they needed money in an attempt to stay afloat. Many were near financial ruin and had no choice but to consider going elsewhere even with Chignik their home. Personally, I was forced to lease my purse seiner to a late-season Kodiak permit holder in 2018 in an attempt to survive economically. I lost in the deal by only getting a mere \$5k, an amount far less than it cost in boat and gear wear.

I do not begrudge those that went outside Area L because of Chignik's 2018 sockeye run failure. Consistent with this, I firmly support doing away with Criteria 3 under Harvester (page 2).

On the issue of the proposed Harvester assignment of 55%, I suggest that it be increased to 65%. The Chignik fleet sustained the greatest impact. Further, I believe that crewmen should be reduced to 25% as considerable expense in providing flight travel to and from Chignik, food, and personal gear were borne by us permit holders --- skippers. Crewmen did not have any money to pay those expenses which would have occurred if a normal fishery had occurred.

I do not follow why the requirement that crewmen must have worked in previous years in Chignik. This requirement should be removed as it is unjust to penalize first-time crew members that signed up for the 2018 Chignik fishery.

Subsistence fishermen had adequate 2018 harvest opportunity for sockeye salmon from the escapements according to the figures provided by the Department. The disaster impact in the

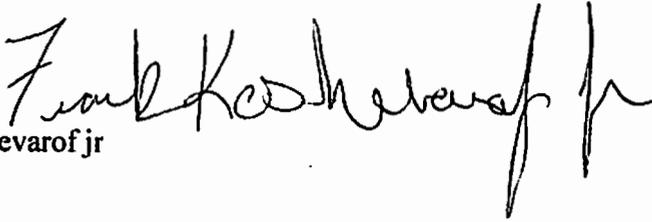
villages was totally due to the failure of a salmon fishery as local crew members, permit holders, and skippers were unable to bring home any money. Since there are allocations proposed for harvesters and crewmen that should be sufficient.

I see that there is no specific assignment for the loss that the Borough, City of Chignik, or Chignik Aquaculture sustained. They each should be made whole. Our aquaculture association has been funding sockeye studies in Chignik for years with the Department and FRI. Do not ignore them nor the L&P Borough and the City of Chignik.

Thank you for the opportunity to comment.

Regards,

Frank Kashevarof jr

A handwritten signature in black ink, appearing to read "Frank Kashevarof jr". The signature is written in a cursive, somewhat stylized script. It starts with a large "F" and "K", and ends with a long, thin vertical stroke that extends downwards.

To Whom It May Concern:

Thank you for presenting the draft relief plan. We appreciate the strong support for the fishing industry.

- Allocation of fund

We noticed that the draft plan allocates approx. \$ 3.1 MM (30%, the second most significant portion of the disaster funds) for research projects. On the other hand, the proposed allocation of the fund for the processing sector (processing plants and tender vessels combined) is approx. \$1.1 MM, or 11% of the budget.

While we agree on the importance of research, we want to ask if Federal disaster (emergency) money is the appropriate place where such funding should come from, unless such projects would bring actionable information that will make a difference for the Chignik Sockeye fishery.

The players in this industry (fishermen and plants) have been dramatically affected by the continued Chignik Sockeye disaster, along with the COVID 19 pandemic, threatening the survival of many. If a bigger portion of those research funds were redirected to boats and plants, more jobs would be saved.

Ted Kishimoto