



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Fish and Game

OFFICE OF THE COMMISSIONER
Headquarters Office

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

October 2, 2020

Second DRAFT Distribution Plan for funds appropriated to address the 2018 Chignik sockeye salmon disaster declaration. NOAA Fisheries has allocated \$10,327,039 for fishery disaster assistance for the Chignik Management Area sockeye salmon fishery. The distribution plan informs the federal grant application submitted by Pacific States Marine Fisheries Commission (PSMFC) to NOAA Fisheries and is subject to change based on approval of the final grant.

Written comments are requested on all elements of the draft distribution plan and should be as specific as possible to be the most helpful. Comments may be posted online and therefore the Alaska Department of Fish and Game (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 or by mail to:

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

Comments must be sent by Monday, October 19, 2020, for consideration in the final draft distribution plan.

Process to develop the distribution plan: ADF&G posted an initial draft distribution plan for public comment in August 2020 and received 62 written comments on the draft plan. ADF&G revised the plan based on public comments and is requesting public comment on this second draft distribution plan before the plan is finalized and submitted to the PSMFC.

In response to these comments, ADF&G is recommending the following major revisions:

- The allocation to harvesters was increased from 55% to 61% by reducing the allocation to research by 5% and moving the subsistence allocation (1%) to the harvester allocation as suggested by several stakeholders.
- The split between the permit holders and vessel crew was adjusted from 65/35 to 75/25 in recognition that permit holders incur higher initial costs that were not reimbursed through standard deductions to crew pay when the fishery is open (i.e. gear, food, travel).
- Eligible permit holders are proposed to receive a minimum payment of \$40,000 to help offset startup expenses. The remaining permit holder funds will be distributed based on a tiered approach to eligible permit holders who did not make landings in a different salmon seine fishery in 2018.
- Crew members do not need to demonstrate prior participation in the fishery as vessel crew to be eligible.
- Tender vessels are not included based on information received during the first draft plan comment period indicating that all tender vessels scheduled to operate in Chignik during the 2018 season, and who met their contractual start date, were compensated consistent with the terms of the tender contract.
- ADF&G acknowledges the comments opposed to allocating disaster funds for research. Research funds provide a balance between meeting the immediate needs of fishery participants and the long-term fishery benefits to prevent or mitigate the impacts of future disruptions to the fisheries consistent with

the intent of the Magnuson-Stevens Fishery Conservation and Management Act. These funds will be available through an open competitive bid process and all entities who are eligible to receive federal grant funds may submit proposals.

- ADF&G recognizes that the Chignik Regional Aquaculture Association (CRAA) receives a fishery tax distribution of 2% from the state of Alaska. These funds are used to support Chignik area research and CRAA operating costs. Funds for research are included as a separate category in this distribution plan and projects supported by CRAA are eligible to submit proposals for those funds. Direct payments to mitigate for lost fishery taxes have not been approved by the White House Office of Management and Budget and are not proposed under this plan.

Proposed guiding principles for disaster funds distribution: Disbursement of funds are intended to:

1) assist Chignik Management Area 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 mitigate the impacts of future fishery disasters that cannot be prevented.

Proposed categories for disaster relief funds:

- **Harvesters:** Direct payments to 2018 CFEC Chignik salmon seine permit card holders and seine vessel crew who meet all eligibility criteria. The Commercial Fisheries Entry Commission (CFEC) commercial salmon permit, CFEC commercial vessel license data, and ADF&G fish ticket data from commercial Chignik sockeye salmon landings will be used to determine eligibility and payment for permit holders. ADF&G commercial crew license or CFEC permit information and crew contracts or skipper affidavit will be used to determine eligibility for vessel crew.
- **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.
- **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.
- **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. Research funds will be distributed through an open competitive bid process administered by PSMFC. Entities authorized to receive federal grant funds may submit proposals for the research funds.
- **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 PSMFC.

Proposed allocations to project categories:

Harvesters – 61%: ADF&G is proposing to subdivide the harvester allocation into two pools, one for vessel permit holders (75%) and one for vessel crew members (25%). The proposed split between permit holders and crew members considers the higher initial costs borne by the vessel operators that are typically reimbursed through standard deductions to crew pay when the fishery is open.

Permit holders (75% of harvester pool):

Proposed eligibility criteria for permit holders:

1. 2018 CFEC S01L permit card holders. Those individuals who received a 2018 S01L permit card embossed by the CFEC.
2. Permit holder must have made Chignik sockeye salmon landings in at least two out of three years from 2015 to 2017. Option: add hardship provision for permit holders whose vessel was disabled and transferred catch to another vessel during a qualifying year (2015-2017).

Proposed distribution for permit holders:

ADF&G proposes a permit holder-based distribution where funds would be paid to the individual named on the CFEC commercial fishing permit in 2018.

Each permit holder who meets the eligibility criteria will receive a minimum payment of \$40,000, except those eligible permit holders who qualified based on landings on the same vessel. The total payment for eligible permit holders fishing off the same vessel will be divided based on the proportion of each permit holder's sockeye salmon landings from 2015-2017 on that vessel. Fifty-nine permit holders are estimated to be eligible based on the proposed criteria.

The remaining permit holder funds, will be distributed to permit holders **who did not make landings in another 2018 salmon seine fishery**, based on the following four tiers. Eight eligible permit holders made landings in another salmon seine fishery in 2018 and would not be eligible for a portion of the remaining permit holder funds.

Four tiers are established 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 remaining permit holder pool will be allocated to each tier and each eligible permit holder in the same tier would receive an equal payment.

Tier level	Average landings (best 2 of 3 years)	Allocation (from the permit holder pool)	Est. number of eligible permit holders
1	≥ 184,500 pounds	25%	8
2	148,000 – 184,499 pounds	25%	10
3	103,000 – 147,999 pounds	25%	12
4	≤ 102,999 pounds	25%	21

Vessel Crew (25% 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 demonstrated intent to participate during the 2018 season.

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 2018 crew contract or skipper affidavit.
3. Crew member must not be eligible for fishery disaster funds under another category of this distribution plan.

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 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.

Tender vessels: ADF&G is not proposing to include tender vessels in this distribution plan. Although the first draft distribution plan proposed to include tender vessels, information received during the first draft plan comment period indicates that all tender vessels scheduled to operate in Chignik during the 2018 season, and were in Alaska on their scheduled start date, were compensated consistent with the terms of the tender contract.

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 PSMFC.

Research – 25%: Research funds will be available through an open and competitive bid process administered by PSMFC. Entities that are authorized to receive federal grant funds are eligible to submit proposals for research projects based on the themes outlined below. Allowable expenses for selected research projects are qualified for reimbursement by PSMFC up to the amount awarded through the competitive bid process.

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.

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 evaluate the lasting effects of the Chignik sockeye salmon disaster on subsistence users in the region. Most of the residents of Chignik Bay, Chignik Lagoon, Chignik Lake, Perryville, and Ivanof Bay rely greatly on earnings from the commercial salmon fisheries for their economic needs. This research is needed to help scientists and managers better understand the relationships between subsistence and commercial fishing and the factors that affect harvest effort and harvest success.

Based on initial comments received from stakeholders, resource managers, and the public, ADF&G recommends funding research projects that are focused on 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 and the relationships between commercial and subsistence fishing.
- 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.

July 25, 2020

Jason D. Alexander

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

Attention: **Kari Winkel**

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

Dear Ms. Winkel,

As a five generation Chignik salmon fishermen I, Jason Alexander, offer the following comments on the subject plan:

- The disaster funding mainly should go overwhelmingly to those impacted. While there is value in funding going toward Chignik salmon research for thoroughly addressing the reasons for the 2018 sockeye disaster and future prevention measures, it is unreasonable for research to be assigned 30% of the funding which would amount to about \$3 million. In the range of 2 million would be sufficient or about 15-20% of the disaster allocation.
- Under the Research category (page 1) mentioned is that funding would be assigned for socioeconomic activities. I do not support this. The Department's Subsistence Division has done enough local assessment of Chignik's subsistence dependence to write a book. Further what more can be said of Chignik's cultural and economic reliance on its local salmon stocks. No study is needed to verify that the Department has consistently harmed Chignik fishermen and villages by advertently championing the interception of migrant Chignik sockeye salmon in the South Alaska Peninsula fishery especially in the Shumagins.

While not specifically germane to the proposed distribution plan, it bears saying that a major means of improving Chignik salmon runs is twofold. The first is to cut back on the release of millions of pink salmon hatchery fry into the Gulf of Alaska, which knowingly compete with juvenile sockeye salmon, and second is to suspend the political advantage that the Department provides, along with the Board of Fisheries, have for the continued non-local sockeye stock fishery in the Area M on the south Alaska Peninsula which impacts migrant Chignik sockeye salmon.

- Subsistence (page 1): It is my understanding that Chignik villages indeed were provided food resources from a grant administered by the Chignik Intertribal Coalition. This was a great service! However am not at all aware that subsistence requirements were not met relative to the harvest of sockeye salmon. There was sufficient escapement to provide local harvest opportunity for subsistence users, to my knowledge. What harmed local residents and other Chignik fishermen was the lack of a sockeye salmon fishery as a revenue source.

Under the proposed allocation to harvesters (page 2), the locals that had permits or crews will be provided compensation. Further it is unclear how the Chignik Intertribal Coalition would 'explore' the development of alternatives to support local subsistence especially if the Department intends to go forward with a social-economic study as an element of receiving a 15-20% grant allocation.

- The assigned 55% to Harvesters (page 2) should be elevated to 65- 75%. It is the harvesters (permit holders and crews) that were impacted mostly followed by the Chignik processors. Adjusting the assignment in the Harvester category is entirely warranted and can be accomplished by reducing the proposed Research allocation to a realistic 15-20%.

Due to the failed 2018 Chignik season, Chignik skippers/permit holders had to cover crew member expenses. This included airfares to Chignik, groceries, fuel, and other expenses that would typically be assigned to the vessel gross had there been a fishery. In 2018 nothing was paid back to the shippers/permit holders. Therefore a reduction from the suggested 35% to 25% or 30% for crew members is warranted and that reduction should be reassigned to the harvesters.

- Under the proposed Criteria #3 for permit holders (page 2), I strongly support Option 2. As one of several that choose to leave Chignik midseason to salmon fish in another area, my purpose was to secure some revenue to meet financial obligations. I could not continue to sit in the Chignik boat harbor for weeks on end and hold a crew together. There was no alternative.

If the intent is to penalize those that left to fish elsewhere, then in 'fairness' one ought to extend the same 'courtesy' to those who took tender contracts and/or worked elsewhere.

Based on prior-years of involvement in the Chignik salmon fishery and the registering of my boat, the *F/V Capt'n Jay*, for the 2018 Chignik purse-seine fishery there should be no question of my intent. I could have elected to stay tied up in the Chignik harbor but some level of commercial fishing had to be pursued for economic survival. In fairness I should be able to share in the 2018 Disaster Relief Fund. And in accordance, minimally Suboption (page 2) for a 50% assignment should be exercised.

- Vessel Crew (page 3): Suggest that the percentage be reduced to 25-30% and that half of that given as an equal share and the other portion (50%) be assigned based on the tier levels presented under Option 2 for the Harvesters. Most of the crew members had about the same basic expenses but individually their potential for success was dependent upon the catch history (potential) of the vessel and skipper. The better boats and skippers attract the best crew members, and consequently not all crew members have the same earning capability, and therefore the justification for application of a tier system.

As previously defined, permit holders covered most of the expenses that crew members had in 2018. While crew members did not make any money they were subsidized by permit holders/skippers. This would not have been necessary had their expenses been covered under the vessel earnings through a 2018 Chignik fishery and not directly out of the permit-holder's pocket.

The eligibility criteria for vessel crew # 1 and # 2 are reasonable. # 3 is not. Crew members who do not have a Chignik history should not be penalized. The only bearing should be meeting the requirements as put forth under criteria's # 1 and #2. It is standard that some crew members often, for various reasons, only serve for one year. Why penalize them if they signed up to crew in the 2018 Chignik salmon fishery as they had full expectations of bringing home money to support family, meet college expenses, and the like.

- Communities (page 3): Recommended is that the L&P Borough and the City of Chignik get 2% and 1% respectively. Further CRAA should get 2% as they support sockeye salmon projects unfunded by the Department that promote improved management and habitat protection for Chignik sockeye salmon. Specifically CRAA has supported sockeye genetic studies, and University of Washington (FRI) analysis and monitoring of critical sockeye rearing areas in the Chignik drainage, and annual forecasting of Chignik's two runs.

CRAA does a lot for the Chignik fishery and resource and should not be left out. The 2% recommendation is based on the tax level that Chignik salmon permit holders approved to fund CRAA annually.

- Under Subsistence (page 4) proposed is direct payments as a possible option to regional households to mitigate food concerns. As previously stated, in 2018 I believe there was ample sockeye salmon of the late-run to fully meet the needs of those that elected to harvest. The regional shortfall was in the annual revenue sector that local permit holders and crew members depend upon. The draft distribution plan calls for funding for permit holders and crew members so there is already compensation built in and no need to go beyond this.
- In the Research category (Page 4) as said initially, 15-20% and no more should be the limit. It is just plain wrong that the Department would even consider exploiting the 2018 Chignik disaster declaration. Take a 15-20% assignment and use the funding wisely. It is enough.

Forecasting off brood tables is adequate for defining future fisheries expectations and to suggest that somehow an area manager or other Department staff from their tool-box(s) could avoid and mitigate impacts of future Chignik disasters sounds good but is darn unlikely at best.

Thank you and feel free to call if there is a question.

Best regards,

Jason Alexander

October 9, 2020

Jason D. Alexander

Alaska Department of Fish and Game
Headquarters Office
P.O. Box 115526
Juneau, AK 99811-5526

Attention: Kari Winkel

Subject: 2nd Draft 2018 Chignik Disaster Fund Distribution Plan

Dear Ms. Kari Winkel,

I am responding to your request for input on the Department's second draft of the disaster plan. My comments are offered as a Chignik permit owner, part of a fifth generation Chignik salmon fishing family, and one who chose to salmon fish in another area in 2018 when it became apparent that there was not going to be a 2018 Chignik sockeye fishery.

- I find this second draft better than the first, but some adjustments are still needed.
- The harvester component should be increased to at least 65%. This can be accomplished by reducing the research component to a lesser amount than proposed. Chignik is in economic peril. Not only was 2018 a sockeye disaster year, but also this year 2020 when not a single sockeye salmon opening occurred and escapement goals were not met. Based on sockeye age data as reported by Department Chignik staff, there is a high likelihood of another failed Chignik fishery next year (2021).
- I support the proposed distribution for permit holders along with the eligibility criteria (page 2). This includes the cited hardship option for eligibility. As a Chignik Area L permit owner who elected to leave Chignik mid-season to fish elsewhere, I find the proposed minimum \$40 thousand payment to be fair. Even though I left Chignik mid-season (late July) it cost me a lot to prepare for a 2018 Chignik fishery. Expenses accrued included four airfares, fuel, groceries, boat maintenance, harbor fees, and insurance. \$40K will cover them.
- The proposed research component should be 15-20%. Certainly a considerable amount of research for determining why the 2018 disaster occurred and what can be done management wise to avoid similar seasons can be accomplished with \$1.5 to 2.0 million budget. If that amount is insufficient, more research money will be available owing to future funding from the 2020 Chignik sockeye disaster season.

- It is apparent that the Department is still championing for a socioeconomic study. This I do not support. There have been enough studies by the Department's Subsistence Division and the McDowell Group to verify that Chignik's economy is solely dependent on its local sockeye salmon fishery. Further Chignik subsistence fishermen were not harmed from a shortfall of sockeye salmon. This is said based on the Department's summary of sockeye harvest numbers from the 2018 subsistence permits. Yes, the Chignik communities suffered greatly in 2018, but that was due to local crew members, permit holders, and boat owners not earning a single dime from salmon fishing
- CRAA supports a lot of Chignik sockeye salmon research. Their expenses should be covered for their funding of selected sockeye research studies by the Department and FRI in 2018.
- When is the Department going to stand up for Chignik? It is disconcerting that the regional office does not do enough to ensure that Chignik sockeye runs are not harmed by interception fishing in the South Alaska Peninsula. Strict conservation measures need to be in place, not an open ticket to harvest transit sockeye without regard to the consequences on terminal fisheries and escapements. I recommend that some of the 2018 disaster funds for research be used to address management strategies that will effectively ensure that Chignik sockeye runs are fully protected in weak years in the South Alaska Peninsula fisheries.

Thank you for all your efforts.

Sincerely



Jason Alexander

Sean C. Alexander
F/V *Mary Jane*

October 9, 2020

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

Attention: Kari Winkel

Re: October 2nd Chignik Disaster Fund Distribution Plan

Dear Ms. Winkel,

I have studied the Department's recently proposed 2018 Chignik salmon disaster fund plan and have a few thoughts to offer.

While I choose to fish salmon in Prince William Sound in 2018 the decision was not made lightly. My crew and I were all geared-up, ready to fish Chignik in 2018. After sitting in the Chignik harbor for weeks without the prospect of a sockeye fishery due to escapement shortfalls, there was no other choice but to go elsewhere. My crew and I had to make a living and cover boat and travel expenses. While we bailed from of Chignik in late July, I and my crew were vested in the 2018 Chignik season and deserve a share in the 2018 Chignik disaster fund.

Per the current plan, permit holders that left Chignik will receive \$40,000 and their crews will share equally in the crew-member pool. This is reasonable.

The proposed distribution to harvesters is set at 61%. This is not reasonable. It should be more in the range of about 70% knowing that my fellow permit holders and crew members took a huge hit from the total lack of a 2018 sockeye fishery. The Department did not lose anything, and yet I see that research is slated to receive 25%. My suggestion is to pair-this-back to about 15% which would be about \$1,500,000.

As for research projects there should be genetic sampling of the escapement during the overlap of the two runs, keeping the Chignik weir in place through August, and an assessment of sockeye fry rearing conditions in the two Chignik lakes based on smolt numbers and their size for use in setting escapement goals. There is no need for a Chignik social study. Everyone is aware that Chignik is totally reliant on revenue from commercial salmon fishing. Further as reported by the Chignik Area Biologist, there was no shortage of sockeye from the escapement to meet

Sean C. Alexander
F/V Mary Jane

subsistence needs in 2018. Money was what was lacking for groceries and other living necessities.

I and others would hope that none of the research money will be squandered on work that will not have direct benefit to Area L. Each project should be independently reviewed on its merits and input from stakeholders solicited.

Thank you for considering my comments.

Most sincerely,

A handwritten signature in black ink that reads "Sean Alexander". The signature is written in a cursive style with a large initial 'S' and a long, sweeping underline.

From: [Promise Fisheries](#)
To: [DFG, 2018ChignikSockeye \(DFG sponsored\)](#)
Subject: RE: 2018 Chignik Sockeye Salmon Federal Disaster 2nd Draft Distribution Plan Comment Requested
Date: Monday, October 5, 2020 9:09:33 AM

We applaud the modifications made to the distribution plan. Specifically, providing \$40,000 to help offset startup expenses across the board to permit holders and then distributing remaining funds on a tiered basis. We encourage the optional hardship provision to consider not only those who transferred catch, but also to include those that attempted to survive via other means in situations of breakdown. One criterion in the hardship provision may include looking back at the past decade or reviewing documentation provided by the permit holder that validates dependence upon the Chignik fishery for livelihood.

From: Timothy Murphy
To: DFG, 2018ChignikSockeye (DFG sponsored)
Subject: 2018 Chignik Disaster
Date: Monday, October 5, 2020 2:45:44 PM

Kari Winkel
Special Projects Assistant
Office of the Commissioner
Department of Fish and Game

To Whom It May Concern;

In regards to the 2018 Chignik Salmon Disaster distribution plan, the funds have been appropriated to be a rescue for the participants in the Chignik salmon fishery and lack thereof due to lost livelihoods, including lost subsistence, and a disaster event has thus since been repeated in 2020. The funds are even more necessary now to alleviate financial losses incurred upon the participants and residents of the 5 Chignik communities.

To assign 25% of the overall relief fund to research is a misappropriation of disaster relief funds which should go directly to those who suffered the loss of income from the disaster.

Didn't ADFG just take half (50%) of the overall Gulf of Alaska 2018 Cod disaster relief for research? Why is more needed?

Per the items listed in the letter requesting comment for the final distribution plan;

Daniel Schindler affiliated with the University of Washington recently produced results of a study of the spawning grounds and ocean conditions as they pertain to survival of Chignik Sockeye, I was able to attend and view this study 2 times in 2019, is anyone who works for the State of Alaska interested in this scientific study?

Appropriating funds to research something that saw an identical study released one year ago will be a misappropriation of disaster funds and a waste of precious time.

Time the Chignik communities do not have.

Dan Schindler's study showed spawning habitat as well as ocean conditions were not detrimental to survival of Chignik Sockeye.

Along the same lines, Kodiak, the South Alaska Peninsula, Cook Inlet, as well as Copper River and PWS met escapement goals for sockeye in 2018 other than some minor systems in Kodiak and one in the South Alaska Peninsula- Orzinski Lake did not meet its meager escapement goal in 2018 and that may be a choice managers made not to close fishing to reach the escapement goal. Copper River opened to commercial harvest but it would appear to be a management decision to limit opportunity as managers kept the personal use dipnet fishery on

the Copper River Sockeye stock status quo as roughly 83,000 sockeye were reported taken in that fishery. Same stock, different user group.

There is current information to fill the "key data gaps" referred to in the request for comment. The "why" is available as to the current state of the Chignik Sockeye fishery and lack thereof.

In 2014, the sockeye returning to Chignik in June were virtually all small males, which is NOT the norm. I personally witnessed local fishermen (experts on the subject) convey to ADFG biologists what was being seen and harvested for subsistence. Not only were the salmon small, there were not very many of them.

The commercial fishery began on July 12, 2014, which is very late, also NOT the norm. During a fishing period a fellow fisherman called ADFG Chignik Weir on the VHF and pleaded with him to close the fishery and declare a disaster, the fishing was that poor in Chignik Lagoon. The manager would not.

I began fishing Chignik 30 years ago, I am a short timer, back then ADFG used a management practice that passed 40,000 sockeye thru Chignik weir as well as a visible build up of sockeye in Chignik Lagoon prior to the first commercial fishing period. This not only put an early deposit in the escapement bank, it also gave ADFG managers a better picture of run strength. They did away with this management practice. The escapement goals for too many years have been to manage escapement to the "lower end goal" and they have to estimate their counts to even reach these objectives.

Management practices also manage resource for the maximum benefit of intercept fisheries with little to no regard for the Chignik Salmon fleet or the escapement for future returns in Chignik.

In 2004 the State of Alaska Board of Fisheries adopted a new salmon management plan in the South Alaska Peninsula, expanding an intercept fishery.

Several years after this, the WASSIP genetic study was conducted over a period of 3 years. During one of the three years the WASSIP study was conducted

the South Alaska Peninsula salmon fishers harvested HALF (50%) of the ENTIRE CHIGNIK SOCKEYE RETURN of that year.

This genetic study revealed a real world event that showed the killing power of the South Alaska Peninsula salmon fishery and attempts at effecting real regulatory change at the Alaska State Board of Fisheries has thus far been inadequate.

The very real, current information to fill the "key data gaps"

mentioned in the request for comment is available if the appropriate personnel will acknowledge it.

Ignoring local knowledge, denying scientific studies, and management that gives opportunity for maximum benefit to intercept fisheries with little to no regard to the Chignik salmon fishery and the escapement for future returns in Chignik is the WHY we are where we are.

There does not need to be further research on socioeconomic impacts, the effect on subsistence users, the scientific studies recently conducted have been widely ignored by "scientists and managers" any more would just be a waste of badly needed financial relief that could and should be appropriated to the people who are losing their livelihoods in the Chigniks.

The Disaster Relief was APPROPRIATED to alleviate the financial losses incurred by the PEOPLE, any other use of it would be inappropriate.

Timoth Murphy

October 7, 2020

Alaska 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- 2nd Draft

Dear Ms. Winkel,

Thank you for preparing a second distribution plan for the \$10.3 million 2018 Chignik disaster fund.

I have a few comments on the current plan as a life-long Chignik salmon fisherman, Area L salmon permit holder, and owner/operator of the purse seiner *F/V Defiant*.

The proposed harvester-allocation method is reasonable. However, the recommended allotment for permit holders and crew members should be 65% not 61% as the Department proposes. Even at 65% we would be falling short of being made whole. The principle intent of the disaster fund is to sustain Chignik stakeholders so let's see an improved distribution to 65%.

As for the research component, I acknowledge the requirement to determine why the 2018 Chignik sockeye runs failed and how to prevent a reoccurrence. In my estimation, a 15% research award (\$1.5+ million) is enough. Twenty-five percent or about \$2.6 million is too much and would be an unfair taking.

I prefer to see research money going for a longer operation of the Chignik weir (extending through August but not beyond) and genetic sampling of the two sockeye runs during the overlap period with in-season application of the results to ensure proper escapements and regulation of the commercial fishery. The balance of the funding should be awarded for environmental analysis of sockeye rearing conditions in Black and Chignik lakes as determined from smolt and fry growth characteristics and densities. Before proposals are funded they should be independently reviewed to assure that each study will be useful for Chignik sockeye-salmon run management.

To repeat in my letter on the first Department draft, a socioeconomic study is not warranted. In 2018 the impact on Chignik was a severe income shortage. Permit holder and crew member revenue is the economic mainstay of our communities. Subsistence fishing was not impacted. The impact was from an absent of revenue.

Lastly, CRAA represents the Chignik fleet and other local salmon stakeholders. CRAA should be compensated for funding Chignik sockeye-run assessment and habitat evaluation and protection studies conducted in 2018. My understanding is that this would be less than 1% of the disaster fund.

Thank you for the opportunity to comment.

Best regards,

Frank Kashevarof Jr

Eugene Anderson
F/V Raymar

October 10, 2020

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

Subject: 2nd Draft 2018 Chignik Disaster Fund Distribution Plan

Dear Ms. Winkel,

I have reviewed the Department's most recent plan for dispersing the \$10.3 million Chignik 2018 Disaster Fund and offer the following comments:

- 1. Page 1. The funding assigned to Chignik harvesters needs to be raised to 65%. This can be accomplished by a reducing the amount the Department proposes for research. It is no mystery that the Chignik salmon fleet has been seriously impacted not only by the absence of a 2018 sockeye fishery but of a repeat of the same this past season. Unlike Kodiak and neighboring management areas, Chignik fishermen have nothing to fall back upon for income. The five Chignik villages depend on their residents having income as permit holders and crewmen. Absent of a sockeye fishery on the two Chignik runs there is nothing to economically to sustain the area. Boat payments and maintenance are being forgone and with boat Insurances prices alone, averaging more than \$15k, being able to scrape by is the best most Chignik fishermen can manage. Raising the harvester allocation to 65% is the right thing.**
- 2. Page 2. Am encouraged that the Department recognizes that CRAA supports Chignik sockeye salmon research programs. While it is understood that the disaster fund cannot cover loss taxes which includes the annual CRAA 2%, there should not be a problem reimbursing CRAA for their actual 2018 research expenses. The cost should be rather minor (<1%).**
- 3. Page 3. The eligibility criteria including the hardship provision and the payment scheme for permit holders is satisfactory. This includes that for permit holders that were intent on fishing Chignik salmon in 2018 but chose to fish elsewhere being limited to a single \$40k payment. Further the proposed four tier payment scheme**

based on average landed poundage of sockeye salmon for permit holders that remained in Chignik is also satisfactory.

4. Page 4. I support a research component of the Chignik disaster fund. However, there is the issue of how much of the fund should be allocated. 15 to 20% seems most reasonable but not 25% as proposed. 15% amounts to \$1.5 million which should suffice in meeting the requirement of determining why Chignik's two sockeye runs failed in 2018 and provide future management benefits for several seasons, including August operation of the Chignik weir and genetic sampling of the runs during the overlapping period.

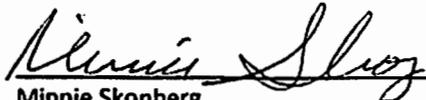
Allocating funds for socioeconomic research for evaluating the lasting effects of the 2018 sockeye disaster on subsistence is totally nonsense. Sockeye subsistence requirements were met in 2018 as reported in the 2019 Chignik Area salmon Management Report. Sockeye were harvested from the escapements, which while below minimums management goals were adequately abundant to serve local harvest requirements. It does not take a study to know that socially, area residents are highly dependent on the commercial salmon fishery, not for subsistence but for an infusion of greenbacks from marketable caught salmon.

Thank you and sincerely,

Eugene Anderson

I, Minnie Skonberg, a Chignik area commercial salmon permit holder, had secured vessel and crew to fish the 2018 Chignik salmon season. I stayed until the bitter end of the fishery and did not leave Chignik to fish in another area. Under the current rules I am not eligible to receive 2018 Chignik salmon disaster funds because, as a permit holder, I only fished one year out of the three years 2015 - 2017. This is a grave injustice and, in my opinion, every permit holder who had a 2018 permit card and was geared up and ready to fish in Chignik should be part of the allocated distribution. Please consider me as eligible to receive 2018 Chignik disaster funds.

Most Sincerely,


Minnie Skonberg

10-13-2020
Date

I, Michael Enright, actively fished salmon in Chignik in 2018 but did not generate a fish ticket because the catch was so low – twelve fish. I stayed until the bitter end of the fishery and was one of the last to quit the fishery. I did not leave Chignik to fish in another area. I fished in Chignik as a permit holder in 2017 but not 2015 or 2016. Under the current rules I am not eligible to receive 2018 Chignik salmon disaster funds. This is a grave injustice and, in my opinion, every permit holder who had a 2018 permit card and was geared up and ready to fish in Chignik should be part of the allocated distribution. Some, like myself, may have only fished a permit a single year prior to 2018 but why should I and my crew be penalized because I am a new permit holder? I have fished in Chignik as crew or permit holder every year since 1972. Please consider me as eligible to receive 2018 Chignik disaster funds.

Most Sincerely,

Michael Enright

10/15/2020

Michael Enright

Date

From: bill.bill
To: DFG, 2018ChignikSockeye (DFG sponsored)
Subject: Fwd: Chignik
Date: Friday, October 16, 2020 8:07:06 AM

This is my comment in regards to your distribution proposal for Chignik 2018 disaster relief.
Get [Outlook for iOS](#)

From: Stephanie McMullen <smsailgurl@gmail.com>
Sent: Monday, October 12, 2020 7:53:57 AM
To: lounsburyb@hotmail.com <lounsburyb@hotmail.com>
Subject: Chignik

I am one of the affected stakeholders impacted by the 2018 Chignik Salmon disaster. More specifically I am one of the eight permit holders who made a delivery in another salmon fishery in 2018.

I disagree with the elimination of permit holders who made landings in other areas. The amount of time of the Chignik season should be prorated. Therefore the amount of time spent by the permit holder sitting in Chignik waiting for the season to open should be compensated for. The time waiting in Chignik could have been better spent in another fishery.

In my case I did not leave Chignik until the A.D.F.G. announcement came out regarding the run escapement numbers that were off by 100,000 fish. When that info came out its was apparent there would be no fishery for 2018. I made a phone call to the wier and had a brief talk to one of the A.D.F.G employees and he told me the likelihood of a fishery would be slim to none. He said if you have an option to go to another fishery, it would be best to do so. One of my crew members had a permit for another area, so we left Chignik. By the time it took to transfer the permit and change the net to meet the new regulation standards, it was past the first week in August. My intentions in the first place was to stay and fish Chignik not some other area.

It is misleading to think that permit holders that went elsewhere had not sacrificed time, money and effort to be a part of the 2018 Chignik fishery.

I believe the fair payouts to affected permit holders should be as follows:

— The time spent waiting for the season to open should be time the permit holder is eligible for.

— If you stayed for the whole season you should get 100%.

— The ones that left to try and make boat and permit payments should be paid for the time spent in Chignik waiting.

— Prorate the days of an average Chignik season by the amount of the payout. The payout would end on the date of the first delivery in the other area fished.

The prorate concept will address this issue. The eligibility criteria must reflect this situation. For those of you permit holders that oppose this formula, it appears that you are only looking at the money and not the fair approach. With the prorate approach this will significantly reduce the amount of money paid out to the permit holders that went elsewhere.

Being fair to all permit holders to set the ground rules for any future bailouts is important. I just got through sitting out the 2020 Chignik disaster in its entirety leaving on the ferry September 15, 2020. Chignik has always been my priority salmon fishery for over thirty years.

Paul Johnson

October 15, 2020

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

Subject: Chignik Sockeye Salmon Disaster Fund - 2018—2nd Draft for Fund Distribution

Dear Karen Winkel,

I have reviewed the Department's second draft, and as a Chignik permit holder, submit the following comments.

1. I support the eligible criteria including the hardship option as currently drafted for harvesters. However an additional eligibility option could be added. A new Area L permit holder, who can demonstrate intent to commercially salmon fish Chignik in 2018 by having a 2018 SOIL card and not participating in another salmon fishery in 2018, probably should qualify.
2. Harvesters should be assigned 75% not 61% as proposed. To achieve 75% the research component needs to be reduced to 15%. According to NOAA the primary purpose of the disaster fund is to aid the fishery harvesters. It is not for feathering nesting of researchers or the Department.
3. I support Chignik salmon research projects that identify why the Chignik sockeye runs are failing and to distinctly manage the two sockeye stocks based on genetic sampling, and keeping the weir operating through August. At 15% research funding would exceed \$1,500,000 which should be enough.
4. In the Department's first for the fund distribution, it was implied that a research component was required. According to NOAA, this is not the case, and in many disaster plans full funding is awarded (100%) to the fishermen impacted. I support a research component, but not at the 25% proposed in the Department's second draft. The Department needs to par research back to 15% and assign the harvester component 75%.
5. Subsistence users were impacted in 2018 from Chignik's two run failures. Since village residents depend on revenue from permit holders, skippers and crew members they were unable to meet demands for food stuffs, energy, and other essential living necessities. The Department's Subsistence Division should draw upon their earlier studies to confirm this without requiring a draw on research funds.

6. Lastly, it should be required that each research project proposed for 2018 disaster money funding be peer-reviewed to ensure that it is grounded on good science and will benefit Chignik sockeye management.

Sincerely,

Paul Johnson

William Jones

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

October 11, 2020

Attention: 2018 Chignik Sockeye Salmon Disaster Funds Distribution- 2nd draft

Dear Ms. Winkel,

As a 4th generation Chignik commercial fisherman, I am responding to the Department's call for comments on the second draft of the 2018 Chignik salmon disaster plan.

1. The Harvester share should be raised to 70%. They sustained the greatest impact, and the proposed 61% is too low. As I will address later an ample adjustment can be made for a 70% harvester assignment by reducing the research component to a realistic level.
 2. I acknowledge that a research component has merit. However, the amount proposed, 25%, is too much. It appears that the 25% was set arbitrarily as there is not the slightest detail on how that amount was determined. An appropriate allocation would be 15%. At 15% this would permit the harvester component to be increased to 70% and still provide \$1.5 million for determining why the two runs failed, what can be expected in the future, and what if any habitat or management changes may improve and/or stabilize production.
 3. Chignik stakeholders were lead to believe, based on Department introductory wordage in the first draft, that a research component was required. It is not. It is optional. In fact some disaster distribution plans have no research component and a 100% stakeholder distribution. Chignik stakeholders are in an economic downward spiral. It is serious. Loan payments are not being met, boat maintenance is not occurring, and many Chignik families are not able to make ends meet. I implore the Department to reduce the research component to permit the harvester component to be raised to 70% or more.
 4. There should be an independent committee formed, comprised of a couple of Chignik stakeholders and several fisheries science experts, to determine how the disaster research money is to be spent. While it is understood that an open competitive bid process will be required, it is not clear why there would be a call for proposals from entities that are eligible to receive federal funding. Proposal should be formulated by the aforementioned fisheries committee and then put out to bid. The intent is to be confident that research projects funded by disaster money will be well vetted.
 5. The proposed eligibility criteria for permit holders are acceptable. This comes with the understanding that the hardship option is included as specifically referenced in the 2nd draft language.
 6. Lastly, I note that in the last paragraph on page 4 it is said that research funds will be available for a socioeconomic study to evaluate the lasting effects of the Chignik disaster on subsistence users. The effect of the 2018 disaster was paucity of revenue, period. There was no fishery revenue and local crew members and permit holders had nothing. Certainly there was not a lack of sockeye salmon for subsistence according to the 2019 ADF&G Chignik AMR.
-

Norine K Jones

Department of Fish and Game

Attn: Ms Kari Winkel

POBox 115526

Juneau, Ak 99811-5526

October 18, 2020

Attn: 2018 Chignik Salmon Disaster Fund Distribution 2nd Draft

Dear Ms. Winkel,

I know that the department has worked tirelessly on make the Distribution of Disaster Funds fair for all concern, and although I would like to express the following comments.

I still feel very strong about the majority of funds going to the Harvester, I believe that the share should be raised to 72%. The Harvester puts more money out before he even starts making any income from fishing, he has the most to lose when a season doesn't pan out. This could be achieved quite easily by reducing the research component to a realistic percentage.

I know having been involved in Chignik seining for 50 years that research is needed, but the proposed 25% is to much, not one detail has been shown how this amount was determined, a more fair allocation would be 15%. At 15% this could give the harvester a bigger percentage and still leave plenty of money to find out why both runs failed.

I would strongly implore the department to give the largest allocation to the harvester as they are continuing going into an economic decline. This last season 2020, was also a disaster in Chignik. So I feel that the choices that are made for this distribution of disaster funds is what will be to come so please lets help these Harvesters.

Thank you

Norine K Jones

October 16, 2020

To Whom It May Concern,

Please find below the following suggestions on how the funds appropriated by Congress to address the 2018 Chignik Area sockeye salmon fishery disaster should be allocated:

Research – 20%

Commercial Sector – 71%

Processors – 6%

Chignik Communities – 3%

Research: 20%

ADF&G's revised proposal to allocate 25% of the available disaster funds towards research is still excessive. 20% will fully cover the sockeye studies needed.

As I said in my previous comments, there are most likely several reasons for the 2018 disaster in Chignik: 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. These issues are political and are *not* going to be solved through research.

However, the research projects outlined by CRAA 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. **Harvesters:** Subdivide the harvester allocation into two pools, one for vessel permit holders (75%) and one for vessel crew members (25%). 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 the 2020 season). Our fleet is devastated.
2. **Eligibility Criteria for Permit Holders (75% of Harvester Pool):**

I still believe that permit holder eligibility to receive any 2018 disaster funds should be defined as **having not actively fished in another area in 2018, period**. It just doesn't seem right to me that a permit holder can receive disaster funds from the Chignik salmon fishery when they made money fishing salmon in another area. That being said, ADF&G

seems intent on going against the Limited Entry Act and paying people for fishing elsewhere, so I offer the following eligibility criteria with a couple of tweaks*:

- 1) Those individuals who received a 2018 S01L permit card embossed by the CFEC,
And,
- 2) Permit holder must have made Chignik sockeye salmon landings in at least two out of three years from 2015 to 2017,

* Add hardship provision for permit holders whose vessel was disabled and transferred catch to another vessel during a qualifying year (2015-2017).

* Add hardship provision for permit holders that were participating in the Chignik fishery in at least two of the three qualifying years (2015-2017) through a combination of active participation and/or medical transfer. I do not feel it is fair to eliminate elderly or widowed permit holders who were negatively impacted by the 2018 disaster and had been receiving income from their permits in at least two of the three qualifying years through some combination of medical transfer and/or “ride along”. For example, I have a widowed Aunt who transferred her permit via medical transfer to two different fishermen in 2015 & 2016. She then went on a vessel as a “ride along” permit holder in 2017, and was geared up to do so again in 2018. Based on the proposed definition of eligibility she will not receive any funds from the 2018 disaster distribution because she only had the permit in her name in 2017 even though her permit was being fished in all of the qualifying years.

3. **Proposed Distribution for Permit Holders:**

I support a permit holder-based distribution where funds would be paid to the *owner* of the CFEC S01L commercial fishing permit in 2018. This is due in part to the example I mentioned above as well as the discussion concerning startup costs below.

I believe each permit holder who meets the eligibility criteria should receive a minimum payment of \$30,000, not \$40,000, to help offset startup expenses.**

**Startup expenses are extremely variable, with some fishermen having much lower startup expenses than others. In my opinion, \$30,000 is closer to the average. Another concern – what of people who were simply hired skippers (I know of at least one)? They may have had a permit transferred to them, and thus a permit in their name, but they didn’t bear the brunt of the startup expenses and therefore shouldn’t receive payment for startup expenses they never incurred. Further, the “ride along” permit holders or permit holders that did a medical transfer didn’t have any startup costs either, so they should not be eligible for the startup payout, but rather just the tiered permit payout based on the performance of their permit in the qualifying years.

I wholeheartedly agree that the remaining permit holder funds, after the payout for startup expenses, should be distributed only to permit holders who did not make landings in another 2018 salmon seine fishery. I also agree with the proposed 4-tier distribution plan 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)

4. Eligibility Criteria for Crew (25% of harvester pool):

- 1) Crew member must have held a 2018 commercial crew license or 2018 CFEC permit for any fishery, AND
- 2) Crew member must provide information to show intent to participate as vessel crew in the 2018 commercial Chignik salmon fishery, based on 2018 crew contract or skipper affidavit, AND
- 3) Crew member must not be eligible for fishery disaster funds under another category of this distribution plan.

Processors: 6%

There has not been a shore-based processing plant in Chignik since 2008. Trident and Ocean Beauty simply tender the salmon they purchase in Chignik to Sand Point or Kodiak Island. 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.

Chignik Communities: 3%

Revenue from the fish tax comprises almost the entirety of the City of Chignik's operating budget. The lack of any fish tax revenue in 2018 was barely survivable & the lack of any fish tax revenue in 2020 may not be. The Lake & Peninsula Borough receives fish tax revenue as well and the revenue generated from that tax is a significant portion of their operating budget.

Administrative: 0%

PSMFC already is tasked with covering the administration of this grant. No need to add another layer of administration to siphon off funds that should go to the affected stakeholders.

Thank you for giving me the opportunity to make suggestions.

Sincerely,

Axel Kopun

October 18th, 2020

ADF&G, Attn: Kari Winkel

PO Box 115526

Juneau, AK 99811-5526

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	COMMUNITIES
2018 SOCKEYE SALMON, CHIGNIK (\$10.3M)	20%	71%	6%	3%

Research: 20%

ADF&G's proposal to allocate 25% of the available disaster funds towards research is still excessive, considering the economic losses experienced by fishers and community members from these run return disasters. Although it is important to look back to assess the run failures (2018, 2019 and 2020), it is equally important to continue gathering information, such as studies for accurately defining the timing and abundance of the two Chignik sockeye runs using in season GSI, operation of the Chignik weir through August, and fry and smolt sampling.

Commercial Sector: 71%

Harvesters: Subdivide the harvester allocation into two pools, one for vessel permit holders (75%) and one for vessel crew members (25%). 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.

Eligibility Criteria for Permit Holders (75% of Harvester Pool):

1. Those individuals who received a 2018 S01L permit card embossed by the CFEC, AND
2. Permit holder must have made Chignik sockeye salmon landings in at least two out of three years from 2015 to 2017, AND
3. Not actively fished Salmon in another area of the State in 2018.

I continue to hold with the State's definition of participation that a permit holder's eligibility to receive any 2018 disaster funds must be defined as having not actively fished in another area in 2018. Provisions in the Limited Entry Act emphasize economic dependence and participation. In recognizing actual dependence on the fisheries and actual participation, this proposed distribution plan fundamentally contradicts the intended purposes of the Limited Entry Act. Those engaging in subsequent fisheries avoided serious economic hardship therefore should not be eligible for these funds.

Eligibility Criteria for Crew (25% of harvester pool):

1. Crew member must have held a 2018 commercial crew license or 2018 CFEC permit for any fishery, AND
2. Crew member must provide information to show intent to participate as vessel crew in the 2018 commercial Chignik salmon fishery, based on 2018 crew contract or skipper affidavit, AND
- 3) Crew member must not be eligible for fishery disaster funds under another category of this distribution plan.

I support ADFG's recommendation using the tiered approach to eligible permit holders who did not make landings in a different salmon seine fishery in 2018.

Processors: 6%

There are no Brick & Mortar processing plants left in Chignik. They 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 greatly reduced.

Communities: 3%

Revenue from the fish tax comprises almost the entirety of the City of Chignik's operating budget and revenue for the Lake and Peninsula Borough. The lack of any fish tax revenue in 2018 and again in 2020 is devastating for our communities.

***I continue to believe that Chignik Regional Aquaculture Association qualifies for equitable relief as an eligible producer up to \$125,000 for disaster relief.**

Administrative: 0%

PSMFC already is tasked with covering the administration of this grant. No need to add another layer of administration to siphon off funds that should go to the affected stakeholders.

Thank you for opportunity to comment on this sensitive issue.

Sincerely,

George Anderson

I, Harvey Kalmakoff Jr, am the son of Joan Kalmakoff who passed away January 23rd, 2020. Joan Kalmakoff held a Chignik permit in her name since 2012 except when it was transferred on an emergency basis. Joan Kalmakoff fished as permit holder in 2017 and 2018 although no landings were made in 2018 because of the total fishery disaster. In 2018 Joan Kalmakoff secured vessel, skipper, and crew and was geared up and ready to fish. Under the current criteria the estate of Joan Kalmakoff is not eligible to receive 2018 Chignik salmon disaster funds because, as a permit holder, Joan Kalmakoff fished only one year out of the three years 2015 – 2017 even though she was on the boat fishing in one capacity or another for all those years and many other years as well. To exclude the estate of Joan Kalmakoff given these facts would be a grave injustice. Please consider the estate of Joan Kalmakoff eligible to receive 2018 Chignik disaster funds based on the fact that she fished the permit in 2017.

Most Sincerely,

Harvey Kalmakoff Jr.

10/19/2020

Harvey Kalmakoff Jr.

Date

October 19th, 2020

ADF&G, Attn: Kari Winkel
PO Box 115526
Juneau, AK 99811-5526
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 the 2018 Chignik Area sockeye salmon fishery disaster plan, I make the following recommendations:

- 1) No way should anyone who fished another area in 2018 should get any part of the 2018 Chignik sockeye disaster funds. Only those who remained in Chignik and were ready to fish the entire season should be eligible to receive funds. Some of those who fished other areas did very well – why should they be allowed to double dip? The state does not allow permit holders to fish multiple salmon areas so why should they be able to make money from multiple areas through disaster funds? It absolutely should not be allowed.
- 2) Crew should not have an allocation. Twenty five percent is likely too much for the few crew members who stayed the whole of the 2018 season. For many permit holders the crew left early to fish other areas and left only expenses behind. What to pay the crew should be left to the discretion of each skipper.
- 3) The 25% allocation to research is too high. It is not a requirement to fund research with disaster funds and with 2020 being another disaster year it is all the more important for as much of the 2018 disaster funds as possible should go to those who suffered the losses – the fishermen. I recommend a maximum of 15% for research while the allocation to harvesters should be increased from 61% to 71%.

Thank you for the opportunity to comment.

Edgar Shangin

10/19/2020

Edgar Shangin

Date

CHIGNIK REGIONAL AQUACULTURE ASSOCIATION

Bellingham, WA 98225

October 19, 2020

Department of Fish and Game

Attn: Kari Winkel

P.O. Box 115526

Juneau, AK 99811-5526

Subject: 2nd Draft 2018 Chignik Disaster Funds Distribution Plan

Dear Ms. Winkel,

Chignik Regional Aquaculture Association (CRAA) respectfully offers the following comments on the Department's second draft plan for distribution of the 2018 Chignik sockeye salmon fishery disaster fund:

1. **General:** The second draft is substantially an improvement from the first draft. A few changes are recommended on assigned harvester allocation, eligibility criteria, amount dedicated for research, and procedure for research-proposal selection, and whether CRAA should be funded.
2. We believe that CRAA should be included along with the Lake and Peninsula Borough and the City of Chignik as entities that receive fish tax revenues. The 2% designated for CRAA would come out of the research budget and must be spent on habitat research, enhancement, or rehabilitation.
3. CRAA requests assurance that the proposed research projects will be well vetted. We recommend that a panel of fisheries scientists be convened to prioritize and draft proposals. While we support an open competitive bid process, we want the bids impartially prepared by a technical staff that recognizes the need for accountability and long-term economic and environmental sustainability of the fishery.
4. Research should be reduced from 25% to no more than 15%. It is not a requirement to have any money dedicated to research at all, and some federal disaster distribution plans distribute all the funds in direct payments. When this disaster weighs so heavily on the affected commercial fishermen 25% is still much too high for research.

A funding amount of \$1,550,000, which is what 15% equates to, is enough to assess why the Chignik sockeye run failed in 2018, support studies for accurately defining the timing and abundance of the two Chignik sockeye runs via in-season GSI, operation of the Chignik weir operation through August, and fry and smolt sampling. Similar run failures occurred this past season year (2020), so additional Chignik research funding opportunities can be expected.

5. We recommend that the harvester allocation as currently proposed at 61% be increased up to 71%. The largest impact of the 2018 sockeye salmon disaster was borne by the Chignik harvesters. Every segment of the Chignik economy was impacted because the harvesters (permit holders, boat skippers, and crew members) brought forth no income from the failed sockeye fishery. If the research component of the fund is adjusted downward, a 71% harvester assignment can be achieved and still not compromise important sockeye-salmon research.

6. The current eligibility criteria exclude three permit holders who were geared up and ready to fish in 2018 because they did not fish two out of the three years from 2015 - 2017. It is inherently unjust to exclude anyone on this basis when they incurred all the expense to gear up and were ready to fish the 2018 commercial salmon season. The eligibility criteria should be adjusted to include them. All three permit holders fished 2017 but did not fish as permit holder two out of the three years from 2015 – 2017. Recommended option: No one who fished in 2017 should be excluded because they did not fish two out of the three years 2015-2018; and, if they did not fish 2017 then they must have fished both 2015 and 2016. This option should add only the three permit holders in question to the current list of eligible permit holders.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Charles McCallum". The signature is written in black ink and is positioned above the typed name and title.

Charles McCallum
Executive Director

From: [Bush, Karla L \(DFG\)](#)
To: [DFG, 2018ChignikSockeye \(DFG sponsored\)](#)
Subject: FW: my recommendation for eligibility criteria
Date: Tuesday, October 20, 2020 9:30:30 AM

From: Chuck McCallum

Because the 2018 season was so poor, many Chignik fishermen who were fully geared up and ready to fish made a reasonable business decision to not spend more money than could be made trying to harvest salmon on one short and very poor fishing opportunity. Only six boats out of the entire fleet actually made deliveries and the total fleet harvest of a mere 128 sockeye justified the decision of those who chose to not fish. The intent of the plan is to find eligibility criteria that captures every permit holder who was fully geared up and ready to fish the 2018 Chignik commercial salmon season. The current eligibility criteria currently exclude three permit holders who were geared up and ready to fish in 2018 and none of these three left to fish another area. The eligibility criteria should be adjusted to include them. One possible option: No one who fished in 2017 and was geared up and ready to fish the entire 2018 season should be excluded; and, if they did not fish 2017 then they must have fished both 2015 and 2016.

From: Dean Anderson
To: DFG, 2018ChignikSockeye (DFG sponsored)
Subject: From Dean Anderson
Date: Monday, October 19, 2020 5:26:02 PM

From Dean Anderson
F/V Memry Anne

To: Kari Winkel an ADFG

Please reward the hardest working proportional to their past history.

Looks like ADFG has there sights on me. I feel like you are offering me and few others half of half of half.

The 4 tiered approach already waters the actual historical approach down as it is let alone offer an even split on the amount that is dedicated for those that made deliveries in other areas.

A solution and compromise would be to flip the proposed formula so that everyone that was ready to go fishing would share based on history and for those that did not make deliveries elsewhere would take an even split on the other half.

Comment on proposed crew share: 30% is industry standard for 3 crew. Don't know how these fisherman come up with 25%?

Share proposal
Harvesters 70
Research 16
Processor 11
Communities 3

Comment on Research
There has been minimal return on investment when it comes to research.

Thank you for your time and consideration.

Dean Anderson

Sent from my iPhone