



August 24, 2023

Final Spend Plan for funds appropriated to address the 2018 Copper River Chinook and sockeye salmon and the 2020 Copper River and Prince William Sound (PWS) Chinook, sockeye, and chum salmon disaster determination. NOAA Fisheries allocated \$34,326,265 for these salmon fishery disasters on May 6, 2022. The scope of this fishery disaster includes fisheries for Chinook, sockeye, and chum salmon. A subsequent request for a fishery disaster determination for the 2020 Prince William Sound pink and coho salmon fishery was approved by the Secretary of Commerce on December 16, 2022. A separate spend plan will be developed for the pink and coho salmon fishery disaster.

This spend plan informs the federal grant application submitted by Pacific States Marine Fisheries Commission (PSMFC) to NOAA Fisheries and is subject to change based on approval of the final grant.

Process to develop the spend plan: ADF&G posted an initial draft spend plan for public comment in May 2023 and received about 49 written comments on the initial plan. ADF&G revised the plan based on those comments and posted a second draft in June 2023. An additional 71 comments were received (Appendix 1) and in response ADF&G is recommending the following revisions:

Harvesters

- ADF&G received comments in support of an equal share distribution and comments in support of a tiered payment approach. ADF&G is recommending a hybrid approach where permit holders who meet the eligibility criteria would receive a minimum 'base' payment and an additional 'tier' payment would be added for those permit holders who have historically participated in the fishery. Tiered payments are based on each permit holder's average gross revenue value for the five years prior to the disaster year. Gross revenue estimates are calculated post-season and informed by the Commercial Fishery Operator Report (COAR) data.
- The base payments were increased for all drift gillnet and set gillnet sectors to allocate 75% - 85% of the funds equally to all eligible permit holders. Allocating a majority of the funds towards base, or equal, payments recognizes that all permit holders incur similar operational and startup costs and all fishery participants in the disaster year were impacted by low returns.
- Funds remaining after the minimum base payments will be used for tiered payments based on an individuals' sector-specific harvest history. ADF&G recognizes that all fishing operations are different and allocating a limited portion of funds to tiered payments based on history recognizes an individual permit holder's past effort and investments in the fishery.
- New entrants to the fishery in the disaster year will be eligible for a tiered payment. ADF&G will use sector-specific annual average gross revenue for all permit holders to determine the five-year historical average for new entrants during the disaster year. ADF&G agrees that new harvesters often incur additional costs to get started in the fishery and were negatively impacted by low returns in the disaster year.

Processors

- ADF&G removed language requiring facility ownership under the eligibility criteria as suggested in public comment and notes that the inclusion of facility-specific language in previous drafts was unintentional. The eligibility criteria apply to processing activity at the company level, based on federal tax identification number, for the fisheries included in this fishery disaster.
- For new processing companies in 2018 or 2020 that operated existing shore-based facilities, the history of the facility will be used to estimate revenue loss. ADF&G received comments that new processors beginning in a disaster year did not have a history to demonstrate loss, as required by the eligibility criteria. After reviewing processing data for affected fisheries, ADF&G determined that history of an existing shore-based facility can be used to estimate loss for a new company in 2018 or 2020 to satisfy the eligibility criteria.
- All eligible processing companies will be compensated pro rata to demonstrated loss without a cap consistent with other recent fishery disaster spend plans.
- Tender vessels must demonstrate a revenue loss due to the fishery disaster to be eligible for disaster funds, consistent with other participants in this disaster and in response to public comment. Tender vessels with daily rate contracts must demonstrate that fewer days were contracted in the disaster year as compared to the previous year. Tender vessels paid on pounds tendered must demonstrate that fewer pounds were tendered in the disaster year as compared to the previous year.

Communities

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

Guiding principles for disaster fund distribution: Disbursement of funds is intended to: 1) assist fishery participants harmed by the 2018 and 2020 salmon fishery disasters and 2) improve fishery information used to assess and forecast future fishery performance and to develop management approaches that avoid and/or mitigate the impacts of future fishery disasters that cannot be prevented.

The categories and allocations reflect consideration of comments received from stakeholder input.

Category	Allocation	Estimated funds ^a
Research	11%	\$3,768,000
Communities	3%	\$1,027,000
Harvesters	57%	\$19,527,000
Processors	29%	\$9,934,000
Program support	<0.2%	\$68,000
Total		\$34,324,000

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

Research: Funds will be allocated to support projects that improve available fishery information and help prevent and/or mitigate future fishery disasters. The scope of this fishery disaster includes Copper River Chinook and sockeye salmon and Prince William Sound Chinook, sockeye, and chum salmon.

The following research projects are responsive to the research themes that were developed by ADF&G staff and fishery participants. The projects will be funded directly in the federal fishery disaster grant. Directing fishery disaster research funds to these projects in the spend plan expedites the administrative process and maximizes the amount of time for investigators to conduct research.

Project 1: Run time modeling of sockeye salmon in the lower Copper River to improve fishery management. This study will help improve information for management and conservation of Copper River sockeye salmon by updating estimates of the travel time from the commercial salmon fishery in marine waters to the first point at which salmon are counted, the Miles Lake sonar site approximately 33 miles upriver. This travel time estimate will help fishery managers set daily sonar passage objectives and develop an indicator of inriver salmon abundance between the commercial fishing district and the sonar site. Salmon run timing may be changing and this study will estimate travel time for three years to provide updated information for use in fishery management decisions. A similar project is planned for the upriver portion of the system (ADF&G Sportfish, submitted to the Alaska Sustainable Salmon Fund in 2023). Altogether, this project will be the first integrated study of travel time of sockeye salmon from the marine commercial fishing district through every upriver fishery.

ADF&G manages the mixed-stock sockeye commercial salmon fishery in the Copper River District (CRD) at the mouth of the river from early May through the end of July. Sockeye salmon that migrate past this fishery are counted at the Miles Lake sonar several days later. Decisions to open or close the fishery in the CRD are made based on the daily count objectives at the sonar, which in turn are set using travel time data that may be outdated. Updated travel time data is expected to improve information available to determine sustainable harvest amounts of sockeye salmon in the commercial fishery. In addition, the sockeye salmon run is composed of six different genetically distinguishable stock groups (Upper Copper River, Gulkana River, Tazlina River, Chitina River, Klutina Lake, and Klutina/Tonsina Lake outlets), each of which can have different run timing through subsistence, personal use, and sport fisheries upriver. This project will help describe run times of these individual stock groups.

Results of this project are expected to improve the understanding and annual monitoring of Copper River sockeye salmon abundance, spawning distribution, and run timing to inform harvest management, set sustainable escapement goals at spatial scales appropriate for management, and inform run forecast models. **Project cost for ADF&G is estimated at \$1.9 million across four years; three years of tagging information and one year for analysis and dissemination of results.**

Project 2: Copper River Chinook and sockeye salmon genetic stock identification. Chinook and sockeye salmon are harvested in subsistence, commercial, sport, and personal use fisheries throughout the Copper River drainage and nearshore marine waters. Most harvests are composed of mixtures of stocks returning to a variety of tributaries in the drainage and the exploitation and productivity of any given stock is not currently well known. This lack of knowledge compromises management objectives to protect stocks from overharvest and sustain the productivity of stocks. This project will use genetic mixed stock analysis to estimate stock composition of the 1) Copper River District commercial Chinook salmon fishery, 2) Copper River District commercial sockeye salmon fishery, 3) Chitina Subdistrict personal use sockeye salmon fishery, and 4) Glennallen Subdistrict subsistence sockeye salmon fishery. In addition, this project will collect samples from spawning Chinook and sockeye salmon to improve the genetic baseline for each species. Information provided by this study would be useful for improving understanding of stock-specific run timing, reconstructing runs, building accurate brood tables to refine escapement goals, and refining management by identifying temporal harvest patterns of local and

nonlocal stocks. **Project cost for ADF&G is estimated at \$600,000 annually over three years = \$1.8 million total.**

Communities (~\$1,027,000): Municipalities rely on revenue generated from salmon landings and other economic activities related to the salmon fisheries. Direct payments will be made to affected municipalities meeting all eligibility criteria and having a demonstrated loss of salmon landings due to the fishery disaster.

Eligibility criteria for communities:

1. Fish ticket port of landing data must show that Chinook and/or sockeye salmon from the Copper River drift gillnet fishery were landed in the municipality in 2018 and/or that Chinook, sockeye, and/or chum salmon from Prince William Sound were landed in the municipality in 2020.
2. Estimated loss in gross revenue value for those salmon species landed in the municipality in 2018 and 2020 combined must be at least \$150,000 as compared to the respective previous five-year averages (2013-2017 and 2015-2019).

Disaster payments to municipalities are **pro rata** to each city’s demonstrated loss relative to the total loss of all eligible municipalities. Based on the criteria, the following municipalities may be eligible for community-designated funds: Cordova, Whittier, Valdez, Seward, and Kenai.

Harvesters (~\$19,527,000): This category includes permit holders, vessel crew, and the Copper River Prince William Sound Marketing Association. The total estimated loss in gross revenue for the 2018 Copper River and 2020 PWS Chinook, sockeye, and chum fishery disaster is \$49.9 million dollars. Funds allocated to the harvesting sector are intended to mitigate this loss by providing funds to bring the harvesting sector up to 38.7% of the sector’s recent historical value.

Direct payments will be made to commercial fishery permit holders and vessel crew who meet all eligibility criteria. Commercial Fisheries Entry Commission (CFEC) permit information and fish ticket data from commercial salmon landings will be used to determine eligibility and payment for permit holders. Eligibility for vessel crew will be verified using ADF&G commercial crew license or CFEC permit data and an affidavit from the permit holder or vessel owner. An affidavit form will be provided by PSMFC in the application information.

Harvester funds are allocated proportional to the estimated gross revenue loss for the 2018 Copper River District Chinook and sockeye salmon drift gillnet fishery and the 2020 Prince William Sound (Area E) Chinook, sockeye, and chum salmon fishery, which includes drift gillnet, set gillnet, and purse seine gear sectors. The estimated loss in gross revenue is calculated by subtracting the value of the fishery in the disaster year from the previous five-year average value (2013-2017 and 2015-2019). The Copper River Prince William Sound Marketing Association will be eligible to receive a direct payment equal to 1% of the total estimated gross revenue loss for the drift gillnet and set gillnet sector.

Fishery	Gross revenue disaster loss	Proportion of total loss	Funds based on loss	Marketing association	Final funds
2018 Copper River drift	\$19,702,388	39%	\$7,703,960	\$77,040	\$7,626,921
2020 PWS drift gillnet	\$26,320,103	53%	\$10,291,596	\$102,916	\$10,188,680
2020 PWS set gillnet	\$1,114,346	2%	\$435,728	\$4,357	\$431,370
2020 PWS seine	\$2,802,224	6%	\$1,095,716	n/a	\$1,095,716
Total	\$49,939,061		\$19,527,000	\$184,313	\$19,342,687

2018 Copper River drift gillnet ~\$7,626,921

Consistent with the fishery disaster request, only Districts 200 and 212 are included in the 2018 portion of this spend plan. The Copper River drift gillnet allocation is divided into two pools, one for S03E permit holders (95%) who participated in the fishery and one for vessel crew members (5%). The split between permit holders and crew members is based on half of the vessels employing up to one crew member who earns a 10% share and public comments received. Based on experience with other recent fishery disasters, separating crew and permit holder payments into two pools simplifies and expedites the distribution process. Creating a separate pool for crew also reduces incentives to mis-report crew information and provides equal access to the funds for all crew who meet the eligibility criteria.

2018 S03E Permit Holders. Eligibility criterion for 2018 drift gillnet permit holders:

- S03E permit holder must have made a Chinook or sockeye salmon landing in 2018 in District 200 or 212, Copper River.

Funds will be paid to the person listed as the 2018 ‘Permit holder’ and temporary emergency transfer permit holders (transferees) in the CFEC database. Permit holders who did not make any landings in 2018 and certified they were unable to participate to qualify for an emergency transfer and permit holders who did not make any landings in 2018 and permanently transferred a permit away in 2018 will not receive payments.

Each permit holder who meets all eligibility criteria will receive a minimum ‘base’ payment of \$12,000. Base payments are intended to help offset operational and startup costs incurred by all permit holders and the amount is determined by the number of eligible participants and funds allocated to each sector. If multiple eligible permit holders made landings in 2018 on the same limited entry permit, the base payment will be split pro rata to the value of each eligible permit holders’ Copper River Chinook and sockeye salmon landings in 2018. A total of 482 permit holders made landings on 478 S03E permits in District 200 or 212 in 2018.

After accounting for minimum base payments, the remaining funds are allocated to four tiers as shown in the table below. The tiers are established based on the 2013 to 2017 average estimated CFEC gross revenue value for Copper River Chinook and sockeye salmon landed by each individual based on their unique CFEC identification number. Individuals who were new entrants in 2018 will receive the annual average gross revenue of all permit holders to determine their tier. ADF&G did not use the CFEC quartiles, as suggested in public comment, because quartiles are based on all salmon species and this fishery disaster does not include pink or coho salmon. Twenty-five percent of the remaining funds will be apportioned to each tier and each individual in the same tier will receive an equal payment.

Tier Level	2013-2017 average CFEC gross revenue value of Copper River Chinook and sockeye salmon landings	Tier Allocation	Est. number of eligible permit holders
1	≥ \$71,500	25%	60
2	\$52,000 - \$71,499	25%	85
3	\$39,000 - \$51,999	25%	115
4	≤ \$38,999	25%	222

2018 drift gillnet vessel crew. Copper River drift gillnet vessel crew must meet the following criteria to be eligible for an **equal payment** of the 2018 gillnet vessel crew funds. Direct payments to minors are

not authorized by the terms of the Federal grant but may be authorized to guardians in the same household on behalf of an eligible minor.

Copper River drift gillnet crew eligibility criteria:

1. Crew member must have held a 2018 commercial crew license or a 2018 CFEC permit for any fishery. This information will be verified using the ADF&G Licensing database and the CFEC permit database.
2. Crew member must provide information to demonstrate participation as fishing crew in the 2018 commercial Copper River drift gillnet salmon fishery for a qualified S03E permit holder, based on an affidavit from the permit holder or vessel owner. An affidavit form will be provided by PSMFC in the application information.
3. Crew member may not be eligible for fishery disaster funds as an S03E permit holder in 2018.

2020 Copper River and Prince William Sound drift gillnet ~\$10,188,680

The allocation is divided into two pools, one for S03E permit holders (95%) and one for vessel crew members (5%). The split between permit holders and crew members is based on half of the vessels employing up to one crew member who earns a 10% share and public comments received. Based on experience with other recent fishery disasters, separating crew and permit holder payments into two pools simplifies and expedites the distribution process. Creating a separate pool for crew also reduces incentives to mis-report crew information and provides equal access to the funds for all crew who meet the eligibility criteria.

2020 S03E Permit Holders. Eligibility criterion for 2020 drift gillnet permit holders:

- S03E permit must have been used to make Chinook, sockeye, or chum salmon landings in 2020 in Prince William Sound, Area E.

Funds are to be paid to the person listed as the 2020 ‘Permit holder’ and temporary emergency transfer permit holders (transferees) in the CFEC database. Permit holders who did not make any landings in 2020 and certified they were unable to participate to qualify for an emergency transfer and permit holders who did not make any landings in 2020 and permanently transferred a permit away in 2020 will not receive payments.

Each permit holder who meets all eligibility criteria receive a minimum ‘base’ payment of \$15,000. Base payments are intended to help offset operational and startup costs incurred by all permit holders and the amount is determined by the number of eligible participants and funds allocated to each sector. If multiple eligible permit holders made landings in 2020 on the same limited entry permit, the base payment is split pro rata to the value of each eligible permit holders’ Chinook, sockeye, and/or chum salmon landings in 2020. A total of 491 permit holders made landings on 487 S03E permits in 2020.

After accounting for minimum base payments, the remaining funds are allocated to four tiers as shown in the table below. The tiers are established based on the 2015 to 2019 average estimated CFEC gross revenue value for Chinook, sockeye, and/or chum salmon landed by each individual based on their unique CFEC identification number. Individuals who were new entrants in 2020 will receive the annual average gross revenue of all permit holders to determine their tier. ADF&G did not use the CFEC quartiles, as suggested in public comment, because quartiles are based on all salmon species and this

fishery disaster does not include pink or coho salmon. Twenty-five percent of the remaining funds will be apportioned to each tier and each individual in the same tier will receive an equal payment.

Tier Level	2015-2019 average CFEC gross revenue value of PWS Chinook, sockeye, and chum salmon landings	Tier Allocation	Est. number of eligible permit holders
1	≥ \$107,000	25%	62
2	\$79,000 - \$106,999	25%	94
3	\$62,500 - \$78,999	25%	122
4	≤ \$62,499	25%	213

2020 drift gillnet vessel crew. Prince William Sound drift gillnet vessel crew must meet the following criteria to be eligible for an **equal payment** of the 2020 drift gillnet crew funds. Direct payments to minors are not authorized by the terms of the Federal grant but may be authorized to guardians in the same household on behalf of an eligible minor.

Prince William Sound drift gillnet crew eligibility criteria:

1. Crew member must have held a 2020 commercial crew license or a 2020 CFEC permit for any fishery. This information will be verified using the ADF&G Licensing database and the CFEC permit database.
2. Crew member must provide information to demonstrate participation as fishing crew in the 2020 commercial drift gillnet salmon fishery for a qualified S03E permit holder, based on an affidavit from the permit holder or vessel owner. An affidavit form will be provided by PSMFC in the application information.
3. Crew member may not be eligible for fishery disaster funds as an S03E permit holder in 2020.

2020 Prince William Sound set gillnet ~\$431,370

The allocation is divided into two pools, one for S04E permit holders (85%) and one for setnet crew members (15%). The split between permit holders and crew members is based on an average crew size of one to two people, each earning a 10% crew share.

2020 S04E Permit Holders. Eligibility criterion for 2020 set gillnet permit holders:

- S04E permit must have been used to make Chinook, sockeye, or chum salmon landings in 2020 in Prince William Sound, Area E.

Funds are to be paid to the person listed as the 2020 ‘Permit holder’ and temporary emergency transfer permit holders (transferees) in the CFEC database. Permit holders who did not make any landings in 2020 and certified they were unable to participate to qualify for an emergency transfer and permit holders who did not make any landings in 2020 and permanently transferred a permit away in 2020 will not receive payments.

Each permit holder who meets all eligibility criteria receive a minimum ‘base’ payment of \$12,000. Base payments are intended to help offset operational and startup costs incurred by all permit holders and the amount is determined by the number of eligible participants and funds allocated to each sector. If multiple eligible permit holders made landings in 2020 on the same limited entry permit, the base payment is split pro rata to the value of each eligible permit holders’ Chinook, sockeye, and/or chum salmon landings in 2020. A total of 26 permit holders made landings on 26 S04E permits in 2020.

After accounting for minimum base payments, the remaining funds are allocated to four tiers as shown in the table below. The tiers are established based on the 2015 to 2019 average estimated CFEC gross revenue value for Chinook, sockeye, and/or chum salmon landed by each individual based on their unique CFEC identification number. There were no new entrants in 2020 in the set gillnet fishery. Given the relatively low number of set gillnet participants, ADF&G was unable to apportion the average individual revenues into four equal quartiles. However, similar to the even quartile approach, the tier allocations for the set gillnet sector are based on the proportion of total harvest by the individuals in each tier and individuals in the same tier will receive an equal payment.

Tier Level	2015-2019 average CFEC gross revenue value of PWS Chinook, Sockeye, and Chum salmon landings	Tier Allocation	Est. number of eligible permit holders
1	≥ \$100,000	32%	5
2	\$75,000 - \$99,999	23%	5
3	\$50,000 - \$74,999	35%	10
4	≤ \$49,999	10%	6

2020 set gillnet crew. Set gillnet crew must meet the following criteria to be eligible for an **equal payment** of the 2020 set gillnet crew funds. Direct payments to minors are not authorized by the terms of the Federal grant but may be authorized to guardians in the same household on behalf of an eligible minor.

Prince William Sound set gillnet crew eligibility criteria:

1. Crew member must have held a 2020 commercial crew license or a 2020 CFEC permit for any fishery. This information will be verified using the ADF&G Licensing database and the CFEC permit database.
2. Crew member must provide information to demonstrate participation as fishing crew in the 2020 commercial set gillnet salmon fishery for a qualified S04E permit holder, based on an affidavit from the permit holder. An affidavit form will be provided by PSMFC in the application information.
3. Crew member may not be eligible for fishery disaster funds as an S04E permit holder in 2020.

2020 Prince William Sound seine ~\$1,095,716

The allocation is divided into two pools, one for S01E permit holders (80%) and one for vessel crew members (20%). The split between permit holders and crew members is based on average crew size and crew shares and considers the higher initial costs borne by seine vessel operators that are typically reimbursed through standard deductions to crew pay.

2020 S01E Permit Holders. Eligibility criterion for 2020 seine permit holders:

- S01E permit must have been used to make Chinook, sockeye, or chum salmon landings in 2020 in Prince William Sound.

Funds are to be paid to the person listed as the 2020 ‘Permit holder’ and temporary emergency transfer permit holders (transferees) in the CFEC database. Permit holders who did not make any landings in 2020 and certified they were unable to participate to qualify for an emergency transfer and permit

holders who did not make any landings in 2020 and permanently transferred a permit away in 2020 will not receive payments.

Each permit holder who meets all eligibility criteria receive a minimum ‘base’ payment of \$1,000. Base payments are intended to reflect recognition of operational and start up costs incurred by all permit holders and on the amount is determined by the number of eligible participants per fishery and total funds available. If multiple eligible permit holders made landings in 2020 on the same limited entry permit, the base payment is split pro rata to the value of each eligible permit holders’ Chinook, sockeye, and/or chum salmon landings in 2020. A total of 223 permit holders made landings on 218 S01E permits in 2020.

After accounting for minimum base payments, the remaining funds are allocated to four tiers as shown in the table below. The tiers are established based on the 2015 to 2019 average estimated CFEC gross revenue value for Chinook, sockeye, and/or chum salmon landed by each individual based on their unique CFEC identification number. Individuals who were new entrants in 2020 will receive the annual average gross revenue of all permit holders to determine their tier. ADF&G did not use the CFEC quartiles, as suggested in public comment, because quartiles are based on all salmon species and this fishery disaster does not include pink or coho salmon. Twenty-five percent of the remaining funds will be apportioned to each tier and each individual in the same tier will receive an equal payment.

Tier Level	2015-2019 average CFEC gross revenue value of PWS Chinook, Sockeye, and Chum salmon landings	Tier Allocation	Est. number of eligible permit holders
1	≥ \$100,000	25%	12
2	\$44,000 - \$99,999	25%	25
3	\$29,000 - \$43,999	25%	49
4	≤ \$28,999	25%	137

2020 seine vessel crew. Prince William Sound seine crew must meet the following criteria to be eligible for an **equal payment** of the 2020 seine vessel crew funds. Direct payments to minors are not authorized by the terms of the Federal grant but may be authorized to guardians in the same household on behalf of an eligible minor.

Prince William Sound seine crew eligibility criteria:

1. Crew member must have held a 2020 commercial crew license or a 2020 CFEC permit for any fishery. This information will be verified using the ADF&G Licensing database and the CFEC permit database.
2. Crew member must provide information to demonstrate participation as fishing crew in the 2020 commercial seine salmon fishery for a qualified S01E permit holder, based on an affidavit from the permit holder or vessel owner. An affidavit form will be provided by PSMFC in the application information.
3. Crew member may not be eligible for fishery disaster funds as an S01E permit holder in 2020.

Processors (~\$9,934,000): Direct payments to processing companies and tender vessel owners that meet all eligibility criteria. The total estimated loss in final exvessel value for the 2018 Copper River and 2020 PWS salmon disaster is 49 million dollars. Funds allocated to the processing sector are intended to

mitigate this loss by providing funds to bring the processing sector up to 20% of the sector's recent historical value.

The allocation will be divided into two pools, one for eligible processing companies (96%) and one for tender vessels (4%). Commercial Operators Annual Report (COAR) buying data will be used to determine eligibility and payment. Processing companies will be identified based on the nine-digit federal tax identification number. Tender vessel eligibility will be determined based on vessel contracts and verified using ADF&G fish ticket information.

Processing companies (96% of the processor pool): Salmon processing companies that meet all criteria are eligible for payment based on the estimated exvessel value loss using COAR buying data for 2018 Copper River District Chinook and sockeye salmon and 2020 Prince William Sound (Area E) Chinook, sockeye, and chum salmon, including salmon harvested under hatchery cost recovery permits. The estimated loss is calculated by subtracting the final exvessel value paid in the disaster year (2018 and 2020) from the respective previous five-year average (2013-2017 and 2015-2019). The five-year average value for processing companies that operated existing shore-based facilities for the first time in 2018 or 2020 will be based on the history of that facility.

Processing company eligibility criteria:

1. Processing company must have purchased Copper River Chinook or sockeye salmon in 2018 and/or Prince William Sound Chinook, sockeye, or chum salmon in 2020.
2. Processing company, or facility if disaster year was first year of operation, must have a demonstrated loss in exvessel value greater than \$10,000 combined for 2018 Copper River Chinook and sockeye salmon and 2020 Prince William Sound Chinook, sockeye, and chum salmon.

Disaster payments to processing companies are **pro rata** to each company's demonstrated loss relative to the total loss of all eligible processing companies.

Tender vessels (4% of the processor pool):

Eligibility criteria for tender vessels:

- Vessel must have been contracted to operate as a tender in the 2018 Copper River Chinook and sockeye salmon and/or 2020 Prince William Sound Chinook, sockeye, and chum salmon fishery as demonstrated by a contract with a processor for salmon tender services.
- Tender vessel must be able to demonstrate a loss as a result of the disaster. Tender vessels with daily rate contracts must demonstrate that fewer days were contracted in the disaster year as compared to the previous year. Tender vessels paid on pounds tendered must demonstrate that fewer pounds of 2018 Copper River Chinook and sockeye salmon and/or 2020 Prince William Sound Chinook, sockeye, and chum salmon were tendered in the disaster year as compared to the previous year.

Tender vessel owners that meet the eligibility criteria will receive one share of the tender vessel allocation for each qualifying year, for a maximum of two shares. Share amounts will be determined by dividing the total tender vessel allocation by the total number of eligible shares.

Program Support (\$68,000): ADF&G is proposing to designate funds for staff working on fishery disaster plan development and implementation in coordination with Pacific States Marine Fisheries Commission.

Appendix 1. Public comment on the second draft spend plan.

June 20, 2023

Attn: Karl Bush

Alaska Department of Fish & Game

PO Box 115526

Juneau, AK 99811-5526

dfg.com.fisheriesdisasters@alaska.gov

Dear Ms. Bush,

I am writing to provide comment on the second draft of the spend plan for funds appropriated to address the 2018 Copper River Chinook and sockeye salmon and 2020 Copper River and PWS Chinook, sockeye and chum salmon disaster determination.

My comments are directed to the processor component of the revised plan. In both drafts, it is clear the ADFG team is dedicated to working with the public to develop a distribution plan that achieves the guiding principles set forth for disaster fund distribution. Thank you for your time, attention to detail and responsiveness to the public in crafting a plan that aims to equitably disburse relief funds for the greatest benefit of all affected parties in the Area E fishery.

The changes proposed to the processor allocation in the new draft are helpful in recognizing smaller facilities with a greater reliance on the CR/PWS fisheries and provide some balance to relief disbursement. Shore-based processing facilities are the backbone of the seafood industry providing the carrying capacity to process and move volumes of salmon product throughout the State of Alaska, lower 48 and beyond. These facilities not only process round product purchased directly from harvesters, but also create value added processing access for smaller niche buying operations and direct marketers thus providing a platform for them to reach a wider market as well.

Under the current draft, access to relief is based on prior operation history to prove loss, which continues to exclude disaster assistance reaching facilities with a first year of operations in 2018 or any disaster year.

I would like to advocate for a metric that recognizes and provides meaningful relief to the few facilities with their first year of operations occurring during a disaster year. The overall loss to the eligible processing facilities is known. Finding a method to fairly estimate the loss of a new facility and incorporate that into providing access to necessary relief assistance is possible. Using production data from this specific shore-based facility under the previous ownership with healthy runs would provide a gauge of the true impact and loss for this company that isn't recognized in either draft of this spend plan.

Supporting diversity in the buying community supports all fishery participants and communities over time. Thank you for the opportunity to participate in this process and provide comment for consideration.

Sincerely,

Alexis Cooper

60 North Seafoods, LLC

From: Sarah Ecolano <
Sent: Friday, June 30, 2023 10:46 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Disaster Allocations, Processor Sector

Regarding the 2018 and 2020 Copper River Fishery Disaster Spend Plans

I write to you today as a stakeholder; an independent owner and operator of an ADFG/State of Alaska licensed and bonded Shore-based seafood processor, in business for over a decade and involved in the fishery for the entirety of my life.

During the disaster years (2018 & 2020) as well as during the tier determination years my business was actively buying and selling Copper River Salmon, my Shore-based processor license was utilized each disaster year and continues to be today.

I recognize that ADFG has been receptive to concerns voiced from within the commercial harvest sector during the stakeholder comment periods. Allocations in this sector have been modified to address and remedy gaps in the spend plan that previously excluded licensed fishery participants with rare circumstances and also allowed for the inclusion of an entity not licensed as a commercial harvester to receive funds from the harvester allocation pool.

I ask that ADFG also give consideration to all the circumstances that surround the many facets of businesses that are licensed and operate in the Processor sector.

I request that the spend plan be modified to include funding for independently owned and operated and licensed Shore based Seafood Processors that do not own a processing facility.

The ownership of a building is not an indicator of the level of involvement of a licensed Processor in the disaster fisheries.

All businesses that are licensed by the state as Processors should receive a share of funds for the years they qualify for based on participation, regardless of building ownership or if production was done by others. When other licensed facilities are utilized for production thorough documentation occurs and that is detailed reporting is utilized to establish the taxed basis.

The currently proposed eligibility requirement of owning a processing facility excludes from funding ADFG licensed Shore-based processors that may not own a building, yet they hold the same state issued license and operate with the same requirements as those that do own buildings.

The Dept of Revenue and ADFG make no distinction in the licensing requirements, bonding requirements, annual and monthly reporting requirements, the basis for taxes levied or the calculation used to determine contributions to ASMI. Additionally, the City of Cordova also does not make a distinction when requiring that a landing tax be withheld and submitted on the behalf of fishermen.

Including a building ownership clause has little to do with verifying the impact and involvement of a licensed Shore-based entity that has operated within the disaster fishery area for over a decade.

Having access to these important disaster funds that have specifically been allocated to the Processor sector should not be based on whether or not a building is owned but instead on the volume of trade and impact of revenue loss. These calculations are easy to verify as they are routinely reported during the course of business when licensed as a Shore-based Processor, like my business is.

Thank you for your consideration.

From: Bill Markowitz
Sent: Wednesday, June 21, 2023 10:28 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Disaster relief

Fair is equal split.

Just because someone has expensive equipment doesn't mean anything...
They may have an original issue permit not and paid high dollar...

This is not an IFQ program and should not be treated as such...

These funds are for disaster relief and we should all be treated equally

If you can't make your payments go get a job....gillnetting only lasts 6 months

William J Markowitz
Area E Gillnetter

From: Anastasia Ovchinnikov
Sent: Wednesday, June 21, 2023 7:17 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: 2018 Copper River and 2020 PWS Fishery Disaster Spend Plan Comment **Equal Distribution is Unfair**

Anastacio Ovchinnikov

I am writing this letter because I strongly disagree with the proposed of equal distributon among harvesters of 2018 CR and 2020 PWS salmon disaster money. "Equal payment" is unfair spending of the money because all fishers and permit holders are individual small businesses, with highly variable and dissimilar business models. It is no where near fair to assume all permit holders had equal losses during either or both of the disaster years. There were many vessels that had stopped commercial fishing then there were others who stayed through till the end of the fishing seasons. This is a generalized miscalculation. It is however, generally fair to say that in fishing, a lasting business with more expenses would land more fish meaning a fishing business that has more expenses would have been hurt more during a disaster season. So, we can far more fairly parallel landing histories to losses. We deem that Equal Payment is not a fair distribution of the disaster funds.

Please consider using a better system to allocate than evenly disbursing the money to all the permit holders during 2018 and 2020. The relief should go to those that felt the disaster the most. The quartarly system on the CFEC database would be the best place to start.

Respectfully submitted.

From: Bill Markowitz
Sent: Wednesday, June 21, 2023 6:18 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Disaster relief funds 2018 & 2020

Greetings,

After reviewing the comments from the second round of public comments it has come to my attention that the department has no concern about what is fair in the distribution of disaster relief funds.

Why has the appropriation of fund being based on 47 comments. This amount of public comment in **NO WAY REPRESENTS THE GENERAL CONSENSUS OF THE FLEET.**

If you look at the names and catch history of those fisherman who commented against equal distribution you will find these are fisherman who not only are selfishly looking for personal gain they also represent the top tier of catch history for the fleet.

It should also be noted that certain individuals chose to comment 3 or 4 times. **ARE THESE COMMENTS BEING COUNTED AS ONE COMMENT ONLY OR AS SEVERAL COMMENTS.**

Another observation I have noticed is that some of these comments not only have been plagiarized but that many of the comments were made by individuals who hold elected offices in the CDFU. **I DO NOT FEEL THIS IS A PROPER REPRESENTATION OF PUBLIC OFFICE.**

That being said I guess this is how politics work in America. He who holds the office makes the decisions even if it goes against their constituents. Another example of abusing political power for personal gain.

I am sending this email in regards to the recent disaster relief funds appropriated by Congress for the 2018 and 2020 Copper River and Prince William Sound salmon fisheries.

I feel that as a Copper River/PWS Salmon permit holder the only "Fair and Just" way to distribute these funds would be an equal division of funds amongst permit holders in the affected fisheries.

If the division of funds were to be based on catch history this would not be fair *UNLESS* the funds were to be distributed in such a way that a permit holders with the smallest catch records for the qualifying seasons would receive a higher percentage of funds.

An example of this would be:

- Gillnetter A catches \$200k of fish
- Gillnetter B only catches \$30k worth of fish

Why would it be fair for Gillnetter A to receive more funds when due to his gross stock he ***did not*** have a disaster as compared Gillnetter B?

Gillnetter B is the permit holder who truly had a disaster due to his low gross stock.

From these examples it can be demonstrated that distribution of funds based on catch history is ***NOT*** a fair method of distribution.

The only way to fairly distribute the funds would be an equal distribution amongst permit holders.

Just because a permit holder has chosen to invest in more expensive equipment does not mean their permit or business has any more value than a permit holder with less expensive equipment.

Thank you for your consideration,

William J Markowitz
Area E gillnetter



June 21, 2023

To: Karla Bush, ADFG

Re: Copper River and PWS Salmon Commercial Fisheries Disaster Spend Plans

Thank you for the opportunity to comment on the second draft of the spend plan for the 2018 and 2020 Copper River and 2020 Prince William Sound Chinook, sockeye, and chum salmon fisheries disasters. The Pacific Seafood Processors Association represents shoreside processing plants operating across Alaska, including those in Cordova and Valdez which are historically dependent on commercial salmon fisheries from Copper River and Prince William Sound.

As stated in our previous comment letter, shoreside processing in Alaska's remote communities is extremely capital intensive, with significant fixed costs just to open the door and take the first delivery, regardless of the strength of the fishery. Fishermen depend on viable shoreside markets across Alaska to deliver their catch, and communities depend on the jobs, fish tax and property tax revenue, and support service businesses resulting from local processing. The level of reductions in the years at issue represented a significant loss to processors dependent on these fisheries. The following comments address three issues, two of which are changes from the initial spend plan.

Overall allocation approach

Overall, we support the State's guiding principles for this process and support the intent that the vast majority of disaster funding be used for direct payments to affected fishery participants, while also accommodating relevant research needs. We continue to recommend that the state consider that processors and harvesters jointly share in the effort and risk in commercial fisheries, and to support an approach that attempts to evenly mitigate losses from the disaster to both sectors. To that end and to increase transparency, please continue to publish in each spend plan the percentage of historical value that each sector achieves with the proposed disaster allocations.

Tender vessels

The second draft spend plan also includes a tender vessel allocation out of the processor funding component and specifically asks for input to evaluate this option. The only proposed criterion for tenders is to verify they operated in the fisheries at issue in the disaster year by showing a contract with a processor. Processor and tender relationships vary, with some processors paying a daily rate regardless of pounds of fish tendered and some paying based on pounds tendered; thus, some tenders were paid in full by processors regardless of the fishery disaster. Given the variable nature of tender and processor relationships, the State should employ an approach that would benefit tenders that can demonstrate a loss as a result of the fishery disaster, similar to the standard for both harvesters and

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JUNEAU
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Suite 200
Juneau, AK 99801
907 586 6366

SEATTLE
1900 W. Emerson Place
Suite 205
Seattle, WA 98119
206 281 1667

WASHINGTON DC
20 F Street NW
Floor 7
Washington, DC 20001
202 431 7220

processors. The law and guidance governing federal disaster funding enables the federal government to help persons engaged in commercial fisheries by initiating projects, payments, or other measures to alleviate harm determined by the Secretary to have been incurred as a direct result of a fishery resource disaster. We respectfully request that the state does not deviate from this fundamental purpose for any sector.

Capping individual processor payments despite demonstrated revenue losses

The second draft plan also changed from the initial plan by proposing that disaster payments to processing companies are pro rata to each company's demonstrated loss relative to the total loss of all eligible processing companies, but up to a maximum of 25% of the total allocation to processors. We oppose this change and respectfully request that the state use the historical and fair approach of compensating each processing company pro rata to each company's demonstrated loss, without a cap.

Capping payments to individual processors despite their proven losses due to the disaster is arbitrary and not reflective of companies that have a higher dependence on the salmon fisheries at issue, which is the stated reason for the change (and in response to public comment). There was not much public comment on the processor allocation component at all, so the basis for the change does not appear well supported. In contrast, multiple comments from harvesters reflecting opposition to equal shares for harvesters use the processing sector as an example, accurately stating that larger processors have larger overhead costs, larger fixed costs, and have a larger loss of income during disaster years (the point being it is unfair to benefit harvesters with fewer losses at the same rate as those harvesters with larger losses).

If the reason for the change is to recognize dependence by small processors, there are no eligibility criteria or data being requested from any business to assess that dependence. Size does not determine dependence, nor does it insulate a business from risk. A larger processor with a large market share can still be fully dependent on these fisheries and potentially more dependent than a smaller processor. Consider the multiple other fishery disasters from the same years as these disasters, which indicate there was and is considerable risk across commercial fisheries, no matter the size of the operation. The previous pro rata approach to compensating for actual losses is not only the fairest way to distribute disaster funding, but it is the most transparent and most aligned with the purpose of federal disaster payments. Moving further away from compensating for actual losses incurred as a result of the disaster and inserting arbitrary rules should be avoided, especially given that the initial disaster request to the Secretary of Commerce was based on aggregate actual revenue losses incurred by harvesters and processors.

Finally, ADFG should consider the impact processing operations have on the communities in the region when considering whether to shift disaster assistance funding away from operations that have experienced significant losses on par with or greater than other affected businesses. There are hundreds of direct jobs in the processing plants, as well as hundreds of related support sector jobs, which provide economic stability and a tax base in an area dependent on commercial fisheries. Consider Alaska communities in which a large processor has closed, which has significant impacts, and the very limited options to backfill for that level of employment, direct and indirect revenue, and local markets for fishermen at the times and volume necessary to support their harvesting operations.

Thank you for the opportunity to comment, and we appreciate ADFG's significant work and open process toward developing and implementing the recent disaster spend plans.

Sincerely,

A handwritten signature in cursive script that reads "Nicole S. Kimball".

Nicole Kimball
PSPA, Anchorage

From: Brad Reynolds
Sent: Wednesday, June 21, 2023 4:21 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Comments for disaster relief allocation

First, I advocate for an equitable split of disaster relief funds among the fleet. Second, if a tiered structure is applied to distribution, I suggest that calculus include the disaster years, 2018 and 2020. Perhaps the range of the five year average could be 2016 to 2020 or 2018 to 2022. Shifting the range allows new entrants to the fishery an opportunity to prove their effort and essentially compete for more than a base amount. This is a group that has typically leveraged themselves financially but has done so with anticipation of growth in this industry; however, two declared disasters in the preceding five years has strapped this group with unanticipated burden. Thank you for considering my comments. Brad Reynolds

From: Hope Finley
Sent: Wednesday, June 21, 2023 2:36 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Comments on 2020 Disaster spend plan

Good afternoon,

I'm writing my comment now with limited service. Most of what I have to say about the 2020 disaster spend plan for 2020 PWS, Chinook, pink, and chum salmon fisheries is to NOT exempt first year permit holders with no catch record. A lot of disaster money has been organized by catch history and schedule C information, but if you were a first year business operator you got nothing. I encourage to find a way to include those first year fishermen in this equation.

Thank you,
Hope Finley

From: Matthew Maxwell
Sent: Wednesday, June 21, 2023 2:30 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Draft plan 2 support

I support the second draft plan. It is a good compromise.

Thank you
Matthew R Maxwell
Area E drift

From: Jim Lytle
Sent: Wednesday, June 21, 2023 1:33 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Fisheries disasters

I feel that the only fair way is to distribute the money equally. every permitted person pays the same fees and their permit gives them the same equal rights to our resources. It's government money and aren't we all supposed to be treated as equals

James Lytle
Permit holder

Sent from my iPhone

From: Ken Lytle
Sent: Wednesday, June 21, 2023 1:32 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Disaster funds

I believe that the funds should be evenly disbursed to the fisherman. All permits are valued at the same price. We all pay the same yearly amount for our permit licenses. I feel that the tiered system is not a good idea and unfairly awards some fishermen more for their suffering. During bad seasons everyone is effected.

Thank You,
Ken Lytle
Permit Holder

Sent from my iPhone

From: kent herschleb
Sent: Wednesday, June 21, 2023 12:47 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Attachments: disaster letter.pdf

I have fished since 1975 out of Cordova.I totally agree with Zeke Brown's take on the payout plan.The second plan should not,repeat not be approved. It's a gift to a few at the expense of the many. Truly a bad plan.
Kent Herschleb

From: Misael Martushev
Sent: Wednesday, June 21, 2023 12:57 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: 2018 and 2020 Copper River and 2020 Prince William Sound Chinook, sockeye, and chum salmon disaster:

The new draft spend plan for disaster relief does away with equal splits and gives more to permit holders with higher historic harvest. This is unacceptable as it screws over the newer entrants into the fishery who do not have a five year history, like myself. I asking for the original equal split distribution or at least to give those with less than 5 years history the highest tier payout. I hope everyone can agree a run failure is much more devastating to a first year fisherman buried in debt then an established highliner. The new draft plan aims to keep high income fisherman with more money with less debt. Which inturn will keep the new young fisherman still digging out of their debt with less money for the same disaster years. Thank you for considering my comment.

From: John & Anne Herschleb
Sent: Wednesday, June 21, 2023 11:32 AM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Draft spend plan

I am commenting in opposition to the second draft spend plan for harvesters and would like the initial equal shares plan to be implemented. This hybrid approach is far too skewed towards an unfair tiered payment approach. This drastic change to the spend plan, during the fishing season, is a complete disservice to the public process that created the initial spend plan.

My opposition to the second draft spend plan centers on the fact that any tiered payment approach based on catch history will be flawed.

Basing the catch history on the Copper River district doesn't account for how fishermen in Prince William Sound were affected by the 2018 and 2020 Copper River closures. The CR/PWS drift fishery is very dynamic. There are many new entrants and folks investing heavily into their operations. Also, there are many retirees and people holders that don't fish as hard as they used to. There is no way for a 5 year average to account for these changes.

A tiered payment system will be flawed and leave many permit holders without relief from this disaster.

I am commenting in opposition to the second draft spend plan and would like the initial equal shares plan to be implemented. The proposed tiered system is inequitable for a number of reasons which are outlined below.

Under the second draft newer entrants will receive less than established fishermen. If an applicant's first year with a permit was 2018 or 2020 they will only get the base payment. Additionally a permit holder with a shorter history in the fishery will receive less even if they were a top tier fisherman during those years. The average gross for a gillnet permit in 2013,2014 was \$100,000. In 2015-2017 the average gross was \$71,000-\$83,000. Because of this the "average" fishermen with the full 5 year history will be placed in a higher tier then the "average" fisherman who only fished 2015 onwards. New entrants if anything should receive the highest tier of relief as they are most likely the furthest in debt having just bought a boat, permit and gear but this plan will instead give the lion's share to the most well established fishermen.

Using historic harvest only from districts 200 or 212 shows a fundamental misunderstanding of the fishery. Every gillnetter has a favorite spot to fish for some it is the Copper river and for some it is Main bay or Esther. However, when your favorite spot is closed you go fish where it is open. In 2018 and 2020 the Copper river was closed for most of the season so those fishermen who normally fish the Copper fished the rest of PWS splitting the available fish up with the Esther and Main bay fishermen. Because of this every area E gillnetter saw a drastic decrease in income in 2018 and 2020 but this spending plan will only reward those who historically focused their fishing on the Copper.

Using historic harvest is a terrible metric to gauge how much fish someone would have harvested on a disaster year. If a fisherman who has a poor catch history due to owning outdated equipment goes deeply in debt upgrading and increasing his catching ability right before a disaster year is he less deserving of relief than someone who bought the bigger boat five years earlier? If a fisherman had a major mechanical breakdown or health issue that reduced his harvest in the seasons prior to the disaster year is his need less? If a new fisherman spends every last penny he has to buy a boat and permit in 2017 and doesn't catch as much as the established producers, did he have less of a disaster than the established highliner who paid his operation off years before the failure happened in 2018?

Any formula that bases payout on catch history is bound to be flawed and will never result in an equitable distribution because there are too many variables that can and do result in poor performance on any given year. The perpetual hope of fishing is that poor past performance is not a determinant of future success and in fisheries such as these where all participants have equal opportunity for profit they should have equal opportunity for relief as well.

Thank you for your time,
Ezekiel Brown

From: Matt Johns
Sent: Wednesday, June 21, 2023 6:45 AM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Disaster relief fund spans plan - Prince William sound 2018 & 2020

I am in favor of an equal payment to all permit holders. We all experienced the same disasters, we were all cutting slices from a very very small pie those years. The difference between top and bottom earners was not much. Top earnings don't necessarily mean higher expenses across the board; "bottom" earners are often fishing older equipment and constantly spending on repairs. Those skinny years make the margins razor thin, which spills into the rest of life and one's overall financial picture. This relief money could help prevent the bottom tier from being stuck in this cycle.

Matt Johns

Sent from my iPhone

From: Brian Lytle
Sent: Tuesday, June 20, 2023 11:58 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)

I believe that money distribution should be done evenly among all permits. All permits are the same (no tier) and in a bad fishing year everyone loses income and fishing opportunity, and everybody could use help. Thanks Brian Lytle

From: Shawn Gilman
Sent: Wednesday, June 21, 2023 6:36 AM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: 2018, 2020 area e disaster relief

> Disaster relief is meant to provide assistance to affected parties to offset financial losses as a result of the disaster. The intent is not to make businesses whole or better than whole. The current spend plan for the drift gillnet fishery businesses as written has a 10K base allocation plus a tiered quartile distribution. This means there will be a significant number of affected businesses receiving distribution amounts equal to or greater than their average yearly sales .

>

> It is commendable that the team working on drafting this distribution plan is this responsive to public input and desires to distribute these relief funds as equitably as possible for the greatest benefit.

>

> The quartile data available does reflect the individual business models represented in this plan, the details as to why the business's sales are different from each other are varied.. . I would recommend the allocation of a base relief payment of 10,000K if the businesses entry into the fishery was 2018 or 2020, but if there is prior history demonstrating a consistent position in a quartile then that quartile distribution would best serve the intent to assist in managing disaster losses. I would support the second draft with the changes of base allocation and lower quartile payments for any new businesses with no history and all other distributions to be based on a businesses history as a good compromise that addresses these concerns and issues. In reading the processor spend plan I cannot understand why a tiered approach and base allocation for new businesses with no history would not be considered as well. Thank you , Shawn Gilman

Sent from my iPhone

From: Ezekiel Brown
Sent: Tuesday, June 20, 2023 9:22 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: 2018 and 2020 Copper River and 2020 Prince William Sound Chinook, sockeye, and chum salmon fisheries

As stated in my earlier comment I am opposed to a tiered spend plan based on historic harvest. However, for the seine fishery there is an argument to be made for not simply using an equal shares plan when it comes to chum salmon. The majority of chum salmon harvested by the seine fleet are harvested in June when most of the fleet is not active. Therefore a chum salmon disaster had the largest impact on those permit holders who were active in June of the disaster year. I would propose a similar tiered system for Seine with base payments; however the tiers should be based on weeks fished in June during the disaster year in question. For example the top tier for 2018 would have at least one delivery a week for every week of June 2018 and the lowest tier would only have a delivery in one week of June 2018.

Ezekiel Brown
PWS Seine Permit holder 2014-2023

From: Ezekiel Brown
Sent: Tuesday, June 20, 2023 9:19 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: 2018 and 2020 Copper River and 2020 Prince William Sound Chinook, sockeye, and chum salmon fisheries

I am commenting in opposition to the modifications to the Gillnet commercial harvesters funds in the second draft spend plan and would like the initial equal shares plan to be implemented. I support the addition of funding for the CRPWSMA and tender vessels. The proposed tiered system is inequitable for a number of reasons outlined below.

Under the second draft, newer entrants will receive less than established fishermen. If an applicant's first year with a permit was 2018 or 2020 they will only get the base payment. Additionally, a permit holder with a shorter history in the fishery will receive less even if they were a top tier fisherman during those years. The average gross for a gillnet permit in 2013,2014 was \$100,000. In 2015-2017 the average gross was \$71,000-\$83,000. Because of this the "average" fishermen with the full 5 year history will be placed in a higher tier then the "average" fisherman who only fished 2015 onwards. New entrants if anything should receive the highest tier of relief as they are most likely the furthest in debt having just bought a boat, permit and gear. This plan will instead give the lion's share to the most well established fishermen.

If a fisherman who had a poor catch history due to owning outdated equipment goes deeply into debt upgrading and increasing his catching ability right before a disaster year is he less deserving of relief than someone who bought the bigger boat five years earlier? If a fisherman had a major mechanical breakdown or health issue that reduced his harvest in the seasons prior to the disaster year is his need less? If a new fisherman spends every last penny he has to buy a boat and permit in 2017 and doesn't catch as much as the established producers, did he have less of a disaster than the established highliner who paid his operation off years before the failure happened in 2018?

Additionally, using historic harvest only from districts 200 or 212 shows a fundamental misunderstanding of the fishery. Every gillnetter has a favorite spot to fish– for some it is the Copper River and for others it is Main bay or Esther. However, when your favorite spot is closed you go fish where it is open. In 2018 and 2020 the Copper river was closed for most of the season so those fishermen who normally fish the Copper fished the rest of PWS splitting the available fish up with the Esther and Main bay fishermen. Because of this every Area E gillnetter saw a drastic decrease in income in 2018 and 2020. However, this spending plan will only reward those who historically focused their fishing on the Copper.

Any formula that bases payout on catch history is bound to be flawed and will never result in an equitable distribution because there are too many variables that can and do result in poor performance on any given year. The perpetual hope of fishing is that poor past performance is not a determinant of future success. In fisheries such as these, where all participants have equal opportunity for profit they should have equal opportunity for relief as well.

Because of this I ask for a return to the initial spend plan of equal shares for all gillnet permit holders with deliveries during the disaster years.

Thank you for your time,
Ezekiel Brown
PWS/CR Gillnet permit holder 2011-2020
PWS Seine permit holder 2014-2023

From: cCHRISTIAN wARE
Sent: Tuesday, June 20, 2023 8:14 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: 2020 pws disaster plan

To whom it may concern, I would like to oppose the current spending plan for the 2020 pws pink salmon disaster relief package. I feel an equal pay out among permit holders is a much better idea than a tiered plan, all active permit holders, myself included suffered equal financial losses. Those who would have caught more did so and earned more at the time. A five year average doesn't reflect the impact on individual fishermen. Giving those with less than a five year history a top tier payout leaves less in the pot for the average permit holders when in reality few new permit holders are going to earn top tier money. Again please reconsider an even pay out, thank you for your consideration, Robert Ware

From: jordan stover
Sent: Tuesday, June 20, 2023 5:11 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Area E spend plan

Equal shares to all permit holders.

It was a disaster season, catch history shouldn't matter if nobody was catching anything anyways.?

Tenders getting processors money when they register and buy permits as "fishermen"? Does that mean they get to double dip? Fisherman and processors.?

Think it's good crew shares went down but think 3% for "picking" fish during a disaster season in area E is fair.

Sent from my iPhone

From: Andrew McFadden
Sent: Tuesday, June 20, 2023 5:10 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: 2018/2020 area E drift relief spending plan

Every business model on the planet says the first 3 5 years of owning a business are the heaviest financial burdens you have.

The new draft spend plan for disaster relief does away with equal splits and gives more to permit holders with higher historic harvest. This is unacceptable as it screws over the newer entrants into the fishery who do not have a five year history. I am asking for the original, reasonable, equal split distribution or at least to give those with less than 5 years history the highest tier payout. I hope everyone can agree a run failure is much more devastating to a first year fisherman buried in debt than an established highliner.

Sincerely,
Andrew McFadden
Area E drift permit holder

From: Koal Backlund
Sent: Tuesday, June 20, 2023 3:12 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Comments

Hi
This is Koal Backlund
On the gillnetting vessel Bazerk in PWS
My vote is for an even split for the disaster I believe that if the government is going to pay us it should be equal for everyone Cause food, gas, clothing all cost the same for all of us and I believe that's more the intent of the money then to try to provide people with the equivalent amount of fish they might have caught

Thanks for your time and effort on this

Have a great day

From: Jenny Nakadot
Sent: Tuesday, June 20, 2023 2:34 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: ADFG: attn Darian Jones, comment for PWS 2018,2020 disaster relief

To Whom It May Concern,

I would like to provide comment on the 2nd draft for the disaster relief spend plan for Copper River, Prince William Sound area for 2018, 2020. As a permit holder in area E, it is of great importance that I share my concerns about this relief plan.

Please see below:

Relief letter

This letter objects to the second draft plans' move to a tiered system of payouts of relief funds for 2018 Copper River and 2020 CR and PWS seasons in Area E. I support an equal share payout.

I am worried that the loudest voices in favor of a tiered system here have the most to gain personally and are not considering the effect on their fellow fishers and the fishery in general. Although I appreciate that the second draft plan is not fully based on quartile distribution I still think it is flawed in that it doesn't provide relief in an equitable way. Every fisher has a baseline expense every year, regardless of their tier status. We all have to pay for fuel, insurance, boat repairs, food, nets, etc... And most of us have a permit and boat payments as well. Those bills always must be paid. What's left is what we live on. In a disaster year as a lower quartile fisher you're unlikely to have anything left after bills, but high quartile fishers will. So those fishers are less affected by low return years. The argument that those that historically make more money in the fishery have a higher investment in the fishery is flawed. In fact those with higher quartiles have likely paid off their permit and boat loans already and so their expenses are lower.

The favoring of higher production fishers is detrimental to the fishery and the fleet in several ways.

First, the graying of the fleet. New young fishers without a dynastic connection to the fishery will not make it in this industry if they're cut out of vital relief funds. These funds could save their operation, which is likely running on tighter margins since it's not established yet. There is decreased motivation for new fisher to get into the fishery if they know they won't be supported in disaster years.

Second, government relief should support a diverse and healthy fleet, not continue to bolster high yield and established fishers. Paying out more to the high quartile fishers is rewarding them for being effective fishers, not relieving them in a disaster. Why is the state's structure, rewarding high producers and punishing lower producers?

Third, this measure sets a precedent. Although quartile based distributions currently have precedent, I would ask you to consider what precedent might be set for the future by the decisions made in this process. Will we choose to reinforce the status quo that rewards established fishers or will we treat everyone equally and encourage the growth of the fishery?

Additionally there is a flaw in the quartile calculations for newer entrants in this proposal. If someones first year was 2018, as mine was, they do not have a five year catch history. Are they automatically put in the lowest quartile? Or the average? One could use the five years since as catch history, but even then no ones first year

is their best as they are learning the ins and outs of the fishery. If they put the effort in that year, they should be eligible for relief.

In conclusion I would like to encourage those in decision making positions to consider returning to an equal share payout. It's fair. It's simple. It more effectively helps those that are in more need of relief. It sets a precedent of fairness and consideration for the future.

Sincerely,

Jenny Nakao

From: geoff gross
Sent: Tuesday, June 20, 2023 1:39 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Disaster relief Copper River\Prince William sound 2018, 2020

I am in favor of equal pay equal shares as a permit holder. I suffered financial problems due to the lack of fish and fishing opportunities. In 2018 and 2020 seasons.

From: AL KAPP
Sent: Tuesday, June 20, 2023 11:39 AM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: comments on PWS fishery disaster plan

I don't support any inclusion of the cost recovery catcher boats or the purchasing cost recovery fish buyers into the disaster plan. The PWS hatcheries, that make possible the cost recovery fish, are not included in this disaster mitigation, so the catcher boats and buyers of the cost recovery fish shouldn't be included either.

Alan Kapp

From: Benjamin lustig
Sent: Tuesday, June 20, 2023 11:12 AM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Pws fisheries disaster fund

Hi I'd like to submit that the payments should be equal. When the flats are bad it puts pressure on western prince William sound. Also if the people that catch the most get more disaster relief it makes the little guy that's hurting the most miss out even more. If you're historically a highliner, you're doing alright. If you aren't, you need relief. Also if we change from the original plan the real winner is going to be the committee that makes millions on calculating the new payments instead of fishermen. That's my two cents.

Thanks,
Ben Lustig

From: Rita Spann
Sent: Tuesday, June 20, 2023 12:30 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Comments on fisheries relief

To ADF&G,

I'm writing to encourage the Department to adopt an equal share allocation of fisheries disaster relief funds. The tiered system is needlessly complicated. Every area E drift fisherman suffers on a bad year. Coming up with equations to account for who suffered more will only result in bitterness and animosity in the fleet. Distributing equal shares of relief funds is the only equitable way to proceed.

I strongly support the inclusion of direct relief to the Marketing Association.

I do not see a need for the specific allocation of funds for crewshare payouts. Typically captains who hire crew pay their crew members an agreed upon percentage of the catch in retros and relief funds. That is something that should be addressed in crew contracts by each vessel.

Thank you for your time,

Rita Spann
Area E permit holder

From: Alaska Fishing
Sent: Tuesday, June 20, 2023 1:34 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Re: Disaster relief Copper River Prince William, Sound, 2018 2020

Due to the poor biomass returns, I have faced financial hardships during these two past seasons (2018, 2020). I am in favor of equal pay for all sides of the fishery.

From: Chelsea and Ben Dubbe
Sent: Tuesday, June 20, 2023 11:54 AM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Second draft spend plan

As an area E permit holder and vessel owner, these are my comments on the second draft spend plan.

I am in favor of a tiered distribution plan for permit holders, similar to as was amended for in the second draft spend plan. This is because of the vastly different amounts of investment and effort expended throughout the fleet. However, as the second spend plan is written, it groups all new permit holders with lower producers. This makes no sense to me, especially since there now have been several seasons since 2020.

I propose that for new entrants into the fishery, landings from 2021 and 2022 be used in place of/or in combination with the five year history requirement.

This would be a more fair distribution of funds than just incorrectly assuming that newer fisherman produce less. It is also true that newer fishermen generally have higher loan payments and startup expenses and were therefore hit harder by the disaster. Fishermen without the five year catch history have also been discriminated against by the vast majority of disaster funding since 2020.

My second comment has to do with the change in crew share percentage from ten to five percent. This is inconsistent with the tiered funding allocation amended for in the plan. If someone didn't have crew, then their share shouldn't be affected. If a person did have crew, then that share should also be tiered to be consistent. The way it is currently written effectively halves the share for crewmembers for the sake of simplification.

Thank you for your consideration.

From: Nathan
Sent: Tuesday, June 20, 2023 10:49 AM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Comments on disaster relief second draft spend plan

Thanks for the opportunity to comment.

I am writing in favor of equal splits of disaster relief money for all permit holders. New permit holders that have startup expenses and are unfamiliar with the fishery were likely disproportionately effected by the run failures. Therefore it doesn't make sense to reward people less effected by the disaster and reward people who were less effected. It's fair and common sense policy to revert to the original equal split distribution as a run failure is much more devastating to a first year fisherman buried in debt than an established highliner. Thank you for your consideration.

NATHAN DUNLON
Area E drift permit holder since 2018

Sent from my iPhone

From: Nathan Cook
Sent: Saturday, June 17, 2023 3:28 PM
To:
Subject: 2 round allocation plan

I would like to speak in support of distributing equal payments to all affected s03e fisherman.

The only fisherman suggesting performance-based payments have been fishing for many of the good years and have long since been collecting money on great seasons, enabling them to make significant investments in boats and gear.

I bought in with my own money in late winter of 2018. I know many other young guys who bought into the fishery during the recent bad years. They haven't had the benefit of fishing several good years of fishing. So, in a performance-based allocation plan, they would receive a much smaller allocation at a time when they are struggling to make a profit.

I believe that grant programs shouldn't be designed around making wealthy people more wealthy, but instead should support all fisherman and women in the fleet equally. That said, I propose payments be split equally amongst all affected 2018 and 2020 participants.

Thank you,

Nathan W Cook--
Nathan.W.Cook

From: Darin Gilman
Sent: Monday, June 19, 2023 12:12 AM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: 2nd draft plan

In reading the second draft for the spend plan, I believe that a great compromise been reached. With the inclusion of minimum base payment, new entrants are not being excluded nor left behind. The tiered approach compensates the businesses that were most impacted by the disaster, based on their efforts in the fishery.

Some members of the community argue that the tiered approach is not fair as some fisherman have breakdowns, health issues and life events that prevent them from fishing. However, this is why a five year average is implemented, in order to ensure that one bad year does not weigh too heavily on one's overall record. I have personally endured multiple seasons with malfunctioning motors and other miscellaneous breakdowns that have prevented me from fishing.

These complications are an element of the business and lifestyle, fishermen need to take appropriate precautions for these inevitable situations. Continued breakdowns in consecutive seasons could be an indication of an individual inadequately maintaining their equipment. When patterns emerge or are repetitive, it would be careless to boil it down to 'bad luck'.

My final concern here is that the majority of the fishermen who are in favor of second draft plan, are currently fishing. They do not have the time to provide further comments to this draft. If the voice of those wanting to receive an equal share speaks louder than those advocating for a tiered plan, it is because they are in town advocating for the equal share concept. It is imperative that we compensate those that are out fishing, providing for our community and economy, in an appropriate manner.

Thank you for your time,

Darin Gilman

Sent from my iPhone

From: Eric Carpenter
Sent: Sunday, June 18, 2023 9:55 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Copper River dispersement plan

The new draft spend plan for disaster relief does away with equal splits and gives more to permit holders with higher historic harvest. By going away from equal splits you are giving more money to the people who it will help the least. The idea of disaster relief is to help people at the bottom overcome adversity/disaster , by taking away the equal splits you are giving more money to the top earners in the fishery, the people who have more money to begin with.

Thanks

Eric

From: Antonin Kuzmin
Sent: Saturday, June 17, 2023 3:36 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)

I support the second draft plan

From: Paul Laca
Sent: Sunday, June 18, 2023 8:26 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Disaster spending plan

What happen to an equal split? Let's just get this done. Enough with the greed out there.
Thanks for your time.
Bodie, Whitney

From: Guido Casciano
Sent: Sunday, June 18, 2023 9:38 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: 2018/2020 Copper River and PWS Draft Spend Plan

After sending comments earlier today I would like to add some additional ones after thinking some more about it. I feel strongly you should revert back to your original spend plan where everyone receives an equal share. I get that maybe no plan is FAIR but equal shares are the most fair in my opinion. As I have said earlier, you are making stuff up as you go along in trying to respond to demands of probably a minority of simply greedy fishermen. Think about each individual's fishing history and how each year's gross revenue can be shaped by events totally beyond their control, resulting in a very poor season. The overwhelming majority of us work hard each and every year, out there to feed our families, simple as that. But things happen. They can become ill suddenly and have to quit fishing. A child or a spouse could have a medical issue demanding their full attention. People get injured, they blow an engine which can not be replaced sometimes for months. On and on and on, shit happens. Fishermen who have endured these types of hardships are being punished under your current spend plan when in fact they likely are in greater need of these disaster funds than the rest of us lucky ones. I personally know of 3 scenarios of friends who have made next to nothing on a given year. One had a teenage son in need of a heart transplant. Another needed to attend to his mother who was dying of cancer. Another suffered a heart attack. That's just 3 that I know of out of a fleet of 550 or so.

So I will reiterate what I wrote in my previous comments. I think equal shares would be preferred but if you absolutely are set on some sort of tiered payment scheme, please keep the disparity between the shares to a minimum. Keep in mind everyone suffered equally dismal gross fishing revenues in 2018 and 2020, not just the highliners.

Thank you again for considering these additional comments. Richard Casciano

Sent from my iPad

From: Bill Craig
Sent: Sunday, June 18, 2023 7:35 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Copper River and PWS disaster relief plan

I support the original equal split among all participants.

If there is a tiered allocation, please use the top three of the previous five years. This will be more fair to newer players and those who missed a season or two due to medical or mechanical issues.

Thank you. Bill Craig.

From: eatAk salmon
Sent: Sunday, June 18, 2023 7:15 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Equal split please

I hear that the draft for the disaster relief in area E is not equal. I have been fishing for years and years and that's not right. Needs to be an equal share to all that fished in the years of the disaster. No need to slow things down. Just help the fleet. Thanks for your hard work.

Thanks

Paul

thank you,
Paul and Whitney

From: Guido Casciano
Sent: Sunday, June 18, 2023 2:06 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Comments on spend plan for 2018 2020 pws and Copper River disaster funds

CREW SHARES.....This notion of setting aside 5% for crew is just nonsense. If a fisherman employed a crew, that payment should come from his or her final share. The vast majority of drift gillnetters do not employ crew so why are you proposing that it comes out of our share.INSANE!

MARKETING ASSOCIATION.....They in no way deserve a portion of the disaster funds. They currently have \$1,000,000 or very close to that in their bank account. Ask them if you don't believe me. During our years of very poor fishing they still received their 1%.This may be beside the point but they have had no success over the years in improving our grounds prices. They simply can not overcome low salmon prices considering the glut of fish from Bristol Bay as well as the enormous numbers of hatchery production from Japan, Chile, Norway and Russia that are competing with us in the world market.

ALLOCATION AMONGST FISHERMENMost of us find it interesting that "equal shares" went out the window so quickly. Most everyone that I know was in favor of equal shares. I for one would likely benefit with spend plan 2(now in place) as I have fished for 35 years and my catch record has been good. My sense of things is that you had comments from the "super high liners". I get their point, they want more for themselves. However now you guys have put yourselves into a situation where you are "picking winners", not a good thing. Not sure about what your "hybrid plan" actually is since you didn't give us any hard numbers. Furthermore you guys are now to the point where you're making this stuff up as you go along. The whole point of equal shares was to avoid that. I guess if you are determined to move forward with the "hybrid plan" I would only hope it be moderated as much as possible with an outcome where the disparity between the high and low shares is modest and not extreme. Thank you for considering these comments.
Richard Casciano

Sent from my iPad

From: Kelsey Opstad
Sent: Sunday, June 18, 2023 1:20 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Comment on disaster relief

Greetings! As a 10-year permit holder I oppose the second draft of Disaster Relief regarding harvesters. I support equal shares to permits that were fished in 2018 and 2020.

Here are some bullet points to support my opinion.

- ALL fishermen have operational expenses regardless of catch and success. Permit payments, boat payments, fuel, spare parts, etc.

- Small operations make less money in general, not because they are lazy or unmotivated, but because their equipment is less efficient. I have a small boat, and I work twice as hard to make less money every year. Pitching fish, delivering more

often, being unable to travel with weight on. We are all trying to do our best with what we have.

- New operations are the most at risk for failure. They will also be in the lower-income bracket.

- The largest impact I have personally experienced is the lack of extra money for boat maintenance. After major payments were made there was nothing left for maintenance. This has had long lasting repercussions. As I write this letter I am in the process of an in-season engine swap, because my old engine blew up. It would have been changed out years ago were it not for my lack of income.

- It is unethical to favor those in the fleet who are already better off financially. What they are suggesting is not disaster relief, it is a free payday. I am not asking for a payday. I am asking for relief money to do essential maintenance on my boat so that I can continue to fish, and continue the way of life I have worked so hard to attain.

I hope you will consider these points and come to a conclusion for fair and ethical assistance to our fleet. Thank you for your time.

Kelsey Opstad

From:
Sent: Sunday, June 18, 2023 10:57 AM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Repief

Equal shares [REDACTED] in Cordova the rich get richer and draws out this process even longer

Sent from my iPhone

From: fred marinkovich
Sent: Sunday, June 18, 2023 11:00 AM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Second draft spend plan

Karla Bush,

I am in support of the second draft spend plan. Thank you for your time and effort,

Fred Marinkovich
Permit# SO3E

From: Matt Adams
Sent: Sunday, June 18, 2023 10:33 AM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Disaster Relief Fund Second Draft Spend Plan

Hello, my name is Matt Adams from Cordova, Alaska. I am 29 years old, a father of two, and a dual permit holder in both the Area E drift gillnet and seine fisheries. I am writing you today to urge you to reconsider the second draft of the spend plan and to return it to an equal share amount as proposed in the first draft. As a seiner who took part in the 2016 pink salmon fisheries disaster I know first hand the disaster relief process. I urge you not to make the same mistakes as what we're made in 2016, where the state of Alaska chose to distribute funding unequally and favor the top producers in the industry. As a young fisherman who got into seining in 2013 I have been slowly building my business and have very large annual payments. When 2016 came I stuck it out and fished every day possible and was unable to generate enough income to make my payments. Many of the top producers saw the writing on the wall early in the 2016 season and left the area and state very early to seek other fishing opportunities as many hold additional permits. Years later from the 2016 disaster relief distribution I was awarded approximately 30k while many of the top producers were awarded upwards of 200k. This distribution curve absolutely screwed the little guy such as myself, who a salmon run failure was much more devastating to, compared to someone who had other fishing opportunities. From this experience I urge you to reconsider a spend plan that does not support a first year fisherman buried in debt and whom a fisheries disaster is likely to put them out of business. New entrance to the fisheries need the state's support in times like these, not the established fisherman near retirement age. While I do not believe an equal share amount is completely perfect, it does eliminate factors of greed and unequally. The equal share model best suits fishermen as a whole and will help support everyone involved in the fishery.

Cheers, Matt Adams

From: Stephen Day
Sent: Saturday, June 17, 2023 9:59 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Second draft CR and PWS spend plan comment

To whom it may concern,

This letter objects to the second draft plans' move to a tiered system of payouts of relief funds for 2018 Copper River and 2020 CR and PWS gillnet seasons in Area E. I support an equal share payout.

I am worried that the loudest voices in favor of a tiered system here have the most to gain personally and are not considering the effect on their fellow fishers and the fishery in general. Although I appreciate that the second draft plan is not fully based on income distribution I still think it is flawed in that it doesn't provide relief in an equitable way. Every fisher has a baseline expense every year, regardless of their tier status. We all have to pay for fuel, insurance, boat repairs, food, nets, etc... And most of us have permit and boat payments as well. Those bills always must be paid. What's left is what we live on. In a disaster year as a lower quartile fisher you're unlikely to have anything left after bills, but high quartile fishers will. So those fishers are less affected by low return years. The argument that those that historically make more money in the fishery have a higher investment in the fishery is flawed. In fact those with higher catch history have likely paid off their permit and boat loans already and so their expenses are lower.

The favoring of higher production fishers is detrimental to the fishery and the fleet in several ways.

First, the graying of the fleet. New young fishers without a dynastic connection to the fishery will not make it in this industry if they're cut out of vital relief funds. These funds could save their operation, which is likely running on tighter margins since it's not established yet. There is decreased motivation for a new fisher to get into the fishery if they know they won't be supported in disaster years.

Second, government relief should support a diverse and healthy fleet, not continue to bolster high yield and established fishers. Paying out more to the higher catch fishers is rewarding them for being effective fishers, not relieving them in a disaster. Why is the state's structure, rewarding high producers and punishing lower producers?

Third, this measure sets a precedent. Although landing based distributions currently have precedent, I would ask you to consider what precedent might be set for the future by the decisions made in this process. Will we choose to reinforce the status quo that rewards established fishers or will we treat everyone equally and encourage the growth of the fishery?

Additionally there is a flaw in the tier calculations for newer entrants in this proposal. If someones first year was 2018, as mine was, they do not have a five year catch history. Are they automatically put in the lowest quartile? Or the average? One could use the five years since as catch history, but even then no ones first year is their best as they are learning the ins and outs of the fishery. If they put the effort in that year, they should be eligible for relief.

In conclusion I would like to encourage those in decision making positions to consider returning to an equal share payout. It's fair. It's simple. It more effectively helps those that are in more need of relief. It sets a precedent of fairness and consideration for the future.

Stephen Day

From:
Sent: Saturday, June 17, 2023 9:38 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Copper river disaster

Hi,

I am in full support of the tiered approach for disbursing payments. I suffered and fished through the entire 2020 season. Meanwhile many went home and did other jobs instead. The disaster relief from the Magnuson Stevens Act was meant for fishermen who fished and suffered through. Thank you.

-Larion D Kuzmin

From: Sherman Powell
Sent: Friday, June 16, 2023 9:57 AM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Disaster spend plan comments

I am writing to address the disaster spend plan for 2020 Copper River and PWS.

I'm in favor of a more equal share distribution among fishermen for a reason that relates to the financial strength or fragility of the fleet. When I bought in, an old fisherman told me this:

1. It doesn't matter how many fish you catch
2. It doesn't matter how much money you make
3. The ONLY thing that matters is how much money you *take home*.

Basing large government payouts on only the metric of "how much money a boat made" skews the economic decisions that fishermen and the fleet as a whole might make. This kind of government incentive promotes large fuel consuming boats that might not be correct for the future fishery to be stable. It removes the responsibility for balancing business expenditures and income and solely focuses on income. This I believe has the potential to increase the fleet's economic fragility by promoting unsustainable business models.

I want this fishery to be around for my children. Over capitalization of the fishery is not supportive of a good long term economic model, and I believe the metrics used to determine disaster aide have the potential to de-emphasize stable business decisions in the quest for short term government handouts.

Thanks for your time,
Sherman Powell

From: Riley Howard
Sent: Saturday, June 17, 2023 4:40 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: 2018,2020 copper river pws disaster spend plan

Hello,

I'm an Area E gillnetter. I'm actually out fishing right now. After reading through the latest draft of the spend plan for disaster relief I would like to say that I completely agree with CDFU that equal shares would be the best route. I bought my boat in 2020 and have leased an emergency transfer permit in 20,21 and 23. 2022 I worked as a crewman because I was still working through my bills from 2020. I also crewed in 2018 and that year was almost equally as hard on my finances especially as a crewmember making 12.5 percent. As a relatively new fisherman I can tell you how hard of a business it is to start out in especially on a disaster run with terrible prices. Also since it was my first year and I couldn't show a loss I wasn't eligible to receive any cares act money. I understand that there's two sides to every argument, but I believe that equal shares would do the most good for those that need it the most and also it would be the simplest and quickest to allocate. It's already been 3 years since 2020 and 5 years since 2018 and although through hard work I've mostly recovered financially it still is having a negative impact on my finances and my business and the sooner we can get this figured out and get the money to the people that need it the better. I would also like to advocate for crewmembers to receive the percentage that they were paid the year of the disaster and for those that were leasing emergency transfer permits to receive the same amount as everyone else.

Thank you for your time,

Jim Riley Howard

From:
Sent: Saturday, June 17, 2023 8:15 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Comment 2018 2020 PWS/Copper

Hi,

I am in full support of the tiered approach for disbursing payments. I suffered a fished through the entire 2020 season. Meanwhile many went home and did other jobs instead. The disaster relief from the Magnuson Stevens Act was meant for fishermen who fished and suffered through. Thank you.

Maksim Kuzmin
F/V Epic

To Whom It May Concern,

I am writing to express my opposition to the tiered payment system proposed in the new draft of the spend plan. This plan is fundamentally unfair to those who entered the fishery between 2017 and 2020 who are the most severely affected fishermen by the recent disasters.

First to become established in a fishery requires a massive outlay of capital, that those who have a track record of production have paid off, much of which generally can not be paid for with secured credit that has low interest rates. For instance between 2019 and 2021 I spent over \$18,000 in cash purely on used nets, which are required to be competitive in the fishery. These had to be paid purely with cash as they were private party sales, to use a credit card I likely would have had to pay double in addition to the higher interest rates required. Established fishermen have already paid for nearly all their gear and are in the game of upgrading, which allows them to catch more fish.

Second, since the disasters permit prices have fallen dramatically, those who bought in have seen their asset value drop by about a third since 2017. This means new entrants to the fishery now have one of their most valuable assets severely devalued, this means it is harder to obtain credit, and causes more financial hardship than someone who is established and were able to pay off their permit with high landings.

Lastly fishermen who are established and have the highest earnings should be in a more stable financial position than new entrants to the fishery, fishing is inherently risky, and we all know that run failure is always a possibility, therefore the prudent fisherman who has had good fortune and full nets will save and invest to hedge against run failure. New entrants to the fishery often do not have that ability because they are still trying to pay off boats and permits,

It is clear that new entrants to the fishery are the most vulnerable to run failures. **Because of this I favor equal payments to all permit holders with landings in affected years and fisheries.** However if tiered payments are made, I recommend that new entrants to the fishery be placed in tiers based on their previous landings, combined with the average landings from previous years. For instance if someone's first year of fishing was 2019, for the 2020 disaster, they are placed in the tier based on the mean from their 2019 landings combined with the average value of the fleet for 2018, 2017, 2016 and 2015. This would be a good compromise.

Thank You for Your Time,
Patrick McCormick

From: Afanacy Reutov
Sent: Saturday, June 17, 2023 3:34 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)

I support 100%

From: vladimir kuzmin
Sent: Saturday, June 17, 2023 3:34 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Draft

I Vladimir Kuzmin support second draft

From: Ketch Em
Sent: Saturday, June 17, 2023 3:16 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: 2018/2020 prince william sound salmon fisheries disaster

I am in support of the second draft plan as written.
It is a great compromise with a base payment and a tiered approach.
Looking forward to seeing this implemented.
Thank you
Andrew Eckley
Area E Gillnet Fisherman

From: micah ess
Sent: Saturday, June 17, 2023 2:03 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: 2018/2020 CR/PWS Disaster Spend Plan Comment

To whom it may concern,

I'd like to voice my support for the tiered allocation approach , with the caveat that new entrance to the fisheries are disproportionately affected due to a lack of catch data. They might be top-tier fishermen but are underrepresented because of an insufficient amount of data before the disasters. I propose that if a fisherman bought in during the disaster year, the department should consider catch histories after the disaster years as well for them to determine their relative performance as a fisherman so they don't get misrepresented as a low performer.

A number of years have gone by since the disaster years so that data is available and might help to keep this allocation fair for everyone.

Top tier fishermen work very hard in the month of June keeping canneries running and providing economic input to this community while some fishermen who have other revenue streams or are retired simply don't fish.

It would be tragic for the fisherman who decided to work for weeks and months away from their families and obligations to continue to fish during a bad year to receive the same compensation as someone who simply went out for two or three openers and then called it quits.

If a format to use catch histories after disaster years proves problematic for you, I'd recommend to stick with the second draft of your spend plan in lieu of changing it because there is not very much precedence in the national workplace for brand new workers to get compensated as much as someone who has put in decades of work already. understand that no plan is perfect, but compensation at a fundamental needs to be tied to performance because of the vast spread in income that this fishery sees between its lowest and highest earners.

Thank you for your time and effort on this project,

Micah Ess

From: Phyllis Shirron
Sent: Saturday, June 17, 2023 12:25 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Second Draft Disaster Relief
Attachments: Second Draft Disaster Relief.pages

I oppose the second draft of Disaster Relief regarding harvesters.

I support equal shares to permits that were fished in 2018 and 2020. Firstly, the drift fleet is a limited entry fishery which means investment in and equal risk/reward for participants. A tiered system regarding catch history is an action utilized by quota fisheries. They are not synonymous and should not be treated as so.

Secondly, a run failure is devastating to new entrants, or one experiencing equipment or health failures. Business analytics reveal that the first 2 years of proprietorship are the least secure and most likely to fail. Historically the intent of disaster relief funds is to 'prevent economic failure for individuals or businesses'. The definition of relief is 'assistance given to those in special need or difficulty'. If adopted, this action will divest funds from the majority of our fleet which will not promote economic stability or growth, and is antithetical to disaster relief.

The proposed second draft disproportionately favors tenured fishermen. The comments exemplify the greatest financial security of the previous five years; 56 of 456 permits in 2018, and 57 of 457 permits in 2020. Catch history is irrelevant in this scenario because the entire fleet suffered, causing significant and negative economic effects for individuals, communities, and related entities. To ensure recovery, relief money should be distributed equally amongst stakeholders who participated.

I agree with the other aspects of the second draft.

Thank you for your time,
Phyllis Shirron

From: Kari Gilman
Sent: Saturday, June 17, 2023 11:36 AM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: 2018 and 2020 2nd draft plan

To whom it may concern,

I am in support of the second draft disaster allocation plan. I think it is better suited to reward those who stuck it out in the fishery and attempted to catch fish during the season. As a crew member of a commercial fishing drift gillnet vessel during those two seasons I feel 5% is a reasonable amount to allocated due to lack of overhead crew members possess.

Thank you

Sent from my iPhone

From: Michael Bowen
Sent: Saturday, June 17, 2023 10:12 AM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: 2018 and 2020 Copper River and 2020 Prince William Sound Chinook, sockeye, and chum salmon fisheries Disaster Relief Fund Second Draft Spend Plan Comments

Hello, Darion

I commented on the first draft spend plan and advocated for a tiered approach instead of an equal split. I wont rehash all the reasons why. After reviewing the 2nd draft spending plan I am in support of it. I think is a good approach and compromise. The other adjustments to crew and marketing association I am in agreement with as well. Thank you for the opportunity to comment on the 2nd draft spend plan. Good luck,

Michael Bowen

From: Marc Carrel
Sent: Friday, June 16, 2023 2:50 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Comments on 2018 and 2020 Copper River and Prince William Sound disaster spend plan

To whom it may concern:

I am writing to express my opposition to the second draft spend plan for harvesters in the 2018/2020 Copper River/Prince William Sound salmon disasters. Specifically, I am opposed to a tiered payout based on catch history.

If the goal of taxpayer funded disaster relief is to support the harvesters who are struggling the most, then basing payouts on catch history completely misses the mark. Using that system, the most money will go to the fishermen who already have made their fortunes and don't need more, while new entrants to the fishery will be penalized.

When I first entered the PWS drift gillnet fishery 15 years ago, I was in a lot of debt and had poor equipment. I couldn't afford to lose a season back then and had a fishery disaster occurred in my first years in the fishery, I may have been forced out of business. Disaster relief would have made all the difference for me then and it would have really hurt me to receive less funding because of a missing catch history or because I couldn't fish as competitively then as I do now. My business is in a much more secure situation now, and I would much rather see more of the funding go to the new entrants of the fishery who may be struggling to make ends meet because of the 2018 and 2020 disaster years.

Basing payouts on catch history is a flawed approach and rewards the people who likely need it least while missing those who likely need it most. Because it is so difficult to assess everyone's financial situation fairly, I support staying with the equal shares distribution in the initial spend plan.

Marc Carrel
PWS salmon drift permit holder since 2009

From: Jeff Olsen
Sent: Friday, June 16, 2023 2:47 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: 2nd draft spend plan

I support the 2nd draft spend plan, it's the most equitable. Equal shares are not equal, it rewards not working hard.
Jeff Olsen

From: Nelly Hand
Sent: Friday, June 16, 2023 1:11 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: PWS Disaster Relief Comment

I am commenting in opposition to the second draft spend plan for harvesters and would like the initial equal shares plan to be implemented. This hybrid approach is far too skewed towards an unfair tiered payment approach. This drastic change to the spend plan, during the fishing season, is a complete disservice to the public process that created the initial spend plan.

My opposition to the second draft spend plan centers on the fact that any tiered payment approach based on catch history will be flawed.

Basing the catch history on the Copper River district doesn't account for how fishermen in Prince William Sound were affected by the 2018 and 2020 Copper River closures. The CR/PWS drift fishery is very dynamic. There are many new entrants and folks investing heavily into their operations. Also, there are many retirees and people holders that don't fish as hard as they used to. There is no way for a 5 year average to account for these changes.

A tiered payment system will be flawed and leave many permit holders without relief from this disaster.

Thank
Nelly Hand

you,

From: Jacob Privat
Sent: Wednesday, June 14, 2023 4:14 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Fishery Disaster Spend Plan Comment

I am writing to support an equal share spend plan. I have been an area E drift permit holder since 2018. Two of my first five seasons have been declared disasters years. Any tiered system based on catch history would not benefit any new entrants into the fishery - especially those just starting out. Thanks for your time and effort.

-Jacob Privat.

From: Jacob Privat
Sent: Thursday, June 15, 2023 11:57 AM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Spend Plan for 2018/2020 CR/PWS Disaster Funding

As a stakeholder in the Area E salmon fisheries I am writing in support of an equal share pay allocation. A tiered system is flawed and does not provide the fleet with appropriate disaster funding. A permit holder who bought in to the area E fishery in 2018 is under more financial stress than a permit holder with a longer catch history. New entrants should not be penalized for investing into the fishery. Those asking for a tiered system are in favor of a "high-liner handout." If a tiered system is being considered I believe that it should factor in the burden of starting a business under disaster worthy conditions.

-Jacob Privat
FV Acadian.

From: Michael Leese
Sent: Friday, June 16, 2023 1:54 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: 2018 and 2020 disaster relief allocation

As an Area E permit holder I'm opposed to the revised disaster allocation plan and request reverting to the initial equal shares plan.

Using past catch numbers to gauge relief, in my opinion, is a flawed metric for allocation. Many of the fishermen most in need of financial help are those who bought in more recently and at higher prices. Rewarding entrenched "veteran" permit holders, who many cases have their operations paid off due to inheriting permits through family or the State of Alaska back when they were free, makes little sense.

There are myriad variables that can dictate whether or not a fisherman is successful. The industry is a gamble by nature and we take our licks along with a big season here and there. Speaking for myself, two of my last three years of gillnetting have been cut short by catastrophic breakdowns, resulting in much lost fishing time and income. If this summer doesn't produce some fish I'll have to take a hard look at different career options.

Trying to allocate funds based on certain years catch numbers will always result in some people getting the short end of the stick. I would love to elaborate more on the topic at hand but I'm out on the grounds with my net in the water trying to make ends meet and pecking away on my phone to write to you. Let's not overcomplicate this.

Equal payouts for permit holders who fished during the disaster years.

Thanks for your consideration.

Michael Leese

From: Kenneth Jones
Sent: Thursday, June 15, 2023 11:54 AM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: PWS 2018 and 2020 spend plan draft 2 comments

Karla,

I enthusiastically support this new draft, thank you ADFG for listening to the comments made in round one. It is good to see the changes and this looks like a much more equitable spend plan for all those involved. I would like to comment on the research component still getting 11% seems high, I would like to see this reduced and participants receive more as the harvesters were the ones most drastically effected.

I appreciate greatly this tender pool addition and missed it in my first comments but I would also like to see this tender % of the processor portion raised from 4% to 10%, the tender operators and crew saw a very drastic cut in days and some like my vessel lost our contracts completely in 2020 due to the condition of the fishery. I would like to see the criteria for inclusion be modified to include operators who were cut completely from the 2020 season, currently this draft would exclude my vessel from a share for 2020 despite that it was under contract for the season and just never used due to the poor run.

The base payment plus tiered approach for harvesters needs to be protected and looks good to me. I do wish to see that the final draft spell out "Copper river & PWS chinook sockeye and chum" was the label for the 2020 funds, but in reading the detail I understand that it's all area E so that is more semantics than anything.

5% for crew looks good as only half the fleet uses deckhands, I appreciate the crew pool being separated and putting the onus on the deckhands to apply for themselves instead of just taking it off the captains settlement.

Thank you for your efforts on this and please move this spend plan forward with just the above minor changes.

Kenneth B Jones

From: Darin Gilman
Sent: Thursday, June 15, 2023 12:26 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Second Draft Plan

I am pleased to hear that Fish and Game listened to the input from the initial draft plan. The quartile system for disbursement is an equitable way to disperse the disaster funds and reflects people's commitment to the fisheries. Also applaud that the crewman portion was lowered to 5 percent reflecting that a vast majority of fishermen do not have crew in the Area E Drift fleet. Only thing that I would like to be changed moving forward is the 11 percent for research seems high. Seems like an arbitrary number to have dedicated for research purposes. I do however support the idea of spending money on research for Copper River Sockeye Run Reconstruction. Thank you for your time and consideration.
Sent from my iPhone

From: Nelly Hand
Sent: Thursday, June 15, 2023 3:09 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Public Comment for Federal Fishery Disaster

My name is Nelly Hand, I own a boat and permit in the Area E commercial fishery. Please consider an equal pay out plan for the fishery disaster allocation. As a young fisherman in the fleet, I have an equal stake in this fishery and ask that you consider an equal distribution of funds.

Thank you,
Nelly

From: Hayley Hoover
Sent: Thursday, June 15, 2023 6:00 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Comment on 2018 and 2020 disaster relief

The new draft spend plan for disaster relief does away with equal splits and gives more to permit holders with higher historic harvest. This is unacceptable as it essentially screws over the newer entrants into the fishery who do not have a five year history. I am asking for the original equal split distribution as it was written previously. I hope everyone can agree a run failure is much more devastating to a first year fisherman buried in debt than an established highliner.

Thanks,
Hayley Hoover
Sent from my iPhone

From: Chris Bourgeois
Sent: Thursday, June 15, 2023 9:58 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: 2018-2020 disaster relief comment

I am for equal shared for all permit holders but if the tiered approach is used my only request is that new permit holders who bought in less the 5 years before each mentioned disaster year be given at the minimum a fleet average. It seems unjust that someone who bought in 2017 only get a three year catch report prior to 2020 with one of those catch report being a disaster year. I think many of the lower cost fishing opera in area E would greatly benefit much more from this type of relief vs rewarding higher shares to much more established fishermen.

From: Jack Broughton
Sent: Thursday, June 15, 2023 6:02 PM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Support equal payout amounts for PWS and copper river run failures

Fisherman newer to the industry are more susceptible to be financially burdened by a run failure than a permit holder that historically does well. Being buried in debt alongside a failed run has surely ended more dreams of running a boat than people that have loans paid off. I think that a tier based approach is flawed and support equal payout amounts.

Jack Broughton

From: jerry mccune
Sent: Friday, June 16, 2023 10:15 AM
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Shares

Equal shares would be faster and easier

Crew should come out of people that have crew not the whole settlement Jerry Mccune Sent from my iPad