



January 31, 2023

DRAFT Spend Plan for funds appropriated to address the 2020 Norton Sound, Yukon River, Kuskokwim River, Chignik, Southeast Alaska; and 2021 Yukon River salmon disaster determination. NOAA Fisheries has allocated \$55,928,849 for these salmon fishery disasters. The 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.

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

dfg.com.fisheriesdisasters@alaska.gov or by mail to:

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Comments must be sent by February 15, 2023, for consideration in the final spend plan.

Process to develop the spend plan: ADF&G posted an initial draft spend plan for public comment in September 2022 and received 27 written comments on the initial plan (Appendix 2). ADF&G revised the plan based on public comments and is requesting public comments on this second draft spend plan before the plan is finalized and submitted to PSMFC.

In response to comments received on the initial draft plan, ADF&G is recommending the following revisions:

Research

- The research theme for a Management Strategy Evaluation (MSE) analysis was not supported for the Southeast salmon fisheries because those fisheries are managed according to provisions in the Pacific Salmon Treaty. The revised draft plan limits the MSE research theme to the Norton Sound, Yukon River, Kuskokwim River, Chignik, and Yukon River management regions included in this fishery disaster.
- To expedite the administrative process for awarding research funds and maximize the time available to conduct research under the federal grant, ADF&G is proposing to identify and direct a portion of the research funds to specific projects directly in the spend plan and to allocate remaining research funds through a competitive process. Descriptions and preliminary cost estimates for research projects proposed by ADF&G that may be included directly in the spend plan are described in the attached Appendix 1.

Subsistence

- The Yukon River and Kuskokwim River subsistence allocations have been separated into two categories, one for the 2020 and 2021 Yukon River and one for the 2020 Kuskokwim River as suggested in public comment to reflect differences in fishery disaster impacts between the two

areas. Restrictions on subsistence fishing activities in the Yukon River area and estimated losses on the Yukon River were much greater than those estimated for the Kuskokwim River. The estimated losses on the Yukon River were approximately six times greater than those on the Kuskokwim River in 2020 and the 2021 losses on the Yukon River were approximately three times greater than the 2020 Yukon River losses.

- A provision that provided for an additional subsistence share for households with an annual income at or below the poverty level was removed as requested in public comment.

Communities

- Community eligibility criteria were modified to specify that port of landing information from salmon fish tickets would be used instead of Commercial Operator's Annual Report (COAR) buying data to identify which communities are eligible to apply for community designated funds.
- The third eligibility criterion for communities was simplified to remove the \$10,000 or greater threshold because further evaluation of available data indicated that all communities where salmon landings occurred that had a loss of fishery value in the disaster year had losses greater than \$10,000.

Commercial fisheries

- References to exvessel value were replaced throughout the spend plan and clarified as the CFEC gross revenue estimates. Gross revenue estimates are calculated post-season and informed by the Commercial Fishery Operator Report (COAR) data.
- In all areas, funds are proposed to be paid to the person listed as the permit holder or the temporary emergency transfer permit holders (transferees) in the CFEC database. Permit holders who certified they were unable to participate in the fishery to qualify for an emergency transfer or permit holders who permanently transferred a permit away will not receive payments. This approach is proposed for consistency with recent Alaska fishery assistance programs.
- Based on public comment, clarified that all salmon species are included in the Chignik area fishery disaster and modified eligibility requirements to include all species of salmon. Included minimum payments for those who held valid permits in 2020 but did not make any landings in 2019 as per public comments.
- Based on public comments, the proposed allocations between the SE commercial fishery sectors are based on comparing the 2020 disaster year to the 2015-2019 average for chum, coho, and sockeye salmon and to the 2010-2018 even-year average for pink salmon.
- To simplify the information used for determining eligibility, the criteria for the SE commercial fisheries are proposed to be based on the salmon species included in the disaster that are the primary targets of each gear sector. Eligibility for the seine sector is proposed to be based on the value of pink and chum salmon; for the gillnet sector on the value of chum, sockeye and coho salmon; and for the troll sector on the value of chum and coho salmon landings.
- Allocations for SE vessel crew are proposed to be sector-specific rather than one pool of funds for all SE crew based on public comment.
- SE seine permit holder distribution is proposed to be equal shares for all eligible permit holders based on public comment.
- Based on public comment, processors will be evaluated in each region at the company level based on their federal operation identification number rather than at the facility level. Payments to processors

who qualify for funds in more than one region will be consolidated at the company level. These changes are expected to streamline the administrative and reporting processes.

Program Support

- ADF&G has determined a need for increased staff assistance to address the volume of work associated with this fishery disaster and is proposing to increase the funds for program support for staff working on fishery disaster plan development and implementation in coordination with Pacific States Marine Fisheries Commission from 0.1% to 0.2%.

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

1) assist fishery participants harmed by the 2020 and 2021 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.

Proposed allocations to project categories: The proposed categories and allocations reflect comments received from initial stakeholder input.

Category	Allocation	Estimated funds
Research	12%	\$6,697,062
Communities	3%	\$1,674,265
Commercial and subsistence participants	85%	\$47,437,522
Program support	0.2%	\$120,000
Total		\$55,928,849

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 is statewide and includes all species of salmon, specifically:

- chum and coho salmon in Norton Sound,
- Chinook and chum salmon in the Yukon River and Kuskokwim River,
- Chinook, chum, coho, sockeye, and pink salmon in Chignik, and
- chum, coho, sockeye, and pink salmon in Southeast Alaska.

ADF&G is not proposing to allocate research funding by individual fishery area in recognition that the cause of these fishery disasters spans multiple regions, and proposed research projects may provide information for more than one fishery area and/or salmon species.

The following research themes have been suggested by ADF&G staff and fishery participants as priorities for funding:

- a. Research that improves understanding of the relative importance of specific mechanisms that drive abundance of Alaska salmon, which could include:
 - i. how ocean/climate conditions impact future runs,
 - ii. the role of diet, health and disease on the survival and spawning success of Alaska salmon.
- b. Research that provides non-adult abundance estimates that can be used in developing or improving forecasting tools.

- c. Improved methods for assessing adult salmon abundance (e.g., chum salmon on Kuskokwim River and in Norton Sound region).
- d. Management Strategy Evaluation (MSE) analyses for salmon fisheries in the Norton Sound, Yukon River, Kuskokwim River and/or Chignik management areas that examine the risks and tradeoffs of different management approaches for mixed-stock fisheries to refine stock-specific management and understand impacts of various management actions under climate and environmental uncertainty. An MSE analysis is not proposed for the Southeast salmon fisheries because those fisheries are managed according to the provisions of the Pacific Salmon Treaty.

ADF&G is proposing to use a hybrid-approach for awarding research funds, where a portion of the research funds are directed to identified projects and the remaining portion would be made available through a Request for Proposal (RFP) process administered by PSMFC. Directing research funds to identified projects in the spend plan expedites the administrative process which maximizes the amount of time for investigators to conduct the research. The RFP process for recent fishery disaster research funds decreased the amount of research time available by ~1.5 years.

ADF&G is seeking comment on the proposed research projects described in the Appendix 1 of the spend plan. The proposed projects are responsive to the identified research themes and have been identified by ADF&G salmon research and management staff as regional priorities. The total estimated cost of all the proposed research projects is ~\$11.6 million, or 20.7% of the total disaster funds. ADF&G is requesting comment on whether some of the proposed projects should be prioritized and identified for funding directly in the spend plan. ADF&G is also requesting comment on whether the proposed allocation of 12% of the disaster funds for research should be increased and what proportion of the research funds should be allocated to projects that are identified in the spend plan versus funds for projects that would be identified through a competitive bid process.

Communities: Municipalities and boroughs rely on revenue generated from salmon landings and other economic activities related to the salmon fisheries. Fishery disaster funds allocated to communities impacted by the fishery disaster can only be used for managing, repairing, or maintaining approved infrastructure, services, or habitat that support salmon fisheries in the affected areas. Only communities that have a demonstrated loss of salmon landings due to the fishery disaster will be eligible to apply for community funds. Fishery disaster funds are Federal funds and cannot be used for cost sharing in other projects that are paid for by Federal funds.

Experience with recent fishery disasters has shown that not all communities eligible for fishery disaster funds are interested in receiving them given that they can only be used for approved projects through a subaward to the Federal fishery disaster grant. Therefore, ADF&G is proposing that community funds be made available through an open bid process for the communities that meet the eligibility criteria rather than designating specific amounts to the eligible communities. This will help ensure that community-designated funds are fully utilized and made available to communities that are interested in receiving them.

Proposed eligibility criteria for communities:

1. ADF&G fish ticket data must show that the salmon species included in this fishery disaster in the affected areas were landed in the community, based on port of landing, in either 2019 or 2020. The year 2019 is used for areas where there were minimal or no commercial fishery landings in 2020.

Area/Year	Salmon species
Norton Sound (2020)	chum and coho
Yukon River (2019)	Chinook and chum
Kuskokwim River (2019)	Chinook and chum
Chignik (2019)	All salmon
Southeast (2020)	Sockeye, chum, coho, and pink

2. Total value for those salmon landings in the community must have an average gross revenue value of \$10,000 or greater from 2017-2019.
3. Community must have a demonstrated loss in gross revenue value for those salmon species in 2020 as compared to the 2017-2019 average.

Based on these criteria, the following communities and/or their local boroughs may be eligible to bid for community-designated funds: Nome, Unalakleet, Emmonak, Fairbanks, Chignik, Kodiak, Sand Point, Craig, Haines, Hoonah, Juneau, Ketchikan, Klawock, Petersburg, Sitka, Wrangell, Yakutat, and the Metlakatla Indian Community.

ADF&G is proposing that bids for community-designated funds be limited to no less than \$15,000 to mitigate administrative burden and is seeking comment on whether bids should be capped and at what amount to ensure funds are distributed across multiple communities and fully expended.

Commercial and subsistence participants: This category includes commercial harvesters, crew, and processors in the Norton Sound, Yukon River, Kuskokwim River, Chignik, and Southeast areas. It also includes subsistence households that rely on subsistence fisheries in the Norton Sound, Yukon River, and Kuskokwim River areas.

- Commercial harvesters: Direct payments to commercial fishery permit holders and their vessel crew who are 18 years old or older and who meet all eligibility criteria in the relevant area. Commercial Fisheries Entry Commission (CFEC) permit data, fish ticket data from commercial salmon landings, and CFEC gross revenue value information will be used to determine eligibility and payment for permit holders.
- Processors: Direct payments to processing companies. COAR fisheries production and value data will be used to determine eligibility and payment for processors based on their federal operational identification number.
- Subsistence households: Direct payments to subsistence households that rely on subsistence fisheries in the Norton Sound, Yukon, and Kuskokwim River areas. Revenue losses in the subsistence fisheries were estimated using an average of the urban and rural food replacement costs for salmon species where harvest in the disaster year was at least 35%¹ lower than the previous five-year average (2015-2019). Available data show that the value of subsistence losses in the Norton Sound, Yukon River, and Kuskokwim River area in the disaster years were significant. In the Norton Sound area, the estimated replacement value of subsistence losses in 2020 were approximately 25% of the commercial fishery losses. In the Kuskokwim River area nearly all the estimated losses in 2020 were

¹ The 35% threshold is used in [NMFS policy guidance on Disaster Assistance](#) to determine whether a commercial fishery failure occurred.

in the subsistence fishery. Likewise, the estimated replacement value of subsistence salmon losses on the Yukon River in 2020 and 2021 were far greater than the losses to the commercial fishery.

ADF&G is not proposing to include subsistence as a category for direct payments in the 2020 Chignik and Southeast areas. The 2018 Chignik fishery disaster spend plan did not include subsistence as a category based on public input that providing funds for commercial permit holders and their crew was sufficient to mitigate subsistence fishery losses. The estimated replacement value of subsistence losses in Chignik due to the 2020 disaster was less than 2% of the commercial fishery losses. For these reasons, ADF&G is not proposing to include a subsistence category for the Chignik area in the 2020 disaster spend plan. Similarly, the estimated replacement value of subsistence losses in the Southeast area was less than 0.2% of the commercial fishery losses and subsistence fisheries in the Southeast region were not restricted in 2020. For these reasons, ADF&G is not proposing to include a subsistence category for the Southeast area in the 2020 spend plan.

Program Support: 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.

ADF&G is proposing to allocate commercial and subsistence harvester funds proportional to the estimated losses. The estimated loss due to the fishery disaster was calculated by subtracting the gross revenue value of the fishery in the disaster year from the previous five-year average (2015-2019) gross revenue value for the species of salmon included in the disaster.

Fishery	Estimated loss* due to fishery disaster	Proportion of total loss	Proposed allocation
2020 Norton Sound commercial chum and coho salmon	\$2,084,944	1.9%	\$921,972
2020/2021 Yukon River & 2020 Kuskokwim River commercial Chinook and chum salmon	\$5,723,606	5.3%	\$2,531,005
2020 Chignik commercial all salmon	\$7,243,729	6.8%	\$3,203,211
2020 Southeast commercial chum, coho, pink and sockeye salmon	\$61,805,783	57.6%	\$27,330,804
2020 Norton Sound subsistence	\$535,440	0.5%	\$236,774
2020/2021 Yukon River subsistence	\$28,629,992	26.7%	\$12,660,315
2020 Kuskokwim River subsistence	\$1,251,548	1.2%	\$553,440
Total	\$107,275,042	100%	\$47,437,522

ADF&G is proposing to combine the 2020 and 2021 Yukon River and 2020 Kuskokwim River commercial fisheries into one category because there has been one commercial fishery participant on the Kuskokwim River in recent years and the harvest and revenue information are confidential. To include the Kuskokwim River participant in the spend plan, the area must be combined with another area.

Subsistence Fisheries

Subsistence households in the Norton Sound, Yukon River, and Kuskokwim River areas are eligible for direct payments based on the number of shares they qualify for, and the total amount of proposed funds allocated to each area as follows:

2020 Norton Sound: \$236,774
2020/2021 Yukon River: \$12,660,315
2020 Kuskokwim River: \$553,440

Household size	Number of Shares
1-3	1
4 or more	2

Eligibility criteria for subsistence households are based on criteria that were developed for Section 12005 CARES Act Fisheries Assistance. To receive fishery disaster assistance, one household member would submit an application for the household. Eligible applicants will be placed into tiers based on household size in 2020 and/or 2021 for Yukon River households. Smaller households with 1-3 members will be eligible for one share and larger households with four or more members will be eligible for two shares. Once all applications have been received, the total number of shares in each area will be determined and payments for applicants will be calculated accordingly.

ADF&G is seeking comment on whether subsistence households could qualify for subsistence payments in more than one area if they participate in more than one area included in this fishery disaster.

ADF&G is seeking further comment on whether dogs should be considered as part of the subsistence category recognizing that salmon are used as a primary source of dog food for many subsistence households. Public comment suggested that additional shares should be allocated to subsistence households based on kennel size (i.e. number of dogs currently owned by the subsistence household).

Proposed subsistence household eligibility requirements:

1. All eligible household members **MUST** be Alaskan residents, this will be verified by meeting at least one of the following criteria:
 - a) Eligible to receive an Alaska Permanent Fund Dividend in 2021 for calendar year 2020*.
 - b) Possessed or eligible to receive a 2020* Alaska resident sport fishing license from the Department of Fish and Game.
 - c) Registered as a resident during 2020* with the Commercial Fisheries Entry Commission.
 - d) Held a subsistence or personal use permit issued by the Alaska Department of Fish and Game in 2020* in either the Norton Sound – Port Clarence Area defined at 5 AAC 01.150; the Yukon Area as defined at 5 AAC 01.200; or the Kuskokwim Area as defined at 5 AAC 01.250. Personal use fishery permits are **NOT** eligible for relief under this spend plan. They may **ONLY** be used to prove residency.
2. Applicant for household **MUST** be at least 18 years old to apply per federal requirements.
3. **MUST** self-certify that they are not de-barred from receiving federal funds and are not on the federal government “do not pay list”.
4. Eligibility will be determined by Alaskan household.
 - o A household is defined as a person or persons having the same permanent residence.

- All Alaskan households participating in subsistence fisheries may apply regardless of physical household address.
 - Only one application may be submitted per household.
5. MUST self-certify that one or more members of the household participated in a salmon subsistence fishery in either the Yukon River Area, Kuskokwim River Area, or Norton Sound-Port Clarence Area in at least two of the previous four years (2016-2019).
- Participation includes harvesting, sharing, and/or using salmon subsistence fishery resources. Subsistence harvest does NOT require the use of a sport fishing license.
 - Subsistence fisheries are defined as fisheries on salmon stocks for which the Alaska Board of Fisheries has found there are positive customary and traditional uses, in addition to federal subsistence fisheries that have no state equivalent.
6. Eligible applicants MUST self-certify that their household has incurred a negative impact on their ability to access subsistence salmon fishery resources in 2020* that was directly or indirectly related to the fishery disaster.

*Criteria for Yukon River subsistence households can be met for either 2020 or 2021.

Commercial Fisheries

2020 Norton Sound commercial (\$921,972):

2020 Norton Sound commercial		Estimated funds
Harvesters (85%)	S04Z permit holders (90%)	\$705,309
	Crew (10%)	\$78,368
Processors (15%)		\$138,296

Total gross revenue losses for harvesters in the Norton Sound coho and chum salmon fishery are estimated at \$2.08 million dollars. The proposed funds allocated to the harvesting sector are intended to mitigate this loss by providing funds to bring the harvesting sector up to 38% of their recent average value.

Total losses for the processing sector are confidential because there are less than three processing companies. The funds allocated to the processing sector are less than 5% of the recent average first wholesale value.

Norton Sound Harvesters – 85%. The harvester allocation will be divided into two pools, one for S04Z permit holders (85%) and one for vessel crew members (10%). The split between permit holders and crew members is based on a typical crew size of one person earning a 10% crew share.

Norton Sound Permit holders (90% of harvester pool). Proposed eligibility criteria for Norton Sound permit holders:

1. S04Z permit must have been used to make Norton Sound chum or coho salmon landings in 2020.

Funds are proposed 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 certified they were unable to participate in 2020 in order to qualify for an emergency transfer or permit holders who permanently transferred a permit away in 2020 will not receive payments.

Permit holder funds will be distributed based on the following four tiers. Four tiers are established based on the 2017-2019 average estimated CFEC gross revenue value for chum and coho salmon landed on each permit. Landings from 2020 will be used for permit holders who do not have a 2017-2019 average. Each eligible permit holder in the same tier would receive an equal payment.

Tier level	2017-2019 average CFEC gross revenue value of chum and coho salmon landings	Tier allocation	Est. number of eligible permit holders
1	≥ \$30,000	40%	24
2	\$20,000 - \$29,999	26%	25
3	\$10,000 - \$19,999	27%	43
4	≤ \$9,999	7%	29

Norton Sound Crew (10% of harvester pool). Crew that are 18 or older and meet all criteria are eligible to receive an **equal payment** from the crew member pool. Proposed eligibility criteria for Norton Sound fishing crew:

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 show they participated as fishing crew in the 2020 commercial Norton Sound salmon fishery for a qualified permit holder, based on an affidavit from the permit holder.
3. Crew member must not be eligible for fishery disaster funds as a Norton Sound permit holder.

Norton Sound Processors – 15%. Norton Sound salmon processing companies that meet all criteria are eligible for payment based on the average wholesale value of Norton Sound chum and coho salmon processed by the company, based on federal operational identification number, from 2017 to 2019 using COAR production data.

Proposed Norton Sound Processor eligibility criteria:

1. Processing company must have processed Norton Sound chum and/or coho salmon in 2020.
2. Processing company must have a 2020 wholesale value of \$10,000 or greater for Norton Sound chum and/or coho salmon.

Disaster payments to processing companies are **pro rata** to their demonstrated loss. The loss is proposed to be calculated as the company's 2017-2019 average wholesale value for Norton Sound chum and/or coho salmon compared to the 2020 wholesale value for Norton Sound chum and/or coho salmon.

2020/2021 Yukon River and 2020 Kuskokwim River commercial (\$2,531,005):

2020/2021 Yukon River & 2020 Kuskokwim River commercial		Estimated funds
Harvesters (85%)	S04Y and S04W permit holders (90%)	\$1,936,219
	Crew (10%)	\$215,135
Processors (15%)		\$379,651

Total gross revenue losses for harvesters in the 2020 and 2021 Yukon River and 2020 Kuskokwim River Chinook and chum salmon fisheries are estimated at \$5.77 million dollars. The proposed funds allocated to the harvesting sector are intended to mitigate this loss by providing funds to bring the harvesting sector up to 37% of their recent average value.

Total losses for the processing sector are confidential because there were less than three processing companies operating in either 2019 or 2020. The funds allocated to the processing sector are less than 5% of the recent average first wholesale value.

Yukon River and Kuskokwim River Harvesters – 85%. Funds provided for this fishery disaster cover both the 2020 and 2021 fishing seasons on the Yukon River and the 2020 fishing season on the Kuskokwim River. For that reason, ADF&G is proposing that the eligible Kuskokwim River permit holder and their crew receive 50% of the payment that eligible Yukon River permit holders and crew receive.

The harvester allocation is proposed to be divided into two pools, one for S04Y and S04W permit holders (90%) and one for crew members (10%). The split between permit holders and crew members is based on a typical crew size of one person earning a 10% crew share.

Yukon River and Kuskokwim River permit holders (90% of harvester pool). Proposed eligibility criteria for Yukon River and Kuskokwim River permit holders:

1. S04Y or S04W permit card must have been used to make Chinook and/or chum salmon landings in either 2019 or 2020. Landings on an S04W permit must have been from the Kuskokwim River (ADF&G statistical area 033511, 033512, 033513, 033514, or 033520).

Funds are proposed 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 certified they were unable to participate in 2020 in order to qualify for an emergency transfer or permit holders who permanently transferred a permit away in 2020 will not receive payments.

Permit holder funds will be distributed based on the following four tiers. Four tiers are proposed based on the 2017-2019 average estimated CFEC gross revenue value for Chinook and/or chum salmon landed on each permit. Landings from 2020 will be used for new permit holders who do not have a 2017-2019 average. Each eligible S04Y permit holder in the same tier would receive an equal payment. The eligible S04W permit holder would receive 50% of an equal tier payment because this fishery disaster covers only the 2020 fishing year for the Kuskokwim River.

Tier level	2017-2019 average CFEC gross revenue value of Chinook and chum salmon landings	Tier allocation	Est. number of eligible permit holders
1	≥ \$14,000	23%	41
2	\$10,000 - \$13,999	25%	65
3	\$6,000 - \$9,999	29%	113
4	≤ \$5,999	23%	221

Yukon River and Kuskokwim River Crew (10% of harvester pool): Crew that are 18 or older and meet all criteria are eligible to receive an **equal payment** from the crew member pool. Crew that worked for a

Kuskokwim River permit holder are eligible to receive 50% of an equal payment. Proposed eligibility criteria for Yukon River and Kuskokwim River fishing crew:

1. Crew member must have held a 2019 or 2020 commercial crew license or a 2019 or 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 show they participated as fishing crew in the 2019 or 2020 commercial Yukon River or Kuskokwim River salmon fishery for a qualified permit holder, based on an affidavit from the permit holder.
3. Crew member must not be eligible for fishery disaster funds as a Yukon River or Kuskokwim River permit holder.

Yukon River Processors – 15%: Yukon River salmon processing companies that meet all criteria are eligible for payment based on the average wholesale value of Yukon River Chinook and/or chum salmon processed by the company, based on federal operational identification number, from 2017-2019 using COAR production data. No commercial processing companies have operated on the Kuskokwim River since 2015 and so none are proposed to be included in this fishery disaster spend plan.

Proposed Yukon River Processor eligibility criteria:

1. Processing company must have processed Yukon River Chinook and/or chum salmon in 2019 or 2020.
2. Processing company must have a 2019 or 2020 wholesale value of \$10,000 or greater for Yukon River Chinook and/or chum salmon.

Disaster payments to processing companies are **pro rata** to the company's demonstrated loss. The loss is proposed to be calculated as the company's 2017-2019 average wholesale value for Yukon River Chinook and/or chum salmon compared to its 2020 average wholesale value for Yukon River Chinook and/or chum salmon.

2020 Chignik commercial (\$3,203,211):

2020 Chignik commercial		Estimated funds
Harvesters (85%)	S01L permit holders (80%)	\$2,178,183
	Crew (20%)	\$544,546
Processors (15%)		\$480,482

Total gross revenue losses for harvesters in the Chignik salmon fishery are estimated at \$7.24 million dollars. The proposed funds allocated to the harvesting sector are intended to mitigate this loss by providing funds to bring the harvesting sector up to 38% of their recent average value.

Total losses for the processing sector are confidential because there were less than three processing companies operating in 2019 and the 2020 fishery was closed. The funds allocated to the processing sector are less than 5% of the recent average first wholesale value.

Chignik Harvesters – 85%: The harvester allocation will be divided into two pools, one for vessel 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 the vessel operators that are typically reimbursed through standard deductions to crew pay when the fishery is open.

Chignik Permit holders (80% of harvester pool). Proposed eligibility criteria for Chignik permit holders:

1. Permit holder must have had a valid S01L permit card in 2020.
2. Permit holder did not make landings in another 2020 salmon seine fishery.

Funds are proposed 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 certified they were unable to participate in 2020 in order to qualify for an emergency transfer or permit holders who permanently transferred a permit away in 2020 will not receive payments.

Each permit holder who meets both eligibility criteria above will receive a minimum payment of \$30,000, except those eligible permit holders who made landings on the same vessel in 2019. If more than one eligible permit holder made landings on the same vessel in 2019, the total payment will be calculated at the vessel level and divided between eligible permit holders pro rata to the value of their 2019 salmon landings. Fifty-six permit holders across 55 vessels are estimated to be eligible for minimum payments based on the proposed criteria.

Additional tier payments for permit holders who made Chignik salmon landings in 2019 will be distributed as described below.

ADF&G is proposing to use estimated gross revenue value for all salmon species to establish tiers because all salmon species were included in the fishery disaster for the Chignik area. Four tiers are proposed based on the estimated gross revenue for salmon landed in 2019 on each permit, or vessel if more than one permit holder landed salmon on the same vessel. Twenty-five percent of the remaining funds, after accounting for minimum payments, will be allocated to each tier and each eligible permit holder in the same tier would receive an equal payment. Forty-six permit holders across 45 vessels are estimated to be eligible for an additional tier payment.

Tier level	2019 average CFEC gross revenue value of salmon landings	Tier allocation	Est. number of eligible permit holders
1	≥ \$299,000	25%	6
2	\$245,000 – \$298,999	25%	8
3	\$140,000 – \$244,999	25%	12
4	≤ \$139,000	25%	19

Chignik Vessel Crew (25% of harvester pool). Vessel crew that are 18 or older and meet all criteria are eligible to receive an **equal payment** from the crew member pool. Proposed eligibility criteria for vessel crew:

1. Crew member must have held a 2019 or 2020 commercial crew license or a 2019 or 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 show they participated as fishing crew for a qualified permit holder, based on an affidavit from the permit holder or vessel owner.
3. Crew member must not be eligible for fishery disaster funds as a Chignik permit holder.

Chignik Processors – 15%. Chignik salmon processing companies that meet all criteria are eligible for payment based on the average wholesale value of Chignik salmon processed by the company from 2015 to 2017 using COAR production data. Proposed processor eligibility criteria:

1. Processing company must have processed Chignik salmon in 2019.
2. Processing company must have a 2019 wholesale value of \$10,000 or greater for Chignik salmon.

Disaster payments to processing companies are **pro rata** to the company's demonstrated loss. The loss is proposed to be calculated as the company's 2015-2017 average wholesale value for Chignik salmon compared to 2019 average wholesale value for Chignik salmon.

2020 Southeast commercial (\$27,330,804):

2020 Southeast commercial		Estimated funds
Harvesters (75%)	S01A, S03A, S05B, S15B permit holders and crew	\$20,498,103
Processors (25%)		\$6,832,701

Total gross revenue losses for harvesters in the Southeast salmon fishery are estimated at \$64.4 million dollars. The proposed funds allocated to the harvesting sector are intended to mitigate this loss by providing funds to bring the harvesting sector up to 32% of their recent average gross revenue value.

Total first wholesale revenue losses for the Southeast salmon processing sector are estimated at \$143.87 million dollars. The proposed funds allocated to the processing sector are intended to mitigate this loss by providing funds to bring the harvesting sector up to 5% of their recent average first wholesale value.

Southeast Harvesters – 75%: Salmon are commercially harvested in Southeast Alaska with purse seines and drift gillnets and in both the Yakutat and Southeast Alaska areas with hand troll and power troll gear. A salmon fishery with set gillnet gear also occurs in the Yakutat area and the Governor did not receive any requests to include the Yakutat set gillnet fishery in the fishery disaster. Therefore, the Yakutat set gillnet fishery was not included in the State's fishery disaster request to the Secretary of Commerce and it is not included in this spend plan.

Based on public comments received on the initial draft spend plan, the harvester allocation is proposed to be divided among the gear sectors based on the proportion of fishery revenue losses in the disaster year compared to the 2015-2019 average for chum, coho, and sockeye salmon and the 2010-2018 even year average for pink salmon. The three gear sectors include seine (S01A) permit holders and crew, drift gillnet (S03A) permit holders and crew, and troll (S05B/S15B) permit holders and crew. Funds for vessel crew will be provided within each gear sector allocation and consider both the average crew size by gear type and comments for suggested allocations received on the draft spend plan.

	Estimated loss*	Proportion of total loss	Estimated funds
SE Seine	-\$40,878,568	63.4%	\$13,005,310
SE Gillnet	-\$18,538,176	28.8%	\$5,897,827
Se Troll	-\$5,013,330	7.8%	\$1,594,966

*Estimated by comparing the disaster year commercial fishery value for species included in the disaster to the previous 5-year average. The years 2015-2019 were used for chum, sockeye, and coho salmon and even years from 2010-2018 were used for pink salmon.

Southeast seine sector:

S01A permit holders (80% of seine sector allocation or ~\$10.4 million): On average over 91% of the salmon harvested in Southeast seine fisheries are pink and chum salmon. Therefore, ADF&G is proposing to use pink and chum salmon landings for the seine permit holder eligibility criteria.

Funds are proposed 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 certified they were unable to participate in 2020 in order to qualify for an emergency transfer or permit holders who permanently transferred a permit away in 2020 will not receive payments. Crew must have worked for an eligible permit holder and meet all crew criteria.

Proposed eligibility criterion for seine (S01A) permit holders:

1. The S01A permit holder must have made a landing of chum and/or pink salmon in 2020.

Every S01A permit holder for whom a recent average fishery value could be calculated (i.e. 2020 was not their first year fishing), experienced a loss in their estimated gross revenue for chum and pink salmon due to the disaster. Therefore, no additional criteria are proposed for eligibility.

An estimated 204 permit holders meet the above criterion and based on public comment, ADF&G is proposing an **equal payment** distribution based on public comments received on the initial spend plan. Equal payments are proposed to be limited to no more than one payment per vessel; if multiple permit holders made landings in 2020 on the same vessel, the equal payment will be split pro rata to the value of each permit holders' pink and chum salmon landings in 2020.

Seine vessel crew (20% of seine sector allocation or ~\$2.6 million). Seine vessel crew must be 18 or older to apply as per federal requirements and meet the following proposed criteria to be eligible for an **equal payment** of the seine crew pool. 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 the vessel operators that are typically reimbursed through standard deductions to crew pay when the fishery is open.

Proposed Southeast 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 show they participated as fishing crew in the 2020 commercial Southeast salmon fishery for a qualified S01A permit holder, based on an affidavit from the permit holder or vessel owner.
3. Crew member must not be eligible for fishery disaster funds as a Southeast seine permit holder.

Southeast gillnet sector:

S03A permit holders (85% of the gillnet sector allocation or ~\$5 million): On average over 93% of the salmon harvested in Southeast drift gillnet fisheries are chum, sockeye, and coho salmon. Therefore, ADF&G is proposing to use chum, sockeye, and coho salmon landings for the gillnet permit holder eligibility criteria.

Proposed criterion for Southeast gillnet (S03A) permit holders:

1. The S03A permit holder must have made a landing for chum, sockeye and/or coho salmon in 2020.

Every S03A permit holder for whom a recent average fishery value could be calculated (i.e. 2020 was not their first year fishing), experienced a loss in their estimated gross revenue for chum, sockeye, and coho salmon due to the disaster. Therefore, no additional criteria are proposed for eligibility.

S03A permit holder funds are proposed to be distributed based on the following four tiers. Four tiers are established based on the 2017-2019 average estimated CFEC gross revenue value for chum, sockeye, and coho salmon landed by each permit holder. Based on public comments received from Southeast harvesters, ADF&G is proposing to use the annual fleet average for permit holders that do not have a

fishery value in 2017, 2018, and/or 2019. Each eligible permit holder in the same tier would receive an equal payment.

Tier level	2017-2019 average CFEC gross revenue value of chum, sockeye, and coho salmon landings	Tier allocation	Est. number of eligible permit holders
1	≥ \$102,000	25%	44
2	\$70,000 - \$101,999	25%	73
3	\$54,000 - \$69,999	25%	99
4	≤ \$53,499	25%	155

Gillnet vessel crew (15% of gillnet sector allocation or ~\$885,000). Gillnet vessel crew must be 18 or older to apply as per federal requirements and meet the following proposed criteria to be eligible for an **equal payment** of the gillnet crew pool.

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 show they participated as fishing crew in the 2020 commercial Southeast salmon fishery for a qualified S03A permit holder, based on an affidavit from the permit holder or vessel owner.
3. Crew member must not be eligible for fishery disaster funds as a Southeast gillnet permit holder.

Southeast troll sector:

Troll (S05B/S15B) permit holders (90% of troll sector allocation or ~\$1.4 million): On average over 99% of the salmon species included in this fishery disaster and harvested in the Southeast troll fishery are chum and coho salmon. Therefore, ADF&G is proposing to use chum and coho salmon landings for the troll permit holder eligibility criteria.

Proposed eligibility criteria for troll (S05B or S15B) permit holders.

1. S05B or S15B permit holder must have made a landing of chum and/or coho salmon in 2020. In 2020, a total of 747 troll permit holders made chum and/or coho salmon landings with an estimated range of value between ~\$6 and ~\$100,000 per person. ADF&G is requesting comment on whether a minimum threshold of fishery value should be included in this criterion.
2. Troll permit holder must have a demonstrated loss in 2020 estimated CFEC gross revenue value for chum and/or coho salmon as compared to their 2017-2019 average CFEC gross revenue value for chum and/or coho salmon. Based on public comments received from Southeast harvesters, ADF&G is proposing to use the annual average value of chum and coho salmon landings per permit for permit holders that do not have a fishery value in 2017, 2018, and/or 2019. A total of 648 permit holders would qualify for fishery disaster funds based on this second eligibility criterion with a range of estimated losses between ~\$36 and ~\$77,000.

ADF&G is seeking comment from troll permit holders on whether other eligibility criteria should be considered.

ADF&G is proposing that troll permit holders who meet the criteria are eligible to receive an **equal payment** from the troll permit holder funds.

Troll vessel crew (10% of troll allocation or ~\$159,000). Troll vessel crew must be 18 or older and meet the following proposed criteria to be eligible for an **equal payment** of the troll crew pool.

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 show they participated as fishing crew in the 2020 commercial Southeast salmon fishery for a qualified S05B or S15B permit holder, based on an affidavit from the permit holder or vessel owner.
3. Crew member must not be eligible for fishery disaster funds as a Southeast troll permit holder.

Southeast Processors – 25%: Southeast salmon processing companies that meet all criteria are eligible for payment based on the average wholesale value of southeast sockeye, chum, coho, and pink salmon processed by the company from 2017-2019 using COAR production data. Processor eligibility criteria:

1. Processing company must have processed southeast sockeye, chum, coho, and/or pink salmon in 2020 with a wholesale value of at least \$10,000.
2. Processing company must have a demonstrated loss in wholesale value of southeast sockeye, chum, coho, and/or pink salmon in 2020 as compared to their 2017-2019 average wholesale value of southeast sockeye, chum, coho, and/or pink salmon.

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

General direction: Unclaimed funds in any of the categories and/or subcategories are proposed to be reallocated amongst all qualified individuals within the same category/subcategory the funds were allocated to. Individuals may be eligible for more than one category e.g., permit holder or crew and head of household for subsistence, S01A and S04A permit holder, but may not be eligible as both a permit holder and crew in the same fishery sector e.g., a S01A permit holder and Southeast seine vessel crew.

Appendix 1. Proposed research projects, estimated costs, and which research theme is addressed.

Salmon Ocean Ecology Program Proposals:

1. Juvenile marine salmon survey in the Southern Bering Sea to assess ocean/climate condition impacts on future Kuskokwim Chinook and chum salmon runs and estimate non-adult abundance that can be used for developing forecasting tools. This survey is modeled after other surveys that have proven useful in the northern Bering Sea (for Yukon salmon) and southeast Alaska (for SEAK salmon) for predicting run size up to 3 years in the future and for evaluating how marine conditions impact future runs. ADF&G, ~\$500,000/year over 3 years = \$1.5 million, themes “a” & “b”.
2. Juvenile marine salmon survey in the western Gulf of Alaska to assess ocean/climate condition impacts on future Chignik salmon runs, and estimate non-adult abundance that can be used for developing forecasting tools. This survey is modeled after other surveys that have proven useful in the northern Bering Sea (for Yukon salmon) and southeast Alaska (for SEAK salmon) for predicting run size up to 3 years in the future and for evaluating how marine conditions impact future runs. ADF&G, ~\$500,000/year over 3 years = \$1.5 million, themes “a” & “b”.
3. Assess early marine food availability for Norton Sound, Yukon and Kuskokwim chum salmon and Chignik salmon (zooplankton and diet analyses) in the Bering Sea and Western Gulf of Alaska, respectively. Stakeholders have expressed concern for the role of warm water temperatures and competition affecting the available food and survival of Alaskan salmon stocks. This project would assess the quantity and quality of food available and how much diet overlap exists among salmon and non-salmon species in their early marine life. ADF&G and UAF for zooplankton component, ~\$200,000/year over 3 years = \$600,000, theme “a”.
4. UAF satellite tagging project to assess western Alaska Chinook salmon migration and habitat use in the Bering Sea. By understanding the habitats used by Norton Sound, Yukon, and Kuskokwim Chinook salmon, it will improve our understanding of how ocean conditions impact survival and future runs. This project will also attempt to provide management tools that would allow marine fisheries to better avoid Chinook salmon as bycatch. ADF&G and/or UAF, ~\$325,000/year over 2 years = \$650,000, theme “a”.

Arctic Yukon Kuskokwim Area Proposals:

1. Structured evaluation of Yukon River Chinook salmon management strategies. This project would allow for a facilitated stakeholder outreach and engagement program to occur concurrently with data simulations to evaluate escapement goal and management strategies for co-occurring Chinook and summer chum salmon. Expected products include 1) documentation of stakeholder objectives and priorities for salmon resources, 2) evaluation of tradeoffs associated with alternative management strategies, and 3) recommendations for consideration by management agencies and stakeholder advisory groups. Successful implementation of this project would require a dedicated facilitator, agency/non-agency/academic partnerships, and extensive stakeholder engagement. ADF&G, ~\$260,000 annually over 3 years = \$780,000, theme “d”.
2. Kuskokwim chum salmon radiotelemetry abundance estimation. Drainagewide estimates of Kuskokwim River chum salmon are not available; however, the existing Kuskokwim River sonar program provides an index of abundance of unknown magnitude. This project would use radiotelemetry and mark-recapture techniques to estimate the total abundance of Kuskokwim River chum salmon upriver from the mainstem sonar location. Results would provide important context for interpreting and possibly correcting bias associated with the annual sonar estimates. Results would be expected to dramatically improve understanding and annual monitoring of Kuskokwim River chum

salmon abundance to inform harvest management, set biological escapement goals at spatial scales appropriate for management, and inform run forecast models. Funds would allow for mainstem tagging, tracking, and subsidize the cost of tag recapture efforts within spawning tributaries. ADF&G, ~\$500,000 annually over 3 years = \$1.5 million, theme “c”.

3. Unalakleet River coho salmon sonar extension project to expand escapement estimates of Unalakleet River coho salmon beyond the normal weir operational period by installing a sonar and initiating species apportionment methods. Unalakleet River coho salmon escapement monitoring is hindered during much of the run due to high water conditions that prevent operation of the Unalakleet River weir. This project would improve escapement counts by providing more robust information for evaluating total run, escapement, stock production, and consideration of harvest management options. ADF&G, ~\$95,000 annually/year over 4 years = \$380,000, theme “c”.
4. Norton Sound coho salmon genetic baseline improvement project. Coho salmon migrating through Norton Sound, and subject to harvest in commercial and subsistence fisheries, are bound for local (e.g., Norton Sound) and distant (e.g., Seward Peninsula, Yukon, and Kuskokwim Rivers) spawning areas. The current coho salmon genetic baseline is not capable of differentiating among Norton Sound stocks and has only limited ability to separate Northern Norton Sound/Seward Peninsula from other large-scale stock groups. This project would allow for additional baseline genetic collections from non- or underrepresented spawning tributaries throughout the AYK Region. Comprehensive genetic baselines are needed for reliably determining salmon origins in mixed stock fisheries and contributing to estimates of stock specific harvest/exploitation, total run, and productivity. ADF&G, ~\$95,000 annually over 4 years = \$380,000, theme “c”.
5. Study to evaluate *Ichthyophonus* disease infection timing and pathways of Yukon River Chinook salmon in the marine environment. *Ichthyophonus* disease associated mortality is a leading hypothesis to explain unprecedented poor abundance of adult Yukon River Chinook salmon entering U.S. spawning tributaries and passing the U.S./Canada border. Chinook salmon are known to become infected via their marine diets, but the specific pathway and timing of infection is not known. This project would allow for 1) systematic evaluation of *Ichthyophonus* infection in Chinook salmon prey species to better understand likely sources of infection, and 2) determine the prevalence and severity of *Ichthyophonus* disease in juvenile, immature, and sub-adult Chinook salmon to determine when infection occurs. Additional samples would be taken from Kuskokwim and Norton Sound inriver test fisheries to determine if recent increases in *Ichthyophonus* infections are unique to the Yukon River Chinook salmon stock. Funds would pay for sample processing and analysis by the ADF&G Pathology Laboratory, and results would improve ongoing and future research and assessment of the biological impacts of *Ichthyophonus* disease on adult run abundance and inriver mortality. ADF&G, ~\$65,000 annually over 4 years = \$260,000, theme “a”.
6. Interdisciplinary approach to evaluate Yukon River Chinook and chum salmon use of inland coastal waterways during their annual return migration. Returning adult Yukon River Chinook and chum salmon utilize inland coastal waterways of the Yukon Management Area however, habitat use patterns are unknown (e.g., specific waterbodies, timing of entry, inland extent traveled, etc...). As such, salmon harvest opportunities within the Yukon Coastal District are managed consistent with the lower Yukon River, District Y-1. In recent years, extremely poor run abundance of Yukon River Chinook and chum salmon have required complete closures of all salmon directed harvest and consideration of opportunities to provide subsistence harvest for co-occurring non-salmon species. This project would use a combination of focused ethnographic and biologic surveys to document salmon and non-salmon presence, timing, distribution, and life stages in inland coastal waterways draining the Yukon River Coastal District. A systematic approach is needed to inventory fish resources in all waterways and collect local ecological knowledge from coastal communities that

customarily fish these systems. Results would provide essential information to determine if additional subsistence opportunities for non-salmon could be provided during times of salmon conservation. ADF&G, ~ \$100,000 annually over 3 years = \$300,000, theme “c”

7. Kuskokwim Chinook and chum salmon smolt outmigration timing project. River outmigration timing of Kuskokwim River Chinook and chum salmon smolt and entrance into Kuskokwim Bay is currently not known. This data gap limits development of a Southern Bering Sea trawl survey program designed to estimate juvenile salmon abundance and produce multi-year adult run forecasts. Chinook salmon capture data from recent Southern Bering Sea trawl survey efforts indicate that survey timing was too early to effectively sample through the populations moving offshore. This project would evaluate the smolt outmigration timing of Kuskokwim River Chinook and chum salmon to better inform marine survey timing. The Chinook salmon outmigration timing results are likely to have a more immediate impact on ongoing efforts to develop a Southern Bering Sea juvenile salmon trawl survey program, while the chum salmon timing information may have be useful long term. ADF&G, ~\$200,000 annually over 4 years = \$800,000, themes “a” & “b”.
8. Norton Sound chum and coho salmon aerial survey project. Aerial surveys are used to evaluate escapement goal performance for one Norton Sound chum salmon stock, three Norton Sound coho salmon stocks, and two Kotzebue Sound chum salmon stocks. These surveys are also used to monitor chum and coho salmon escapement trends on numerous tributaries without established goals. Funding limitations have resulted in reductions to the aerial survey monitoring efforts throughout Norton and Kotzebue Sounds and impacted evaluation of salmon escapement goal performance. This project would allow for a more comprehensive air survey escapement monitoring program and improve annual evaluation of established escapement goals. ADF&G, ~ \$30,000 annually over 4 years = \$120,000, theme “c”.
9. Yukon fall chum salmon habitat assessment project. Yukon River fall chum salmon spawning activity is commonly associated with early winter ice free areas and areas with abundant hydrological upwellings. This project would use remote archived sensing data to evaluate changes in water temperature, ice cover, ice thickness, snow cover, and location of upwellings in relationship to known fall chum salmon spawning abundance and spawning areas as indexed by aerial surveys and sonar. Limited field studies would be conducted to ground truth or subsidize remote sensing data. Evaluations would occur in known priority spawning tributaries such as the Delta Clearwater, Sheenjek, and Treedriinjik Rivers to evaluate drivers of fall chum salmon production and potentially inform run forecast models. ADF&G, ~\$125,000 annually over 2 years = \$250,000, theme “a”.

Chignik Area Proposals:

1. Analyze 20 years of limnological and juvenile sockeye salmon data and enhance this data set with genetic, diet, bioenergetic, and high-resolution limnological data to evaluate drivers of Chignik River watershed sockeye salmon population productivity to understand critical linkages between ecological conditions in time and space that are key drivers to annual salmon production. Results will benefit the maintenance and conservation of Chignik sockeye salmon by identifying the importance of lake rearing habitats for survival, mediated by habitat quality effects on juvenile sockeye salmon condition and growth, which will assist in identifying factors affecting future returns. ADF&G, ~\$415,000, theme “a”.
2. Study the seasonal Chignik Lake habitat utilization by juvenile sockeye salmon within the watershed using split-beam hydroacoustics. Greater understanding of the sockeye salmon life history and migrations within the watershed will yield important information about key timeframes and

parameters while estimating abundance, size and condition are particularly useful in assessing productivity of the watershed as a whole. ADF&G, ~\$300,000, themes “a & b”.

Southeast Area Proposals:

1. Southeast Coastal Monitoring Survey (SECM) work in Stephens Passage, Upper Chatham Strait, and Icy Strait. The primary objective of SECM is to evaluate the status of the pelagic ecosystem, including juvenile salmon and other pelagic fish species, in the northern region of Southeast Alaska (SEAK). SECM surveys support research on the marine ecology of salmon, provide data for harvest forecast models for SEAK pink salmon, and support ecosystem research in the Gulf of Alaska. ~ \$100,000 annually over 4 years ADF&G, ~ \$400,000, themes “a” and “b”.
2. Chum salmon helicopter surveys throughout Southeast Alaska. ADF&G maintains a standardized survey program to index spawning chum salmon abundance at 87 summer-run and seven fall-run streams. Chum salmon may be masked by high densities of pink salmon on the spawning grounds, particularly in years of low chum salmon abundance, which makes monitoring wild chum salmon populations challenging. Helicopter surveys provide surveyors improved views of these streams, validate observations of chum and pink salmon abundance, identify primary chum salmon spawning areas, and improve managers’ ability to identify chum salmon during routine aerial surveys of other index streams in the area. ADF&G, ~\$60,000 annually over 4 years = \$240,000, theme “c”.
3. McDonald Lake sockeye mark-recapture study. McDonald Lake sockeye salmon are a current *Stock of Concern* in Southeast Alaska, and an *Action Plan* is in place to reduce the commercial fisheries harvest on this stock. Escapements are estimated from standardized foot survey counts at Hatchery Creek, the primary spawning tributary. The expansion factor was based on comparison of peak foot survey counts to six years of population estimates from weir counts and mark-recapture studies. This project would fund additional years of mark-recapture population estimates to improve the current foot survey expansion and allow for improved age composition data and other relevant data to be collected at the lake. ADF&G, ~\$70,000 annually over 4 years = \$280,000, theme “c”.
4. Environmental effects on coho salmon age at smolting in northern Southeast Alaska. This research would investigate the causes of annual fluctuations in coho salmon age at smolt outmigration in the Berners River in northern Southeast Alaska. The Berners River coho salmon is one of the essential coho salmon indicator stocks for Southeast Alaska. This proposal would fund a dedicated graduate student for 2.5 years to investigate the effects that environmental conditions, hydrology, and diet have on smolt age. This research would quantify the effect that age has on smolt-to-adult survival (marine survival), an important aspect in attempting to forecast coho salmon runs. UAF, ~\$120,000 over two years = \$240,000, themes “a & b”.
5. Freshwater influences on disease and condition factor at Sashin Creek. Marine survival of coho salmon varies with fish health, weight, and fat content. This project would fund three years of smolt capture, sample collection, and adult recapture studies at Sashin Creek on southern Baranof Island. Each smolt outmigrating from Sashin Creek would be captured at a smolt weir, tagged with a PIT tag, a tissue sample collected for fish health analysis, and lipid content sampled. Returns of adults would be sampled for PIT tags to determine which size, age, lipid content, body condition, and health was associated with marine survival. ADF&G, ~\$240,000 annually over 3 years = \$720,000, themes “a” & “b”.

Yukon/Kuskokwim



YUKON RIVER DRAINAGE FISHERIES ASSOCIATION

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“Protect and Promote All Wild Fisheries and Traditional Cultures within the Yukon River Drainage”

October 5, 2022

ADF&G

Attn: Ana Enge

PO Box 115526

Juneau, AK 99811-5526

Re: Comments on Fishery Disaster Spend Plan

Dear Ms. Enge,

The Yukon River Drainage Fisheries Association (YRDFA) is a federally recognized 501 (c)(3) non-profit association of subsistence and commercial fishers with the mission of protecting and promoting all healthy fisheries and cultures along the Yukon River drainage. This longest salmon migration in the world provides critical dietary and cultural support for over forty-five rural Alaskan communities. YRDFA was created in 1990 to conserve Yukon River salmon runs by giving a voice to the people who have used and managed the resources for many generations. Our work has become an essential part of the communication between fishers and other agencies and organizations. Today, YRDFA stands united to provide comments on the Fisheries Disaster Spend Plan.

First, we do not understand the reasoning why the fisheries disasters for the Yukon River are being combined for 2020 and 2021. These two fishery disaster requests were filed separately and should continue as we move forward with allocations. Second, the Yukon River and Kuskokwim River should not be combined for commercial and subsistence allocation. These are two different river systems and the Kuskokwim River was allowed fishing openings where the Yukon River had zero. This is an insult to the people of the Yukon River.

Research

With all the fisheries disasters that are consecutively occurring in Alaska, the management strategy should not be waiting for research to be conducted or results from research to address the crisis Alaska is experiencing. We also recommend that research funds be provided and be conducted by an outside agency to provide transparency and begin to rebuild trust in the current management system.

Commercial and Subsistence

Again, we are confused as to why the Yukon and Kuskokwim Rivers are combined for this allocation. The two river systems are different. The Yukon River commercial and subsistence salmon fisheries were completely shut down whereas the Kuskokwim River received opportunities to harvest salmon.

We disagree with the share allocations for subsistence users and the income guidelines. It does not matter the income of a rural resident. If a person lives in a rural community that person is subsistence fishing. The allocation should be looking at the 5-year average subsistence harvest; excluding 2019, 2020, & 2021, and then the share allocations can be put in place.

Thank you for the opportunity to provide comments on the fishery disaster spend plan.

Sincerely,

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

Serena Fitka
Executive Director

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

Hi Ana,

Because of some wonderful help we have received I wish to have my original comments removed and replaced with this one that has more information for you to look over. We have our subsistence fishing records back to 1994. Losing the fish for personal use is not nearly as catastrophic as losing the fish that fed our dogs. For some, not attached to the road system the cost of freighting in dog food is beyond belief and for us having to add several more 1000 mile freight runs to get the additional dog food we need for our dogs has created a major financial hardship. For us the numbers of chum salmon we took to feed our dogs averaged from 3500 to 4500. This fed the dogs for a whole year.

Here are our comments on the 2020 Norton Sound, Yukon River, Kuskokwim River, Chignik, Southeast Alaska; and 2021 Yukon River Salmon Disaster Determination Spend Plan. Our comments are specifically for the 2020/2021 Yukon River & 2020 Kuskokwim River Subsistence Fishery section of the spend plan which has a proposed allocation of about \$14 million. Having lived a subsistence lifestyle on the Yukon River for many years, we were so happy to hear that the spend plan was addressing subsistence damages. We do have some comments regarding the proposed methodology. The data source for these comments is the 2018 Alaska Subsistence and Personal Use Salmon Fisheries Annual Report by the ADF&G. We have attached the data we used from this report below. We have been getting help with this from a friend of ours who happens to have twenty years' experience as an environmental economist. I believe you spoke with her on the phone last week and she shared some of these thoughts with you. Here are our four comments:

1 - The current methodology fails to reflect the differences between the Yukon and Kuskokwim subsistence activity by valuing shares equally between the two areas

Even though there are fewer subsistence households in the Yukon area compared to the Kuskokwim area, Yukon households rely on subsistence salmon much more than Kuskokwim households. In 2018, the people living in the Yukon area ate 24% more salmon than those living in the Kuskokwim area. We ask that the total shares for claims by households located in the Yukon area be multiplied by a factor of 1.24 to reflect this greater consumption and greater financial damages experienced due to the loss of subsistence salmon for food.

2 - The current methodology of determining eligibility shares omits dogs

Salmon is used as the primary source of dog food for many subsistence households. In 2018, dogs consumed 21% of the total salmon harvest for the Yukon and Kuskokwim areas. Households with dogs have experienced extreme financial hardship due to the loss of salmon as the primary food source for their dogs. We ask that shares be allocated for dogs based on kennel size. One suggestion is that a household with 16 or fewer dogs receive one share and households with more than 16 dogs receive two shares. You could even add another category for kennels greater than 30 dogs and give them three shares. Similar to the share method for people households, the total shares would be doubled if you live in the Yukon area and had damages for both years.

3 - Need to account for the very large difference between Yukon and Kuskokwim subsistence salmon dog consumption

Similar to our comment in #1 above, dogs in the Yukon area rely much more heavily on subsistence salmon than dogs in the Kuskokwim area. In 2018, Yukon area dogs ate 137% more subsistence salmon than dogs in the Kuskokwim area. Dog owners in the Yukon have experienced much larger financial hardships than those in Kuskokwim. To account for this, we ask that for Yukon area kennel owners the number of dog shares determined in comment #2 be multiplied by 2.37 to account for this 137% difference in reliance on subsistence salmon for dog food.

4 - Need to have a separate money allocation for dogs

To better allocate subsistence damage claims between people and dogs we proposed to separate the two. In 2018, dogs ate 21% of the total salmon harvested in the Yukon and Kuskokwim areas so we propose that 21% of the \$14,040,516 be allocated to dog shares which is \$2,948,508.

Again, we can't thank you enough for including subsistence damages in this spend plan. We hope you include our comments in the next draft spend plan so the claim process is more fair and equitable to all subsistence users. Let us know if you have any questions and that you have received this e-mail. Please email us a copy of the revised spend plan when it is available.

Thanks,
Scarlett and Wayne Hall

	Total HHs	% of Total	Total Salmon Harvest	Dog HHs	Salmon Consumed by Dogs	% of Total	Salmon Consumed by People	% of Total	Per HH Consumption by People	% More Consumed by Yukon People	Per HH Consumption by Dogs	% More Consumed by Yukon Dogs
Yukon Area	3,320	44%	182,471	280	59,580	33%	122,891	67%	37	24%	213	137%
Kuskokwim Area	4,302	56%	137,076	94	8,454	6%	128,622	94%	30		90	
Totals:	7,622		319,547	374	68,034	21%	251,513	79%				
Source: Alaska Subsistence and Personal Use Salmon Fisheries 2018 Annual Report. 2021 Technical Paper No. 484. Alaska Dept of Fish and Game.												
Hyperlink												

--
Wayne and Scarlett Hall



From: [John/Karen Krieg](#)
To: [DFG, ComFisheriesDisasters \(DFG sponsored\)](#)
Subject: Re: Federal Fishery Disaster Initial Draft Spend Plan- 2022/21 Statewide Salmon
Date: Monday, October 3, 2022 1:45:16 PM

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Hi,
I would like to comment on this spend plan.

I would like to see a proportion of the research money to investigate whether the Alaska Board of Fish is violating state statute 5AAC 39.222. This gives priority to wild salmon over hatchery fish which are flooding the ocean and eating food that native stocks have relied on for thousands of years. Increased dumping of hatchery fish has led to smaller runs and smaller fish and the Board of Fish continues to allow it anyway. Many studies will backup this.
Thanks

From: [Gim Tavyv](#)
To: [DFG, ComFisheriesDisasters \(DFG sponsored\)](#)
Subject: Salmon fisheries disaster relief
Date: Thursday, October 6, 2022 1:14:23 AM

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Hello,

My name is Jim Duffy and I live in Russian Mission on the Yukon river. I have participated in the subsistence salmon fishery for the last 40 years and actively participated in the commercial salmon fishery from the late eighties to the early 20 teens, when it became no longer viable.

I am grateful to the Congregational delegation and other politicians for again recognizing the disaster that the salmon fishery has become. The last salmon fishery disaster declaration, around 2015, or so, I was ineligible for because the runs were already under stress and the limited harvests and long deliveries were not profitable. The rally cry among fishermen at the time was, make a few landings and you'll be eligible for disaster relief. As much as I wanted to fish, I chose not to put more pressure on the fish already under duress.

Now, to the current disaster declaration, I cannot emphasize enough, this is a cultural and environmental disaster. To see elders from the area unable to prepare the fish they grew up on and pass these skills to the next generations, is heartbreaking. People from our area have been traveling to the Kuskokwim and Bristol Bay regions to subsistence fish. Very few families can afford to do this, but if it is a trend, what impact is it going to have on already tenuous kuskokwim stock.

As to my recommendation for disaster relief funds, direct payments to commercial and subsistence families is, at best, a temporary solution. Long term, it will do nothing to put fish in the river or in the smoke house. Any amount sent to families will be gone in a month, paying for substitute foods that will not satiate the craving for smoked salmon. The question I have asked many of the fish scientists that work in our area, is what is causing the eradication of salmon stocks. In the last 30 years, I have heard a revolving door of reasons for, declining runs. A few include, El Nino, La Nina, Ichthyophonus, predation, loss or destruction of brooding streams, Canadian dams, big nets, deep nets, downriver, upriver, global warming, warming sea temperatures, Fukushima and the word barely whispered, "bycatch." Let no one irritate the billion dollar baby.

For this reason, I would like to propose that a majority of the disaster funds be used to do research in the Bering Sea to determine the impact the decades of waste/bycatch has had on current stocks. What would be the impact on fish stocks of converting the trawler fleet to traps or longline? What impact would a trawler moratorium have on salmon stocks? What has been the impact of increasing the pollock/cod quota from 800,000 to 1.5 million metric tons on fish stocks? At sea research takes years and maybe the answer won't be found until the fish are completely depleted, but it needs to be done, while the fish still have a chance to recover.

I am still a licensed commercial fisherman with a boat and nets ready to fish. I service the boat every season but I am not optimistic there will be a commercial fishery in the foreseeable future. I am hopeful that the sacrifices all the people have made and possible forced sacrifices on the trawler fishery that someday we will have a subsistence fishery and at-sea research can help make that happen.

Thank you.

Southeast

From: [Zack Worrell](#)
To: [DFG, ComFisheriesDisasters \(DFG sponsored\)](#)
Subject: 2020 Alaska salmon fishery disaster comments
Date: Monday, October 3, 2022 9:33:14 AM

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To whom it may concern,

As a past and current participant of the Southeast AK Drift Gillnet fishery, I would like to express my support for production based compensation of disaster relief funds.

It appears that your draft spend plan is set up to compensate fishery participants based on where their average annual earnings fall within the ADFG quartile tables. This spend plan succeeds in the goal of compensating participants commensurately with production and effort levels. As you may be aware, there are many part timers, retirees, school teachers off for the summer, people with other primary sources of income, etc. who sporadically participate in these fisheries. Further unbalancing of disaster funds to compensate full time participants (3rd and 4th quartile earners) would be appreciated.

Thanks for the opportunity to provide comment

Zack Worrell
[REDACTED]

Sent from Yahoo Mail. [Get the app](#)

From: Benjamin Phillips
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: 2020 draft disaster spend plan
Date: Monday, November 21, 2022 5:44:52 PM

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To whom it may concern,

After reading the spend plan draft for the 2020 SE Alaska declared salmon fishery declaration, I respectfully request the following change:

As it is currently written: (Pg. 10) “ **Southeast Permit holders**: Funds are proposed to be paid to the person listed as the 2020 ‘Permit holder’ in the CFEC database. Temporary holders through emergency transfer and permit holders who permanently transferred a permit away in 2020 will not receive payments.”

Should be changed to: “**Southeast Permit holders**: Funds are proposed to be paid to the person listed as the 2020 ‘Permit holder’ in the CFEC database **and** temporary emergency transfer permit holders(transferees) that can also demonstrate participation in the SE Salmon fishery for 2019 and 2018. Permit holders that certified they were unable to participate in 2020 in order to qualify for an emergency transfer or permit holders who permanently transferred a permit away in 2020 will not receive payments.”

Reasoning:

1. First, Emergency transfer of permits involve the permit holder certifying that they are unable to fish for that calendar year. The disaster funds are intended by congress to compensate a SE commercial salmon harvester operating in 2020. A person who emergency transferred a permit in 2020 did not operate in 2020 and did not incur operating expenses in 2020 and, therefore, should not be eligible to receive disaster money to cover non-existent expenses.

2. Emergency transfer of a permit typically involves the permit holder receiving some type of compensation from the person they transfer the permit to (the “transferee”). Details of the transaction and type of compensation is a CFEC reporting requirement for every emergency transfer. The permit holder that emergency transferred their permit in 2020 has already received compensation from the transferee. As a matter of law, the transferee by contract

with the original permit holder has secured the right to participate in the 2020 fishery and now enjoys the benefits of the transferred permit. A logical consequence of that contract implies that a transferee should automatically be qualified for disaster funds, provided the transferee can demonstrate they fished the in permit in 2020, and also fished a permit 2019 and 2018. Just as a permit holder that emergency transferred a permit in 2020 surrendered their right to participate in the 2020 fishery, they also logically surrendered the right to claim disaster funds from 2020 fishing season. It is the person that participated in the fishery with that permit should be eligible for disaster funds. Therefore, it is the transferee of an emergency permit transfer and not the original permit holder that should be eligible for disaster funds.

3. The definition as currently written is discriminatory. A disproportional number of young, disadvantaged and minority fishermen use emergency transfers every year for access to commercial fishing in alaska. Financial hardship is the cause. The reasons include the high cost or lack of availability of limited entry permits. For some aspiring fishermen that use an emergency transfer for access it may be divorce that causes a financial hardship. For others it may be lack of earning opportunity in disadvantaged rural areas of alaska that cause the hardship. There are many other reasons but the reality is that this class of harvesters has the exact same operating expenses and are legitimate commercial salmon harvesters. They are the most vulnerable and at risk. These funds would help them the most. Excluding this class of harvester on a technicality would be a violation of the constitutional guidelines for the use of the disaster funds appropriated by congress. Therefore, the definition should be amended to only include those who actually participated in a commercial salmon fishery in the declared disaster ares during the 2020 season.

Thank you for the opportunity to participate in this process. -Ben

From: [Andy Kittams](#)
To: [DFG, ComFisheriesDisasters \(DFG sponsored\)](#)
Cc: [Eric Evens; Derek Thynes; Craig Evens; Megan O'Neil; scott Kandoll](#)
Subject: 2020 SE salmon disaster funding
Date: Sunday, October 16, 2022 6:21:50 PM

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This is Andy Kittams from Petersburg on the F/V SaraDawn. I am a Southeast purse seiner and a Petersburg Vessel Owner board member. I apologize for my late comments but things apparently happened as the comment period ended that I just became aware of.

First, I emphatically support the spend plan as written. ADFG did a excellent job coming up with a fair and equitable way to distribute the disaster funds amongst the southeast purse seine fleet.

Second, we at PVOA had a general membership meeting and discussed the plan just days before comments were due. Everyone, both seiners and gillnetters supported the plan as written. Third, at that meeting we had two SEAS board members in attendance. They assured us that SEAS was going to support the plan as written. No other option was even brought to us. I just became aware that hours later at the SEAS board meeting they came up with a new plan to distribute funds equally amongst the fleet. This is and was not supported by PVOA's membership. The SEAS board did not even poll their membership before making this decision. As SEAS does not even represent the majority of the southeast seine permit holders, I encourage you to take their last minute change of heart with limited confidence.

The drafted spend plan is a well crafted plan. Many of us did not comment on the spend plan because we were told that all the gear groups were in favor of the plan and would easily move on as written. Had we known that people speaking on our behalf were going to attempt to change things up at the last minute you would have seen many more comments in support of the plan as written.

Thank you for your consideration

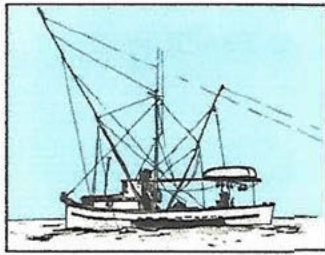
Andy Kittams, F/V SaraDawn
[REDACTED]

Sent from [Mail](#) for Windows

I see that on September 22, 2022 ADF&G published a Draft Spend Plan for funds appropriated to address the 2020-21 Salmon Disasters and requested comments on that draft. I am an affected fisherman, specifically I troll for salmon out of Sitka. Here are my comments:

- 1) **ADF&G should not include odd calendar-years in any base period**- Including odd years means including the catch history from years with strong pink salmon returns. It isn't reasonable to expect the 2020 catch of humpies from a region, a gear-group, or by an individual fisherman to be as high as the catch in an odd year. By using the proposed base periods of 2017-2019 and 2015-2019, the department is unfairly compensating fishermen who caught lots of pink salmon during the big runs of 2015, 2017 and 2019 even though the department forecast indicated that like other even years, the 2020 run would be much smaller. By including 2015, 2017 or 2019 and thereby artificially inflating the baseline of those who targeted humpies, their 2020 catch appears to have dropped more than would have reasonably been expected. To fairly allocate funds between those who targeted humpies and those who targeted sockeye, chum or coho, the base periods should only include even years. One could have reasonably expected their 2020 catch of any of the four species to be similar to 2016 or 2018, but there was no reason to expect odd-year levels of pinks in 2020.
- 2) **I support the crew proposal**- While I am not a crewman in any qualifying fishery, I appreciate that the draft plan is generous to crew. They have always been legitimate stakeholders, but were not included in the biggest allocation of fish resources in Alaska- IFQs. I am glad to see that ADF&G proposes to include them in this distribution plan. Since crew payments are not always well documented, I support the proposal to simply requiring the skipper to vouch for the crew member and to distribute crew compensation on an equal share basis
- 3) **\$8,000 troll minimum in 2020 is arbitrary**- Why was this amount picked as the cutoff? It looks like a seiner or gillnetter that caught even one pink would qualify for relief money, but trollers have to meet a much higher bar. What justifies this threshold?
- 4) **I support equal share for Trollers**- Unless the amount of money directed at the troll fleet is significantly increased (perhaps by using only even years in the base period), the funds are insufficient to justify the time and hassle of documenting and verifying income necessary for a tiered approach. Hence, the equal share method is the most appropriate for the funding level currently proposed. If the department is going to eliminate the \$8,000 minimum, then perhaps the range of income lost would be large enough to justify a tiered approach.
- 5) **Omission of Yakutat Setnet fishery**- Why was this fishery not included in the draft plan?

Thank you for considering my input,
Tad Fujioka
FV Sakura



Alaska Trollers Association

130 Seward #205
Juneau, AK 99801
(907) 586-9400
alaskatrollers@gmail.com
www.aktrollers.org

October 5, 2022

Ana Enge, Program Coordinator
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811

Re: 2020 SE Disaster Funds

Dear Ana,

As you know, Alaska Trollers Association represents the Southeast Alaska troll fleet. We are responding to your request for comment on the Draft Spend Plan for funds appropriated on the 2020 21 Salmon Disasters. We offer the following comments to your department:

- 1) **Inappropriate inclusion of odd calendar-year catch history in baseline calculations** Pink salmon runs are highly cyclic with odd year returns typically much stronger than even year returns. Comparing the 2020 catch by a region, a gear-group's, or an individual fisherman to their catch from a historic period that includes odd years (i.e. 2017-2019 or 2015 2019) is inappropriate as there was no reason to expect that the 2020 pink salmon catch would have been on par with recent odd years. Including the catch history of recent even years should be considered. Including only odd year catch history in the base period unfairly compensates fishermen that targeted pink salmon compared to fishermen that targeted sockeye, chum or coho as the historic odd year pink harvest was much larger than ADF&G forecasts for 2020. This results in the draft providing for an inappropriately small allocation to trollers.
- 2) **Qualified support for equal share for SE Trollers-** In part because of the inclusion of odd calendar years in the base period (especially 2019 which was nearly as poor as 2020 for the troll fleet), the compensation being proposed for the troll fleet is so small as to make creating a tiered compensation plan more hassle than it is worth. The troll fleet is the second largest limited entry fishery in the state after the Bristol Bay drift net fishery. While not all trollers will qualify, there will still be enough qualifying trollers to make the average individual troller's share so small that developing a more complicated allocation scheme will not be worth the fisherman or administrating agency's time. If the spend plan is revised to increase the troll allocation, then a tiered approach might be worth considering.

- 3) **\$8,000 troll minimum in 2020 to qualify**- \$8000 appears to be an arbitrary amount and is high, particularly considering that fishermen who were engaged in the seine and gillnet fisheries (which are generally more lucrative) can qualify for relief with a 2020 catch worth as little as \$1.
- 4) **Appreciation of generous allocation for SE & Chignik Crew** Our membership includes crew members and we appreciate that the draft plan is generous to those who help makes the salmon harvest possible. All too often crew get left out of mitigation efforts. Furthermore, we understand the practical difficulties of attempting to create a tiered compensation system for crew due to potential lack of documentation of one's crew share. Thus, we support the proposed equal share method.
- 5) **Omission of Yakutat Setnet fishery**-The draft plan did not provide any relief for Yakutat setnetters who catch pink, chum, sockeye and coho. Why was this fishery not included?

We hope you can address some of our concerns expressed above – in hopes to make this relief more balanced and fair.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amy Daugherty', with a long horizontal flourish extending to the right.

Amy Daugherty
Executive Director



Box 2196, Petersburg AK 99833 * (253) 279-0707 * usag.alaska@gmail.com * akgillnet.org

USAG'S MAIN PURPOSE IS TO PROTECT, SERVE AND ENHANCE SOUTHEAST ALASKA'S COMMERCIAL GILLNET FISHERY

Comments regarding initial 2020 Disaster Spend Plan

United Southeast Alaska Gillnetters appreciate the opportunity to comment on the initial 2020 Disaster Spend Plan. As this exercise moves along, it is our hope that the department will be able to find a formula that will be used in future disaster declarations to speed the process up, and allow relief to impacted stakeholders as soon as possible. For the sake of brevity, we will comment only on research and the southeast portion of the spend plan.

Research

In our estimation, the 12% is a large ask. While we would agree there are many unknowns associated with run failures, and further research could be helpful in predicting disasters in the future, we are dubious as to whether some projects would be sustainable. Most studies would be subject to several generations of salmon to be conclusive, and depending on species, could take decades.

Non-adult abundance is already available in the southeast chinook streams, and has shown that high abundance non-adults does not correlate to better returns, and only show the river itself is suitable habitat. It could be helpful for other streams to possibly identify habitat issues, but probably not a very reliable forecast tool, given that ocean survival has been the mantra of the department for decades.

Deciphering impacts of climate/ocean conditions seems broad and would require a very long-time frame and resources to accomplish, as there are likely many contributing factors.

The role of diet, health, and disease are already well known, but further studies along these lines could be helpful. Parasites in fresh-water systems could also be investigated.

Better tools to assess adult populations would be worthy, since one must know the number of fish you are managing.

Management Strategy Evaluation analysis of mixed stock fisheries would be good information on a variety of fronts, but would not do much to avert disasters. Knowing the composition of mixed stocks allows for meaningful management.

Another course of research that may be helpful, is assessing impacts of the rising populations of sea mammals. Since the implementation of the Marine Mammal Protection Act, there has been a

dramatic rise in sealion and harbor seals that frequent river mouths during the month's salmon return, and also when smolt out-migrate. It is likely that this is contributing to poor ocean survival.

Southeast Portion

Generally, we are supportive of the spend plan for southeast. The allocation of funds to the fleets seems relative to historical performance. If the trollers must be included, we feel the criteria presented is representative of that portion of the fleet that was impacted.

We are supportive of the crew portion. Having their own pool will save time and energy on several fronts. We realize our operations are useless without a work force, and as independent contractors, their own pool of relief is necessary.

We are supportive of the quartile disbursement formula that has been presented. While we would have preferred a formula that weighed dependency more than past fishery performance, we recognize that the presented formula could allow for a faster disbursement of funds. Again, it is tantamount the department develop a procedure and protocol for fleet disbursement in disaster relief. We recognize that every disaster is somewhat unique, but having a procedure in place will help speed up the process.

We are in opposition to including the Metlakatla reservation permit in the relief pool. The fish sold on this permit are not the result of a state fishery. The criteria for a fishery disaster used data from state fisheries, not theirs. The residents of Metlakatla who own limited entry permits and sold fish from state managed fisheries are eligible, as they should be.

Again, we appreciate the opportunity to comment. Transparency and inclusion are important, and we appreciate your recognition of that as well.

Sincerely,

A handwritten signature in black ink, appearing to read 'Max Worhatch', with a stylized, flowing script.

Max Worhatch, Executive Director, USAG

From: [Brian Warmuth](#)
To: [DFG, ComFisheriesDisasters \(DFG sponsored\)](#)
Subject: Disaster relief fund distribution
Date: Thursday, October 6, 2022 8:50:39 AM

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Ana

I have been chatting with some of my friends on the dock here in Ketchikan and one interesting point was brought forward that I wanted to share with you. The data base for the seiners that is used to Distribute these funds places trollers at a large Disadvantage.

Pinks salmon are on a two year Cycle , even and odd years. Historically, the odd year runs are much bigger for pinks. So when you add in the larger even years it makes 2020 look even worse. Trollers targeting other types of salmon with a much longer life spans are Subjected to the same even and odd year spikes in production.

So probably the fair way to look at the sein numbers would be to just look at the history of even year pink runs and see how far off 2020 was from the even year average. It's still a disaster, just not as large of a disaster. This would help the fair allocation of funds if some could be moved from the seiners to the trollers.

Thank you for taking the time to consider this

Brian Warmuth

Sent from my iPhone

From: [Brian Warmuth](#)
To: [DFG, ComFisheriesDisasters \(DFG sponsored\)](#)
Subject: Fwd: Federal Fishery Disaster Initial Draft Spend Plan- 2020/21 Statewide Salmon
Date: Tuesday, October 4, 2022 11:47:18 AM

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Sent from my iPhone

Begin forwarded message:

From: Brian Warmuth [REDACTED]
Date: October 4, 2022 at 11:42:29 AM AKDT
To: [REDACTED]
Subject: Re: Federal Fishery Disaster Initial Draft Spend Plan- 2020/21 Statewide Salmon

Ana

Thanks for getting back to me about the formula for distribution of disaster funds . I am sure that the figures that you gave me in your last email were correct. One thing that I hope you folks accounted for was the incredible diversity of the Troll fleet compared to the Southeast Seiners.

Seiners more or less target pinks and sell their catch to a few processors. Trollers target several different species and now many market their own fish. It's probably next to impossible to account for this in your formula. But, personally I feel that I am Receiving less than my equitable Share.

One last question, should I contact my crew from that season ? Will troll crew members be eligible for a share of disaster funds ? If they are what are they looking at in compensation ?

If I do contact them I am sure that will be the first question I hear.

Cheers
Brian Warmuth

Sent from my iPhone

From: [JILL WOODWORTH](#)
To: [DFG, ComFisheriesDisasters \(DFG sponsored\)](#)
Subject: Nick Babich consideration
Date: Thursday, October 6, 2022 12:55:51 PM

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I have owned a Southeast permit for over 30 years. I renewed the permit in 2020 planning to fish, but being struck hard with Covid I had to let my crew go and never felt well enough to make the trip to Alaska. I went back to fishing in 2021, as I have since the age of 12. I hope you will take this into consideration for the requirements for the disaster relief. I would have been in Alaska if not for this illness. I really appreciate your consideration.

Thank you, Nick Babich

From: [Nicole Kimball](#)
To: [DFG, ComFisheriesDisasters \(DFG sponsored\)](#)
Cc: [NicoleK](#); [Bush, Karla L \(DFG\)](#)
Subject: PSPA comment on Commercial Fisheries Disaster Spend Plan -- Southeast Alaska
Date: Wednesday, October 26, 2022 4:46:15 PM

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Thank you for the opportunity to review and comment on the draft spend plan for funds appropriated to address the 2020/21 salmon disasters. Our comment is specific to the fisheries disasters determined for the 2020 Southeast Alaska commercial salmon fisheries. **We also submitted a comment letter on October 6, 2022. This is an additional comment after further consideration.**

The Pacific Seafood Processors Association (PSPA) represents shoreside processing plants operating across Alaska, including those historically dependent on the commercial salmon fisheries in Southeast Alaska (Craig, Wrangell, Sitka, Ketchikan, and Petersburg). PSPA member companies supporting the comments provided here include Alaska General Seafoods, Sitka Sound Seafoods, Silver Bay Seafoods, and Trident Seafoods.

Our additional comment pertains only to the entity that can apply for eligibility as a Southeast salmon processor. Currently the draft spend plan requires that individual southeast salmon processing facilities apply. We ask that you consider allowing the processing company as a whole to apply on behalf of the combination of Southeast salmon processors it owns and operates, in addition to the option to apply on an individual facility basis as proposed. For shoreside processing companies that own and operate more than one Southeast plant, it is not only more efficient to consolidate the application, but it makes more sense to consider processing operations as a whole in the disaster year. Given both serious COVID-19 mitigation needs and the very low salmon runs that constituted the fisheries disaster, some plants consolidated operations into one plant/community in 2020 in order to minimize COVID-19 risk, stay operational, and continue to provide a market to salmon fishermen. These processing companies are still full participants, subject to the disaster, and their operations contributed to the average values calculation made in the initial disaster request to the Secretary of Commerce. Yet the current criteria applied only on a facility basis could prevent a company from receiving funds in two ways: 1) the closed plant did not operate in 2020 and thus would not qualify; 2) the plant that took additional deliveries may not demonstrate a loss in wholesale value even if the company overall experienced a substantial loss in 2020 compared to their 2017 – 2019 average value.

DCCED has used language in recent COVID-19 relief programs (AK-ARPA Business Relief Program and the Seafood Processors Pandemic Response and Safety block grant program) that states that ‘A corporation may file as a whole, or its subsidiaries may apply separately. But a corporation and one or more of its subsidiaries may not both apply.’ This type of language could be considered to modify the draft spend plan as follows:

A processing company may file as a whole on behalf of its combined Southeast salmon processing

facilities, or it can apply by individual Southeast salmon processing facility. But a company and one or more of its facilities may not both apply. Southeast salmon processing companies or facilities that meet all criteria are eligible for payment based on the average wholesale value of Southeast sockeye, chum, coho, and pink salmon processed by the facility from 2017-2019 using COAR data. Processor eligibility criteria:

1. Processing facility (or company, if applying as a company) must have processed Southeast sockeye, chum, coho, and/or pink salmon in 2020 with a wholesale value of at least \$20,000.
2. Processing facility (or company, if applying as a company) must have a demonstrated loss in wholesale value of Southeast sockeye, chum, coho, and/or pink salmon in 2020 as compared to their 2017-2019 average wholesale value of Southeast sockeye, chum, coho, and/or pink salmon.

-

Thank you for considering this comment for the second draft spend plan relative to 2020 Southeast salmon.

Nicole Kimball
PSPA



October 6, 2022

Ana Enge
Program Coordinator I
Department of Fish and Game
Phone: (907) 465-4394
Via email: dfg.com.fisheriesdisasters@alaska.gov

Dear Ms. Enge,

Thank you for your work on the ADF&G draft spend plan for funds appropriated to mitigate the 2020 and 2021 Alaska salmon disaster declarations and the opportunity to comment. We support the majority of the plan as written and have a few suggested alterations.

Petersburg Vessel Owner's Association (PVOA) members participate in a wide variety of species and gear type fisheries in state and federally managed waters. PVOA members fish throughout Alaska from Southeast to the Bering Sea for species including salmon, herring, halibut, sablefish, cod, pollock, crab, shrimp, and tuna. The majority of our membership participates in salmon fisheries in Southeast Alaska and will be eligible for financial assistance under the draft spend plan. As our membership is primarily made up of commercial interests, we will focus our comments to these aspects of the spend plan.

Guiding Principals

PVOA members support the guiding principles of the plan *to first assist participants harmed by the salmon fishery disasters*; and secondly improve assessments and management approaches, and mitigate impacts of future disasters.

Research

PVOA supports leaving these funds unallocated by region in order to support projects with the greatest need. Due to this year's continued chum and chinook run failures in Western Alaska, our members expect some projects in this area will be top priority. While this research work may take place in Western Alaska, several of the suggested priorities for research funding would provide information that could be significant to other regions including Southeast.

Further, we believe funding for research through the spend plan should be used on projects that can be accomplished in totality. Not on projects that once started necessitate a region find future funding to finish. Since we believe the use of these funds

would be best spent on projects that can be completed, we realize this likely equates to less projects and not the availability of funds for projects in each declared region.

Of the four research themes suggested in the plan, the one we feel would provide the best insight and benefit to all regions impacted by the 2020-2021 disasters is: research that improves understanding of the relative importance of specific mechanisms that drive abundance of Alaska salmon, which could include:

- how ocean/climate conditions impact future runs,
- the role of diet, health and disease on the survival and spawning success of Alaska salmon

Commercial and Subsistence Participants

PVOA members support the proposed allocation of funds proportional to the estimated loss in each of the six fisheries. Each region faced its own unique shortfall of salmon resulting in economic impacts in 2020-2021 and we believe this approach is the most equitable to all affected Alaskans.

2020 Southeast Commercial

PVOA members support this section of the spend plan including:

- Harvester allocation between permit holders based on average recent ex-vessel values for the troll and gillnet gear groups. *However, for the seine gear group, we recommend the average be based on the previous five even-year ex-vessel values.* The seine fishery is predominately a pink salmon fishery. This is a two-year stock with strong even and odd-year trends. Altering the plan in this way would match the even-year average practice used in previous spend plans including the 2016 southeast salmon disaster.
- Crew shares coming 'off the top,' based on average crew sizes
- And active participation in the 2020 season be shown through at least one landing in order for a permit holder to be eligible.

The draft spend plan does not outline how unclaimed funds from the four categories will be spent. *PVOA asks the plan be amended to ensure unclaimed funds from the commercial and subsistence category be reallocated within the sector they are appropriated to.* Additionally, unspent funds should also remain within a region i.e., unclaimed Southeast harvester funds would be reallocated to Southeast harvesters. We expect the majority of permit holders will apply for relief funds, but what happens with funds if a permit holder chooses not to or misses the deadline?

We assume it will be more difficult for Pacific States Marine Fisheries Commission to track crewmen than permit holders as we expect the number of eligible crewmen to be higher and span more states. In the past, ADF&G's database for tracking of crewman licenses has proven to be less detailed than CFEC's for permit holders. Consequently, the number of crewmen applying for funds will likely be less than the number estimated by ADF&G in their 'average crew size across all Southeast salmon gear types.' Additional reasons a lower number of crewmen may apply include; crewmen from out of state not being aware of the program, or crewmen not seeking an affidavit from permit holders.

Again, thank you for your work in developing this spend plan and we look forward to reviewing the next draft. Please contact us with any questions.

Sincerely,



Megan O'Neil
Executive Director

From: [Brian Warmuth](#)
To: [DFG, ComFisheriesDisasters \(DFG sponsored\)](#)
Subject: Re: Federal Fishery Disaster Initial Draft Spend Plan- 2020/21 Statewide Salmon
Date: Friday, September 30, 2022 2:02:58 PM

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Ada

Thanks for the update on the plan for the disaster funds for the 2020 season. I am a power troller out of Ketchikan. Looking at the plan it looks to me like the troll fleet is getting the short end of the stick. The plan gives more funds to crew members than troll permit holders, how was that Decision made ?

Hopefully, it's not to late change the percentages of the amount of funds allocated to the different users .

Have a nice weekend
Brian

On Thu, Sep 29, 2022 at 11:55 AM DFG, ComFisheriesDisasters (DFG sponsored) <dfg.com.fisheriesdisasters@alaska.gov> wrote:

From: [Kathy Hansen](#)
To: [Enge, Ana C \(DFG\)](#)
Subject: RE: Mega Salmon Fishery Disaster Comments
Date: Monday, October 3, 2022 9:16:03 AM

Ana, thank you for the disaster declaration information.

On the spend plan I think I want to emphasize again that there needs to be more of a tie to effort expended in 2020 fishery. The current plan reminds me of the CARES Act plan and that has already tended to make fishermen up to whole in comparison to their 5 year averages, particularly those that didn't fish much so this money should go to the individuals that actually tried to fish/did fish in 2020 and more money for those who fished more in 2020 not that you are a highliner with your five year average.

From: Kathy Hansen [REDACTED]
Sent: Wednesday, September 28, 2022 1:01 PM
To: Enge, Ana C (DFG) [REDACTED]
Subject: RE: Mega Salmon Fishery Disaster Comments

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That looks accurate more concise than I articulated to start with.

I prefer fish ticket per stat week criteria over landing because an individual fishermen who caught the same amount in the same area depending on their tender might have one fish ticket while another boat would have 4-5 so landing can disguise actual participation over the course of a season.

Another method I have thought about for simplicity sake and treats every gillnet permit holder the same in 2020 since reading the draft plan is for the gillnet fleet (seine wouldn't want it) is an equal flat amount for every participant that had one landing or more in 2020 regardless of the previous years history.

Kathy

[REDACTED]

[REDACTED]

[REDACTED]

From: [Bob Martin](#)
To: [DFG, ComFisheriesDisasters \(DFG sponsored\)](#)
Subject: S03A tiers unnecessarily cause large disparities in the distribution of relief
Date: Thursday, November 10, 2022 11:00:42 AM

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Dear ADF&G,

The proposed S03A tier system is too crude and unevenly distributes funds in an arbitrary way.

S03A Estimated Funds	\$4,926,167			
Funds per tier	\$1,231,542			
	Tier 1	Tier 2	Tier 3	Tier 4
Upper Bound		\$105,999	\$73,999	\$58,500
Lower Bound	\$106,000	\$74,000	\$58,500	
Eligible Permits	43	74	98	156
Estimated Share	\$28,641	\$16,642	\$12,567	\$7,894
% of Production at Upper Bound		15.7%	17.0%	13.5%
% of Production at Lower Bound	27.0%	22.5%	21.5%	

The difference between a permit with historical production of \$105k vs \$106k is particularly egregious.

Wouldn't it be better to determine that percentage of historical production (apparently somewhere around 20%) that exactly consumes all available funds and distribute it to eligible permit holders regardless of tier? Then there would not be these ridiculous jumps between tiers.

I believe that would be more in the spirit of how the federal disaster designation was derived.

Sincerely,

Robert W. Martin, Salmon Gillnetter

Petersburg, AK 99833

From: [Tracy Rivera](#)
To: [DFG, ComFisheriesDisasters \(DFG sponsored\)](#)
Subject: S15B troll comment
Date: Thursday, September 22, 2022 3:23:23 PM

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I am a power troller from Tenakee Springs, Alaska. It is not fair to require a landing amount of \$8000 or greater to qualify for the relief money. It should be \$4000 or less to include more trollers. Please consider my comments.

Sincerely,

Tracy Rivera
F/V Good News

Sent from my iPad



October 6, 2022

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

Dear Commissioner Vincent-Lang,

Thank you for the opportunity to provide comments on the 2020 statewide salmon disaster Draft Spend Plan on behalf of the members of Southeast Alaska Seiners Association (SEAS). SEAS represents 125 members of the seine fleet in Southeast Alaska who harvest all five species of Pacific salmon, primarily targeting pink and chum salmon. In the interest of responsible stewardship of Southeast Alaska's resources, SEAS works to balance the interests of all users of our region's waters to ensure the continued ability to harvest our historical and equitable share of salmon. We appreciate the opportunity to offer our comments as the Alaska Department of Fish and Game (ADF&G) works to complete its spend plan for the fishery disaster funding allocations announced by the U.S. Department of Commerce on May 5th, 2022.

First and foremost, we would like to recognize ADF&G leadership and staff for efforts to put together the Draft Spend Plan. We believe the overall framework accomplishes the difficult task of equitably distributing the disaster funds across the affected regions. While there may be some minor adjustments going forward, we support the concept described in the current Draft Spend Plan of calculating the proportion of the statewide loss incurred by each disaster. While we maintain this broad support for the Draft Spend Plan as written, we would also like to take this opportunity to provide general comments and address specific points related to the Southeast section of the document.

General Comments

In our June 15th, 2022, letter, which is appended to this letter for convenience, we noted that the methodology ADFG used to calculate lost revenue for the 2020 pink salmon fishery is different from methodologies used in previous disasters. Specifically, the 2016 pink salmon disaster, which estimated lost pink salmon revenue by comparing the disaster year to the five most recent even years. We request that, in calculating lost revenue for pink salmon statewide, ADF&G compare 2020 to the preceding 5 even years (2010, 2012, 2014, 2016, and 2018) for the reasons outlined in our June letter.

On page 2 of the Draft Spend Plan, a suggested research priority for funding is "*Management Strategy Evaluation (MSE) analyses examining risks and tradeoffs of different management approaches for mixed-*

stock fisheries to refine stock-specific management and understand impacts of various management actions.” While we suspect that ADF&G intended for this language to address U.S. and Alaska fisheries, the current research priority as written could have unintended consequences in our region, particularly regarding treaty management. We would be happy to communicate with ADF&G further to assist in ensuring unintended consequences do not arise from MSE mixed-stock fishery language in a final draft.

Southeast Comments

Regarding the Southeast specific portion of the Draft Spend Plan, the SEAS board voted unanimously to support an equal distribution between all permit holders. We believe the simplicity of this approach will ensure a more timely and fair process, and we strongly encourage ADF&G to adopt this methodology. In the instance of multiple permits making landings on one vessel, we support a limit of one payment share per vessel, regardless of the number of permits completing landings on that vessel. The disaster relief funds should go to the transferee in the instance where limited entry permit(s) have been transferred by the owner to another individual.

We oppose inclusion of the Metlakatla Indian Community’s (MIC) permits among eligible applicants for these relief funds. Since the MIC fishery is Federally managed and these disaster relief funds are specifically for State of Alaska fisheries, we believe the inclusion of MIC participants that do not hold a limited entry permit would be inappropriate. We support the inclusion of Metlakatla fishermen who hold limited entry permits alongside all other CFEC permit holders in the salmon seine, gillnet, and troll fisheries.

Additionally, we support ADF&G’s proposed set-aside of funds for crewmembers whose wages were affected by the 2020 salmon disaster. We agree that it is important to ensure that crewmembers have an opportunity to access relief alongside permit holders. Because the average crew share varies between specific sectors, we encourage ADF&G to consider distributing the \$4.4 million crewmember allocation between the seine, gillnet, and troll sector crews based on each sector’s proportion of the region’s estimated lost revenue. We further propose that crew payments be subject to a cap in the event that the number of applicants is low and allow any undisbursed crewmember relief funds to be rolled over to the general allocation for permit holders within that sector.

We greatly appreciate the opportunity to work closely with ADF&G in the development of this spend plan. We are grateful for the strong communication with ADF&G thus far and look forward to providing further comments as this process continues. Please contact us with any questions regarding the feedback provided here.

Sincerely,

Phil Doherty
Executive Director
Southeast Alaska Seiners Association
PO Box 6238
Ketchikan, AK 99901



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

Dear Commissioner Vincent-Lang,

Southeast Alaska Seiners Association (SEAS) represents 125 members of the seine fleet in Southeast Alaska who harvest all five species of Pacific salmon but primarily target pink and chum salmon. As responsible stewards of Southeast Alaska's resources, SEAS works to balance the interests of all users of our region's waters to ensure the continued ability to harvest our historical and equitable share of salmon. We appreciate the opportunity to offer our comments as the Alaska Department of Fish and Game (ADFG) works to develop its spend plan for the fishery disaster funding allocations announced by the U.S. Department of Commerce on May 5th, 2022.

Before we offer comments on the forthcoming spend plan itself, SEAS is concerned about the methodology used to calculate lost revenue for the 2020 Southeast pink salmon fishery. ADFG's salmon fishery disaster determination request memo¹ calculates lost revenue to the Southeast Alaska pink salmon fishery by averaging only the two even years in the time series (2016 and 2018), resulting in a "five-year" average ex-vessel value for the purse seine fishery consisting of only two data points - one of which (2016) was a disaster year itself. While we understand the logic of comparing only even-year values due to the alternating two-year cycle of pink salmon returns, it is important that the average consist of five data points like every other salmon fishery being evaluated and consistent with federal guidance. The methodology we propose is not without precedent. For the 2016 pink salmon disaster, ADFG calculated lost revenue by comparing 2016 to the average of the 5 most recent even years.² Likewise, we believe that in calculating the lost revenue in the 2020 pink salmon fishery, ADFG should compare 2020 ex-vessel revenue to the average ex-vessel revenue from the 5 most recent even years (2010, 2012, 2014, 2016, and 2018) to ensure consistency across salmon fisheries (all of which rely on

¹ "2020 Southeast Alaska commercial salmon fishery disaster determination request." Memo from Karla Bush to Commissioner Vincent-Lang, February 2nd 2021. *Alaska Dept. of Fish & Game*.

² "FAQs - 2016 Gulf of Alaska Pink Salmon Fishery Disaster Relief." August 5th, 2019. *Alaska Dept. of Fish & Game*.

the 5 most recent years of data) and with previous pink salmon disasters. This issue should be addressed before proceeding further in the development of a spend plan.

Southeast Alaska experienced very poor returns of four of five species of salmon in 2020, which affected ex-vessel value for the purse seine fleet and ultimately resulted in a significant loss relative to the previous five even years. Even using ADFG's underestimate of the pink salmon fishery's five-year average ex-vessel value, the magnitude of this loss clearly qualifies the seine fleet for relief under Sec. 312(a) of the Magnuson Stevens Act. SEAS is grateful for Governor Dunleavy's decision to request a fishery disaster declaration for Southeast Alaska's 2020 salmon fishery. On January 21st, 2022, Secretary of Commerce Gina Raimondo approved disaster declarations for multiple fisheries in Alaska, including the 2020 Southeast salmon fishery.

Of the total commercial economic losses created by the six individual fishery disasters that are eligible for relief funding allocated by the National Marine Fisheries Service, Southeast Alaska constitutes more than three quarters of that loss. As a share of the total ex-vessel losses in Southeast Alaska, the purse seine fishery experienced more than half of those losses, significantly more than any other affected gear group in Southeast Alaska. We urge ADFG to take this into consideration as it develops a spend plan and considers which sectors/gear groups should be eligible for relief. It is important to note that while certain salmon species declined sharply in 2020, the impacts were not felt uniformly across all sectors.

ADFG's disaster memo notes that the poor return of pink salmon to Southeast Alaska was "not entirely unforeseen." The relatively weak pre-season forecast for pink salmon derived from ADFG's collaborative work with NMFS through the Southeast Coastal Monitoring (SECM) survey does not diminish the fact that the seine fleet suffered considerable economic losses in 2020 due to depressed salmon returns. The foreseeability of the pink salmon failure in 2020 should not be a determining factor as ADFG develops a spend plan for the allocated disaster funds. ADFG should not discount the amount of relief needed by sectors dependent on pink salmon solely because the 2020 forecast was relatively weak compared to previous years. We urge ADFG to develop a spend plan that is clearly grounded in the available data regarding losses and impacts to fishing sectors.

Further, we encourage ADFG to utilize the per-region percentages of the total *commercial* loss to allocate funding that will compensate $\frac{2}{3}$ of the total ex-vessel commercial fishery loss in each region. This would provide Southeast Alaska fishermen with at least \$36,341,471 in disaster relief to be allocated among the relevant sectors that experienced commercial fishery failures due to the 2020 salmon disaster for all species except Chinook salmon. Again, this figure uses ADFG's metric for total commercial ex-vessel loss in Southeast, which we know undervalues the five-year average ex-vessel value for the pink salmon fishery.

We recognize that communities in other regions of Alaska have experienced losses in subsistence opportunity due to poor salmon returns in Norton Sound, Chignik, and on the Yukon and Kuskokwim Rivers. The impacts are undeniable and significant, and while we are not

opposed to disaster relief being used to address subsistence losses, both the Magnuson Stevens Act and NMFS's Policy on Disaster Assistance state that funds may be appropriated for the purpose of providing disaster relief only after the Secretary of Commerce has approved a *commercial* fishery failure due to a fishery resource disaster. NMFS's decision to include both commercial and subsistence fisheries under a single disaster relief allocation creates significant challenges in balancing the impacts of commercial losses and lost subsistence opportunities in Western Alaska. Nonetheless, federal law and policy clearly dictate that commercial fishery losses must inform the relative distribution of these funds across the affected regions of Alaska.

Thank you for the opportunity to weigh in on the development of a data-driven spend plan for the federal disaster funds allocated to the salmon disasters in Southeast Alaska, Norton Sound, Chignik, and on the Kuskokwim and Yukon Rivers. SEAS staff and board members stand ready to work with you throughout this process to provide additional data or other informational support as needed. We look forward to staying in regular contact with the Department of Fish & Game and appreciate your efforts to make this a timely and efficient process for all involved stakeholders.

Respectfully,

Phil Doherty
Executive Director
Southeast Alaska Seiners Association
PO Box 6238
Ketchikan, AK 99901

From: [Tom Lovrovich](#)
To: [DFG, ComFisheriesDisasters \(DFG sponsored\)](#)
Subject: Spending Plan Comments
Date: Wednesday, October 5, 2022 5:35:01 PM

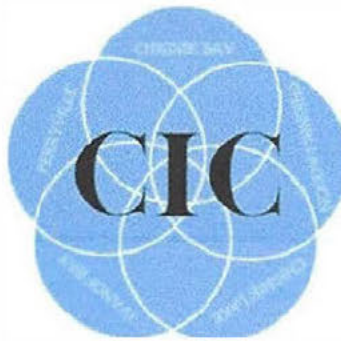
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Ana please submit my written comments. Thank you

I am an owner and fisherman of a SOLA seine permit. I've owned and fished my permit for decades. I would like to comment on the eligibility requirements for this plan as a commercial harvester. Coming into the 2020 season I renewed my permit with intentions to fish. As covid 19 increased in Alaska I decided to remain home to take care of my elder parent. I am asking the individuals involved to consider past history in the fishery and removing having to have a delivery to be eligible for funds. I Know of other longtime Southeast fishermen who did the same as well. We should not be penalized for access to these funds because of hard decisions associated with the pandemic. Any individual who did renew with the specified intent to fish should be eligible. Thank You for your consideration. Tom A Lovrovich

Chignik



**CHIGNIK INTERTRIBAL COALITION
427 AIRPORT ROAD
CHIGNIK LAGOON, ALASKA 99565**

October 6, 2022

State of Alaska, Department of Fish & Game
Ana Enge
PO Box 115526
Juneau, AK 99811-5526

RE: Comment on State of Alaska, ADF&G Draft Spend Plan, dated September 22, 2022

Dear Ms. Enge,

This letter is written on behalf of the five federally recognized tribes represented by the Chignik Intertribal Coalition (CIC). Our tribes are members of the communities of Chignik Bay, Chignik Lagoon, Chignik Lake, Ivanof Bay and Perryville. The Coalition has represented these tribes in each of the salmon disaster processes since the 2018 disaster.

On page 2, in the paragraph titled Research, and in recognition that the new suggested themes have been expanded to include Management Strategy Evaluation (MSE) analyses examining risks and tradeoffs of different management approaches or mixed stock fisheries to refine stock specific management and understand impacts of various management actions. The Coalition supports this theme as a priority for funding because we recognize that the cause of these fish disasters span more than one fishery area and/or salmon species.

On page 9, in the paragraph titled Chignik Harvesters, we approve of the language indicating that the permit holders and crew payment formula & minimum payment per eligible permit holder (\$30,000 in 2020 vs \$40,000 in 2018), combined with the quartile tier system from the 2018 disaster plan, has been proposed to be replicated for the 2020 plan. The 2018 distribution plan worked for both permit holders and crew.

We support the eligibility criteria listed for Chignik permit holders as proposed:

1. SQ1L permit card must have been valid in 2020, We support this requirement.



**CHIGNIK INTERTRIBAL COALITION
427 AIRPORT ROAD
CHIGNIK LAGOON, ALASKA 99565**

2. Permit must have been used to make Chignik sockeye salmon landings in 2019. We support that those who demonstrated commitment and participated in the 2019 Chignik fishery, should be the only qualified permit holders and crew to apply for the 2020 salmon disaster funds.

3. Permit holder did not make landings in another 2020 salmon seine fishery. We support this requirement to be included in the eligibility requirements for the 2020 disaster plan.

We support that the proposed payment of funds transfer only to the person listed as the 2020 "Permit holder" in the CFEC database and is the appropriate way to determine eligibility.

In closing, we approve adoption of the proposed draft spend plan for the 2020 Chignik salmon disaster funds with our enclosed recommendations. We look forward to the next opportunity to comment in this process and our Coalition membership appreciates your work.

Sincerely,

George Anderson

President, Chignik Intertribal Coalition

[Redacted]



October 4, 2022

Commissioner Doug Vincent-Lang
Alaska Department of Fish and Game
dfg.com.fisheriesdisasters@alaska.gov

Re: DRAFT Spend Plan for funds appropriated to address the 2020 Norton Sound, Yukon River, Kuskokwim River, Chignik, Southeast Alaska; and 2021 Yukon River salmon disaster determination

Commissioner Vincent-Lang,

Thank you for the opportunity to comment on the Federal Fishery Disasters DRAFT Spend Plan for funds appropriated to address the 2020 Norton Sound, Yukon River, Kuskokwim River, Chignik, Southeast Alaska; and 2021 Yukon River salmon disaster. For the purposes of this DRAFT plan, OBI Seafoods will focus on the Chignik salmon fishery.

We support and appreciate the allocation of funds in the DRAFT spend plan to provide 12% to research. We believe this is a fair amount and will help in mitigation of future fishery disasters.

We also support the allocation of 3% for communities, 85% for commercial participants, and 0.1% for program support. We believe this is a reasonable breakdown and aligns with requests we have made in the past.

We are however less supportive of the 85% Harvester / 15% Processor split and ask that the numbers be revised to a 75% Harvester / 25% Processor split for reasons detailed below.

OBI Seafoods, formerly operating as Ocean Beauty/Icicle, operated in the Chignik district from 2015 to 2021. When runs were normal it was an excellent source of sockeye for our operation.

OBI has a strong commitment to our fleet and the communities where we operate. The Chignik fleet and community are very dependent on the sockeye run as it represents the main source of income to the area. Before the start of a season processors often advance funds to fishermen so they can gear up for the season. These monies cover gear, insurance, repairs, and airfare to name a few things and can add up to a large sum. This is before any in-season advances to cover emergencies. These advances are usually offset by salmon harvests and are typically paid back at the end of the season. There are a few cases where repayment extends to future years. Unfortunately, in 2020, due to the almost non-existent return these were not paid back. In addition, we had tenders and capacity in place to handle the expected volume, so we experienced significant economic harm due to this shortfall.

Regarding the allocation of funds by fishery, we are supportive of 6.1% proportion of total loss for the Chignik commercial sector given the estimated loss in 2020 compared to the rest of the fisheries.

We thank you for this opportunity to comment and appreciate the Alaska Department of Fish and Game's willingness to consider our suggestions.

Sincerely,

A handwritten signature in black ink that reads "Mark Palmer". The script is cursive and fluid, with the first letters of the first and last names being capitalized and prominent.

Mark Palmer
President, OBI Seafoods



October 6, 2022

To: ADFG Commissioner Vincent-Lang

Re: Commercial Fisheries Disaster Spend Plan – Southeast Alaska

Thank you for the opportunity to review and comment on the draft spend plan for funds appropriated to address the 2020/21 salmon disasters. Our comment is specific to the fisheries disasters determined for the 2020 Southeast Alaska and Chignik commercial salmon fisheries.

The Pacific Seafood Processors Association represents shoreside processing plants operating across Alaska, including those historically dependent on the commercial salmon fisheries in Chignik and Southeast Alaska (Craig, Wrangell, Sitka, Ketchikan, and Petersburg). PSPA member companies supporting the comments provided in this letter include Alaska General Seafoods, North Pacific Seafoods, Sitka Sound Seafoods, Silver Bay Seafoods, and Trident Seafoods.

Overall distribution approach

We support the State's overall approach to use the proportion of the total loss due to the fisheries disasters as the basis for distribution by fishery. This seems like a fair, logical, and transparent approach supported by the data and linked most closely to the estimated losses.

Distribution to the processing sector

We appreciate the State compensating all categories of the most highly affected fishery participants – harvesters, processors, and communities – as well as considering a portion of available funds for salmon research. Salmon processing is highly capital intensive and characterized by high fixed costs incurred before the season begins. The 2020 salmon fisheries were extremely costly to the processing sector as these fixed costs were not fully covered by production due to low salmon runs. Being included in the spend plan is very important to shoreside processors.

The State's draft spending plan provides dollar amounts proposed to the harvesting and processing sectors in Chignik and Southeast Alaska but does not indicate how those amounts translate into each sector's percentage of their 2017-2019 average value. In previous salmon disaster plans, the state has provided data such that it is clear to the public that the plan distributes disaster funds at a level to allow harvesters to reach X% of their average ex-vessel value and processors to reach X% of their average first wholesale value. We recommend the next draft of the plan provide this information (i.e., disaster funds plus 2020 actual fishery value = X% of historic average for each sector). For the commercial fisheries, given that both processors and harvesters jointly share in the effort and the risk, we continue to support an

approach that compensates harvesters and processors at a similar percentage of their 2017 – 2019 average ex-vessel value and average gross revenue, respectively.

Shoreside processor eligibility criteria

We support the straightforward criteria proposed to determine eligible processing facilities, including the 2017 – 2019 timeframe and the use of COAR data to estimate losses of wholesale value related to sockeye salmon for Chignik and sockeye, chum, coho and/or pink salmon for Southeast. We also support the State's proposed method for distributing disaster funds among eligible processors pro rata to their demonstrated 2020 loss.

Research component

ADFG is also asking for comment on research priorities to receive salmon disaster funding (proposed level = \$6.7m), especially given that any disaster funding dedicated to research comes from funds that could otherwise support communities, harvesters, and processors affected by the disaster. Most of the research themes proposed are very supportable and appear to be research ADFG has and is undertaking currently to improve juvenile and adult salmon abundance estimates for forecasting or research to improve understanding of the primary drivers of lower salmon productivity. These themes should be of the highest importance if further prioritization is needed, and such research could benefit many salmon fisheries across many regions.

There is less understanding of the management strategy evaluation (MSE) analysis proposed to examine risks and tradeoffs of different management approaches for mixed-stock fisheries. More detail on what this analysis entails and how it links to the stated goal to 'improve available fishery information and help prevent and/or mitigate future fishery disasters' is needed in the second draft of the spend plan.

Finally, while we generally support the use of disaster funds for research, we ask ADFG to be prudent about the need for use of disaster funds in this capacity, and balance that with the opportunity to use UGF or other state funds to pursue these important statewide questions.

Thank you for the opportunity to comment and for providing a process by which stakeholders can review two drafts of the proposed spend plan. We look forward to reviewing the second draft when it is available and providing further public comment.

Sincerely,

A handwritten signature in dark ink, appearing to read 'C. Barrows', with a stylized flourish at the end.

Chris Barrows, President
PSPA

September 28, 2022

Alaska Department of Fish and Game

Hello. My name is Jason Alexander. I am a Chignik salmon seine fisherman starting my career in 1973. I fished each of the 10 years prior to the 2018 sockeye disaster.

I disagree with the qualifying criteria for the 2020 Chignik sockeye salmon disaster.

I had full intention to fish in Chignik in 2020. I had a full crew (3) plus myself and my seine boat waiting in the Chignik harbor for the run to develop. I sent my crew home in August when it was obvious of no fishery. I never salmon fished anywhere in 2020.

Under the current qualifying criteria I do not qualify for the 2020 sockeye disaster fund because I did not make a salmon landing in Chignik in 2019.

I noticed I was one of very few seine boats in the Chignik harbor in the summer of 2020. Many never left their winter harbor such as Homer, a 2 day trip. They would have not needed to insure their vessel for travel or purchase crew insurance, groceries, or fuel. Yet if they fished in Chignik in 2019 and nowhere in 2020 they qualify for the 2020 disaster fund.

I, on the other had, had all the expenses of vessel insurance, crew insurance, fuel, groceries, all the normal expenses for a salmon seine season. Plus I flew one crew member in from Anchorage on Lake Clark Air at \$645 each way.

Under the current plan I do not qualify for the 2020 Chignik disaster fund. I did not make any salmon seine deliveries anywhere in 2020 however I chose not to fish in Chignik in 2019 which disqualifies me for the disaster fund. I have all my nets, skiffs, spare parts and decades of knowledge fishing in Chignik.

Even though the 2018 salmon season was a disaster in 2019 I returned to Chignik with a crew waiting for quite some time for the season to open. I left when the first run failed to materialize in June.

I am asking the Alaska Department of Fish and Game to reconsider the qualifying criteria to include more than the one year (2019) for participation. Since 2018 was a run failure I suggest using any year between 2016 to 2019 for qualification.

Another reason to reconsider the single year (2019) for participation is this example:

A fisherman bought a Chignik salmon seine permit in the fall of 2019 or winter/spring of 2020. They show up in Chignik with their seiner and a full crew and full intent to fish. However under the current criteria this fisherman does not qualify because of the single year (2019) qualifying criteria.

Under the current plan a fisherman qualifies that made landings in Chignik in 2019 but never came to Chignik in 2020, showed little intent to fish in Chignik in 2020 and had little or no expenses because they didn't show up.

This is not fair and not right.

Please consider using more than the one year (2019) for participation for qualifying for the 2020 Chignik Disaster Fund. Consider using any year between 2016 to 2019.

As an alternative plan please consider including in the \$30,000 minimum payout to those fisherman that showed full intent to fish in Chignik in 2020 and made no salmon landings elsewhere in the state in 2020. This plan would include any crew that was aboard a qualifying vessel to be entitled to a crew share from this fund. My crew should be reimbursed for their efforts in 2020 because of their participation and intent to fish Chignik.

Thank you,



Jason D. Alexander



From: [Timothy Murphy](#)
To: [DFG, ComFisheriesDisasters \(DFG sponsored\)](#)
Subject: 2020 Chignik Disaster Eligibility
Date: Monday, October 3, 2022 6:58:51 AM

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To ADFG spend plan administrator(s);

2019, nor any other previous year should have any bearing on the 2020 Chignik Salmon fishery disaster eligibility.

Line Item 2. for eliigibility must be removed- Permit must have been used to make Chignik sockeye salmon landings in 2019. 2019 should have no bearing on eligibility for 2020 disaster relief. Why are these convoluted requirements thrown around in an attempt to disqualify more Chignik fishermen?

Timothy Murphy

From: [Sean Alexander](#)
To: [DFG, ComFisheriesDisasters \(DFG sponsored\)](#)
Subject: 2020 Chignik fishery disaster plan
Date: Thursday, October 6, 2022 4:01:18 PM

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October 6, 2022

Alaska Department of Fish and Game

Hello, my name is Sean Alexander, and I am a 4th generation Chignik salmon fisherman. I purchased my first commercial fishing license in 1993. In 2019, I purchased a Chignik salmon permit and started fishing it the following year. I operated my commercial salmon boat every year in Chignik until my last salmon landing in August of 2017.

Every year, my full intention is to fish Chignik. I have a big investment in the Chignik fishery, it's where I grew up. All of my nets, skiff and gear is all stored in Chignik. I arrived in Chignik in 2018 and 2019 and waited for a fishery. Due to the significant run failures, I had no choice but to leave.

In 2020, my salmon net never touched the water, as I had zero fish landings anywhere in the state of Alaska. Although, I did incur preseason boat expenses, such as licenses, permit renewal, insurance, fuel, oil, filters, food, lodging as well as crew expenses, I never left the port of Seward.

Under the current written plan, other fishing vessels, which never left other ports, such as Homer, to go fish in Chignik, will qualify for the disaster pay out, due to how the language is written for this proposal.

Please reconsider the qualifications for this disaster payout. As of now, how the current proposal is written for the disaster relief funds, the requirements are clearly unfair. Please consider qualifying years prior to the 1st salmon disaster, which was in 2018.

Thank you kindly,
Sean Alexander,

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