



October 9, 2024

Final Draft Spend Plan for funds appropriated to address the 2022 Kuskokwim Management Area salmon fishery disaster determination. NOAA Fisheries has allocated \$331,920 for this salmon fishery disaster. 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.

Process to develop the spend plan: ADF&G posted an initial draft spend plan for public comment on July 1, 2024, and received two comments. ADF&G posted a second draft spend plan for public comment July 29, 2024, and received one comment letter (Appendix 1). A subsequent meeting was held with Kuskokwim River Inter-Tribal Fish Commission (KRITFC) and Association of Village Council Presidents (AVCP) representatives to discuss comments submitted on the second draft spend plan.

In response to the comment received on the second draft spend plan, ADF&G made the following revisions:

Research

- ADF&G previously proposed directly funding a research project to improve the coho salmon genetic baseline. Public comment did not support this project and recommended continuing the Kuskokwim River sonar operations and/or opening the research funding to a competitive bid process. ADF&G recommends an open, competitive bid process for research funds in response to these comments.

Harvesters

Subsistence

- Based on public comment, ADF&G replaced the tier-based share allocation system with shares that are equivalent to the number of people in each eligible household.
- Based on public comment, ADF&G removed the option for registration as a resident with the Commercial Fisheries Entry Commission (CFEC) as one of four potential options to prove Alaska residency in 2022.

Commercial

- Based on public comment ADF&G modified the commercial harvester eligibility criteria to include all 2022 S04W permit holders listed as the current owner. KRITFC and AVCP representatives recognize that individual payments will be smaller but urged ADF&G to establish fair and inclusive eligibility requirements. ADF&G agrees with KRITFC and AVCP that funds allocated to this fishery disaster did not fully consider the estimated losses to the subsistence fishery and are not sufficient to mitigate the impacts to participants.

Guiding principles for disaster fund distribution: Disbursement of funds is intended to 1) assist fishery participants harmed by the 2022 Kuskokwim Management Area salmon fishery resource disaster and 2) improve information used to manage the fishery impacted by the fishery resource disaster.

This spend plan recommends the following categories and allocations for fund distribution:

Category	Allocation	Estimated funds ^a
Research	9.8%	\$32,500
Commercial and subsistence participants	89.9%	\$295,185
Program support	<0.2%	\$500
Total		\$328,185

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

The impact of the fishery disaster created significant loss of income to those involved in the harvesting and processing sectors and to the communities in which the cultural and basic economic structure is the marine economy. A portion of these funds will be allocated to research activities that promote restoration of the fishery and help assist the fishing communities that were affected by this fishery resource disaster by recognizing the loss of incomes and loss of salmon resources needed for food security. These direct payments will compensate participants consistent with fishery investments and/or historical fishery performance. Historically one of the purposes of disaster funding was to get funds to communities and fishermen as fast as possible. Direct payments provide that method.

Research ~10% (\$32,500): Research funds will be available through an open and competitive bid process administered by PSMFC. Entities that are authorized to receive federal grant funds are eligible to submit proposals for research projects based on the themes outlined below. Allowable expenses for selected research projects are qualified for reimbursement by PSMFC up to the amount awarded through the competitive bid process. The scope of this fishery disaster is the Kuskokwim Management Area and includes Chinook, chum, and coho salmon.

The following research themes have been suggested as priorities for funding by ADF&G staff and public comment on previous draft spend plans:

- Extend Kuskokwim River salmon sonar operations later in the season to help inform management decisions for coho salmon.
- Maintain the Tatlawiksuk River weir telemetry project to improve total abundance estimates of Kuskokwim River drainage chum salmon.
- Improve research and assessment of the biological impacts of Ichthyophonus disease on adult salmon run abundance and in-river mortality.
- Improvement of the Kuskokwim Area and broader Western Alaska coho genetic baseline using sample collection at spawning locations.

Community: ADF&G does not include a community directed allocation. Kuskokwim Management Area salmon landings primarily occurred at a floating processor vessel rather than shore-based facilities. Fish ticket data does not show a significant decline in salmon landings to any municipality or borough due to the 2022 fishery disaster.

Commercial and subsistence participants ~90% (\$295,185): This category includes commercial harvesters, crew, and processors in the Kuskokwim Management Area. It also includes subsistence households that rely on subsistence salmon fisheries in the Kuskokwim Management Area.

ADF&G allocated commercial and subsistence harvester funds proportional to estimated losses. The estimated commercial fishery loss due to the fishery disaster was calculated by subtracting the gross revenue value of all salmon in the disaster year, 2022, from the previous five-year average annual gross revenue value for all salmon from 2015 through 2019, which excludes the 2020 and 2021 disaster years.

ADF&G estimated subsistence fishery losses by subtracting the total estimated pounds of all salmon species harvested in the disaster year from the 2015 through 2019 annual average. Revenue losses for subsistence salmon were based on an average of urban and rural replacement costs for each species of salmon¹.

Fishery	Estimated loss due to fishery disaster	Proportion of total loss	Allocation
2022 Kuskokwim commercial	-\$140,568	5.4%	\$15,868
2022 Kuskokwim subsistence	-\$2,474,353	94.6%	\$279,317
Total	-\$2,614,921	100%	\$295,185

Subsistence Participants (~\$279,317): Subsistence households in the Kuskokwim Management Area are eligible for direct payments based on the number of people in each household that meet the eligibility criteria. To receive fishery disaster assistance, one household member may apply for the household and payments are based on number of eligible people in each household relative to the total number of eligible people in all households.

Subsistence household eligibility requirements:

1. All eligible household members **MUST** be Alaskan residents meeting at least one of the following criteria:
 - a) Eligible to receive an Alaska Permanent Fund Dividend for calendar year 2022.
 - b) Possessed or eligible to receive a 2022 Alaska resident sport fishing license from the Department of Fish and Game.
 - c) Held a subsistence or personal use permit issued by the Alaska Department of Fish and Game in 2022 in the Kuskokwim Area as defined at 5 AAC 01.250. Personal use fishery permits are NOT eligible for payments 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.
 - A household is defined as a person or persons having the same permanent residence.
 - Alaskan households that participate in subsistence salmon fisheries on the Kuskokwim River may apply regardless of physical household address.
 - Only one application may be submitted per household.

¹ For a description of methods use to estimate replacement costs for salmon see: The Economic Benefits of Bristol Bay Salmon <https://mckinleyresearch.com/wp-content/uploads/2023/09/Final-Economic-Benefit-of-Bristol-Bay-Salmon-3-17-21.pdf>

5. MUST self-certify that one or more members of the household participated in a salmon subsistence fishery in at least two of the previous five years when the fishery was open (2017-2021) in the Kuskokwim Management Area.
 - 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 2022 that was directly or indirectly related to the fishery disaster.

Commercial participants (~\$15,868):

2022 Kuskokwim Commercial	Allocation	Estimated funds
Harvesters	90%	\$14,281
Processors	10%	\$1,587
Total		\$15,868

Total losses are confidential because there are fewer than three processing companies.

Kuskokwim permit holders – 90% of commercial allocation

Eligibility criterion for permit holders:

- Individual must have held a S04W permit in 2022.

Funds are paid to the person listed as the 2022 ‘Permit holder’ and temporary emergency transfer permit holders (transferees) in the CFEC database. Permit holders who certified they were unable to participate in 2022 in order to qualify for an emergency transfer and permit holders who permanently transferred a permit away before the 2022 salmon season will not receive payments. Each eligible permit holder will receive equal payment. An estimated 703 permit holders are eligible for equal payment.

Processors – 10% of commercial allocation (~\$1,587): Kuskokwim area salmon processing permit holders that are required by 5 AAC 39.30 and 50 CFR 679 to complete and submit the Commercial Operator’s Annual Report (COAR) and who meet the eligibility criterion are eligible for direct payment. COAR buying data will be used to determine eligibility and payment for processors because those data are linked to the salmon harvesting location.

Processor eligibility criterion:

- Processing permit holder must have processed Kuskokwim area salmon in 2021.

Based on the criterion, ADF&G estimates one processing company is eligible for payment.

Program Support ~ 0.15% (\$500): ADF&G designates funds for staff working on fishery disaster plan development and implementation in coordination with Pacific States Marine Fisheries Commission.



August 12, 2024

Alaska Department of Fish & Game

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Submitted via email to dfg.com.fisheriesdisasters@alaska.gov

RE: 2022 Kuskokwim Management Area Chinook, Chum, and Coho Salmon Fisheries Second Draft Spend Plan

To Whom It May Concern:

In November 2022, the Kuskokwim River Inter-Tribal Fish Commission (KRITFC)¹ and Association of Village Council Presidents (AVCP)² submitted a letter to Governor Dunleavy seeking a request for a federal fishery disaster declaration for 2022 Chinook, Chum, and Coho Salmon Fisheries on the Kuskokwim. We are pleased this request was granted by the Secretary of Commerce, and we offer the following comments on the [Second Draft Spend Plan](#) for the \$328,185 of disaster funding.

First, we feel it is important to note that this disaster funding is not commensurate with the physical, cultural, spiritual, and economic losses that Kuskokwim families are experiencing. We often hear from regional rural residents that the disaster relief is both difficult to secure and minimal in its compensation for fishery losses when it comes. We urge the State of Alaska and Secretary of Commerce to increase the amount of disaster funding allocated directly to fishers in the future.

Research Funds (9.8%)

We support the majority of the disaster funding to be directed to participants in subsistence and commercial fisheries rather than research funding. However, we ask that the **research funds allocated in this disaster funding be made available through a competitive process to other fisheries research entities on the Kuskokwim River**, including KRITFC, other Tribal entities, and local organizations and not just be directed to the Alaska Department of Fish & Game (ADF&G). We additionally request more information on who develops research ideas and has authority in deciding where and how much of the overall funding goes to research.

ADF&G has proposed to use disaster funds to improve coho salmon genetic baselines in parts of the Kuskokwim drainage. We believe this is a low-priority project for management and research at

¹ Guided by both Indigenous Knowledge and values and the best available Western science, KRITFC represents the 33 federally recognized Tribes of the Kuskokwim River drainage in fisheries management, research, and monitoring.

² AVCP is an inter-Tribal non-profit consortium based in Bethel, Alaska, and is controlled by 56 federally-recognized Tribes. AVCP provides human, social, and other culturally relevant services to its member Tribes, which are located in villages throughout the Yukon-Kuskokwim Delta in an area of approximately 59,000 square miles.

this time. A project that would improve fishery information and future in-season management more directly is the **Kuskokwim River sonar**, which is becoming a useful and reliable tool for in-season salmon management yet is not currently funded to operate through the coho salmon season. **We recommend the \$32,500 of research funding be used to extend the Kuskokwim River sonar operations in the next year(s) beyond late July.**

Commercial and Subsistence Participants (89.9%)

Again, we support directing the majority of these disaster funds to the hands of the fishing families who suffered physical, cultural, spiritual, and economic losses due to the devastatingly low 2022 Chinook, chum, and coho salmon returns.³

For commercial allocations: KRITFC and AVCP agree with the comments from the first draft spend plan to expand the eligibility for commercial participants. There are many commercial fishery permitholders on the Kuskokwim who have been unable to land and sell salmon because of a decline in salmon populations and subsequent cessation of commercial fishery openers in recent years. The lack of commercial fishery income has been a substantial loss to many families, and not just in the 2021 and 2022 seasons. We suggest that **all commercial permitholders on the Kuskokwim who made a landing in at least the 11 years leading up to and including 2022 (2012–2022)—if not further back— be made eligible for the commercial allocation of this disaster funding.** This will help provide more effective and meaningful commercial fishery disaster relief to fishing families.

For subsistence allocations: Many households in our region are multi-generational and large, with all members of the family dependent upon subsistence-caught salmon. **KRITFC and AVCP recommend that the number of shares is equivalent to the number of people in the household rather than a tier-based share allocation system.** Additionally, we recommend **removing eligibility requirement 1.C, in which household members be “registered as a resident during 2022 with the Commercial Fisheries Entry Commission (CFEC).”** Subsistence and commercial fisheries are substantially different on the Kuskokwim, and subsistence fishery eligibility should not be linked to registration with the CFEC. Moreover, this inherently limits many fishers in the middle and upper Kuskokwim who are removed from lower Kuskokwim and other commercial fisheries yet depend heavily on subsistence fisheries—and may have experienced the record-low 2022 salmon runs most intensely.

Sincerely,



Kevin Whitworth
Executive Director, KRITFC



Vivian Korthuis
CEO, AVCP

³ See KRITFC, “2022 Kuskokwim River Salmon Situation Report,” https://www.kuskosalmon.org/s/2022-Kusko-Situation-Report_Feb-23_complete-fpbp_printed.pdf.