



July 29, 2024

**Second 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.

**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](mailto:dfg.com.fisheriesdisasters@alaska.gov) or by mail to:

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**Comments must be sent by August 12, 2024,** for consideration in the final spend plan. This is the last opportunity to submit comments before the spend plan is finalized and sent to Pacific States Marine Fisheries Commission (PSMFC).

**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 that recommended revising commercial harvester eligibility criteria to make all 2022 commercial harvester permit holders eligible for a direct payment (Appendix 1). The initial draft spend plan proposed to limit payment eligibility to commercial permit holders with a salmon landing in 2021. The comments indicated that many areas along the Kuskokwim River have not had local processors or buyers and the lack of a commercial fishery since 2015 has negatively impacted all permit holders and should be considered in the distribution of disaster funds. ADF&G agrees that commercial fishing opportunities have been limited in recent years. However, the intent of the fishery disaster program is to assist fishery participants harmed by a disaster. If all 703 current S04W permit holders were eligible for 2022 disaster relief, estimated payment amounts would be \$20 per permit holder, and insufficient funds would be available to assist active commercial fishery participants harmed by the 2022 disaster. ADF&G proposes maintaining the eligibility criteria for commercial harvesters and retaining the larger allocation towards subsistence use because this reflects the reality of the fishery participation in recent years.

ADF&G did not receive public comment on the research component of the initial draft spend plan and proposes direct funding for a research project suggested by ADF&G staff. This project would improve the genetic baseline of Kuskokwim River coho salmon for genetic mixed stock analysis (MSA) that can be used to inform fisheries management and research priorities.

**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 disaster and 2) improve fishery information used to assess and forecast future fishery performance and to develop

management approaches that avoid and/or mitigate the impacts of future fishery disasters that cannot be prevented.

The proposed categories and allocations reflect comments and ADF&G staff input received on the 2021 Kuskokwim River salmon disaster spend plan and the initial draft 2022 spend plan.

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

<sup>a</sup> 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 or prevent a similar failure in the future, but they will also be used to 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 are intended to support projects that improve available fishery information and help prevent and/or mitigate future fishery disasters. The scope of this fishery disaster is the Kuskokwim Management Area and includes Chinook, chum, and coho salmon.

The following research project is responsive to the research themes that were developed by ADF&G staff and fishery participants. ADF&G proposes direct funding of the following project in the federal fishery disaster grant. Directing fishery disaster research funds to projects in the spend plan expedites the administrative process and maximizes the amount of time for investigators to conduct research.

**Project: Improve Kuskokwim River Coho Salmon Genetic Baseline**

Recent efforts have laid the foundation for developing a high-resolution genetic baseline of Kuskokwim River coho salmon for genetic mixed stock analysis (MSA) that can be used to inform fisheries management and research priorities within the Kuskokwim River and broader Western Alaska. All Western Alaska coho salmon tissue samples in the ADF&G archives have been genotyped to produce a preliminary baseline of 42 populations and 277 genetic markers using genotyping-in-thousands by sequencing methods. However, large geographic areas of the Kuskokwim River were not represented in the tissue archives. An MSA baseline should include adequate representation of all populations expected in mixed stock samples. Leveraging current Kuskokwim River assessment projects and local partners, ADF&G plans to target 4 additional baseline collections of 50 to 100 samples each to fill gaps in the baseline needed to improve accuracy and precision of the MSA. Priority target sites include George River weir, Kogrukluk River weir, and 2 upper river sites (e.g., North, Middle, South Fork Kuskokwim). We anticipate that updating the baseline with these new collections will allow us to use MSA on coho

salmon catches and distinguish between lower river and upper river coho salmon within the Kuskokwim River.

ADF&G is seeking comments on this research project as outlined above.

**Community:** ADF&G does not propose 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. ADF&G proposes allocating funds to commercial and subsistence participants who were greatly impacted by the 2022 salmon fishery disaster and is requesting input on this or other suggestions.

**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 is proposing to allocate 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 salmon.

<b>Fishery</b>	<b>Estimated loss due to fishery disaster</b>	<b>Proportion of total loss</b>	<b>Proposed allocation</b>
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):** ADF&G proposes that subsistence households in the Kuskokwim Management Area would be eligible for direct payments based on the number of shares they qualify for, and the total proposed allocation.

ADF&G proposes using eligibility criteria for subsistence households based on criteria that were developed for Section 12005 CARES Act Fisheries Assistance. To receive fishery disaster assistance, one household member would apply for the household. Eligible applicants would be placed into tiers based on household size in 2022. Smaller households with 1-3 members would be eligible for one share, households with 4-6 members would be eligible for two shares, and households with seven or more members would be eligible for three shares.

<b>Household size</b>	<b>Number of Shares</b>
1-3	1
4-6	2
7+	3

Once all applications have been received, the total number of shares would be determined and payments for applicants calculated accordingly.

Proposed 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) Registered as a resident during 2022 with the Commercial Fisheries Entry Commission (CFEC).
  - d) 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 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.
  - 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.
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 four years when the fishery was open (2017-2020) 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):**

<b>2022 Kuskokwim Commercial</b>	<b>Allocation</b>	<b>Estimated funds</b>
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

Proposed eligibility criteria for permit holders:

1. S04W permit holder must have made a salmon landing in 2021.

2. Permit holder must have had a valid S04W permit in 2022. A permit is considered valid if fees are paid to renew the permit in 2022.

Funds are proposed to be 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 or permit holders who permanently transferred a permit away before the 2022 salmon season will not receive payments. Based on the proposed criteria, ADF&G estimates nineteen permit holders are eligible for equal payment.

**Processors – 10% of commercial allocation (~\$1,587):** Kuskokwim area salmon processing companies meeting the criteria are eligible for direct payment based on the Commercial Operator's Annual Reports (COAR) buying data. COAR buying data are used to determine eligibility and payment for processors because those data are linked to the salmon harvesting location.

Proposed processor eligibility criterion:

- Processing company must have processed Kuskokwim area salmon in 2021.

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

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

## Appendix 1. Public comments received on initial draft spend plan.

Clarence Daniel:

Clarence would like to see funding used for finding a market on the Kuskokwim or helping Kuskokwim River fishermen sign up for catcher/seller permits. Eligibility criteria for commercial permit holders should not require fee payment or landings. All S04W permit holders should be able to receive payment because CFEC has waived fees for permit renewal.

Jeffrey Evon:

To whom it may concern,

I am writing in regard to either disaster spend plan and would like to assure that anybody with a commercial fishing license should be eligible to receive the disaster relief money. We hadn't had the chance to fish for a long time and as a result, we couldn't catch any fish to sell commercially here near Bethel, Alaska. This spend plan needs to be expanded up and down the Kuskokwim for all commercial fisherman who are effected by the lack of commercial fisheries.