THE STATE of ALASKA
GOVERNOR MIKE DUNLEAVY

Department of Fish and Game

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September 18, 2026

Final Draft Spend Plan for the 2023/24 Bering Sea snow (BSS) crab fishery disaster. NOAA Fisheries provided funds for this crab fishery disaster in two allocations; $39.5 million in the first and $75.2. million in the second for a total of $114.5 million. This spend plan will inform 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 provided an initial draft spend plan for public comment in July 2024 and received nine written comments. ADF&G revised the plan based on public comments and posted a second draft plan in October 2024 and received six written comments. NOAA Fisheries announced supplemental funds in June 2026 and per public comments and stakeholder suggestions, ADF&G drafted a third spend plan with the total allocation amount for public comment. ADF&G posted the third draft spend plan in July 2026 and received 14 written comments (Appendix 1).

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

General

- ADF&G recommends a 76.5/23.5 split of the harvester-processor funds as a compromise between the 78/22 split recommended by harvesters and the 75/25 split recommended by processors. The compromise approach is also reflective of the average harvester/processor split based on the most recent 5- and 10-year total fishery value. The table below shows the total 5- and 10-year exvessel value from CFEC gross revenue data and first wholesale value from COAR production data and the average between those two sets of years.

	Total exvessel (harvester)[1]	Value-added (processor)	Total first wholesale[2]	% of fishery value to harvesters	% of fishery value to processors
2018-2022	$565,763,031	$135,619,488	$701,382,519	80.7%	19.3%
2014-2022	$994,724,836	$342,493,995	$1,337,218,831	74.4%	25.6%
Average	**$780,243,934**	**$239,056,741**	**$1,019,300,675**	**76.5%**	**23.5%**

[1]CFEC gross revenue data
[2]COAR production data

- ADF&G increased the allocation to communities from 5% to 5.5%. Public comments suggested increasing the allocation up to 6% based on changes in the allocation to research that only benefited the harvester/processor/CDQ allocations. Providing a 0.5% increase in the allocation to communities helps to further mitigate the impacts of the snow crab fishery disaster which has reduced the tax base in these communities due to the closure of processing facilities and support-sector businesses.
- ADF&G recommends increasing the Saint Paul Community allocation from 1% to 1.5% and including Trident Seafoods' Saint Paul processing plant as an eligible entity in this category. The Saint Paul processing plant and other entities in this category do not have other high-volume

fisheries to mitigate the losses from the snow crab fishery collapse. These entities provide critical infrastructure for the community's economy.

Research

- Included specific research themes for funding priorities. These include movement, distribution, and abundance of snow crab on the Bering Sea slope; improved understanding of snow/Tanner hybrid crab and their influence on snow crab; importance of nursery habitats and/or closure areas for snow crab; research to improve stock assessment modeling, which may include examination of hybrids; and management strategies to better understand, manage, and utilize snow/Tanner crab hybrids.

Community Development Quota Groups

- ADF&G recommends increasing the funding proportion that each CDQ group receives up front from 75% to 85% of their allocation, not including the 13% allocation for CDQ captains and crew. The remaining 15% is equivalent to the allocation for CDQ captains and crew (see Table on p.5) and should be distributed concurrently with the CDQ captain and crew payments. This change further promotes the ability for CDQ groups to get disaster assistance to their member village residents.
- To be consistent with funds designated for IFQ captains and crew, ADF&G recommends any unclaimed CDQ captain and crew funds be redistributed among all eligible CDQ captains and crew.

Harvesters

- ADF&G increased the minimum Quota Share holding from 1,000 units to 1,001 units because smaller holdings result in payments that are less than the cost of administering the payment (e.g., less than $30).
- The 2021/22 season is included in the seasons used for calculating the allocation of harvester funds among vessels; the best three of six seasons from 2016/17 to 2021/22 will be used.
- Crew that participated on a vessel that harvested BSS IFQ in either 2021 or 2022 are eligible for disaster relief. Vessel owners that applied for 2021/22 and 2022/23 snow crab fishery disaster funds do not need to re-submit 2021 BSS crew information because PSMFC already has that information; vessel owners must provide 2022 crew information if the vessel harvested BSS IFQ in 2022.

Processors

- ADF&G provided clarification that Peter Pan Seafoods is ineligible for fishery disaster relief as an 'active processor' because the company is no longer operating in Alaska.

Guiding principles for disaster fund distribution: Disbursement of funds is intended to 1) assist fishery participants harmed by the 2023/24 BSS crab fishery disaster, and 2) improve fishery information used to manage the fishery impacted by the fishery resource disaster.

In addition to PSFMC's estimated costs for administering the federal grant, ADF&G recommends the following categories for funding: research, Saint Paul Island entities, communities, Community Development Quota (CDQ) groups, harvesters, processors, and ADF&G program support. Allocation percentages and amounts are estimates and subject to change based on administration fees, rounding, and/or recalculations.

Category	Allocation	Estimated funds [a]
Research	5%	$5,725,000
Saint Paul Island	1.5%	$1,717,500
Communities	5.5%	$6,297,500
Harvesters/Processors/CDQ	88%	$100,760,000
ADF&G Program support	0.01%	$10,000
Total	100%	$114,510,000

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

The impact of the fishery disaster created a 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, and 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. 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 fishery participants as fast as possible. Direct payments provide that method.

Research – 5% (~$5.72 million): The 2023/24 BSS crab fishery disaster resulted from natural and undetermined causes which resulted in low stock abundance. Research funds will be allocated to improve available fisheries information and help prevent and/or mitigate future fisheries disasters. ADF&G is proposing 5% of the funds be allocated for research. The Magnuson-Stevens Fishery Conservation and Management Act prioritizes specific uses for disaster funds, including scientific research that reduces adverse impacts to the fishery or improves understanding of the affected species or its ecosystem. ADF&G is proposing that research funds be available through a combination of 1) an allocation to the Bering Sea Fisheries Research Foundation (BSFRF) to coordinate and lead one BSS survey, 2) an allocation to ADF&G for research, and administrative staff to lead, oversee, and coordinate BSS crab disaster related research and management, and 3) an open and competitive request for proposals (RFP) administered by PSMFC and utilizing the North Pacific Research Board's (NPRB) scientific review process. Entities that are authorized to receive federal grant funds are eligible to submit proposals for research projects based on the themes outlined below.

Research priorities:

- Movement of snow crab on the Bering Sea slope and along the US/Russian border.
- Distribution and abundance of snow crab on the Bering Sea slope.
- Improved understanding of snow/Tanner hybrid crab and their influence on snow crab.
- Importance of nursery habitats and/or closure areas for snow crab.
- Research to improve stock assessment modeling, which may include examination of hybrids.
- Management strategies to better understand, manage, and utilize snow/Tanner crab hybrids.
- Extensions of snow crab research currently funded by the 2021/22 and 2022/23 fishery disaster and/or synthesis projects are eligible and will go through this RFP review process and be considered separate awards.

<u>Saint Paul Island entities - 1.5% (~$1.72 million)</u>: ADF&G recognizes the severity of loss from the fishery disasters to the City of Saint Paul, Trident Seafoods' shorebased processing facility, and Saint Paul's tribal entities, the Tanadgusik (TDX) Corporation and the Tribal Government for the Aleut Community of Saint Paul. Saint Paul is unique among communities affected by the BSS crab fishery disaster because it does not participate in other fisheries that could help mitigate the impacts of losses from the crab fisheries. ADF&G recommends direct payments distributed equally to each of these four entities that support the community of Saint Paul Island's fishery infrastructure and institutions. This does not exclude the City of Saint Paul from applying for funds under the Community allocation, which are intended to cover a portion of lost fishery tax revenue, or Trident Seafoods from applying for funds under the harvester/processor categories.

The City of Saint Paul is almost entirely dependent on the crab fisheries for municipal operations and fishery-related infrastructure and services. These funds are intended to support the City of Saint Paul's loss of associated fisheries service activities such as fuel sales and supplies, reduced dockage and wharf fees, and loss of employment and population from significantly reduced harvesting and processing activity.

TDX Corporation provides direct support services to the crab fisheries in Saint Paul, including land and dock leases, fuel sales and storage, processed crab and crab pot storage, shipping and air carrier support, lodging, and more. The crab fisheries are integral to TDX's business, and the disasters caused direct harm to the Alaska Native Village Corporations' employees and shareholders.

The Tribal Government for the Aleut Community of Saint Paul (the Tribe) owns and manages the local grocery and other businesses that serve crab fishing vessel crew and processing plant workers. The Tribe experienced a major loss to the annual general funds for the Tribal Government due to the fishery disaster which further affects its ability to make or issue grants to support community services and programs.

Trident Seafoods maintains a shorebased processing facility in Saint Paul which provides critical infrastructure for the community's economy. This facility is unique relative to other shorebased processing plants in the Bering Sea crab fishery because it is entirely dependent on snow crab and cannot offset operational losses caused by the fishery disaster.

<u>Communities- 5.5% (~$6.3 million)</u>: Municipalities and boroughs rely on revenue generated from BSS crab fishery landings and other economic activities related to the crab fisheries and the fishery disaster significantly reduced, and in some cases eliminated, these revenue sources. The state's Fishery Business tax rate is 3% for shore-based crab landings and is shared 50/50 with the state and municipalities/boroughs where the landings occur. If landings occur in the bounds of a municipality and borough, landing tax revenues are shared 50/50 between each entity. Some municipalities and boroughs levy an additional local raw fish tax at a rate of 2% to 3.5% depending on the location and species. ADF&G recommends a 5.5% allocation to affected municipalities and boroughs to help mitigate losses in fish tax and other economic losses due to the fishery disaster.

Direct payments will be made to municipalities and boroughs based on the port of landing where crab deliveries occurred.

Community eligibility criteria:

- BSS crab must have been landed in the community during 2021 and/or 2022 based on the port of landing from ADF&G Fish Ticket data.

ADF&G recommends direct payments be distributed pro rata to eligible communities based on the proportion of the total 2021 and 2022 pounds of BSS crab landed in all eligible communities. If landings occurred in a community represented by both a municipality and borough, the funds are split 50/50 between the municipality and borough, consistent with the methodology for distribution of the state's Fishery Business taxes. Landings of BSS crab occurred in four communities represented by four municipalities and one borough: 1) City of Akutan, City of King Cove, and the Aleutians East Borough, 2) City of Unalaska, and 3) City of Saint Paul.

Harvesters/Processors/Community Development Quota – 88% (~$100.76 million): CDQ groups receive, in aggregate, a 10% allocation of the annual BSS crab harvest limit and depend on revenue generated from BSS crab landings to provide economic and social benefits in member communities consistent with statutory mandates. Therefore, ADF&G recommends allocating 10% of the harvester/processor/CDQ funds off the top to the CDQ fishery.

Harvesting sector representatives proposed allocating funds using the Non-Binding Price Formula for BSS crab of 78% to harvesters and 22% to processors. Processing sector representatives proposed an allocation of 75% to harvesters and 25% to processors to recognize investments that are not fully captured in the Non-Binding Price Formula and ongoing costs to maintain crab processing infrastructure during closed BSS crab fisheries. **ADF&G recommends a compromise approach of 76.5% to harvesters and 23.5% to processors**. The compromise approach is also reflective of the average harvester/processor split based on the most recent 5- and 10-year total fishery value (see table on p.1).

Commercial Sector Components	**Allocation**	**Estimated funds [a]**
Community Development Quota (CDQ)	10%	$10,076,000
Remaining		**$90,684,000**
Harvesters	76.5%	$69,373,260
Processor	23.5%	$21,310,740
Total Commercial Sector Funds		**$100,760,000**

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

Western Alaska Community Development Quota (CDQ) Programs – 10% (~$10.07 million): ADF&G proposes direct payments to CDQ groups. Direct payments to each CDQ group are based on each group's allocation of the BSS crab fishery in federal regulation and shown in the table below, minus captain/crew funds which will be distributed by PSMFC.

ADF&G understands business models and leasing arrangements for CDQ snow crab quota differ among the CDQ organizations. However, ADF&G recommends that a total of 13% of each CDQ group's disaster funds be allocated to the captain(s) and crew of the vessel that harvested the group's CDQ quota in the most recent season prior to the 2023/24 fishery disaster. For all except one CDQ group, these are the captains/crew who fished CDQ quota in 2022. For the CDQ group that leased its quota to another group in 2022, these are the captains/crew who fished the CDQ group's quota in 2021.

Note: The values in this table are estimates and do not include the portion of total funds that will be directed to Pacific States Marine Fisheries Commission to administer the federal grant.

CDQ Group	Percent Allocation	Starting Allocation Amount	Allocation for CDQ captains and crew (13%)	Total direct payment to CDQ	Initial CDQ payment distribution (85%)	Second CDQ payment distribution (15%)
APICDA	8%	$806,080	$104,790	$701,290	$596,096	$105,193
BBEDC	20%	$2,015,200	$261,976	$1,753,224	$1,490,240	$262,984
CBSFA	20%	$2,015,200	$261,976	$1,753,224	$1,490,240	$262,984
CVRF	17%	$1,712,920	$222,680	$1,490,240	$1,266,704	$223,536
NSEDC	18%	$1,813,680	$235,778	$1,577,902	$1,341,216	$236,685
YDFDA	17%	$1,712,920	$222,680	$1,490,240	$1,266,704	$223,536
Total	**100%**	**$10,076,000**	**$1,309,880**	**$8,766,120**		

At the time of application, each CDQ group must provide an affidavit that includes final settlement information for the qualifying year, 2022 or for one CDQ group 2021, including:

1. Crew names and most recent known address and contact information.
2. Amount paid to each individual in the qualifying year.

To ensure timely distribution of relief while also encouraging accurate reporting of crew member participation by the CDQ group, ADF&G recommends a disbursement of 85% of each CDQ group's calculated payment after the application period is closed. The remaining 15% of each group's payment would be issued in a second round of disbursement, concurrent with payments to vessel crew. ADF&G recommends that any unclaimed CDQ crew funds be distributed pro-rata to all eligible CDQ captains and crew consistent with the process for distributing IFQ crew funds.

Harvesters (~$69.37 million): Harvester funds are allocated to QS holders, vessel owners, captains, and crew. The QS holder allocation is 42% of the harvester funds and the remaining 58% is allocated to vessel owners, captains, and crew based on the vessel's harvesting history.

Previous public comments suggested that the reported lease rate from the Crab Economic Status Report[1] by NOAA Fisheries is not indicative of actual cost sharing proportions between vessels and QS holders, therefore ADF&G proposes an to allocate harvester funds between QS holders and vessels based on exvessel gross revenue minus taxes to determine a net value. This approach accounts for harvesting arrangements with no lease fees and provides a slightly higher allocation to vessel owners to recognize continued accrual of vessel costs during the fishery disaster. The 2023/24 season will be used to determine eligibility for QS holders and vessel owners because that is the season included in this fishery disaster. ADF&G used participation in 2021 and 2022 for captain and crew eligibility because these are the last two seasons prior to the BSS fishery closure.

[1] NOAA Fisheries Crab Economic Status Report: https://media.fisheries.noaa.gov/2023-06/2022-crabsafe.pdf

Harvester component	Allocation	Estimated funds [a]
QS Holders	42%	$29,136,769
Vessel owners	37%	$25,668,106
Captains/crew	21%	$14,568,385
Total harvester funds	**100%**	**$69,373,260**

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

Quota Share Holders - 42% of harvester funds. The following criterion is used to determine QS holder eligibility for direct payment:

- Must be listed as a QS holder of Catcher Vessel Owner (CVO), Catcher/Processor Owner (CPO), Catcher Vessel Crew (CVC), and/or Catcher/Processor Crew (CPC) quota for BSS for the 2023/24 season and hold a minimum of 1,001 QS units.

ADF&G included a minimum holding of 1,001 QS units because smaller holdings result in payments that are less than the cost of administering the payment, less than $30. Direct payment amounts to QS holders are pro rata based on each QS holder's proportion of total QS units held by all QS holders who apply and are eligible for QS holder direct payments. There are an estimated 330 individual QS holders who meet the above criterion for the 2023/24 season.

Vessel-based payments for vessel owners, captains, and crew - 58% of harvester funds. The following criterion is used to determine vessel-based payment eligibility for direct payment:

- The vessel must have been used to harvest BSS in the IFQ fishery during either 2021 or 2022.

A total of 64 vessels may be eligible for direct payments based on this criterion. There were 62 vessels that harvested BSS IFQ in 2021 and two additional vessels that harvested BSS IFQ in 2022.

The available harvest during the 2021/22 season was very limited and therefore, ADF&G proposes pro-rata vessel-based payments based on the average pounds of BSS IFQ harvested by the vessel, not including deadloss, in the best three of six seasons, 2016/17 to 2021/22. This information will be calculated for each eligible vessel based on fish ticket data and does not need to be provided by the vessel owner.

ADF&G proposes allocating 63% of available funds to eligible vessel owners and 37% to eligible captains and crew, which provides vessel owners with 37% of the harvester funds and captains/crew with 21% of the harvester funds. This approach is consistent with the 2021/22 and 2022/23 fishery disaster spend plan and is based on BSS exvessel revenue distribution between vessel owners and captains/crew as reported in the NOAA Fisheries Crab Economic Status Report and shown in the table below. ADF&G does not recommend increasing the crew allocation, as suggested in public comments, because an increase is not supported by available data.

Season	Ex-vessel revenue[1]	Taxes	Lease Fees[2]	Net revenue	Captain/Crew payments[3]	Vessel owner revenue
2019/20	$137.67	$12.25	$51.88	$73.54	$27.11	$46.43
2020/21	$219.13	$19.06	$83.62	$116.45	$42.62	$73.83
Total	$356.80	$31.31	$135.50	$189.99	$69.73	$120.26
			Percent of net revenue		**37%**	**63%**

[1] Table 1.1 Economic SAFE report, 2022: https://media.fisheries.noaa.gov/2023-06/2022-crabsafe.pdf

[2] Table 1.3 Economic SAFE report, 2022

[3] Table 1.2 Economic SAFE report, 2022

Vessel owners - 63% of the vessel's share of the total allocation for vessel-based payments (37% of the harvester funds).

ADF&G recommends direct payments to the same vessel owners that received funds for the 2021/22 & 2022/23 Bering Sea crab fishery disaster, unless the CFEC vessel registration database shows ownership of an eligible vessel was transferred between 2023 and 2024. The 2022/23 disaster spend plan addressed vessels transferred between 2019 and 2023; documentation submitted during that application period does not need to be resubmitted.

ADF&G recognizes there are a few vessels that may have transferred ownership between 2023 and 2024. The department does not have access to private sale information to help create an equitable mechanism to divide vessel-owner relief between former and current owners. Therefore, if ownership of an eligible vessel was transferred between 2023 and 2024 eligibility for payment will not be impaired by such transfer, any payments shall be made:

1. As agreed between the transferor and transferee based on an affidavit signed by both the transferor and transferee and provided at the time of application, or

2. To the transferor if the landing history of the vessel was not conveyed to the transferee under the Purchase and Sale agreement. A copy of the Purchase and Sale Agreement must be provided at the time of application.

The CFEC data indicate there are likely two or three vessels where ownership was transferred between 2023 and 2024.

At the time of application, each vessel owner must provide an affidavit that includes final settlement information for the qualifying years, 2021* and 2022, including:

1. Crew names and most recent known address and contact information.
2. Amount paid to each individual in each qualifying year*.

*Vessel owners that submitted 2021 BSS crew information for the 2021/22 and 2022/23 fishery disaster do not need to re-submit 2021 crew information.

To ensure timely distribution of relief while also encouraging accurate reporting of crew member participation by the vessel owner, ADF&G recommends a disbursement of 75% of each vessel owner's calculated payment after the application period is closed. The remaining 25% of each vessel owner's payment would be issued in a second round of disbursement, concurrent with payments to vessel crew.

If a vessel did not fish during the 2021/22 season and is eligible based on participation in the 2020/21 season, the same vessel crew information provided for the previous fishery disaster will be used.

ADF&G recommends that any unclaimed crew funds be distributed pro-rata to all eligible captains and crew.

Captains and crew - 37% of the vessel's share of the total allocation for vessel-based payments (21% of harvester funds).

ADF&G recommends direct payments to captains and crew who worked on an eligible vessel in 2021 or 2022 and who meet all eligibility criteria and submit a complete application.

- Crew must have held a commercial crew license or a CFEC permit for any fishery. This requirement is met by holding a license or permit in the qualifying year, 2021 and/or 2022.

Processors (~$21.31 million): ADF&G proposes direct payments to PQS holders during the 2023/24 season and active processing companies that processed BSS during the 2021/22 season. The processor allocation will be split 45/55 between PQS holders and active processing companies to recognize the increased level of investment and costs to maintain crab processing infrastructure during the snow crab fishery disaster that are not fully recaptured through custom processing fees. Active processing companies include shore-based processing facilities that processed crab, including custom processing.

Eligibility criterion for PQS holders:

- Must be listed as a PQS holder for BSS in 2023/24.

ADF&G proposes direct payments to PQS holders be pro rata based on each PQS holder's proportion of the total PQS units held by all PQS holders who apply and are eligible for PQS holder funds. There were 14 individual PQS holders during the 2023/24 BSS season.

Eligibility criterion for active processing companies:

- Shore-based processing facility owned by the processing company must have received deliveries of BSS crab in 2022.

ADF&G proposes direct payments for active shore-based processing companies that are pro rata based on each company's proportion of the total 2022 pounds of BSS crab, not including deadloss, delivered to all eligible shore-based processing plants. ADF&G recommends that Peter Pan Seafoods not be eligible for fishery disaster funds in the 'active processing companies' category because the company is no longer an active processing company in Alaska; this recommendation does not impact facilities or companies that processed IPQ derived from PQS held by Peter Pan Seafoods. There are three companies with four active shore-based processing facilities that meet the criterion and are still operating in Alaska.

Program Support - <0.1% (~$10,000): ADF&G allocates funds to partially cover salary and benefits for a Program Coordinator who helps manage the disaster program on behalf of the State of Alaska.

General direction: Unless otherwise specified, unclaimed funds in any category/subcategory will be reallocated among all qualified individuals within the same category/subcategory.

Appendix I. Public comments received on third draft spend plan

Subject: RE: Third Draft Spend Plan for 2023/24 Bering Sea Snow Crab [WARNING! - EXTERNAL]
Date: Wednesday, July 29, 2026 11:27:14 AM

Request for crew payments distributed by PSMFC and not vessel owners. For the percent for captains/crew, the split should be more heavy on the crew side as there might be only 2 captains impacted but several crew members. The crew members should be eligible for as much as the captains as this is their livelihood as well. Equal percent per individual.

Thanks Kate

Kate Umentum

From:	Gary Soper
To:	DFG, ComFisheriesDisasters (DFG sponsored)
Subject:	I’ve been fishing on same boat for 35 years the only snow crab fishery I missed was2022 .it doesn’t make sense that a new crewman with one year experience on same boat would be eligible for disaster relief
Date:	Wednesday, August 12, 2026 9:14:52 AM

Sent from my iPhone

CITY OF SAINT PAUL
ALASKA

August 14, 2026

Doug Vincent Lang
Commissioner, Alaska Department of Fish & Game
Attn: Darion Jones, dfg.com.fisheriesdisasters@alaska.gov
P.O. Box 115526
Juneau, Alaska 99811-5526

Via e-mail: dfg.com.fisheriesdisasters@alaska.gov

Re: Comments on Third Draft Spend Plan for the 2023/24 BSS Fishery Disaster

Dear Commissioner,

On behalf of the City of Saint Paul, Alaska (City), I wanted to thank the Alaska Department of Fish and Game (ADF&G) for requesting comments on the Third Draft Spend Plan for the 2023/24 Bering Sea snow (BSS) crab fishery disaster.

To begin, the City supports the 1% allocated to Saint Paul Island community entities. We remain grateful to you, the State, and crab industry stakeholders for recognizing the unique severity of the crab fishery disasters on our community.

The City also supports the proposed reduction in the Research allocation from 12% to 5%. These funds which total about $8 million are then distributed among the CDQ, harvester, and processor sectors.

However, unlike the other sectors, the community sector does not benefit from this redistribution and would receive roughly the same dollar amount it was allocated under the 21/22 and 22/23 spend plan. The City therefore requests that ADF&G consider a 1% increase in the Community allocation for a total of 6%. This would be meaningful to several Alaskan communities that are suffering from the devastating multiyear disaster in the crab fisheries and the resulting loss of crab operations and revenues. The other sectors would still gain from the proposed redistribution in relation to the previous 21/22 and 22/23 Spend Plan, as illustrated in the attached table.

	Third Draft - 2023/2024 BSS		2021/22 & 2022/23 BBR & BSS			
Category	**Allocation %**	**Disaster Funds**	**Allocation %**	**Disaster Funds**	**Difference**	**% Change**
Research	5.0%	$5,726,000	12.0%	$ 13,736,676	($8,010,676)	-58.3%
Saint Paul Island & Tribal Entities	1.0%	$1,143,000	1.0%	$ 1,143,000	$0	
Communities	6.0%	$6,870,000	5.0%	$ 5,726,000	$1,144,000	**20.0%**
Harvesters / Processors / CDQ	88.0%	$100,761,000	82.0%	$93,866,625		
CDQ	**8.8%**	$10,076,100	8.2%	$ 9,386,662	$689,438	**7.3%**
Harvesters / Processors	**79.2%**	$90,684,900	73.8%	$ 84,479,962	$6,204,938	**7.3%**
ADF&G Program Support	0.1%	$10,000	0.03%	$ 37,699	(27,699)	
Total Funds	**100%**	**$114,510,000**	**100%**	**$ 114,510,000**	-	

As you are aware, Saint Paul has seen no meaningful economic activity since the closure of the BSS fishery in the 2022-23 season. The disaster funds distributed to Saint Paul in early 2025 in response to the 2021/22 and 2022/23 BBR-BSS disaster determination have been invaluable in maintaining municipal operations, and replacing lost resource revenues and taxes. Over the last two years, the City has been working with other local entities, state and federal agencies, congressional offices, and partners in the fishing industry to pursue funding and develop projects intended to diversify Saint Paul's economy including other fisheries activities and expanded tourism. This summer the community has been abuzz with activity associated with operations and maintenance of the Saint Paul Harbor; new sewer lift stations; new housing; and upgraded utilities in the Small Boat Harbor.

The City is pleased that the $39.5 million that were the subject of comments on the Second Draft Spend Plan for the 2023/24 BSS disaster, have been complemented with an additional amount of $75.2 million appropriated by Congress in late 2024. The new total is far more responsive to the magnitude of the impacts experienced by stakeholders resulting from this disaster.

To conclude, the City appreciates ADF&G's work in the development of the 2023/24 BSS Spend Plan as well as its broader efforts in support of Alaskan crab dependent communities and other fishery stakeholders affected by recent fishery disasters. The City remains available for any questions or feedback regarding its comments.

Sincerely,

Phillip A. Zavadil, City Manager

Cc. Saint Paul City Council
Ray Melovidov, President, Central Bering Sea Fishermen's Association

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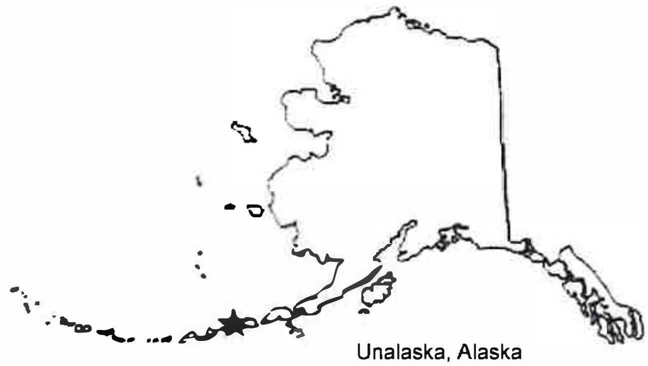

July 30, 2026

Karla Bush
Alaska Department of Fish and Game
Juneau, Alaska 99801
Send via Email: dfg.com.fisheriesdisasters@alaska.gov

Re: Crab Disaster Spend Plan Third Draft Community Percentages

Dear Ms. Bush:

The City of Unalaska supports the status quo funding percentages for Crab Communities for the 2023–2024 Snow Crab Disaster Spend Plan: 5%, plus an additional 1% for St. Paul Island, as outlined in the Third Draft Snow Crab Disaster Spend Plan.

Thank you for your consideration of our comments on this issue, which is of the utmost importance to the City of Unalaska, the seafood industry, support-sector businesses, and our community's residents.

Sincerely,

CITY OF UNALASKA

Vincent M. Tutiakoff, Sr.
Mayor

CC: Marjorie Veeder, Unalaska Deputy City Manager
Jim Sharp, Finance Director
Unalaska City Council Members

CITY OF UNALASKA
43 Raven Way - P.O. Box 610
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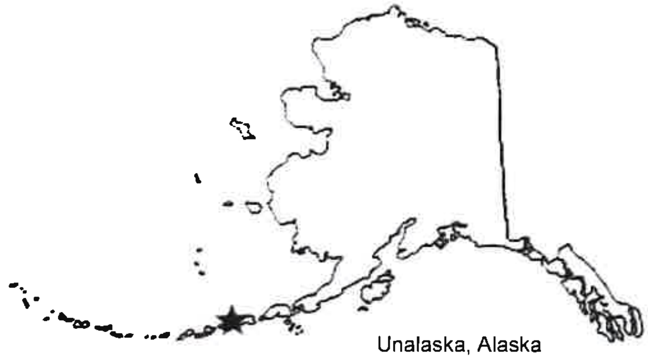
TEL (907) 581-1251 FAX (907) 581-4469



August 13, 2026

Darion Jones
Alaska Department of Fish and Game
Juneau, Alaska 99801
Via Email: dfg.com.fisheriesdisasters@alaska.gov

Re: Crab Disaster Spend Plan – Third Draft Community Percentages

Dear Mr. Jones:

The City of Unalaska is submitting this amended letter to replace the comment letter regarding the Crab Disaster Spend Plan Third Draft that was submitted on July 30, 2026, to Ms. Karla Bush of the Alaska Department of Fish and Game (ADF&G). The City of Unalaska now supports increasing the community sector allocation from 5% to 6%, while maintaining the additional 1% allocation to the City of St. Paul.

The reason for this change is that, after further review of the Third Draft Spend Plan, we recognized that the research allocation was reduced from 12% to 5%, decreasing the funding from approximately $13 million to $5.7 million. The 7% reduction was entirely reallocated to the harvest and processing sectors. We strongly believe that Alaskan communities should share in that reallocation.

There are communities throughout Southwest Alaska that were longtime participants in the Bering Sea crab fisheries and have experienced plant closures and the departure of processors from their communities. These closures and losses have caused fishery-dependent economies to collapse. Communities are barely hanging on, residents are leaving, support-sector businesses are closing, and unemployment is increasing throughout the region.

The City of Unalaska strongly encourages ADF&G to increase the community allocation in the 2023–2024 Snow Crab Disaster Spend Plan from 5% to 6%, in addition to maintaining the 1% allocation for St. Paul Island, for a total community allocation of 7% in the Third Draft Snow Crab Disaster Spend Plan.

Thank you for your consideration of our comments on this important issue, which is of the utmost importance to the City of Unalaska and the residents of our community.

Sincerely,

CITY OF UNALASKA

Vincent M. Tutiakoff

Vincent M. Tutiakoff, Sr.
Mayor

CC: Marjie Veeder, Acting City Manager
Jim Sharpe, Interim Finance Director
Unalaska City Council Members

August 10, 2026

Darion Jones, Program Coordinator
Alaska Department of Fish & Game
Via email dfg.com.fisheriesdisasters@alaska.gov

Dear Ms. Jones,
Thank you for the opportunity to comment on the Third Draft Spend Plan for the 2023/2024 Bering Sea Snow crab fishery disaster. The Aleutians East Borough supports the proposed allocations in the spend plan as fair for all fishery participants, including communities.

The Aleutians East Borough is situated on the Western Alaska Peninsula and Eastern Aleutian Islands between the Bering Sea and Gulf of Alaska, and encompasses the communities of Akutan, False Pass, Cold Bay, Sand Point, Nelson Lagoon and King Cove. The Borough levies a 2% raw fish tax on all fish and crab delivered to any of our ports for processing.

We appreciate the work by ADF&G on the Spend Plan. If you have any questions, please don't hesitate to contact our Natural Resources Department Director, Ernie Weiss at eweiss@aeboro.org.

Sincerely,

Alvin D. Osterback, Mayor

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SUPPLEMENTAL PUBLIC COMMENT

Third Draft Spend Plan - 2023/24 Bering Sea Snow Crab Fishery Disaster

August 9, 2026

Alaska Department of Fish and Game
Attn: Darion Jones
P.O. Box 115526
Juneau, AK 99811-5526
Email: dfg.com.fisheriesdisasters@alaska.gov

RE: Supplemental Comment - Vessel-owner eligibility and vessel transfers

Dear Mr. Jones:

We previously submitted comments concerning the qualifying seasons, historical participation, and the allocation of disaster funds between harvesters and processors. This supplemental comment addresses a separate issue raised by the Third Draft: the treatment of vessel ownership transfers and the eligibility of current active vessel owners.

We are active participants in the Bering Sea crab fishery and partners in the ownership of two crab vessels, the **F/V Confidence** and the **F/V Pacific Mariner**. We purchased the Confidence in 2020 and the Pacific Mariner in the fall of 2022. Both vessels remain active in the crab fleet, and we continue to maintain them and keep them capable of returning to the Bering Sea crab fisheries.

This request does not change our previous comments supporting the use of historical qualifying seasons and vessel fishing history to determine eligibility and allocation. We continue to support using appropriate historical participation to determine a vessel's share. Our concern is different: when a qualifying vessel has been sold, the vessel's historical participation should not result in the former owner receiving the entire vessel-owner benefit while the current owner bears the continuing costs and economic impact of the 2023/24 disaster.

The proposed eligibility structure can create a serious inequity for current owners who purchased qualifying crab vessels during the years immediately preceding the 2023/24 disaster. Substantial vessel-related disaster payments may go to former owners based on historical ownership and participation even though those owners sold the vessels and no longer bear the continuing cost of keeping those vessels operational.

At the same time, current owners are paying insurance, maintenance, repairs, moorage, financing, regulatory expenses, and other fixed costs during the fishery closures, yet may receive little or none of the vessel-owner disaster relief.

> **The Third Draft states that disaster funds are intended to assist fishery participants harmed by the 2023/24 BSS crab fishery disaster. It also explains that the vessel-owner allocation recognizes the *continued accrual of vessel costs during the fishery disaster.* Those continuing vessel costs are being borne by the current owners.**

We invested substantial capital in these vessels to remain in the Bering Sea crab industry - not to exit it. The collapse and closures of the crab fisheries have created severe financial hardship, while the cost of preserving the vessels and keeping them ready to fish has continued year after year.

A system that can provide a large vessel-related disaster payment to a former owner while providing little or nothing to the current owner of that same vessel does not accurately identify who is carrying the ongoing economic impact of the 2023/24 disaster. It also risks directing relief away from the vessels and businesses that the fishery will depend upon when the stocks recover.

We recognize that former owners may have suffered legitimate losses during earlier disaster years, and we are not asking ADF&G; to disregard those losses. We are asking that the final spend plan recognize **both the**

historical loss and the continuing loss borne by the current active vessel owner.

Requested revision

We respectfully request that ADF&G; revise the final spend plan to create an equitable mechanism for qualifying crab vessels that transferred ownership during the years leading up to the 2023/24 disaster. A reasonable approach could divide vessel-owner relief between former and current owners according to the relevant ownership periods, recognize the transfer of the vessel's qualifying fishing history with the vessel, or establish a separate allocation for current owners who acquired qualifying vessels and continued to maintain and operate them through the disaster period.

The important principle is that disaster relief should not be structured so that a person who sold and exited ownership of a vessel receives the bulk of vessel-owner relief while the current owner - who is still paying to keep that vessel in the fleet - is excluded.

This issue is larger than our two vessels. The State should encourage continued investment in and preservation of the Bering Sea crab fleet. The future of this fishery depends on having vessels, owners, captains, and crews financially capable of being there when the crab stocks recover.

The **F/V Confidence** and **F/V Pacific Mariner** are still here. We are still maintaining them, still employing fishermen, still participating in the industry, and still committed to the Bering Sea crab fisheries. We are carrying the continuing financial burden of these closures, and the disaster program should recognize that reality.

We respectfully ask ADF&G; to reconsider the vessel-owner eligibility provisions before adopting the final spend plan and provide meaningful relief for current active owners who purchased qualifying Bering Sea crab vessels and continued to carry those vessels through the disaster.

Thank you for considering this supplemental comment.

Sincerely,

Oystein Lone
Partner / Owner
F/V Confidence & F/V Pacific Mariner

David Sheldon
Partner / Owner
F/V Confidence & F/V Pacific Mariner

Proposed Arguments for Increasing the Captain & Crew Allocation

These arguments are intended to support public comments on the Third Draft Spend Plan for the 2023/24 Bering Sea Snow Crab Fishery Disaster Relief.

1. The people who lost 100% of their income received the smallest share.
Captains and crew depend almost entirely on fishing income. When the fishery closed, many lost essentially all of their earnings from snow crab. QS holders retained ownership of a long-term asset, while vessel owners retained ownership of their vessels. Disaster relief should prioritize replacement of lost earned income as well as asset losses.

2. Captains and crew had no ability to diversify the risk.
Crew generally cannot lease, sell, refinance, or otherwise realize value from quota ownership. Their livelihood depended on working in the fishery.

3. Captains and crew kept the industry functioning.
Experienced captains and crews are essential to rebuilding the fishery when it reopens. Retaining this skilled workforce benefits the long-term health of the fishery.

4. The current allocation may not reflect actual economic hardship.
The proposal allocates 42% to QS holders, 37% to vessel owners, and 21% to captains and crew. Public comments can request that ADF&G; explain why the group that lost wages receives the smallest allocation and whether the split reflects documented economic losses.

5. Settlement records provide an objective distribution method.
Commercial fishing settlement sheets document who worked, each person's share, and what they earned. These records provide a transparent and efficient way to distribute a larger captain-and-crew allocation.

Suggested Alternative Allocation
Rather than completely redesigning the program, consider increasing the captain-and-crew allocation from 21% to 30%, with a corresponding reduction to the QS holder allocation. One example would be:
• QS Holders: 35%
• Vessel Owners: 35%
• Captains & Crew: 30%

Additional Point
Captains carry operational responsibility beyond their settlement percentage, including crew safety, regulatory compliance, vessel operations, and successful execution of the fishery. A revised allocation could recognize these responsibilities while still compensating all stakeholder groups.

August 14, 2026

Darion Jones
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
Submitted via email to: dfg.com.fisheriesdisasters@alaska.gov

RE: 2023/24 Bering Sea Snow Crab Fishery Disaster, Third Draft

Ms. Jones:

Thank you for the opportunity to comment on the final draft spend plan for the 2023/24 Bering Sea snow crab fishery disaster. Trident Seafoods has been heavily invested in the Bering Sea crab fisheries for more than 50 years. We operate shoreside processing plants in Akutan and Saint Paul and have 5 vessels that participate in the IFQ fishery. Our St. Paul plant is the lone processor in the North region, and for all practical purposes, a single-species plant that is designed to efficiently handle the large volumes of snow crab upon which the crab program was designed. Despite the many years of challenging conditions, we have maintained the plant, in part due to the role that the plant plays in transferring the benefits of the fishery into the community of Saint Paul.

Trident appreciates the high degree of thought and effort that Alaska Department of Fish and Game (ADF&G) staff put into each disaster spend plan. ADF&G staff receive a significant amount of input from all stakeholders, and we appreciate their ability to find balance and fairness amongst divergent requests. We recognize that disaster funds cannot make any stakeholder whole, but we want to emphasize how important these funds are, given the magnitude of losses and risk associated with owning and operating shoreside processing facilities. We have three requests, below, for your consideration.

1. **Include Trident in the Saint Paul Community Category and Increase the Allocation to 2%**

Trident supports the off-the-top set aside for Saint Paul Island and Tribal entities based on the rationale that the community is uniquely affected by the snow crab disaster because it does not have other fisheries to mitigate the losses from the fishery collapse. **We ask ADF&G to consider including Trident's Saint Paul plant as an eligible entity in this category.** Like the other eligible entities, Trident's Saint Paul plant is critical infrastructure for the community's economy, entirely dependent on the snow crab fishery, and suffered losses that are unique amongst any other stakeholder in the fishery. The losses caused by ongoing fishery closures and low quotas have continued since the disaster, making the need for special consideration important to our ability to maintain critical infrastructure in Saint Paul.

Trident has been invested in Saint Paul since 1994. Beyond annual costs, we have invested more than $30 million on capital projects since 2008 and have more than $4 million in the near term to maintain the facility for operational readiness should the fishery return to more economical levels of abundance. This facility is unique relative to other shoreside processing plants in the Bering Sea crab fishery because it does not process any other species at volume; therefore, it cannot offset operational losses caused by fishery closures through other fisheries. These operational costs are significant: from 2022 to 2026, we spent an average of around $2 million per year on direct costs to maintain the plant. These costs include wages, fuel and utilities, repairs and maintenance, lease payments, and other miscellaneous costs. None of these costs are offset by other fisheries, custom processing fees, or the price formula.

We also request that ADF&G increase the allocation for this category to 2%. Increasing the Saint Paul category to 2%, while also including Trident, results in a net increase to all eligible entities under an even split. We believe this is justified given the reduction in research funding from 12% to 5%, relative to the last round of disaster relief. Under the third draft spend plan, the funds freed up by the reduction in research flow entirely to the harvester/processor/CDQ categories due to the way that the "off-the-top" allocations for research and communities are calculated. We think some of this benefit should flow directly to the entities in this category given their unique dependence and losses.

2. **Maintain the First and Second Draft Spend Plan Harvester/Processor Split of 76.5%/23.5%**

Trident supports the harvester/processor split provided in the first and second drafts of the spend plan. While we recognize the difficulty in arriving at a split that is both fair and based on sound rationale and data, it is important to note that using the division of wholesale and ex-vessel revenue does not capture the disproportionate increases in labor and operating costs associated with the processing sector (Trident's labor costs per pound increased by 127% from 2021 to 2022, for example) or the maintenance costs associated with having a plant or crab line sit idle when it has no other use. Given where we are in the process, however, we accept that ADF&G is using this as an approach to overcome the challenges of fairly quantifying costs in both sectors.

Looking at COAR data, it appears that ADF&G staff are using a 7-year average of revenue distribution between harvesters and processors, even though that is not stated as rationale. We respectfully ask that ADF&G consider a more robust set of years that provides a fuller picture of the harvester/processor relationship. There is compelling rationale for other sets of years:

- **2006-2022:** encompasses the full duration of the crab rationalization program. Given ADF&G's use of the non-binding price formula — a mechanism of the crab rationalization program — as the tool to determine an equitable split between the sectors, it makes sense to consider the full suite of years under the program.
- **2013-2022:** The past decade has been unprecedented in terms of market, trade, abundance, and operational changes. Using a 10-year average provides a more robust picture of the volatility in markets, pricing, and revenue sharing.
- **2021-2022:** If the focus is solely on the conditions present at the time prior to the disaster, it makes sense to consider the two years immediately prior to the disaster.

The table below provides the harvester/processor split using the same methodology the Alaska Bering Sea Crabbers used in their letter on the second draft spend plan.

Years	Harvester Revenue Share	Processor Revenue Share
2006-2022 (full duration of crab rationalization program)	70%	30%
2013-2022 (10-year avg)	75%	25%
2021-2022 (2-year avg)	77%	23%
Average of 17-, 10-,7-,5-, and 2-year averages	76.4%	23.6%

As you can see, many of these ranges provide data-driven numbers well above the 76.5/23.5% split presented in the earlier draft spend plans. However, we recognize that compromise is needed and are thus maintaining our support for the 76.5/23.5% split. Notably, this split is the average of all the different ranges that could be reasonably justified. We therefore think this split is reflected in available data.

3. **Maintain the modified 55/45% split between active processors and PQS holders**

This change is responsive to public comment from the remaining active processors in the fishery and better reflects the inherent costs and investments associated with owning and operating physical processing plants that are not recaptured through custom processing fees or the price formula. It also recognizes the importance of maintaining active processors in the fishery, which is critical to all stakeholders.

Thank you for the opportunity to comment on the spend plan.

Sincerely,

Shannon Carroll

VP, Alaska Government Affairs and Fisheries Development

August 14, 2026

Alaska Department of Fish & Game
Attn: Darion Jones
P.O. Box 115526
Juneau, Alaska 99811-5526

Re: Proposed 2023/24 Bering Sea Snow (BSS) Crab Fishery Disaster Spend Plan, Third Draft

Dear Ms. Jones,

The Community Development Quota (CDQ) groups that make up the Western Alaska Community Development Association (WACDA) collectively receive 10% of the annual BSS total allowable catch, and rely on the revenues generated from this fishery to provide economic and social benefits to their 65 member communities, consistent with the program's mission and statutory requirements. In addition, in furtherance of CDQ and Crab Rationalization Program objectives, CDQ groups have made significant investments in processing and harvesting assets which have been impacted by the multiyear BSS disaster.

We appreciate the opportunity to comment on the third draft spend plan for the 2023/24 Bering Sea Snow (BSS) Crab Fishery Disaster as part of the Alaska Department of Fish and Game's (ADF&G) efforts to gather public input and develop a fair approach for distributing these important disaster relief funds. We also appreciate the considerable amount of work and effort the Department devotes to developing these plans.

We note that the third draft contains substantive changes from the second version released in 2024. In addition to the proposed CDQ allocation for captains and crew, which we have discussed with ADF&G and addressed in our comments on the second draft, we offer the following comments:

1. **CDQ Allocation for Captains and Crew**:

As previously noted, we support setting aside 13% of the CDQ allocation for payments to captains and crew who fished on vessels harvesting CDQ BSS crab during the 2022 qualifying year. The amount available for captains and crew under this set-aside should be proportional to each CDQ group's share of the fishery. The third draft incorporates this and proposes the following:

a. An affidavit from each CDQ group to the Pacific States Marine Fisheries Commission (PSFMC) that includes final settlement information for the season, including crew names and most recent addresses/contact information. Plus, the amount paid to each individual as a percentage.

b. Subsequent to this, 75% of a CDQ group's allocation would be disbursed after the application period is closed.

c. The remaining 25% would be issued to the CDQ group in a second round of disbursement concurrent with payments to vessel crew.

d. ADF&G recommends that any unclaimed crew funds be provided back to the CDQ group in the second payment.

Concerning the second disbursement, or set-aside, we believe that the percentage held back should be equivalent to the recommended 13% CDQ allocation for captains and crew. It is our understanding that PSFMC would remain responsible for disbursing these funds. Given this, and the continued timing delays in the distribution of disaster funds, which are outside of the control of the Department, aligning the set-aside with the crew allocation helps avoid further delays in getting disaster assistance to our member villages.

2. **Harvester/Processor Split**:

In this third draft, ADF&G is proposing a 78/22% split among harvester and processor funds, instead of 76.5/23.5% as presented in the first two drafts. The payment split for BSS under the previous 21/22 and 22/23 Spend Plan issued on January 10, 2024, was 78/22%. During subsequent discussions in 2024 for this 23/24 BSS disaster, the split was modified to 76.5/23.5. This was described as a compromise position between the 78/22% advocated by harvesters and the 75/25% advocated by processors at the time, and that it more "appropriately balances losses to each sector from the fishery disaster."

CDQ groups are invested in both sectors and understand the careful balancing act required to keep each sector as whole as possible. We understand the challenges of accurately quantifying operational costs of all participants, but respectfully request that the final Spend Plan provide additional rationale for the time period used to calculate the revenue split of harvesters and processors and the basis for the reversion back to a 78/22 split.

3. **Proposed Active Shore-based Processor and Non-active PQS Holder Split**:

ADF&G is proposing that the $20.2 million allocated to processors be split 55/45% between active processors and non-active processors (PQS holders). Prior disaster spend plans, and the first and second drafts for this 23/24 BSS disaster, had the split at 50/50%.

In furtherance of CDQ and Crab Program objectives, many of our CDQ groups have invested heavily in PQS since the inception of the Crab Program. These CDQ groups are entirely dependent on a small number of active processors to process their crab, and we recognize the importance of maintaining a healthy and viable processing sector for the continued success and stability of the Crab Program and crab-dependent communities.

We understand that a higher allocation is desired by active shore-based processors' facility owners in recognition of the costs they incur in the maintenance and operation of their infrastructure and markets. While non-operator PQS holders may not face the same level of challenges, they must also deal with the higher costs of operation through steadily increasing custom processing fees and related transportation costs. We would note that should a differential value for active and inactive PQS holders be adopted in this final spend plan, that this decision not be precedent-setting in any future regulatory discussions regarding changes to the Crab Program.

4. **Community Allocation**:

Finally, we note that the Research allocation has been reduced from 12% to 5%. In dollar terms, this amounts to over $8 million. After Research and Community payments come off the top, these funds are then distributed among the CDQ, Harvester, and Processor sectors. We believe that the Community sector, which includes some of our member villages, should benefit from this $8 million as well. A .5% or 1% increase to the 5% Community allocation would be meaningful to communities hurting from the loss of BSS operations and revenues and would allow all sectors to benefit equitably from the savings derived from the reduction in the Research allocation.

We attach tables that illustrate the gains proposed in the draft for all sectors, with the addition of a .5% and 1% increase for the Community sector.

	Third Draft - 2023/2024 BSS		2021/22 & 2022/23 BBR & BSS			
Category	**Allocation %**	**Disaster Funds**	**Allocation %**	**Disaster Funds**	**Difference**	**% Change**
Research	5.0%	$5,726,000	12.0%	$ 13,736,676	($8,010,676)	-58.3%
Saint Paul Island & Tribal Entities	1.0%	$1,143,000	1.0%	$ 1,143,000	$0	
Communities	**6.0%**	$6,870,000	5.0%	$ 5,726,000	$1,144,000	**20.0%**
Harvesters / Processors / CDQ	88.0%	$100,761,000	82.0%	$93,866,625		
CDQ	**8.8%**	$10,076,100	8.2%	$ 9,386,662	$689,438	**7.3%**
Harvesters / Processors	**79.2%**	$90,684,900	73.8%	$ 84,479,962	$6,204,938	**7.3%**
ADF&G Program Support	0.1%	$10,000	0.03%	$ 37,699	(27,699)	
Total Funds	**100%**	**$114,510,000**	**100%**	**$ 114,510,000**	-	

	Third Draft - 2023/2024 BSS		2021/22 & 2022/23 BBR & BSS			
Category	**Allocation %**	**Disaster Funds**	**Allocation %**	**Disaster Funds**	**Difference**	**% Change**
Research	5.0%	$5,726,000	12.0%	$ 13,736,676	($8,010,676)	-58.3%
Saint Paul Island & Tribal Entities	1.0%	$1,143,000	1.0%	$ 1,143,000	$0	
Communities	**5.5%**	$6,297,500	5.0%	$ 5,726,000	$571,500	**10.0%**
Harvesters / Processors / CDQ	88.5%	$101,333,500	82.0%	$93,866,625		
CDQ	**8.8%**	$10,133,350	8.2%	$ 9,386,662	$746,688	**8.0%**
Harvesters / Processors	**79.6%**	$91,200,150	73.8%	$ 84,479,962	$6,720,188	**8.0%**
ADF&G Program Support	0.1%	$10,000	0.03%	$ 37,699	(27,699)	
Total Funds	**100%**	**$114,510,000**	**100%**	**$ 114,510,000**	-	

To conclude, we understand the time pressures associated with the spend plan process. Given the significant changes to the proposed spend plan and the timing of the comment period over the busy summer months, the stakeholders would benefit from an additional opportunity to understand the rationale or policy decisions behind these changes, and to explain their own positions in a virtual setting.

Thank you for considering our comments and for ADF&G's continued work to develop a fair and transparent spend plan.

Sincerely,

Angel Drobnica, Chair
Western Alaska Community Development Association (WACDA)

August 14, 2026

Doug Vincent Lang
Commissioner, Alaska Department of Fish & Game
Attn: Darion Jones, dfg.com.fisheriesdisasters@alaska.gov
P.O. Box 115526
Juneau, Alaska 99811-5526

Via e-mail: dfg.com.fisheriesdisasters@alaska.gov

Re: Community Comments on Third Draft Spend Plan for the 2023/24 BSS Fishery Disaster

Dear Commissioner,

We wanted to thank you for the opportunity to provide comments on the Third Draft Plan issued by the Alaska Department of Fish & Game (ADF&G or the State) on July 29, 2026.

The undersigned Alaska crab community representatives appreciate the efforts by ADF&G to incorporate stakeholder input into the Third Draft Spend Plan. In first place, our communities support the State's proposal to take the Research, Community, and Saint Paul allocations off the top as was the case with the 2021/22 and 2022/23 BBR-BSS Spend Plan.

We also support the proposed reduction in the Research allocation from 12% to 5%. These funds which total about $8 million are then distributed among the CDQ, Harvester, and Processor sectors in response to impacts these sectors have experienced from the 2023/24 BSS disaster.

However, unlike the other sectors, the Community sector does not benefit from this redistribution and would receive roughly the same dollar amount it was allocated under the 21/22 and 22/23 BBR-BSS Spend Plan. <u>Our communities therefore request that ADF&G increase the Community allocation by 1% for a total of 6%</u>. This increase would be significant to communities that are suffering from the devastating multiyear disaster in the crab fisheries and the resulting loss of crab operations and revenues in this part of our State. It should be noted that the other sectors would still gain from the proposed redistribution in relation to the previous 21/22 and 22/23 Spend Plan.

We are grateful to ADF&G for its responsiveness to our concerns during this difficult era and look forward to further coordination with the State of Alaska to respond to the numerous challenges affecting our crab and commercial fisheries, and dependent communities.

Thank you for your consideration.

Alvin Osterback, Mayor
Aleutians East Borough

Joe Bereskin, Mayor
City of Akutan

Joseph Kozloff, Mayor
City of Saint Paul

Warren Wilson, Mayor
City of King Cove

Vince Tutiakoff, Mayor
City of Unalaska

PSPA
PACIFIC SEAFOOD
PROCESSORS ASSOCIATION
EST. 1914

August 14, 2026

Darion Jones
ADFG
PO Box 115526
Juneau, AK 99811-5526
Submitted via email to: dfg.com.fisheriesdisasters@alaska.gov

Re: Draft spend plan for 2023/24 Bering Sea snow crab fishery disaster

Dear Ms. Jones:

Thank you for the opportunity to comment on the third draft spend plan for the 2023/24 Bering Sea snow crab fishery disaster. The Pacific Seafood Processors Association represents processing plants operating across Alaska, including shoreside processors historically dependent on the snow crab fishery in Unalaska, St. Paul, Kodiak, and the Aleutians East Borough. These are plants located in Alaska and should be a high priority for the State. We last commented on the previous draft plan in July, and these comments reinforce our initial comments as well as oppose the change to the harvester/processor split. **We support the split that was provided by ADFG as a compromise in the first two drafts (76.5% - 23.5%).** There was no indication such a significant change was pending from other drafts or the public outreach session conducted July 10.

Shoreside processing in Alaska is extremely capital intensive, with significant fixed and operating costs, especially in remote ports in the Bering Sea. Costs have been increasing for all fishery participants, and there is no way for active shoreside processors to make up losses in subsequent years to cover the significant costs incurred during the disaster years. We are still dealing with extremely inefficient operations (high costs) to process small volumes of crab.

Active shorebased processors are a crucial part of the spend plan and the objective of disaster funding to keep fisheries infrastructure sufficiently viable to be able to operate when stocks rebound. Few active Alaska processors remain in the Bering Sea crab fisheries, evidenced by only 5 active processors that were operating in the 2019/2020 and 2020/2021 seasons.[1] The closure of the snow crab fishery represented a significant loss to active processors, which makes the distribution of disaster funds to retain local processing infrastructure through these difficult times even more important. Fishermen depend on viable shoreside markets across Alaska to deliver their catch; communities depend on the

[1]Compare to 14 active processors as the annual average from 2011 – 2015. Source: BSAI Crab Rationalization Program Review, NPFMC, May 2024. Table 8-16, p. 170.

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202-661-6220

jobs, fish tax and property tax revenue, and support service businesses resulting from local processing; and the increasing number of crab PQS holders who do not own processing facilities depend on active shorebased processors to custom process their quota.

We appreciate the department's efforts in preparing this and other spend plans and addressing the difficult issues associated with allocating disaster funds to crab stakeholders and communities severely impacted by the recent crab fishery disasters and closures. We continue not to support using the crab rationalization program's arbitration system non-binding price formula as the method to allocate crab disaster funds, as there is no connection between losses in either sector as a result of the recent snow crab disaster to that formula identified almost thirty years ago for a different purpose (historical distribution of first wholesale revenue between harvesters and processors). As is clear, the formula does not account for costs in any way, and neither does any approach based on a division of wholesale/ex-vessel revenue (which by definition does not include costs).

The only rationale provided in the third draft for changing the split is that public comment was received that harvesters incurred 'higher costs.' Yet there is no evidence this is the case for such a significant change. **However, if the state is going to use division of revenue as a basis because it is lacking cost data, there is a stronger rationale for retaining the 76.5% - 23.5% split, or a higher allocation to the processing sector, based on various ranges that reflect either the duration of the BSAI crab program or even a 5- or 10-year average.**

In addition, we support the change to the allocation to active shorebased processors vs those that hold processing quota but do not process their own crab (55% - 45%). A higher distribution to active processors is appropriate given that processors' losses will outweigh such an allocation when funds are appropriated, processors are consistently compensated at a lower proportion than harvesters, *and the level of investment in actual infrastructure to process crab in Alaska is far more vulnerable to disasters than those who only hold processing quota.* Processors cannot make up for these losses through higher custom processing fees or the price formula that has been dictating prices paid to harvesters. The costs associated with maintaining processing infrastructure and reviving or finding new final markets once lost due to fishery closures are extremely high, and we believe a goal of the spend plan should be to assist shoreside operations in weathering the disaster in order to retain viable markets in the Aleutians for harvesters and communities.

We also continue to support crab community allocations as part of the final spend plan. Crab processors and dependent communities have a strong interdependent relationship operating in the remote Bering Sea crab fisheries. Both need to remain viable, and the Congressional intent is such that disaster funds are intended to assist in that regard as the fishery recovers.

Thank you for the opportunity to comment, and please consider these issues as you develop the final plan.

Sincerely,

Julie Decker
President, PSPA

From:
To: DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Third draft spend plan for BSS Disaster Relief
Date: Friday, August 14, 2026 1:06:03 PM

To Darion Jones

Thank you for your response to my inquiry earlier today clarifying that it will be Pacific States who does the distribution of funds for the CDQ portion of the spend plan not the CDQ groups. That level of accountability is crucial to the fairness of this spend plan.

One component regarding the CDQ/captains and crew compensation that I think is unfair is that unclaimed funds would be returned to the CDQ groups. I firmly believe that the fair and equitable way to deal with those funds would be to redistribute them back to the pool of CDQ captains and crewmen.

Sincerely, Tom Suryan
F/V Bristol Mariner

ALASKA
BERING SEA
CRABBERS

August 14, 2026

Alaska Department of Fish and Game
Attn: Darion Jones
PO Box 115526
Juneau, Alaska 99811-5526

Re: THIRD Draft Spend Plan for the 2023/24 Bering Sea Snow Crab Fishery Disaster

Dear Ms. Jones,

Thank you for the opportunity to comment on the third draft of the spend plan for the 2023/24 Bering Sea Snow (BSS) Crab Fishery Disaster. Alaska Bering Sea Crabbers (ABSC) is a non-profit industry trade association representing the majority of independent crab harvesters who commercially fish for king, snow (opilio), and Tanner (bairdi) crab with pot gear in the Bering Sea and Aleutian Islands (BSAI) Crab Rationalization Program. Our comments in this letter build off experience from recent rounds of fishery disaster spend plans for the 2019/20 bairdi fishery and the 2021/22 & 2022/23 Bristol Bay red king crab and Bering Sea snow crab fishery. We also incorporate by reference ABSC's comments on the first and second draft spend plans for the 2023/24 Bering Sea snow (BSS) crab fishery disaster.

ABSC appreciates the state's efforts to speed up the BSS spend plan process with a first and second draft while NOAA Fisheries, OMB, and Congress worked to determine a new, higher total allocation for this fishery disaster. ABSC also appreciates the state offering this 3rd draft of the BSS spend plan for comment given the time that has elapsed since the second draft in Oct 2024 and given the lessons learned during other recent crab fishery disasters. In addition, we respectfully request that Alaska Department of Fish and Game (ADFG), NOAA Fisheries, and Pacific States Marine Fisheries Commission (PSMFC) clear up any confidentiality issues around data sharing arrangements early in the process to reduce delays that happened in the last fishery disaster.

RESEARCH

ABSC supports a research allocation of no more than 5%, consistent with the 3rd draft spend plan. In addition, ABSC encourages as much of that allocation as possible go to the Bering Sea Fisheries Research Foundation (BSFRF). BSFRF is the research organization funded, in part, by affected crab industry stakeholders, and they collaborate closely with state and federal agencies, universities, and other research partners.

COMMUNITIES, INCLUDING SAINT PAUL

ABSC supports the allocation to communities at 5%, plus an additional 1% allocated specifically to Saint Paul Island, consistent with the 3rd draft BSS spend plan. This approach mirrors the recent 2021/22 & 2022/23 Bristol Bay red king crab and Bering Sea snow crab fishery disasters (or BBR/BSS for short).

CDQ

Normally, ABSC, as an organization representing only IFQ harvesters, would not comment on the process for how other crab sectors distribute their allocated disaster funds. However, our comment here is on a process that does affect our membership. All the captains and crew that fish community development quota (CDQ) also fish individual fishing quota (IFQ) and we feel it's important for ABSC to represent our members in this segment of the spend plan.

ABSC appreciates that the 3rd draft spend plan includes captain/crew that fished CDQ getting a portion of the CDQ allocation. However, we request that the process for unclaimed funds should mirror the harvester captain/crew process where unclaimed funds go back to those eligible CDQ captain/crew. Unclaimed funds should not go back to the CDQ groups. In other words, unclaimed funds should stay within the same sub-allocation of CDQ captain and crew, consistent with harvester captain/crew for this and recent crab fishery disasters.

In addition, ABSC will encourage vessel owners that harvested CDQ crab to provide CDQ groups the list of eligible CDQ captain/crew to assist with the application process. Because of the overlap between IFQ and CDQ fishermen, we do not expect there to be cases where so few fishermen apply that it creates a situation where a fishermen might be paid more than their expected losses from the 23/24 BSS season.

HARVESTER/PROCESSOR SPLIT

ABSC continues to support the fair, data-driven approach of a 78%/22% split of funds between harvesters and processors based on the Non-Binding Price Formula for BSS crab. This is consistent with the approach for both the 2019/20 bairdi spend plan and the 2021/22 and 2022/23 BBR/BSS spend plans. It is based on the long-standing revenue sharing arrangements from the Non-Binding Price Formula used in the BSAI Crab Rationalization Program. It is a historical and fair approach to sharing between harvesters and processors, both of which continue to face increasing costs of doing business. For example, harvesters are facing significant increases in costs for fuel, labor, shipyard/maintenance/repairs, moorage, equipment, bait, and insurance, to name a few. Please see ABSC's comments on the first and second draft 23/24 BSS spend plans for more data and details, including the processor's own Commercial Operator's Annual Report (COAR) data showing an even higher percentage split to harvesters (roughly 80%).

HARVESTERS

ABSC would prefer that the 23/24 BSS spend plan for vessel owners, captains, and crew use the same years and process for eligibility and history as the recent 2021/22 and 2022/23 BBR/BSS spend plan (e.g., 2019/20 and 2020/21). This process would be much faster by relying largely on existing information collected this year. In addition, ABSC is concerned with fairness if the 2021/22 season (i.e., 5.6Mlb TAC year) is included as proposed in the 3rd draft BSS spend plan. ADFG encouraged less boats to fish that year to reduce handling mortality of crab given concerns over the health of the stock. While this is ABSC's preference, we are okay with the eligibility and history outlined in the 3rd draft spend plan for vessel owners, including the new element of using the best 3 out of 5 years (2016/17 through 2020/21).

In whatever approach is used by ADFG for vessel owners, ABSC requests that ADFG provide the denominator used in their calculation for transparency so vessel owners can estimate their payments and verify the calculations by PSMFC and ADFG. While recognizing the need to maintain vessel confidentiality, the denominator would need to include enough details that vessel owners could double check what they expect to receive based on their landings data compared to the total pool.

For captains and crew, ABSC supports the 3rd draft BSS spend plan process that requires captain and crew to apply directly for their disaster award and does not require vessel owners to disperse those funds. Regarding the details of eligibility, if ADFG is not willing to use the eligibility and history from the recent 2021/22 and 2022/23 BBR/BSS spend plan (e.g., 2019/20 and 2020/21), ABSC requests that participation from both years (2020/21 and 2021/22) be used for qualification. This is a more fair approach and consistent with the BBR/BSS spend plan just with different set of years (2020/21 and 2021/22, instead of 2019/20 and 2020/21). ABSC thinks using participation from both years rewards those crew that were loyal during the challenging, low BSS quota season in 2021/22 while also recognizing that, due to the low TAC, some long-time crew had to look for more stable and profitable work to continue to provide for their families. ADFG's proposed 1-year approach in the 3rd draft BSS spend plan is not consistent with the other recent crab disaster approaches, not consistent with the vessel eligibility in the 3rd draft BSS spend plan and may cause harm to some long-standing crew. In summary, ABSC requests that crew be handled the same as vessels with regard to using participation over a two-year period for eligibility.

Finally, ABSC requests that captain and crew be paid faster than previous disasters. They are risking their lives out on the water in challenging conditions and deserve to be paid as promptly as the other disaster recipients.

Thank you for considering our comments.

Sincerely,

Jamie Goen
Executive Director
Alaska Bering Sea Crabbers

City of King Cove
PO Box 37
King Cove, Alaska 99612
mayor@kingcoveak.org

OFFICE OF THE MAYOR

August 14, 2026

Commissioner Doug Vincent-Lang
Alaska Department of Fish & Game
ATTN: dfg.comfisheriesdisaster@alaska.gov
P.O. Box 115526
Juneau, AK.99811-5526

RE: Comments on the 3nd Draft Spending Plan for the Additional 2023/24 BSS Fishery Disaster Funds

Dear Commissioner,

Thank you for the opportunity to provide comments on the Third Draft Plan issued by the Alaska Department of Fish and Game on July 29, 2026.

First, we support our coalition of southwest Alaska **impacted crab community's** recommendation that 5% of these additional disaster funds should come "off the top" and set aside 1% for the St. Paul island community entities. These comments have been provided in a separate letter which I have also signed.

I also wish to reaffirm the proposed reduction in that letter for the Research allocation from 12% to 5%. These funds which total about $8 million are then distributed among the CDQ, Harvester, and Processor sectors in response to impacts these sectors have experienced from the 2023/24 BSS disaster.

However, the Community sector does not benefit from this redistribution and would receive roughly the same dollar amount it was allocated under the 21/22 and 22/23 BBR-BSS Spend Plan. Consequently, I wish to reinforce our communities therefore request that ADF&G increase the Community allocation by 1% for a total of 6%. This increase would be particularly significant to the City of King Cove where we continue to financially suffer from the closure of the Peter Pan plant in early 2024

I also wish reaffirm my prior request in my July 19, 2026 letter that all/some of the snow crab processor shares that may be allocated to the now-defunct Peter Pan company should be allocated to the City of King Cove to pay the city for the $125,000 in unpaid taxes and utilities when they abruptly ceased operations in early 2024.

Doesn’t this seem reasonable to you? While it’s not quite the same scenario that occurred for St. Paul, I believe the relevancy is similar and that a small portion of these recent crab disaster funds would resolve at least one financial aspect of what has happened in King Cove.

Thank you for your consideration of these requests.

Sincerely,

/s/ warren wilson

Warren Wilson

Mayor

Cc: Gary Hennigh, City Administrator