THE STATE of ALASKA
GOVERNOR MIKE DUNLEAVY

Department of Fish and Game

OFFICE OF THE COMMISSIONER
Headquarters Office

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July 20, 2026

Third 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.

Written comments are requested on all elements of the proposed spend plan and should be as specific as possible. Comments will be posted online as received and the Alaska Department of Fish and Game (ADF&G) requests that no business proprietary information, copyrighted information, or personally identifiable information be included in written comments. Comments can be submitted by email to: dfg.com.fisheriesdisasters@alaska.gov
or by mail to:

ADF&G, Attn: Darion Jones
PO Box 115526
Juneau, AK 99811-5526

Comments must be submitted by August 14, 2026, for consideration in the final spend plan.

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 spend plan in October 2024 and received six written comments (Appendix 1). NOAA Fisheries announced supplemental funds in June 2026 and ADF&G is requesting public comments on the third draft spend plan before it is finalized and submitted to PSMFC.

In response to comments received on the second draft spend plan, and lessons learned during the distribution phase of the 2021/22 & 2022/23 Bering Sea crab fishery disasters, ADF&G is recommending the following revisions:

General

- ADF&G acknowledges the most recent open season, prior to the 2023/24 fishery disaster, was the 2021/2022 season. Therefore, ADF&G recommends using the 2020/21 and 2021/22 BSS seasons to determine eligibility and allocations rather than the 2019/20 and 2020/21 seasons as previously proposed.
- Based on public comments, ADF&G recommends a 78/22 split of the harvester-processor funds.
- ADF&G does not propose an allocation to trade organizations or observer businesses.

Community Development Quota Groups

- Consistent with the previous Bering Sea snow crab disaster spend plan, ADF&G recommends calculating the 10% CDQ allocation after funding for research, community, and program support is taken ‘off the top’.

- ADF&G recommends that 13% of each CDQ group's allocation be provided to the captains and crew that fished the CDQ group's quota in the most recent year prior to the 2023/24 disaster.

Harvesters

- ADF&G is proposing to use the 2020/21 and 2021/22 BSS seasons for eligibility. Because the available harvest during 2021/22 was very limited, ADF&G is proposing to use the best of three of five previous seasons (2016/17 through 2020/21) to determine the pro-rata distribution for vessel-based payments.
- Captains are identified as the T91Q permit holder(s) that landed BSS crab in 2022, or in 2021 if the vessel did not fish BSS in 2022.
- Vessel owners are proposed to be the same owners that received fishery disaster funds for the 2021/22 & 2022/23 BSS crab fishery disaster, unless the CFEC data show ownership of an eligible vessel was transferred between 2023 and 2024.

Processors

- Based on public comments, ADF&G recommends allocating a slightly higher proportion of the processor funds to active processors versus IPQ holders.
- Based on public comments, ADF&G recommends that Peter Pan Seafoods is ineligible for fishery disaster relief 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.

The proposed categories and estimated allocation percentages were informed by recent BSS crab fishery disaster spend plan and public comment. ADF&G is proposing to allocate funds for research, communities, Community Development Quota (CDQ) groups, harvesters, processors, and ADF&G program support. Allocation percentages and amounts are estimated and subject to change based on administration fees, rounding, and/or recalculations.

Category	Allocation	Estimated funds [a]
Research	5%	$5,726,000
Saint Paul Island	1%	$1,143,000
Communities	5%	$5,726,000
Harvesters/Processors/CDQ	89%	$101,905,000
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% (~$5.726 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 either 3a) an open and competitive request for proposals (RFP) administered by PSMFC and utilizing the North Pacific Research Board's (NPRB) scientific review process, and/or 3b) extensions of currently funded BSS crab project to facilitate synthesis and additional funds for graduate students to complete their degrees.

Saint Paul Island & Tribal Entities- 1% (~$1,143,000): ADF&G recognizes the severity of loss from the fishery disasters to the City of Saint Paul and Saint Paul's tribal entities, the Tanadgusik (TDX) Corporation and the Tribal Government for the Aleut Community of Saint Paul. The community of 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 proposes direct payments distributed equally to each of these three 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.

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.

Communities- 5% (~$5.726 million): 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 proposes a 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 the 2020/21 and/or 2021/22 season based on the port of landing from ADF&G Fish Ticket data.

ADF&G proposed direct payments be distributed pro rata to eligible communities based on the proportion of the total 2020/21 and 2021/22 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 – 89% (~$101.9 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 proposes allocating 10% of the harvester/processor/CDQ funds to the CDQ groups.

During development of the previous Bering Sea crab fishery disaster spend plan, ADF&G proposed two approaches to allocate funds between the harvesting and processing sectors. 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 to allocate 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 initially proposed a compromise approach of 76.5% to harvesters and 23.5% to processors for the 2023/24 BSS crab fishery spend plan and has received several comments noting higher costs for harvesters due to the fishery closures. In recognition that both harvesters and processors incur increased operational costs that are not directly reflected in available data, ADF&G recommends an allocation of 78% to harvesters and 22% to processors.

Commercial Sector Components	Allocation	Amount
Community Development Quota (CDQ)	10%	$10,190,500
Remaining		**$91,714,500**
Harvesters	78%	$71,537,310
Processor	22%	$20,177,190
Total Commercial Sector Funds		**$101,905,000**

Western Alaska Community Development Quota (CDQ) Programs – 10% (~$10.2 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 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.

CDQ Group	Percent Allocation	Allocation Amount	Captains and crew allocation (13%)	Direct CDQ payment amount
APICDA	8%	$815,240	$105,981	$709,259
BBEDC	20%	$2,038,100	$264,953	$1,773,147
CBSFA	20%	$2,038,100	$264,953	$1,773,147
CVRF	17%	$1,732,385	$225,210	$1,507,175
NSEDC	18%	$1,834,290	$238,458	$1,595,832
YDFDA	17%	$1,732,385	$225,210	$1,507,175
Total	**100%**	**$10,190,500**	**$1,324,765**	**$8,865,735**

At the time of application, each CDQ group must provide an affidavit that includes final settlement information for the qualifying season, 2020/21 or 2021/22, including:

1. Crew names and most recent known address and contact information.
2. Amount paid to each individual as a percent of all captain/crew payments made 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 75% of each CDQ group's calculated payment after the application period is closed. The remaining 25% 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 crew funds be provided back to the CDQ group in the second payment.

Harvesters (~$71.5 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 SAFE 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

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

determine eligibility for QS holders and vessel owners because that is the season included in this fishery disaster. ADF&G used participation in the 2020/21 or 2021/22 BSS seasons for captain and crew eligibility because these are the last two seasons prior to the BSS fishery closure.

Harvester component		
QS Holders	42%	$30,045,670
Vessel owners	37%	$26,468,805
Captains/crew	21%	$15,022,835
Total harvester funds	**100%**	**$71,537,310**

Quota Share Holders - 42% of harvester funds. The following criterion is used to determine QS holder eligibility for a 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 1,000 QS units.

ADF&G included a minimum holding of 1,000 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:

- The vessel must have been used to harvest BSS in the IFQ fishery during either the 2020/21 or 2021/22 season.

A total of 64 vessels may be eligible for direct payments based on this criterion. There were 62 vessels that participated in the 2020/21 IFQ season and two additional vessels that participated in the 2021/22 IFQ season.

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 five seasons (2016/17 through 2020/21).

ADF&G proposes allocating 63% of available funds to eligible vessel owners and 37% to eligible captains and crew, which is consistent with BSS exvessel revenue distribution between vessel owners and captains/crew reported in the Crab SAFE report. The split would provide vessel owners with 37% of the harvester funds and captains/crew with 21% of the harvester funds.

Vessel owners - 63% of the vessel's share of the total allocation for vessel-based payments.

ADF&G proposes 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 previous disaster spend plan addressed vessels transferred between 2019 & 2023 and documentation submitted during that application period does not need to be submitted again.

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 three vessels where ownership was likely 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 season, 2020/21 or 2021/22, including:

1. Crew names and most recent known address and contact information.
2. Amount paid to each individual, including captains, as a percent of all captain/crew payments made in the qualifying year.

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.

<u>Captains and crew</u> - 37% of the vessel's share of the total allocation for vessel-based payments.

ADF&G recommends direct payments to captains and crew who worked on an eligible vessel during the 2020/21 or 2021/22 season, whichever was the most recent season the vessel participated prior to the 2023/24 disaster, and who meet all eligibility criteria and submit a complete application. If a vessel participated in both the 2020/21 and 2021/22 seasons, only the captain/crew of the 2021/22 season are eligible for disaster relief.

- Captains are identified as the CFEC permit holder based on Fish Ticket data.
- 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 2021 for the 2020/21 season or in 2022 for the 2021/22 season.

<u>Processors (~$20.2 million)</u>: 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. 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. There were four companies with five active shore-based processing plants in 2022, however ADF&G recommends that Peter Pan Seafoods not be eligible for fishery disaster funds because the company is no longer 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 and/or subcategory will be reallocated among all qualified individuals within the same category/subcategory.

November 4, 2024

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

Re: Comments on Second Draft Spend Plan for 2023/24 Bering Sea Snow Crab Fishery Disaster

Dear Commissioner,

We wanted to thank you for the opportunity to provide comments on the Second Draft Plan issued by the Alaska Department of Fish & Game (ADF&G or the State) on October 25, 2024.

The undersigned Alaska crab community representatives appreciate the improvements that ADF&G has incorporated into the Second Draft Spend Plan since the announcement of the 2023/24 BSS fishery disaster determination in April 2024 and the issuance of an Initial Draft Spend Plan on July 1, 2024.

In particular, we support ADF&G's proposed increase in the community sector allocation from 4% to 5%. This will bring the community allocation to the same levels provided in the 2021/22 and 2022/23 BBR and BSS spend plans. This is especially appreciated at a time when our municipalities and boroughs continue to be hit hard by the extended crab disasters, the low total allowable catch (TAC) crab fisheries, and the multiple challenges affecting the North Pacific fishing industry including the loss of processing capacity in various locations.

We also agree with and support the 1% allocated to Saint Paul Island community entities in recognition of the unique severity of the crab fishery disasters on Saint Paul Island. Saint Paul has seen no meaningful economic activity since the closure of the BSS fishery in the 2022-23 season and is relying on the soon to be released crab disaster funds through the Pacific States Marine Fisheries Commission (PSFMC) to survive in 2024 and 2025.

We understand that the $39.5 million that is the subject of this Second Draft Spend Plan, are funds that were recently made available by NOAA Fisheries and that this is a small portion of the assistance needed to respond to the magnitude of the 2023/24 BSS disaster. Anticipating that the U.S. Congress may yet fund recent disaster determinations including the one at hand, we support maintaining the proposed allocations framework going forward.

We are grateful to the ADF&G for its responsiveness to our concerns 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.

Sincerely,

Alvin Osterback, Mayor
Aleutians East Borough

Joe Bereskin, Mayor
City of Akutan

Warren Wilson, Mayor
City of King Cove

Jacob Merculief, Mayor
City of Saint Paul

Vince Tutiakoff, Mayor
City of Unalaska

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Saltwater Inc.

October 22, 2024

Alaska Department of Fish and Game
Darion Jones
Dfg.com.fisheries.disasters@alaska.gov
Darion.Jones@alaska.gov
907-267-2593

Hello Ms. Jones,

I am writing to request that Saltwater Inc be added to the 2023/2024 disaster relief fund spend plan in the amount of $329,535 per attached analysis. This amount represents losses beyond the prior 5-year net income average. In 2022, the loss beyond the 5-year average net income was $-215,477 and in 2023 the loss beyond 5-year average net income was $-114,087.

Saltwater Inc is an Alaskan Woman Owned Small Business, incorporated in 1988. Saltwater Inc collects fisheries data to assist in the management of fisheries and to promote healthy oceans.

Saltwater Inc had been providing on-vessel marine biologist observer services during the relief period for the State of Alaska under the following two contracts, Vendor Number SAL10279:

1. Bering Sea Onboard Crab Observers, Contract SC 19-147, June 19, 2019, through June 30, 2024
2. Aleutian Islands Onboard Crab Observers, Contract SA 19-149, June 19, 2019, through June 30, 2024

Saltwater Inc is also currently performing the same activities for the Alaska Department of Fish and Game under contract 1124101, Bering Sea and Aleutian Islands Onboard Crab Observers.

During the relief period, Saltwater Inc had a decline in revenue from Crab operations of 41% in 2022 and 35% in 2023, respectively, when compared to the five-year average from 2015 – 2020. Similarly, Saltwater Inc had a decline in net income of 190% in 2022 and 100% in 2023, respectively, when compared to the five-year average from 2015 – 2020.

Please note that while operating revenues did increase significantly in 2020 and 2021, the costs associated with operating during covid increased substantially, particularly the costs of quarantining observers (Lodging and meals for 14 days pre-deployment).

Sincerely,

Steve Warnke
CFO
Saltwater Inc

CITY OF UNALASKA
P.O. BOX 610
UNALASKA, ALASKA 99685-0610
(907) 581-1251 FAX (907) 581-1417

UNALASKA, ALASKA

November 8, 2024

Doug Vincent Lange, Commissioner, Alaska Department of Fish and Game
ATTN: Darion Jones, dfg.com.fisheriesdisasters@alaska.gov
PO Box 115526
Juneau, Alaska 99811-5526

RE: Comments on the Second Draft Spend Plan for Bering Sea Snow Crab for the 2023/2024 Bering Sea Fishery Disaster

Dear Commissioner:

Thank you for the opportunity to provide comments on the Second Draft Plan issued by the Alaska Department of Fish & Game (ADF&G or the State) on October 25, 2024.

The City of Unalaska appreciates the improvements that ADF&G has incorporated into the Second Draft Spend Plan since the announcement of the 2023/24 BSS fishery disaster determination in April 2024 and the issuance of an Initial Draft Spend Plan on July 1, 2024.

We support ADF&G's proposed increase in the community sector allocation from 4% to 5%. This will bring the community allocation to the same levels provided in the 2021/22 and 2022/23 BBR and BSS spend plans. This is especially appreciated at a time when our municipalities and boroughs continue to be hit hard by the extended crab disasters, the low total allowable catch (TAC) crab fisheries, and the multiple challenges affecting the North Pacific fishing industry including the loss of processing capacity in various locations.

We also agree with and support the 1% allocated to Saint Paul Island community entities in recognition of the unique severity of the crab fishery disasters on Saint Paul Island. Saint Paul has seen no meaningful economic activity since the closure of the BSS fishery in the 2022-23 season and must rely on the soon-to-be-released crab disaster funds through the Pacific States Marine Fisheries Commission (PSFMC) to survive in 2024 and 2025.

We understand that the $39.5 million that is the subject of this Second Draft Spend Plan, are funds that were recently made available by NOAA Fisheries and that this is a small portion of the assistance needed to respond to the magnitude of the 2023/24 BSS disaster. Anticipating that the U.S. Congress may yet fund recent disaster determinations including the one at hand, we would support maintaining the proposed allocations framework going forward.

We are grateful to the ADF&G for its responsiveness to the City of Unalaska's concerns and look forward to further coordination with the State of Alaska to respond to the numerous challenges affecting our crab and commercial fisheries, and fishery-dependent communities.

Thank you for your consideration of the second draft of the spend plan for the Snow Crab fishery disaster funding.

Sincerely,
City of Unalaska

Vincent M. Tutiakoff Sr.

Vincent Tutiakoff Sr.
Mayor

CC: Extended Jurisdiction Manager, Karla Bush
Deputy Commissioner ADFG, Rachel Baker
ADFG, Darion Jones
City Manager, William Homka
Deputy City Manager, Marjorie Veeder
Unalaska City Council Members

Trailblazer LLC
Alaska Seafood Producers, Inc.

Gary L. Painter
Midnite Pacific Enterprises, Inc.

PO Box 1027 – Newport, OR 97365
Fax: (541) 610-1764
gpainter@midnitepacific.com

11/8/2024

Alaska Department of Fish and Game
Attn: Darion Jones
Re. Draft Plan for the 2023/24 Bering Sea Snow Crab Fishery Disaster
Via email: dfg.com.fisheriesdisasters@alaska.gov

Dear Ms. Jones,

I have been an active participant in Alaskan crab fisheries since 1967. I have been a crewman, captain, and boat owner. (I'm currently a managing boat owner.) Over that length of time, I have been active in the Council process, ADFG management process, CPT, SSC, etc. I am a founding member of the Bering Sea Fisheries Research Foundation. I am a former president of BSFRF and still a member of its BOD. I am also a member of the North Pacific Industry Advisory Committee.

My comments are applicable to current and future fishery disaster spend plans.

In my opinion, disaster funds for fishery failures are the same as disaster funds for hurricanes, wildfires, earthquakes. In short, for all natural disasters. Fishery disaster funds in the state of Alaska do several things. Among them:

- Help preserve a way of life.
- Help keep participants "alive" until better days show.
- Help the industry maintain its fishery assets during the interim.
    - Whether machinery is working or idle, it must be maintained to be viable in the future.
        - When better days show, the State of Alaska will want industry members to harvest, process, and distribute these great renewable resources. It's not only good for the State of Alaska, but also for the U.S.A.

When these disasters struck, I attended a meeting where ADFG said that it wanted less vessels on the fishing grounds, and for those vessels on the grounds, ADFG wanted them to share fishery information, primarily, so that all vessels could have less bycatch, and less bottom contact by increasing CPUE, therefore having less pot-pulls. As we know, any fishery has **some** bycatch. We crabbers are keenly aware of this and prosecute the fisheries with this in mind. Along with this awareness, less pots pulled means less expenses, and therefore more profit. (Or at least, less loss.) The vessels that have participated in the aftermath of the disaster(s) have done better because some of the vessels "sat out" some of the fisheries.

I ask that any future spend-plans take this into consideration. My vessel has not fished recently. We have used our IFQ returns to maintain our vessel, and to keep it prepared for better days. There are other vessels that have taken the same path. These vessels should not be penalized in future spend-plans. Just because a vessel sat out a fishery or fisheries should not disqualify it from receiving future disaster funds.

The TACS for the 2024-25 fisheries are the best we've seen in several years. But consider that:

- The BBR TAC is still quite low.
- While the WBT & EBT TAC's increased dramatically, the expected X-vessel price will be significantly lower than it was several years ago, and that expenses have risen. (These facts show that profits will likely not dramatically increase.)
- The reasoning in my comments regarding the WBT/EBT fishery also applies to BSS.

There will come a day when the likelihood of profit will outweigh concerns about the lack of potential profit and more bycatch than is necessary in depressed fisheries. At that point, the benefits of future failures should go to current participants. But I submit that we are not there yet, and that those who sit out should not be penalized.

Thank you for your consideration.

Sincerely,

Gary L. Painter

November 8, 2024

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

Re: SECOND 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 second draft of the spend plan for the 2023/24 Bering Sea Snow (BSS) Crab Fishery Disaster. Our comments in this letter build off the experience from recent rounds of fishery disaster spend plans for the 2019/20 bairdi fishery disaster and the 2021/22 & 2022/23 Bristol Bay red king crab and Bering Sea snow crab fishery disasters and incorporate by reference ABSC's comment on the first draft spend plan for 2023/24 Bering Sea snow crab dated July 17, 2024.

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 harvesters and our organization were directly harmed by the subject fishery disaster.

ABSC is generally supportive of the disaster fund allocations proposed in the second draft of the 2023/24 BSS spend plan, except for the harvester/processor split. The "compromise position" proposed in ADFG's second draft spend plan is arbitrary and capricious as a change from recent crab final spend plan approaches without data to support the change.

Available data from 3 different data sets - the processor's own data from their ADFG Commercial Operator's Annual Report (COAR), the ratio of processor first wholesale value compared to ex-vessel value, and the historic sharing in the Crab Rationalization Program – all support a higher percent of the fishery disaster allocation going to harvesters than is proposed in the second draft spend plan.

- **Processor's own data support 80%/20% split** (harvesters/processors) – see the COAR data provided in Attachment A.
- **Processor versus harvester value of crab supports 78%/22% split –** Governor Dunleavy's request letter for this disaster states an estimated $133M in ex-vessel losses to harvesters and $171M in first wholesale losses once processors are factored in. One way of looking at this data is that the harvester losses represent 78% of the total first wholesale losses.
- **Crab Rationalization Program supports 78%/22% split –** The historical sharing arrangements between harvesters and processors in the BSAI Crab Rationalization Program also support a 78%/22% split for snow crab as further described in ABSC's comment letters on the 2021/22 & 2022/23 Bristol Bay red king crab and Bering Sea snow crab fishery disaster spend plan dated July 14, 2023, and December 11, 2023, herein incorporated by reference, which captured the data and rationale for this approach.

ADFG's rationale for the 76.5% harvesters and 23.5% processor split states this decision "appropriately balances the losses of each sector" and considers the processor reported "ongoing costs to maintain crab processing infrastructure." However, ADFG offers no data to substantiate the processors' increased costs and specifically called this out as the rationale for not choosing a "compromise position" in the 2021/22 & 2022/23 Bristol Bay red king crab and Bering Sea snow crab fishery disaster final spend plan, stating,

> *"The allocation of funds between the harvester and processor sectors was revised to … 78/22 for Bering Sea snow crab (BSS) based on the Non-Binding Price Formula. Processor sector representatives proposed an allocation of 75% to harvesters and 25% to processors but did not provide supplemental data to support those allocations. Therefore, ADF&G determined that the Non-Binding Price Formula was the best source of information to inform sector allocations."* Page 2 of ADFG 2021/22 & 2022/23 Bristol Bay red king crab and Bering Sea snow crab fishery disaster final spend plan, January 10, 2024.

Furthermore, it is inappropriate to consider costs because it is too difficult to attribute them to a single fishery, especially for multispecies processors, as described further in previous ABSC spend plan comment letters. That's why sharing arrangements historically rely on revenue as a more equitable sharing arrangement. However, if ADFG does consider costs in the split, then they need to do so for both harvesters and processors and provide the data used in that decision. In making the proposed compromise split in the second draft 2023/24 BSS spend plan, ADFG did not also consider the ongoing and increased costs that harvesters are facing at the same time as described further in ABSC's July 17, 2024, comment letter on the initial draft 2023/24 BSS spend plan, hereby incorporated by reference. Therefore, the proposed harvester and processor split in the second draft 2023/24 BSS spend plan is arbitrary and capricious, lacking justification for the change from previously adopted, correlated final spend plans without supporting data.

ABSC encourages the State to continue to lean on data-driven approaches in Council matters and when setting crab harvest levels. We encourage the State to use a data-driven approach here, too, in selecting the harvester-processor split. While using the processors' own data shows a 80%/20% split is appropriate, **ABSC recommends a 78%/22% harvester/processor split as a data-driven split that considers all 3 different sets of available data and strikes a balance between harvesters and processors**.

A final comment and request. ABSC requests clarification on the captain and crew allocation. In cases where not all eligible captains and crew apply or qualify, does that person's share get distributed among just the others that qualified with that vessel or does it get distributed pro-rata among all captains and crew that qualified for the relief. Also, ABSC understands that ADFG does not support a direct allocation to an association like ABSC or any other industry organizations for this spend plan.

Thank you for considering our comments.

Sincerely,

Jamie Goen
Executive Director
Alaska Bering Sea Crabbers

ATTACHMENT A

BSS - COAR Report 2 & 5 year splits

BSS - HARVESTER AND PROCESSOR SHARE - 2 YEAR AVERAGE PROFIT SHARE BASED ON COAR REPORT DATA

	2019	2020	Total
Processor Wholesale Value (COAR Production Report)	$ 139,826,357	$ 150,145,930	
Divided by: Vessel Pounds Delivered (COAR Buying Report)	26,313,098	32,317,123	
Processor Gross Revenue Per Pound Delivered	$ 5.31	$ 4.65	
Less: Average Statewide Exvessel Price Per Pound (COAR Buying Report	$3.98	$3.96	
Processor Profit Per Pound Delivered	$ 1.33	$ 0.69	
Processor Share (Profit Per Pound/Processor Gross Revenue Per Pound)	25.09%	14.83%	
Processor Average Share of BSS (Processor %/2 Years)	12.54%	7.42%	**19.96%**
Vessel Share of BSS			**80.04%**

BSS - HARVESTER AND PROCESSOR SHARE - 2 YEAR AVERAGE PROFIT SHARE BASED ON COAR REPORT DATA

	2020	2021	Total
Processor Wholesale Value (COAR Production Report)	$ 150,145,930	$ 277,487,639	
Divided by: Vessel Pounds Delivered (COAR Buying Report)	32,317,123	42,240,645	
Processor Gross Revenue Per Pound Delivered	$ 4.65	$ 6.57	
Less: Average Statewide Exvessel Price Per Pound (COAR Buying Rep	$3.96	$4.96	
Processor Profit Per Pound Delivered	$ 0.69	$ 1.60	
Processor Share (Profit Per Pound/Processor Gross Revenue Per Pour	14.83%	24.43%	
Processor Average Share of BSS (Processor %/2 Years)	7.42%	12.22%	**19.63%**
Vessel Share of BSS			**80.37%**

BSS - HARVESTER AND PROCESSOR SHARE - 5 YEAR AVERAGE PROFIT SHARE BASED ON COAR REPORT DATA

	2016	2017	2018	2019	2020	Total
Processor Wholesale Value (COAR Production Report)	$ 154,703,485	$ 111,349,791	$ 87,302,357	$ 139,826,357	$ 150,145,930	
Divided by: Vessel Pounds Delivered (COAR Buying Report)	36,590,494	20,579,183	21,056,890	26,313,098	32,317,123	
Processor Gross Revenue Per Pound Delivered	$ 4.23	$ 5.41	$ 4.15	$ 5.31	$ 4.65	
Less: Average Statewide Exvessel Price Per Pound (COAR Buying Repo	$2.67	$4.07	$3.89	$3.98	$3.96	
Processor Profit Per Pound Delivered	$ 1.56	$ 1.34	$ 0.25	$ 1.33	$ 0.69	
Processor Share (Profit Per Pound/Processor Gross Revenue Per Poun	36.95%	24.78%	6.10%	25.09%	14.83%	
Processor Average Share of BSS (Processor %/5 Years)	7.39%	4.96%	1.22%	5.02%	2.97%	**21.55%**
Vessel % Share of BSS						**78.45%**

BSS - HARVESTER AND PROCESSOR SHARE - 5 YEAR AVERAGE PROFIT SHARE BASED ON COAR REPORT DATA

BSS Calculation of Processor & Harvester Share	2017	2018	2019	2020	2021	Total
Processor Wholesale Value (COAR Production Report)	$ 111,349,791	$87,302,357	$ 139,826,357	$ 150,145,930	$277,487,639	
Divided by: Vessel Pounds Delivered (COAR Buying Report)	20,579,183	21,056,890	26,313,098	32,317,123	42,240,645	
Processor Gross Revenue Per Pound Delivered	$ 5.41	$ 4.15	$ 5.31	$ 4.65	$ 6.57	
Less: Average Statewide Exvessel Price Per Pound (COAR Buying	$4.07	$3.89	$3.98	$3.96	$4.96	
Processor Profit Per Pound Delivered	$ 1.34	$ 0.25	$ 1.33	$ 0.69	$ 1.60	
Processor Share (Profit Per Pound/Processor Gross Revenue Per	24.78%	6.10%	25.09%	14.83%	24.43%	
Processor Average Share of BSS (Processor %/5 Years)	4.96%	1.22%	5.02%	2.97%	4.89%	**19.05%**
Vessel Share of BSS						**80.95%**

Statewide COAR Buying by Species

Year	Species Code	Species Name Common	COAR Buying Pounds Bought	COAR Buying Final Amount Paid	Preliminary Statewide Average Exvessel Price per Pound (Nominal)	Final Statewide Average Exvessel Price per Pound (Nominal)	Processor Count
2021	932	crab, Tanner, snow (opilio)	42,240,645	$209,692,960	$4.96	$4.96	10
2020	932	crab, Tanner, snow (opilio)	32,317,123	$127,877,948	$3.96	$3.96	10
2019	932	crab, Tanner, snow (opilio)	26,313,098	$104,748,403	$3.98	$3.98	10
2018	932	crab, Tanner, snow (opilio)	21,056,890	$81,979,505	$3.89	$3.89	10
2017	932	crab, Tanner, snow (opilio)	20,579,183	$83,756,674	$4.07	$4.07	11
2016	932	crab, Tanner, snow (opilio)	36,590,494	$97,534,713	$2.67	$2.67	9

Statewide COAR Production by Species

Year	Species Name Common	Company Count	Net Weight (Sum)	Wholesale Value (Sum)
2021	crab, Tanner, snow (opilio)	11	32,982,486	$277,487,639
2020	crab, Tanner, snow (opilio)	9	25,609,455	$150,145,930
2019	crab, Tanner, snow (opilio)	11	22,207,384	$139,826,357
2018	crab, Tanner, snow (opilio)	10	14,204,007	$87,302,357
2017	crab, Tanner, snow (opilio)	12	17,366,493	$111,349,791
2016	crab, Tanner, snow (opilio)	10	29,019,034	$154,703,485

CITY OF SAINT PAUL

ALASKA

November 12, 2024

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

Re: Comments on Second 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 Second Spend Plan for the 2023/24 Bering Sea snow (BSS) crab fishery disaster.

The City supports ADF&G's proposed increase in the community sector allocation from 4% to 5%. This will bring the community allocation to the same levels provided in the 2021/22 and 2022/23 BBR and BSS spend plans. The City also supports the 1% allocated to Saint Paul Island community entities in recognition of the unique severity of the crab fishery disasters on our community. We are grateful to you and the State for your consideration of our situation.

As you are aware, Saint Paul Island has seen no meaningful economic activity since the closure of the BSS fishery in the 2022-23 season (see table below) and is relying on the soon to be released crab disaster funds through the Pacific States Marine Fisheries Commission (PSFMC) to make it through the remainder of 2024 and 2025.

Overview of City of Saint Paul Taxes and Revenues from 2018

Year	**2018** *(actual)*	**2019** *(actual)*	**2020** *(actual)*	**2021** *(actual)*	**2022** *(actual)*	**2023** *(actual)*	**2024** *(actual 10/31/24)*	**Avg 2018-22**
Local Fish Tax	$1,120,918	$1,655,960	$1,827,588	$3,347,430	$524,888	$16,687	$46.909	$1,695,410
Shared State Fish Tax	$623,979	$593,330	$841,798	$840,827	$1,545,892	$232,880	$26,648	$889,165
Total	**$1,744,897**	**$2,249,290**	**$2,669,386**	**$4,188,257**	**$2,070,780**	**$249,567**	**$73,557**	**$2,584,332**
	Change	$504,393	$420,096	$1,518,871	($2,117,477)	($1,821,213)	($176,010)	
	%Change	29%	19%	57%	-51%	-88%	-71%	
Total General Fund Revenue	**$2,937,238**	**$3,869,686**	**$4,456,780**	**$5,750,825**	**$4,265,894**	**$1,580,315**	**$1,566,894**	**$4,132,188**
Other GF Revenue	**$1,192,341**	**$1,620,396**	**$1,787,394**	**$1,562,568**	**$2,195,114**	**$,1.330,748**	**$1,493,337**	**$1,617,710**
% of GF Revenue from Fish Tax	59%	58%	60%	73%	49%	16%	5%	
% of GF Revenue from Other Sources	41%	42%	40%	27%	51%	84%	95%	

As soon as the disaster funds for the 2021/22 and 2022/23 BSS and BBR fisheries become available (which we understand will be soon) we intend to use these in part to replace lost resource revenues and taxes. For the 2023 and 2024 calendar years the City has had to take funds from its limited savings account to maintain ongoing municipal operations and minimize the devastating impacts that the crab fishery closures have had upon City finances and our community. Saint Paul Island needs to be able to maintain critical municipal services ("keep the lights on") in order to stem population loss and begin pivoting towards infrastructure investments necessary to generate new economic activities.

Concerning the future, the City is working with other local entities, state and federal agencies, congressional offices, and partners in the fishing industry to identify projects and expenditures to be pursued in part with its eventual allocation of disaster funds. These include:

- investing in opportunities that diversify Saint Paul Island's economy, including but not limited to other fisheries activities, mariculture, and expanded tourism;
- working on deferred maintenance of critical public, fisheries-related, infastructure;
- matching disaster funds to federal and state grants that require a local match.

The City understands that the $39.5 million that is the subject of this Second Draft Spend Plan, are funds that were recently made available by NOAA Fisheries and that this is a small portion of the assistance needed to respond to the magnitude of the 2023/24 BSS disaster. Anticipating that the U.S. Congress may yet fund recent disaster determinations including the one at hand, we support maintaining the proposed allocations framework going forward.

In response to the loss of a significant portion of revenue the City has been forced to make severe cuts once again to its budget which included:

- A hiring freeze of key positions,
- Loss of paid EMS services,
- Loss of police officer positions.
- No funding for community donations and City sponsored community events,
- Limting purchases to essential purchases only,
- No travel budget to participate in essential municipal meetings.

For a second year in a row the City has had to take funds from limited its savings accounts to maintain ongoing municipal operations and minimize the devastating impacts that the crab fishery closures have had upon City finances and our community.

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 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

July 13, 2026

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

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

Dear Ms. Bush:

The Community Development Quota (CDQ) groups that make up the Western Alaska Community Development Association (WACDA) appreciate the opportunity to comment on the second draft spend plan for the 2023-24 Bering Sea Snow (BSS) Crab Fishery Disaster. We also appreciate the Alaska Department of Fish and Game's (ADF&G) efforts to gather public input, make changes from past lessons learned, and develop a fair approach for distributing these important disaster relief funds.

We support the direct payment structure proposed by ADF&G for the CDQ program in the second draft spend plan for the 2023-24 Bering Sea snow crab (BSS) fishery disaster. As you know, CDQ groups collectively receive 10% of the annual BSS total allowable catch and rely on the revenue generated from harvesting that allocation to provide economic and social benefits to their member communities, consistent with the program's mission and statutory requirements. Accordingly, we support a structure under which payments to each CDQ group are based on its federally allocated share of the BSS fishery.

Our groups also support setting aside 13% of the CDQ allocation for payments to captains and crew who fished on vessels harvesting CDQ BSS crab during the 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. We believe this approach provides the best approximation for crew compensation when comparing information across CDQ groups, given differences in business models, leasing arrangements, lease rates, vessel ownership structures, and the proportion of CDQ harvested relative to other quota on individual vessels. A uniform 13% set-aside falls within the range of existing CDQ crew compensation practices and provides a reasonable, consistent method for accounting for these differences.

We recognize that coordination will be needed among the CDQ groups, their harvest partners, where applicable, and the Pacific States Marine Fisheries Commission to identify the captains and crew who are eligible for payments. We support using an affidavit or similar verification process that requires CDQ groups to provide the information needed to identify eligible participants and help ensure payments are made accurately and efficiently.

We believe the Pacific States Marine Fisheries Commission is the most appropriate entity to distribute payments to captains and crew. If that is not feasible, the CDQ groups are prepared to make reasonable efforts to ensure payments are distributed in a timely manner. In our view, an affidavit-based process, along with documentation confirming payment, would provide sufficient accountability without creating additional complications or potentially delaying payments.

Finally, after a reasonable application deadline has passed, if eligible captains or crew have not applied for their payments, we recommend that any unclaimed funds from the CDQ captain and crew set-aside be returned to the CDQ groups for mission-related purposes.

Thank you for considering our comments and for ADF&G's continued work to develop a fair and transparent spend plan. We appreciate the department's efforts to ensure these funds reach those affected by the fishery disaster and continue to support Western Alaska communities.

Sincerely,

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

From: [redacted]
To: DFG, ComFisheriesDisasters (DFG sponsored); Bush, Karla L (DFG); Jones, Darion B (DFG)
Subject: 23/24 Bering Sea snow crab disaster comments
Date: Monday, July 13, 2026 2:09:10 PM

Good afternoon,

My name is Charlie Hensel, and I am the VP of Finance for Aleutian Spray Fisheries. We own and operate the F/V Kiska Sea and have recently purchased the F/V Trailblazer. Both vessels are longtime participants in the BSAI crab fisheries. I am writing to you today to provide some input before the 3rd draft spend plan is released for public comment for the 23/24 Bering Sea snow crab fishery disaster.

We strongly encourage ADFG to keep the process and the qualifying years for history the same as the recent BBR/BSS fishery disasters as much as possible. That process, while taking a long time, was fairer for the captain and crew than the bairdi disaster before it and did not put the liability on the vessel owner for dispersing payment to captain and crew. If the process was kept the same, PSMFC could provide the list of captain/crew from the recent BBR/BSS disaster and vessel owners could simply be asked to provide an addendum for any changes. This should speed up the process significantly.

We would also recommend keeping the 78/22 split amongst harvesters and processors. There was a lot of time and discussion spent on this in the previous disaster spend plans and there is no need to change the allocation. The processors have proposed a 75/25 split to recognize investments that are not fully captured in the Non-Binding Price Formula and ongoing costs to maintain crab processing infrastructure during the closed BSS crab fisheries. We would like to also point out that the formula does not recognize investments or ongoing costs to maintain crab **VESSELS** during the closed BSS crab fisheries. Shifting 1.5% to the processors essentially means the department values the costs of processors more than it does harvesters. Last summer we hauled out the Kiska Sea and fully repainted it. This summer we are overhauling both main engines, replacing the forward mast and we have ordered 188 pots to replace our old, tired gear. These are necessary repairs/investments to keep our boat operating safely and efficiently and are at a significant cost. Other vessels in the fleet are likely to have had to make similar investments and it's fair to consider these costs as well as the costs the processors have incurred, which is why we feel the 78/22 split is best left unchanged.

We really appreciate your work on this disaster spend plan. Thank you for all your efforts! Please reach out if you have any follow up questions to our comments here.
Cheers!
Charlie Hensel
Vice President of Finance
Aleutian Spray Fisheries, Inc.

From: [redacted]
To: DFG, ComFisheriesDisasters (DFG sponsored); Bush, Karla L (DFG); Jones, Darion B (DFG)
Subject: 23/24 Bering Sea snow crab fishery disaster
Date: Monday, July 13, 2026 2:41:52 PM

Thank you for the opportunity to provide input before the 3rd draft spend plan is released for public comment for the 23/24 Bering Sea snow crab fishery disaster. As a vessel owner, I strongly encourage ADFG to keep the process and the qualifying years for history the same as the BBR/BSS fishery disaster as much as possible. That process, while taking a long time, was more fair for the captain and crew than the bairdi disaster before it and did not put the liability on the vessel owner for dispersing payment to captain and crew. If the process was kept the same, PSMFC could provide the list of captain/crew from the recent BBR/BSS disaster and vessel owners could simply be asked to provide an addendum for any changes. This should speed up the process significantly.

I feel the percentage share between harvesters and processors should not change from what was used for the previous two disaster fundings, 78% and 22% based on the Non-Binding Price Formula. The harvesters have similar increased costs as processors in maintaining the vessels, upkeep and maintaining machinery, difficulties in hiring qualified crew and acquiring materials/machinery to the same remote places the processors are located. We have increased insurance costs and increased fuel costs as well. The Non-Binding Price Formula was implemented to recognize the historical splits in revenue. To start meddling in what each sector's costs might be based on anecdotal information without any data seems to be ill-advised.

Thank you for considering my comments.
Jim Stone

From: [redacted]
To: DFG, ComFisheriesDisasters (DFG sponsored); Bush, Karla L (DFG); Jones, Darion B (DFG)
Subject: BSS Spend Plan
Date: Monday, July 13, 2026 9:30:30 AM

As I understand the current options:

- **Having vessel owners dispersing captain/crew payments to speed up the process.**
    - In my case, this would be easy.
- **Including additional seasons.**
    - While including BSS seasons after the disaster declaration may not be consequential, I believe it would be unfair, because ADFG told the fleet in a meeting in September of 2021 that they would like to see less boats harvest BSS so that there would be less bycatch. This induced me and probably others not to have their boats harvest in years after the 2020-21 season.

Thanks for the opportunity to comment.

Gary Painter, F/V Trailblazer

From: [redacted]
To: Jones, Darion B (DFG); Bush, Karla L (DFG); DFG, ComFisheriesDisasters (DFG sponsored)
Subject: draft spend plan for crab disaster aid.
Date: Monday, July 13, 2026 1:39:18 PM

Thank you for the opportunity to provide input before the 3rd draft spend plan is released for public comment for the 23/24 Bering Sea snow crab fishery disaster. As a owner of two crab fishing vessels and an active captain in the industry, I strongly encourage ADFG to keep the process and the qualifying years for history the same as the BBR/BSS fishery disaster as much as possible. That process, while taking a long time, was fairer for the captain and crew than the bairdi disaster before it and did not put the liability on the vessel owner for dispersing payment to captain and crew. If the process were kept the same, PSMFC could provide the list of captain/crew from the recent BBR/BSS disaster and vessel owners could simply be asked to provide an addendum for any changes. This should speed up the process significantly.

For history to determine the allocation—best 3 out of 5, or using the previous 2 open seasons—I would like to see the last 2 years and that is for vessels that have been active, I don't agree with going more than that. The percentage share between harvesters and processors should not change from what was used for the previous disasters (BST and BBR/BSS).

Harvesters are hurting and facing increased costs; processors have multiple ways to make income throughout the year.

We have also not seen many improvements at their facilities over the last 10 years and processing capacity has dropped off. Why should they get more of the disaster? That's not right. ADFG settled on the fairest approach and should keep this status quo. - using the non-binding price formula that has determined sharing arrangements between harvesters and processors since the crab rationalization program started. Both sides, harvesters have faced increasing costs that are not captured in the formula. Setting any other sharing arrangement than the well-established formula is arbitrary without a full review of both sides. If anything crab fishing vessels need this disaster help more than anybody. As a vessel owner I am seeing our costs go through the roof and profits dwindle. In my opinion vessels and crew should get this amount of funds to stay alive and maintain vessels for the future.

Thank you for considering my comments. If you have any questions please feel free to call me.

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

From: [redacted]
To: Jones, Darion B (DFG); Bush, Karla L (DFG); DFG, ComFisheriesDisasters (DFG sponsored)
Subject: Re: draft spend plan for crab disaster aid.
Date: Monday, July 13, 2026 3:24:10 PM

After some thought I have a few more things to add. Sorry for doing this and should have been added with first email but I am out fishing and had been a little hard to fish and respond properly

1.The processors own CORE data shows a 80-20 split between harvesters and processors. 2. The harvesters have also seen increases in their costs. Therefore, a reasonable split should be 80-20, not a discount of an already discounted in the processors favor that is.

We support the ABSC position from second draft, that used the last two open seasons as qualifying years (excluding the last open mini season)

We recommended Excluding the last open mini season. The reason was that because of the low size, boats traded quotas in/ out to make it work operationally. Including this season could have several abnormal effects and would send a signal to harvesters that working together might come with a cost. If the mini season is included, this option needs to be changed to the last 3 seasons

Again if you have questions please give me a call. Again I apologize for the double email on this.

Regards. Oystein Lone

KEVLEEN L LLC

July 15, 2026

Alaska Department of Fish and Game
Attn: Karla Bush, Extended Jurisdiction Program Manager
P.O. Box 115526
Juneau, Alaska 99811-5526

Re: Spend Plan Recommendations for the 2023/24 Bering Sea Snow Crab fishery disaster

Thank you for the opportunity to provide input before the 3rd draft spend plan is released for public comment for the 23/24 Bering Sea snow crab fishery disaster. As a vessel owner, I strongly encourage ADFG to keep the process and the qualifying years for history the same as the BBR/BSS fishery disaster as much as possible. That process, while taking a long time, was fairer for the captain and crew than the bairdi disaster before it and did not put the liability on the vessel owner for dispersing payment to captain and crew. If the process was kept the same, PSMFC could provide the list of captain/crew from the recent BBR/BSS disaster and vessel owners could simply be asked to provide an addendum for any changes. This should speed up the process significantly.

To be continuance with the previous fishery disasters I would use the two years prior to calculate allocations for payment.

I see no reason to change the percentage share between the harvesters and the processors from what was used for the pervious disasters. The price formula for establishing the price has not changed. If the formula had changed there would be justification for changing the share percentage, but it has not changed. The price settling process is embedded in the Crab Rat program. The program is a revenue sharing program not a profit-sharing program. Costs were left out for very important reasons.

Thank You
Lance E Farr
F/V Kevleen K

July 13, 2026

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

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

Dear Ms. Jones:

Thank you for the opportunity to comment on the second 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. We last commented on the initial plan in July 2024. Shoreside processing in Alaska is extremely capital intensive, with significant fixed and operating costs, especially in remote ports in the Bering Sea. Active shorebased processors are equally vulnerable to fisheries disasters as other participants and are a crucial part of the spend plan. In this case, fishermen depend on viable shoreside markets across Alaska to deliver their catch; communities depend on the 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 are certain you are aware of the very challenging conditions in the Alaska seafood industry, which includes the Bering Sea crab fisheries. 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.

In addition to the uncertainty with snow crab stock status due to the rapidly changing and warming marine ecosystem and challenging global market conditions (higher global crab supply particularly from Russia and Canada; strong US dollar; trade policy), rising fuel, labor and other operational costs are greatly affecting the overall processing capacity in BSAI communities. These changes have created major

[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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disruption to processors, as significant capital has been spent in the processing sector to maximize our opportunity in global crab markets, and we are still dealing with extremely inefficient operations (high costs) to process small volumes of crab.

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).

We support consideration of a higher allocation to active shorebased processors, whether that is through a larger proportion of the total or through a higher proportion of the amount allocated to active processors versus those that hold processing quota but do not process their own crab. The initial spend plan proposes to allocate 79% of the disaster funds to harvesters and processors, and of that, 23.5% to the processing sector, for an effective allocation of 18.6% of total funds. It also proposes an equal split of that allocation between active processors and PQS holders who do not process crab. 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.* The costs associated with maintaining processing infrastructure and reviving or finding new 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 on the spend plan, and for the transparency and public process associated with its development.

Sincerely,

Julie Decker

Julie Decker
President, PSPA

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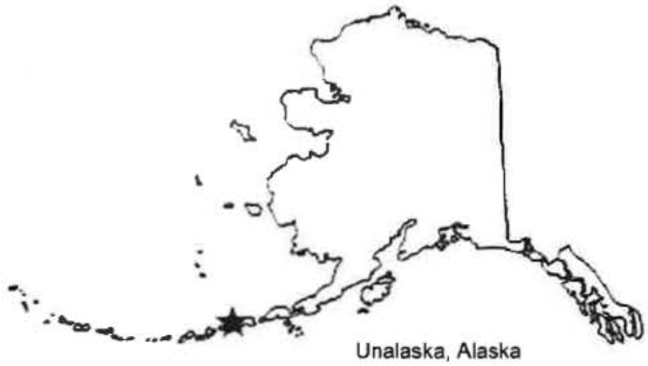

July 13, 2026

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

Re: Crab Disaster Spend Plan Community Percentages

Dear Ms. Bush:

The City of Unalaska supports maintaining the current funding percentages for crab communities in the 2023–2024 Snow Crab Disaster Spend Plan: 5% for eligible crab communities, with an additional 1% allocated to St. Paul Island. These percentages are consistent with the previous 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, supporting businesses, and our community's residents.

Sincerely,

CITY OF UNALASKA

Vincent M. Tutiakoff

Vincent M. Tutiakoff, Sr.
Mayor

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

City of King Cove
PO Box 37
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OFFICE OF THE MAYOR

July 13, 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 2nd Draft Spending Plan for the Additional 2023/24 Bering Sea Snow Crab Fishery Disaster Funds of $75.2 million

Dear Commissioner Vincent-Lang,

Thank you for the opportunity to provide comments on the draft spending plan for the additional $75.2 million in disaster funds for the 2023/24 Bering Sea snow crab disaster.

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.

However, and as also noted in my July 19, 2024 letter, King Cove lost 100% of our processing capacity starting in early 2024. This TOTAL collapse of our local fishing industry translates into a 70-75% **reduction** of our local and state fish taxes and local sales taxes. We are in the same predicament as St. Paul and continue to be very worried about our future and how we can survive as a functioning and vibrant community. These continue to be scary times for King Cove as we keep making significant budget reductions. At this point, with our limited annual revenue basis and current cash reserves, we can financially "survive" for a few more years. But this sure is no positive way to see and operate my community.

Finally, and as also suggested in my July 19, 2024 letter, I now recommend that **ALL** of the now-defunct Peter Pan processor shares should be allocated to the City of King Cove. If this is not acceptable, then at least $125,000 of any processor share should be paid to the city as the amount that Peter Pan owed to the city for unpaid taxes and utility expenses where they left us high and dry in early 2024.

Thank you for your consideration.

Sincerely,

/s/ warren wilson

Warren Wilson
Mayor

Cc: King Cove City Council Members
Gary Hennigh, City Administrator

Comments recorded during the public listening session on 7.10.26

Nicole Kimball
- Shoreside processors are vulnerable and should continue to be included in all spend plans.

Frank Kelty
- Unalaska supports the status quo, 5% for communities plus 1% for St. Paul.

Jamie Goen
- Recognizes that the PSMFC process for crew payment is longer but feels it has met the goal of fairness.

Gary Hennigh
- Asked if the money that would've gone to a King Cove processor that no longer exists could go to the city.

Angel Drobnica
- Verified that ADF&G will fix the off the top allocation in the third draft spend plan.

Clair Widing
- Prioritize vessel owner and crew payments going out before other categories.

Joshua Songstad
- Not in favor of vessel owners distributing crew funds, lots of movement of crew and potential liability for vessel owners.
- Suggests prioritizing vessel owners and crew, utilizing the existing templates from the last application period and sending an addendum form to keep everything the same with opportunity to include those few additional 2022 boats and crew.
- Can ADF&G do the groundwork to gather vessel owner and crew information ahead of the application period?